



THE LONDON BOROUGH
www.bromley.gov.uk

BROMLEY CIVIC CENTRE, STOCKWELL CLOSE, BROMLEY BRI 3UH

TELEPHONE: 020 8464 3333

CONTACT: Steve Wood
stephen.wood@bromley.gov.uk

DIRECT LINE: 020 8313 4316

DATE: 20 March 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, BYCBromley Youth Council

A meeting of the Public Protection and Enforcement Policy Development & Scrutiny Committee will be held at Bromley Civic Centre on **TUESDAY 28 MARCH 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--31ST JANUARY 2023 (Pages 1 - 8)**
- 4 QUESTIONS FROM THE PUBLIC OR COUNCILLORS**

Generic questions concerning the Public Protection and Enforcement Portfolio should have been received by the Democratic Services Team by 5:00pm on the 14th of

March.

Questions specifically on the March agenda should be received by the Democratic Services Team by 5:00pm on the 22nd of March.

- 5 **MATTERS ARISING** (Pages 9 - 12)
- 6 **UPDATE FROM BROMLEY YOUTH COUNCIL--TBC**
- 7 **BUSINESS CONTINUITY AND RESILIENCE UPDATE** (Pages 13 - 24)

HOLDING THE PORTFOLIO HOLDER TO ACCOUNT

- 8 **UPDATE FROM THE PORTFOLIO HOLDER FOR PUBLIC PROTECTION AND ENFORCEMENT**
- 9 **PUBLIC PROTECTION PERFORMANCE OVERVIEW** (Pages 25 - 26)
- 10 **PRE-DECISION SCRUTINY OF PORTFOLIO HOLDER REPORTS**

Portfolio Holder decisions for pre-decision scrutiny.

- a **BUDGET MONITORING 2022/23** (Pages 27 - 32)
- b **PUBLIC PROTECTION & ENFORCEMENT DRAFT PORTFOLIO PLAN**
(Pages 33 - 58)

POLICY DEVELOPMENT AND OTHER ITEMS

- 11 **CONTRACTS DATABASE REPORT AND DATABASE EXTRACT** (Pages 59 - 68)
- 12 **PUBLIC PROTECTION AND ENFORCEMENT RISK REGISTER** (Pages 69 - 78)
- 13 **WORK PROGRAMME** (Pages 79 - 84)

PART 2 AGENDA

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

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

- 15 **CONTRACTS REGISTER PART 2 UPDATE**
(Pages 85 - 86)

Information relating to the financial or business affairs of any particular person (including the authority holding that

information)

.....

This page is left intentionally blank

PUBLIC PROTECTION AND ENFORCEMENT POLICY DEVELOPMENT & SCRUTINY COMMITTEE

Minutes of the meeting held at 7.00 pm on 31 January 2023

Present:

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

Sharon Baldwin and Nathan Ward

Also Present:

Councillor Nicholas Bennett J.P. and Lucien Spencer

STANDARD ITEMS

108 APOLOGIES FOR ABSENCE AND NOTIFICATION OF SUBSTITUTE MEMBERS

Apologies for absence were received from Oscar Seal from Bromley Youth Council.

109 DECLARATIONS OF INTEREST

There were no declarations of interest.

110 MINUTES OF THE PUBLIC PROTECTION AND ENFORCEMENT PDS COMMITTEE HELD ON 15th NOVEMBER 2022

The Committee considered the minutes of the meeting of Public Protection and Enforcement PDS Committee held on 15th November 2022.

RESOLVED that the minutes of the meeting held on 15th November 2022 be agreed and signed as a correct record.

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

No questions were received.

112 QUESTIONS FOR THE PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO HOLDER

No questions were received.

113 MATTERS ARISING/OUTSTANDING

CSD23022

Members noted the updates on the Matters Arising report.

It was noted that Councillor Nicholas Bennett had helped to draft a letter to Bromley Magistrates' Court seeking more robust and realistic costs for fly-tipping offences.

A Member said that she was pleased to note the fly-tipping prosecutions that had taken place. She asked if the Council would 'name and shame' offenders. The Street Enforcement Manager responded in the affirmative saying that the Council would seek to publicise successful prosecutions where possible. Members were pleased to note that a number of vehicles used for fly-tipping had been seized.

RESOLVED that the Matters Arising Report be noted.

HOLDING THE PORTFOLIO HOLDER TO ACCOUNT

114 PORTFOLIO HOLDER UPDATE

The Portfolio Holder stated, with respect to fly-tipping, that LBB would name and shame where possible in press releases. The Portfolio Holder had attended a meeting of the Youth Justice Service in December with the Leader and Deputy Leader. The Portfolio Holder met with Chief Superintendent Dave Stringer who informed the Portfolio Holder that he was retiring and his position was being filled by acting Chief Superintendent Andy Brittain. The Portfolio Holder and the Chairman of the PP&E PDS Committee had recently met with the Borough Fire Commander, Chris Line, where the Bromley Mentoring Initiative was discussed with a view to involving the London Fire Brigade in the scheme.

RESOLVED that the update from the Portfolio Holder be noted.

115 PUBLIC PROTECTION AND ENFORCEMENT PERFORMANCE OVERVIEW

The Chairman stated that in addition to the Performance Overview document being printed in A3, he asked if it was possible for the font to be larger and asked that a request be made to the Print Room to this effect. (This request was subsequently conveyed to the Print Room by email on 22nd February).

Members noted item 2c which was in respect of 'Challenge 25' test purchases. Only one business was non-compliant, but this meant that the 100% target had not been met.

The matter of the FSA (Food Standards Agency) and food safety inspections was discussed. The FSA were aware of the backlog of inspections and the plan that had been set in place by the Council to rectify this. No concerns were currently being raised by the FSA.

RESOLVED that the Performance Overview update be noted.

a OUT OF HOURS NOISE SERVICE

ES 20254

It was explained that a key benefit of the new service proposal was that it would be focusing on the time of greatest need. This would be on Fridays, Saturdays, Sundays and bank holidays. It was therefore anticipated that there would be a greater opportunity for intervention in real time. It was proposed that the service would be provided by LBB contracted staff, whereas previously the service was provided by voluntary staff. If the framework was agreed, then the operational fine-tuning would be worked out later. It was noted that this service was non-statutory. The proposals were presented to the Committee because the current system was not sustainable.

Members noted that option four (of the recommendations) was the preferred option and it was agreed that the Service would be reviewed a year subsequent to implementation. The Committee unanimously agreed the proposals.

RESOLVED:

1) That the Portfolio Holder be recommended to agree that Option 4 of the delivery options be adopted.

2) That an update on the revised service be brought back to Committee a year after implementation.

**116 PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO
DRAFT BUDGET 2023/24**

ES20246

Members noted the Public Protection and Enforcement Portfolio Draft Budget for 2023/24.

It was noted that funding for the revised Out of Hours Noise Service would be fed into the budget--probably from the Contingency Fund.

No further comments were provided for the attention of the Executive.

RESOLVED that the update on the financial forecast and the initial draft budget for 2023/2024 be noted.

**117 HOUSES OF MULTIPLE OCCUPATION (HMO) MEMBER
 UPDATE**

ES20252

It was noted that the introduction of an Article 4 direction had slowed down HMO expansion. The Environmental Protection & Housing Regulation Manager provided an explanation of the definition of an HMO. It was a property that was occupied by three or more people in two or more households, which shared amenities. In 2018 there was a change in the law which removed the requirement for the definition to include properties that had three or more storeys. This led to an increase in the number of HMO licences being issued. Before September 2022 many HMOs could be developed under permitted development and did not require planning permission. The introduction of an Article 4 Direction since September 2022 made planning permission a requirement for all HMOs.

It was noted that there was not a maximum size for HMOs. Bromley currently had 20 people living in a single HMO. The differences between a HMO and a hotel were discussed. This was primarily around tenancy agreements.

Landlords could run HMOs while waiting for a licence as long as they had applied for the licence as it was incumbent on the local authority to provide a licence as soon as possible. There were 358 HMOs operating within the borough and there were 150 licence applications outstanding at the time of the meeting. This was because of the current high demand for HMO licences. Legally, the timescale for the processing of a HMO licence took a minimum of 42 days. The difference between mandatory and additional licences was discussed. It was noted that an application for an additional licence would need formal adoption. However, this would sometimes need the approval of the Secretary of State and had to be for specific reasons. The Assistant Director for Public Protection and Enforcement explained that the Council was assessing whether a borough wide scheme should be adopted for additional licences from 2029 onwards.

The Chairman said that ward members sometimes received complaints regarding HMOs and so it would be helpful if an aide memoir could be disseminated to show whom they should report concerns to. It was pointed out that such an aide memoire had previously been drafted and would be circulated to Members.

It was noted that the local authority had a statutory duty to produce a public register of all HMOs. It was confirmed that such a document existed and was available on request. Developments were currently taking place which would mean that the HMO register would be available on the Council website in the near future. Details of HMOs could also be accessed via the Licencing Portal on the Council website.

RESOLVED that the report be noted and that the Head of the Planning and Development Support Team disseminate an aide memoir to Members which outlined how complaints relating to HMOs should be processed.

118 MINUTES OF THE PREVIOUS MEETING OF THE SAFER BROMLEY PARTNERSHIP BOARD--12th JANUARY

The Chairman was concerned that the Mayor's Office for Policing and Crime (MOPAC) was not providing data in an easily accessible and fit for purpose format. He felt that this was a matter that should be raised directly with MOPAC as an action point.

The Chairman said that if committee members wished to direct questions to the police at the June meeting, then they should submit their questions at least two weeks before the meeting. His aim was to scrutinise the police in depth at the June meeting.

There was a general consensus that education campaigns should be undertaken in schools to counteract misogynistic ideas that had been propagated by certain individuals on social media.

The Chairman of Bromley Youth Council said that in his view there had been a misogynistic sub-culture developing in schools that needed to be addressed. It was agreed that he would write to the Safer Bromley Partnership concerning this.

A Member said that she would like to know what the staffing levels were in the Safer Neighbourhood Team. The Chairman responded and said that he would write to the police concerning this.

RESOLVED:

1) That the Chairman would contact MOPAC regarding providing data in a more easily accessible format.

2) That partners should submit questions for the police at the June meeting to the Chairman two weeks in advance of the meeting.

3) The Chairman to write to the police to find out what the staffing levels were in the Safer Neighbourhood Team.

4) The Chairman of BYC would write to the Safer Bromley Partnership concerning the misogynistic sub-culture that was developing in schools.

**119 SCRUTINY OF THE SAFER BROMLEY PARTNERSHIP--
INCORPORATING AN UPDATE FROM PROBATION SERVICES**

Lucien Spencer (Head of Service: Bromley and Lewisham Probation Delivery Unit) addressed the Committee. This followed his recent presentation to the Safer Bromley Partnership Board on the 12th of January. The HMIP had conducted an inspection of the Lewisham and Bromley Probation Delivery Unit during the Summer of 2022. Forty two cases had been scrutinised and six PDUs were audited across the South London region. Mr Spencer reported that four PDUs had been assessed as 'inadequate' and this included Lewisham and Bromley. The South London ratings were reflective of the national picture. In terms of the national ratings, the Bromley and Lewisham PDU was somewhere in the middle. The inspections focused on the management of risk of serious harm. Subsequent to the audit, an action plan had been developed and a further audit took place and some improvement had been proven.

Mr Spencer explained that since the Probation Service was split into Probation Delivery Units and Community Rehabilitation Centres (CRC), the organisation had in effect experienced 10 years of disruption. There had been recruitment difficulties and operational challenges. With the CRC units folding, there was a general deficiency in trainee and experienced officers. No quick fix existed for the Probation Service. The current vacancy rate was in the region of 25%. On the positive side, Community Payback and Integrated Offender Management (IOM) were working well and there was a good relationship with the local authority and other partners.

A Member asked why there were problems with recruitment and retention. The Head of Service for the PDU responded and said that this was a multifaceted problem that dated back some 10 years. There had been a framework change in 2012 which had resulted in a significant reduction in the number of probation officers being trained. There was now however, a significant uplift in the number of new officers being trained. Some officers left naturally and others moved on into other services like the police or the health sector. Nationally, there was now a significant uplift in training. Three new cohorts would be coming to London in March, this would mean that 125 new officers would be entering into the service then. It was acknowledged that the Probation Service needed to look at staff working conditions, particularly with respect to manageable workloads.

Reference was made to the Jordan McSweeney case and what safeguards existed to prevent a similar incident occurring in Bromley. Mr Spencer responded and said that there was better communication now between the Probation Services and the Police and a new framework for reporting. The process for recalls was now more robust.

A document had since been drafted which was relevant for the whole of London. This document was referred to as 'the action plan for London'. This document detailed recommended actions subsequent to lessons learned from the Jordan McSweeney case. The actions were live and open to review and HMIP was very much involved in this.

It was expected that the next inspection of Lewisham and Bromley PDU would take place in approximately two and a half years. Mr Spencer informed the Committee that Lewisham and Bromley PDU had developed its own internal quality improvement programme which was based on the recommendations from the HMIP report on the Jordan McSweeney case; this noted their performance against the recommendations of the report. This was not a public document but it was shared with HMIP.

The Chairman noted the ongoing work being undertaken to improve the performance of Lewisham and Bromley PDU and he thanked Mr Spencer for attending. Mr Spencer agreed to supply another update in a year's time.

The Chairman referenced page 87 of the agenda pack which was the Crime Performance Dashboard data provided by the police. The Chairman commented that he was not happy with the format of the data as it was difficult to read. He requested that the police be made aware of this.

(Post meeting note: An email was sent by the Committee Clerk on behalf of the Chairman regarding this matter on 23rd February 2023).

A concern was raised regarding the increase in knife crime and the fact that Bromley now had seven active gang nominals. The Chairman responded and said that these concerns would be noted for the attention of the police. The Chairman of the Safer Neighbourhood Board hoped that because Bromley had now been allocated a dedicated Superintendent, the situation may improve.

RESOLVED:

- 1) That the Head of Service for Bromley and Lewisham PDU attend the Committee in a year's time to provide a further update on progress made by the Probation Service against the recommendations of HMIP.**
- 2) That the police should be made aware that the format of the data provided with respect to the Crime Performance Dashboard be provided in a manner that was easier to read.**
- 3) Concerns should be raised with the police regarding the increase in knife crime and in the number of gang nominals in Bromley.**

**120 BROMLEY DOMESTIC ABUSE SERVICES--INFORMATION
PAPER**

ES20252

It was explained that responsibility for providing domestic abuse services had been transferred from 'Early Intervention and Family Support' to 'Community Safety'. The Bromley Domestic Abuse Services strategy would be incorporated and outlined within the new Community Safety Strategy for 2024 to 2027 which was being developed by the Safer Bromley Partnership.

RESOLVED that the Bromley Domestic Abuse Services information paper be noted.

121 PUBLIC PROTECTION AND ENFORCEMENT RISK REGISTER

ES20239

Members noted the latest version of the Public Protection and Enforcement Risk Register.

RESOLVED that the Public Protection and Enforcement Risk Register be noted.

122 WORK PROGRAMME

CSD23023

It was noted that a report would be presented to the Committee in June that would review Council procedure for the provision of dog walking licences.

RESOLVED that the Work Programme be noted.

123 PP&E Contracts Register

The meeting ended at 8.30 pm

Chairman

Report No.
CSD 23049

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: Public Protection and Enforcement PDS Committee

Date: 28th March 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: 2023/2024 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 115 Performance Overview 31 st Jan 2023	The Chairman stated that in addition to the Performance Overview document being printed in A3, he asked if it was possible for the font to be larger and asked that a request be made to the Print Room to this effect.	This request was conveyed to the Print Room by email on 22 nd February. The print room responded and said that they were not able to make the font larger.
Minute 117 HMO Update 31 st Jan 2023	Resolved that the Head of Planning and Development Support Team would disseminate an aide memoir to Members which outlines how many complaints relating to HMOS should be processed	An update will be provided at the meeting.
Minute 118 Minutes of the SBP 31 st Jan 2023	That the Chairman would contact MOPAC regarding providing data in a more easily accessible format.	MOPAC have been contacted and we await a response.
Minute 118 Minutes of the SBP 31 st Jan 2023	The Chairman to write to the police to find out what the staffing levels were in the Safer Neighbourhood Team.	The police have been contacted and we await a response.
Minute 118 Minutes of the SBP 31 st Jan 2023	The Chairman of BYC would write to the Safer Bromley Partnership concerning the misogynistic sub-culture that was developing in schools.	Awaiting update from the BYC Chairman.
Minute 119 SBP Scrutiny and Probation update 31 st Jan 2023	That the police should be made aware that the format of the data provided with respect to the Crime Performance Dashboard be provided in a manner that was easier to read.	An email was sent by the Committee Clerk on behalf of the Chairman to the police regarding this matter on 23rd February 2023.
Minute 119 SBP Scrutiny and Probation update 31 st Jan 2023	Concerns should be raised with the police regarding the increase in knife crime and in the number of gang nominals in Bromley.	These concerns have been raised with the police.

This page is left intentionally blank

Report No.
ES20255

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO

Date: Tuesday 28 March 2023

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

Title: EMERGENCY PLANNING & CORPORATE RESILIENCE
SERVICE - ANNUAL UPDATE

Contact Officer: David Tait, Emergency Planning and Corporate Resilience Manager
E-mail: david.tait@bromley.gov.uk – 07781 845503

Chief Officer: Assistant Director of Public Protection

Ward: (All Wards);

1. Reason for decision/report and options

- 1.1 The purpose of this annual report is to provide the Committee with an account of the key resilience works undertaken in 2022-23 and provide assurance of the Council's Civil Contingency activities across the organisation for 2023-24.

2. **RECOMMENDATION(S)**

- 2.1 Members are asked to note this report.

Impact on Vulnerable Adults and Children

1. Summary of Impact: Summary of Impact: In an emergency situation certain groups of people may become vulnerable, depending on the situation faced. The Emergency Planning and Corporate Resilience Team work closely with blue light services and other partners to ensure that those who may be particularly vulnerable are identified and the appropriate levels of support are provided.
-

Transformation Policy

1. Policy Status: Existing Policy
 2. Making Bromley Even Better Priority
To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
-

Financial

1. Cost of proposal: Not Applicable (N/A)
 2. Ongoing costs: N/A
 3. Budget head/performance centre: Emergency Planning
 4. Total current budget for this head: £146k
 5. Source of funding: General Fund
-

Personnel

1. Number of staff (current and additional): 1.8 FTE
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Statutory Requirement
 2. Call-in: N/A
-

Procurement

1. Summary of Procurement Implications: N/A
-

Property

1. Summary of Property Implications: N/A
-

Carbon Reduction and Social Value

1. Summary of Carbon Reduction/Sustainability Implications: N/A
-

Customer Impact

1. Estimated number of users or customers (current and projected): Borough residents and businesses.
-

Ward Councillor Views

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

3. COMMENTARY

3.1 Under the requirements of the Civil Contingencies Act 2004 (CCA) Local Authorities, as Category One Responders, have a legal duty to prepare, exercise & update their Civil Contingencies arrangements to ensure that whilst responding to an incident and / or business interruption, their core essential public services can continue to be delivered. Such arrangements must also consider essential services that are delivered by third party contractors alongside those delivered by directly employed staff. This service aims to provide the framework for effective management during such emergencies. The CCA also requires Local Authorities to provide local businesses with guidance on business continuity, particularly the need to plan for emergency events to aid their recovery from the impacts as soon as possible.

3.2 This annual report provides a summary of the activities undertaken by the Emergency Planning and Corporate Resilience Team (EPCRT) in fulfilling its duties under the Act.

Incident Response:

3.3 The EPCRT have responded to 23 emergency incidents over the last year, the response to which can be split into three broad categories:

- **Monitoring** - where Officers are only required to monitor the situation.
- **Information Sharing and Communicating** - whereby Officers cascade information to partners; and,
- **Incident Response and Co-Ordination** - where Officers have attended the scene and or utilised Local Authority equipment / services to assist in the emergency response.

3.4 Appendix 1 below provides the details of the incidents responded to during the reporting period. The most notable was the fire at 79 St Mark's Square, Bromley that occurred on the afternoon of Sunday 3rd July. A fire broke out on the 15th floor of the 18 storey residential building. The London Fire Brigade (LFB) attended and evacuated the whole block, the nearby cinema complex and hotel. 150 persons were evacuated in total. The EPCRT were informed and attended to manage a rest centre initially opened by the Met Police (MPS). Due to the scale of the incident, 12 members of the Council's Emergency Response volunteers attended to assist our displaced residents. EPCRT worked with the LFB and the MPS, giving regular briefings to residents as the incident progressed. After 7 hours, residents for the majority of the block were allowed to re-enter their homes. Only 1 family needed to be provided with temporary accommodation.

3.5 The incident posed many challenges to the Council responders, but they dealt admirably with the situation. Bromley Town Members came to the rest centre and thanked the Council team for their efforts. This was the largest emergency response incident the Council has managed in the last 4 years. The Council volunteers did an excellent job and came forward in numbers when the call out was made, so much so that offers of assistance had to be turned down from our staff.

Training, testing, and exercising during 2022-2023

- 3.6 A successful training programme was delivered during the year seeing Officers trained in roles across the spectrum of emergency response, increasing the number of trained staff across the Council. Refresher training was also delivered to our cohort of Borough Emergency Control Centre and Rest Centre Officers. All Assistant Directors with Environment and Public Protection were trained in the Silver role, further increasing our resilience. Another series of training days were provided to Bromley Rotarians in relation to emergency planning and rest centre working. We have retained over 40 Rotarian Emergency Response Volunteers trained to assist if required, with an enhanced call out system in place. Training was also provided to Biggin Hill Airport staff in relation to rest centre operation and management.
- 3.7 In terms of testing and exercising, the team again took part in several tabletop exercises over the year designed to test plans and enhance partnership working. These included an NHS Business Continuity exercise, a mass water disruption and a mass fatalities workshop, severe weather incident, a flooding scenario, 8 Directorate specific Business Continuity exercises, and an exercise at Biggin Hill Airport, which is worthy of specific mention.
- 3.8 Operation Tanner was a live play exercise held at Biggin Hill Airport in November 2022. Here a 2 aircraft collision was simulated, resulting in a number of fatalities, casualties, and uninjured survivors. As part of the exercise The Local Authority ran a Survival Reception Centre in conjunction with Airport staff and the MPS. 20 of our Rotarian Emergency Response volunteers played the roles of survivors along with actors from the Casualty Union. The exercise was very successful and raised a number of key learning points for all organisations involved. We await the full debrief document to be published, however the initial lessons learnt for the Local Authority have now been implemented.
- 3.9 Exercise Safer City 2023 is planned for the 17th of May. It will focus on the response to a London wide flooding incident. The exercise will again this year feature a live play component and it is our intention to utilise the incident to run a full major incident scenario within the Borough to fully test our response structures and processes.

Borough Resilience Forum update

- 3.10 The Borough Resilience Forum (BRF) is a statutory body established by the Civil Contingencies Act 2004 and is responsible for multi-agency emergency preparedness and co-ordination at the local level as determined by identified Borough risks and needs. The BRF consists of representatives from the MPS, LAS, LFB, British Transport Police, various NHS bodies including our local hospitals, The Environment Agency, utilities suppliers, business leads and third sector organisations. Also represented are The Red Cross, St John's Ambulance, Biggin Hill Airport Ltd and the Probation Service, with Council Officers from Public Protection and Public Health also in attendance. The Forum meets three times a year and is chaired by the Emergency Planning and Corporate Resilience Lead. The last meeting was held on the 6th of March, with the next scheduled for the 3rd of July.

- 3.11 The main business for the forum this year will be to interpret the direction of the recently published [UK Government Resilience Framework](#) to determine its impact upon local resilience working. The framework seeks to concentrate partner's resilience activities towards prevention and preparation as opposed to response and recovery. The strategy views resilience as a 'whole society endeavour' and sets out 6 broad themes to achieve these aims. One statement to note from the framework : 'This means putting resilience at the heart of our decision making and investment, well beyond areas that are explicitly focussed on emergencies.' We await further information regarding implementation which will be led by London Resilience Group through the BRF mechanism.
- 3.12 The review of the Borough Risk Register took place during July 2022 and now mirrors the format of the London Risk Register. The new document has seen a consolidation of old risks, identification of new risks but now also includes identified threats. Our risk owners worked together to reflect upon the new format and analyse the changes in risk profile. These were then reviewed from a local perspective and assessed accordingly. A redacted version has been placed on our Website. The next full review will take place in 2024.

Resilience Standards for London (RSL)

- 3.13 The standards were launched in July 2019. They were designed to enable Local Authorities to assess their capability and capacity against 12 standards that ensure Local Authorities have the appropriate procedures and policies in place to lead to good outcomes and leading practice, whilst supporting compliance with the Civil Contingencies Act 2004. The content of the standards has been recently reviewed by the author but remain unchanged.
- 3.14 The EPCRT have conducted 2 further reviews of the standards during this reporting year, reflecting upon works undertaken during COVID and the delivery of an online training presentation designed for Members. This has enabled us to demonstrate higher levels of resilience across the organisation. The Members' presentation outlines the Council's statutory responsibilities under the Civil Contingencies Act 2004, the method of operation used by the Council during emergency incidents and provides advice and guidance for Members when becoming involved in an emergency incident. The presentation was circulated to all members in November of last year.
- 3.15 The standards have also been reviewed by Colin Brand, Director for Environment and Public Protection as part of his role as a Member of the Southeast Resilience Programme Board. The latest review was presented to the Chief Officer Executive (COE) on the 7th of February for their review and corporate sign off prior to submission to London Resilience Group.
- 3.16 Last year's review of London's resilience arrangements has been shared with Chief Executives but has not been published more widely at this stage. The only change so far introduced was to realign the collaborative borough groups across London, with the Southeast region now including Lambeth and Southwark, with Croydon moving to the West. The Southeast Resilience Programme Board met in February, with a new chair from Southwark Council. The intention of the board is to reconnect Boroughs at Director level in preparation to implement any recommendations from the review and to continue to develop resilience and working arrangements within our newly formed region.

Business Continuity

3.17 Our Business Continuity (BC) cycle was completed in February 2023. All service plans have been reviewed and updated. A series of Directorate testing and exercise programmes have also been completed. The headlines from the lessons learnt from these 8 exercises were, and not in any particular order:

- Importance of fast time communication channels
- Mitigation of single points of failure
- Understanding of the BC response process
- Understanding key suppliers BC plans
- Nominated deputies
- BC access to key IT systems
- Importance of service impact analysis when a BC incident occurs
- Development of 'back office' support functions
- Staff understanding and confidence when operating during a BC incident

A lessons learnt document was produced and fed back to plan owners via the Corporate Leadership team for learning to be incorporated within all Service plans.

3.18 A COE BC session was held in January. Here the corporate plan was reviewed along with the findings of the Directorate exercises. A set of scenarios were then used to test the corporate plan and Senior Leaders' response, which was well received. The Chief Executive has requested a full organisational BC test to further test and embed these processes. This will be scheduled for later this year. The Council's BC management process for 2023-2024 will begin again in April.

Other areas of work undertaken by the EPCRT

3.19 Below is a summary of other areas of work undertaken by the EPCRT during this reporting year.

Close down and return to previous use of our 3 COVID testing sites. The 3 sites in question, Crystal Palace Park, Cotmandene and Hayes, Station Approach carparks were decommissioned over 3 month period. The team liaised with NHS England, our contractors and Council teams to ensure all spaces were returned to Council care in good order.

Event delivery across the Borough. The team assisted with the planning of the Council's Platinum Jubilee Celebrations in June, the open top bus tour by Bromley FC following their winning of the FA Vase, and the visit of His Royal Highness the Duke of Gloucester. The team were once again involved in the Safety Advisory Group (SAG) meetings for Wireless 2022 and provided support to the Event Liaison Team on site during the festival. Assistance was also provided to officers managing the urgent dismantle of the floodlights at Crystal Palace National Sports Centre.

Delivery of the London Bridge Plan. Following the death of Her Majesty Queen Elizabeth II, our plan was actioned. In the 10 days before the funeral, 6 venues were set up for residents to leave messages of condolence. A minute's silence was held on the day after the announcement of Her Majesty's death and the Proclamation Ceremony took place a day later, led by the Mayor. A service of remembrance was held the day before the funeral at Bromley Parish Church, with a live screening of the funeral itself taking place in Queen's Gardens Bromley.

Pan London work. The London Resilience Group maintains a number of emergency planning frameworks for Boroughs to formulate their local plans. One of those frameworks, Mass Evacuation and Shelter, is overseen by our EPCRT. This framework has now been reviewed and signed off; however a further capability review is currently being undertaken as the team do not believe that London Boroughs can deliver to the level required. Early survey indications are proving them to be correct.

IT Cyber playbook development. Based upon the EPCRT compiled and prioritised list of IT systems and databases used by all services, the team worked with IT and BT colleagues to workshop various situations to develop a series of processes to detail a set of actions required to identify, protect, detect, respond, and recover from a cyber security incident.

Coronation Celebrations. The team are involved in the planning and delivery of the big screening of the King's Coronation taking place on the 6th of May in Queen's Gardens, Bromley. The format will be similar to that of the screening of Her Majesty Queen Elizabeth II's funeral. The team are preparing the event management plan and subsequent risk assessment, booking of suppliers and security, and will oversee delivery on the day.

Membership of cross Council committees. The EPCRT continue to be active members with the following committees: Safety Advisory Group, Lone Working Group, Health and Safety Committee, Corporate Risk Management Group, Health Protection Board, the Emergency Planning and Liaison Group at Biggin Hill Airport, the Green Recovery Working Group, and the Safer Bromley Partnership. The team also have bi-monthly standing agenda items at the Corporate Leadership and the Chief Officer Executive meetings to update senior leaders on matters of resilience. The reach and engagement by the team is successfully increasing the understanding of colleagues in respect of the Council's resilience agenda.

Protect Duty

- 3.20 On Monday 19th December the Government announced details for the Protect Duty, now to be known as Martyn's Law.' This law will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate measures.
- 3.21 The Government announcement confirmed the locations to which Martyn's Law would be applied. They are locations where 'qualifying activities' take place. This will include locations for such purposes as entertainment and leisure, retail, food, drink, museums, galleries, sports grounds, public areas of local and central Government buildings, visitor attractions, temporary events, places of worship, health, and education. Whilst the location description is quite

broad, the location scope of the law has been reduced since the initial consultation, with public accessible places now removed.

3.22 It is proposed that Martyn's law will apply to eligible buildings which are either a building (including a collection of buildings used for the same purpose) or a location/event (including temporary event) that has a defined boundary, allowing capacity to be known. Premises will be drawn into scope if they meet the following criteria:

- That the premises is an eligible one – i.e. a building or event with a defined boundary.
- That a qualifying activity takes place at the location and;
- That the maximum occupancy of the premises meets a specified threshold of either 100+ or 800+

3.23 Proportionality is a fundamental consideration for this legislation and as such a tiered model of required activity will be introduced:

• **A standard tier** will drive good preparedness outcomes. Duty holders will be required to undertake simple yet effective activities to improve security and preparedness. This will apply to qualifying locations with a maximum capacity of over 100.

• **An enhanced tier** will see additional requirements placed on high capacity locations in recognition of the potential catastrophic consequences of a successful attack. This will apply to locations with a capacity of over 800.

3.24 Further information is awaited to define what activities standard and enhanced duty holders will be required to undertake, also the enforcement regime to ensure compliance. The Government will introduce Martyn's Law as soon as Parliamentary time allows. The Council's responsibilities under this legislation will be reviewed when more information is published by Government.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

4.1 In an emergency situation certain groups of people may become vulnerable, depending on the situation faced. The Emergency Planning and Corporate Resilience Team work closely with blue light services and other partners to ensure that those who may be particularly vulnerable are identified and the appropriate levels of support are provided.

5. TRANSFORMATION/POLICY IMPLICATIONS

N/A

6. FINANCIAL IMPLICATIONS

This report is providing a performance update on the service which members are asked to note.

There are no direct financial implications derived from this report, the annual budget position is regularly reported via the quarterly budget monitoring process.

7. PERSONNEL IMPLICATIONS

N/A

8. LEGAL IMPLICATIONS

The Civil Contingencies Act 2004 imposes a range of duties on the Local Authority as a category 1 responder. These include; assessing local risks of emergencies; preparing plans to mitigate the effect and deal with the consequences; having business continuity plans in place to provide an appropriate response whilst maintaining essential services.

9. PROCUREMENT IMPLICATIONS

N/A

10. PROPERTY IMPLICATIONS

N/A

11. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

N/A

12. CUSTOMER IMPACT

N/A

13. WARD COUNCILLOR VIEWS

N/A

Non-Applicable Headings:	5,7,9,10,11,12,13
Background Documents: (Access via Contact Officer)	1) The UK Government Resilience Framework, Dec 2022 2) Resilience Standards for London Local Government, Jun 2019 3) Bromley Borough Resilience Forum Risk Register, V 1.1, Jul 2022



Incidents responded to by the Emergency Planning and Corporate Resilience Team

February 2022 to January 2023

2022	Incidents
February	Vehicle into building, Travelodge Bromley. Information sharing & Comms.
March	Suspect package Decathlon, Bromley High St. Monitoring.
March	Sink Hole, Westmoreland Rd, Bromley. Information sharing and comms.
March	Honor Oak Pump failure, potential water supply issues across South London. Incident response and co-ordination.
April	10 pump fire, Kings Hall Road, Beckenham. Information sharing & Comms.
April	8 pump fire, Cowden Rd, Orpington. Incident response and co-ordination.
June	House fire, Chelsfield Hill, Chelsfield. Information sharing & Comms.
July	12 pump fire, St Mark's Square Bromley. Incident response and co-ordination.
July	House fire, Waring Drive, Orpington. Incident response and co-ordination.
July	Heat wave red weather warning. Incident response and co-ordination.
July	Fallen masonry, Chislehurst High St. Incident response and co-ordination.
July	Grass fire, Lilly's Farm Chelsfield. Information sharing & Comms.
August	Grass fire, Wickham Court Farm, Layhams Rd. Information sharing & Comms.
August	Gas leak, Leaves Green, Biggin Hill. Information sharing & Comms.
August	Arson, gardens adjacent to the Churchill Theatre, Bromley. Incident response and co-ordination.
August	Mutual Aid assistance to gas explosion, Galpins Rd, Thornton Heath. Incident response and co-ordination.
October	Mutual Aid assistance to major fire, London Road, Thornton Heath. Incident response and co-ordination.

October	Evacuation of the Glades Shopping Centre, Bromley. Information sharing & Comms.
November	Unexploded bomb, Biggin Hill Airport. Information sharing & Comms.
November	Unsafe structures, Crystal Palace Sports Stadium. Incident response and co-ordination.
December	Power supply issue at the Civic Centre. Information sharing & Comms.
2023	Incidents
January	Public health matter, Saxville Rd, Orpington. Incident response and co-ordination.
January	Burst water main, Widmore Road, Bromley. information sharing & comms

- **Monitoring** - where Officers are only required to monitor the situation.
- **Information sharing and Communicating;** whereby Officers cascade information to partners.
- **Incident Response and Co-Ordination** – where Officers have attended the scene and or utilised Local Authority equipment / services to assist in the emergency response.

David Tait: Emergency Planning and Business Continuity Lead

Report No: ES20264		PP&E Performance Overview (2022/23)																		
Outcome	PORTFOLIO PLAN INDICATOR	DESCRIPTION	2021-22 ACTUAL	GOOD PERF.	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	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	HIGH	1	1	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%	HIGH	NA	NA	NA	N/A	N/A	NA	NA	NA	N/A	N/A	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	HIGH	0	(1 of 1) 100%	0	0	(1 of 1) 100%	0	(1 of 1) 100%	0	0	(1 of 1) 100%	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	HIGH	(0 of 0) 100%	1 of 1 (100%)	(0 of 0) 100%	(0 of 0) 100%	(1 of 1) 100%	(0 of 0) 100%	(1 of 1) 100%	(0 of 0) 100%	(0 of 0) 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	HIGH	(0 of 0) 100%	1 of 1 (100%)	(0 of 0) 100%	1 of 1 (100%)	(0 of 0) - 100%	(1 of 1) 100%	(0 of 0) 100%	(1 of 1) 100%	(0 of 0) 0%	(0 of 0) %	4	4	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above		
	1F	Completion of Covid returns (outcome)	New KPI 22/23	OUTCOME	N/A	NA	NA	N/A	NA	NA	NA	NA	N/A	N/A	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	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)	0	6 events (258 attendees)	998	50	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above		
	2B	Rapid Response interventions responded to within 2 hours (%)	100%	HIGH	3 (100%)	2 (100%)	2 (100%)	2 (100%)	3 (100%)	0 (100%)	3 (100%)	2 (100%)	0 (100%)	0 (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	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%)	0 (73%)	0 (73%)	73%	100% Compliant Businesses	RED	Red: more than 10% Amber: Within 10% Green: At target or above	An underage test purchase operation took place in February 2023 and 9 premises were targeted. Unfortunately one premises sold, which was the outstanding non compliant business which had previously been the subject of a licensing review and temporary suspension. Its unlikely a re-visit will be completed before the end of March 2023 whilst follow up action is being progressed.	
	2D	To disseminate 25 Alerts on emerging topics including doorstep crime and scams	New KPI 22/23	HIGH	2	4	6	4	3	3	3	2	4	2	40	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)	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 4% (4 out of 84)	Risk A 71% (5 out of 7) Risk B 7% (6 out of 84)	Risk A 71% (5 out of 7) Risk B 12% (10 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 81% (9 out of 11) Risk B 53% (45 out of 84)	Risk A 100% (11 out of 11) Risk B 72% (61 out of 84)	Risk A: 57% Risk B: 26%	100% (Annual Target)	RED	Red: more than 10% Amber: Within 10% Green: At target or above	February 2023: The food team will meet this target in accordance with the Food Standards Agency (FSA) recovery plan by the 31st of march 2023.	
	3B	Due food hygiene (FH) inspections of all food businesses undertaken (% Annual Target)	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)	All FH 40% (221 out of 541)	All FH 53% (287 out of 541)	21%	100% (Annual Target)	RED	Red: more than 10% Amber: Within 10% Green: At target or above	February 2023: The service estimate that they will have 252 overdue inspections on the 31st of March 2023 to carry into 2023/24 The food team estimate that they will meet the requirements of the FSA recovery plan as they will have inspected all high-risk A and B rated businesses and all C rated businesses by the 31st of March 2023. The remaining 252 businesses are D and E rated. The 36 overdue D Rated businesses will be inspected during 2023/24. The team will use the Alternative Enforcement Strategy to inspect the 207 overdue E Rated businesses. For the upcoming year 2023/24 there are approximately 700 businesses due for inspection from the 1st of April 2023.	
	3C	Inspection of UNRATED (UR) food businesses (FB)(% completed) (Number of inspections or closures if no longer trading)	N/A	HIGH	UR FB 10% (40 of 387) UR CM 0% of 433)	UR FB 19% (75 of 387) UR CM 0% of 433)	UR FB 30% (116 of 387) UR CM 0% of 433)	UR FB 39% (154 of 387) UR CM 0% of 433)	UR FB 49% (190 of 387) UR CM 0% of 433)	UR FB 56% (218 of 387) UR CM 0% of 433)	UR FB 60% (228 of 387) UR CM 0% of 433)	UR FB 60% (237 of 387) UR CM 0% of 433)	UR FB 64% (248 of 387) UR CM 0% (0 of 433)	UR FB 66% (256 of 387) UR CM 0% (0 of 433)	UR FM = 45% UR CM = 0%	100% (Annual Target)	RED	Red: more than 10% Amber: Within 10% Green: At target or above	February 2023: The service estimate they will have approximately 570 unrated businesses awaiting inspection on the 31st of March 2023. 570 unrated businesses awaiting inspection. All other businesses – 123 – high and low risk – feed into inspection programme 2023/24 Home caterers – 35 high risk - feed into inspection programme 2023/24 71 low risk Childminders - 271 high risk 70 low risk. Notes: The team will satisfy the requirements for the FSA recovery plan as they have dealt with all overdue high-risk businesses except for the high-risk childminders, the expectation of the FSA is that these businesses will be inspected in 2023/24. The team have worked hard to reduce the number of unrated food businesses awaiting inspection. The outstanding unrated businesses (except childminders) will be fed into the inspection programme for 2023/24 as indicated above. For the period from the 1st of April 2023 – there have been 397 newly registered businesses open to trade in the borough so far.	
	3D	Overdue (OD) food hygiene inspections of food businesses undertaken (% completed)	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)	OD 48% (523 of 1089)	OD 49% (543 of 1089)	31%	100% (Annual Target)	RED	Red: more than 10% Amber: Within 10% Green: At target or above	February 2023: The team estimate they will have approximately 488 unrated premises still awaiting inspection on the 31st of March 2023. The food team estimate they will meet the requirements of the FSA recovery plan as they will have inspected all high-risk A and B rated businesses and all C rated businesses by the 31st of March 2023. The remaining 488 businesses are D and E rated. The 286 overdue D Rated businesses will need to be inspected during 2023/24. The team will use the Alternative Enforcement Strategy to inspect the 178 overdue E Rated businesses. The AES is a self assessment questionnaire which is sent to a business and on completion reviewed by a Food Safety officer who will determine if there have been any changes to the business since the last inspection which might indicate an increased risk to food safety and whether the current risk rating is appropriate.	
	3E	Respond to 70% of food safety complaints within 5 working days (%)	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% (33out of 37)	93% out of 30)	85% (18 out of 21)	96% (25 out of 26)	92%	70%	GREEN	Red: more than 30% Amber: Within 20% Green: Within 10% or above		
Page 25	4A	Supply of CCTV data on request by appropriate agencies	100%	HIGH	100%	100%	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	100%	OUTCOME	100%	100%	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	OUTCOME	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	Awaiting Data	100%	100%	OUTCOME	Awaiting Data		

Outcome	PORTFOLIO PLAN INDICATOR	DESCRIPTION	2021-22 ACTUAL	GOOD PERF.	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	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	4D	Issue HMO licenses where valid applications are received (No.)	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%	(12 out of 12) 100%	(8 out of 8) 100%	100%	100%	GREEN	Red: more than 10% Amber: Within 10% Green: At target or above	
	4E	Total Number of Fly-tipping incidents (No.)	3576	OUTCOME	251	277	303	340	387	339	301	292	220	332	3650	N/A	OUTCOME	N/A	
	4F	Total Number of open fly-tipping incident investigations (No.)	N/A	OUTCOME	5 (open for period of 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)	66 (open for period April to December)	73 (open for period April to January)	N/A	N/A	OUTCOME	N/A	
	4G	Fly-tipping % of closed cases where action has been taken (those where evidence was available) (%).	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 investiagation 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 September). Of 50 cases, 44 have had enforcement action which is 88%).	82% (63 cases closed after investigation for April to October). 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%).	81% (99 cases closed after investigation for April to December). Of 99 cases, 81 have had enforcement action which is 81%).	93% (107 cases closed after investigation for April to January). Of 107 cases, 100 have had enforcement action which is 93%).	50%	50%	OUTCOME	N/A	
	4H	Parking appeals heard by the Environment and Traffic Adjudicators (ETA) against PCNs issued by LBB (No.)	240	LOW	15	21	29	8	12	17	17	29	20	18	223	200	GREEN	Red: More than 251 Amber: 226 to 250 Green: 200 to 225	
	4I	Parking ETA cases won by LBB (% of cases heard)	83%	HIGH	100%	95%	76%	63%	67%	88%	65%	79%	80%	72%	78%	85%	AMBER	Red: Less than 70% Amber: Less than 85% Green: At target or above	There has been a slight increase in personal hearings where the adjudicator believe that the motorist is a creditable witness and may be more lenient towards the motorist. Officers can only ask for a review of an adjudicators decision on certain grounds, therefore it is extreamly rare that a review is requested.

Report No.

London Borough of Bromley

ES20268

PART ONE - PUBLIC

Decision Maker: PUBLIC PROTECTION AND ENFORCEMENT PORTFOLIO HOLDER

Date: March 28th 2023

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

Title: BUDGET MONITORING 2022/23

Contact Officer: Murad Khan, Head of Finance (Environment and Community Services)
E-mail: murad.khan@bromley.gov.uk

Chief Officer: Director of Environment and Public Protection

Ward: (All Wards);

1. Reason for decision/report and options

This report provides the revenue budget monitoring position for 2022/23 for the Public Protection & Enforcement Services Portfolio based on expenditure and activity levels for the second quarter of the financial year.

2. **RECOMMENDATION(S)**

The Portfolio Holders are requested to:

- 2.1 Endorse the 2022/23 revenue budget monitoring for the Public Protection & Enforcement Services Portfolio.

Impact on Vulnerable Adults and Children

1. Summary of Impact: None
-

Transformation Policy

1. Policy Status: Existing Policy: Further Details
 2. Making Bromley Even Better Priority (delete as appropriate):

(5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
-

Financial

1. Cost of proposal: Not
 2. Ongoing costs: Recurring Cost
 3. Budget head/performance centre: All Public Protection & Enforcement Portfolio Budgets
 4. Total current budget for this head: £2.6m
 5. Source of funding: Controllable Revenue Budgets 2022/23
-

Personnel

1. Number of staff (current and additional): 47.3 FTE
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

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

Procurement

1. Summary of Procurement Implications: N/A
-

Property

1. Summary of Property Implications: N/A
-

Customer Impact

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

Ward Councillor Views

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

3. COMMENTARY

- 3.1 This report sets out the results of the third quarterly revenue budget monitoring exercise for the 2022/23 financial year for Public Protection & Enforcement Portfolio.
- 3.2 The position for quarter three for the Portfolio is showing an overspend of £208k based on financial information available.
- 3.3 The projected outturn is detailed in Appendix 1A, which shows the forecast spend for each division within the Portfolio compared to the latest approved budget.
- 3.4 Appendix 1B provides further detail and commentary on each of the projected variations within each service.

4. TRANSFORMATION IMPLICATIONS

- (5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
- 4.1 To meet the ambitions for residents, the Council must use available resources deploy its workforce wisely. This is reflected in the "Making Bromley Even Better" ambition of Service Efficiency - 'To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.'
- 4.2 The "2022/23 Council Tax" report highlighted the financial pressures facing the Council. It remains imperative that strict budgetary control continues to be exercised to minimise the risk of compounding financial pressures in future years.
- 4.3 Chief Officers and Heads of Finance are continuing to place emphasis on the need for strict compliance with the Council's budgetary control and monitoring arrangements.

5. FINANCIAL IMPLICATIONS

- 5.1 A detailed breakdown of the projected outturn by service area is shown in Appendix 1A with explanatory notes in Appendix 1B.
- 5.2 Overall, an overspend of £208k is projected to the year-end based on the information available for the third quarter of the year.

Non-Applicable Headings:	Social Care, Legal, Personnel, Property & Procurement Implications
Background Documents: (Access via Contact Officer)	2022/23 budget monitoring files within E&CS Finance section

Public Protection & Enforcement Budget Monitoring Summary

2021/22 Actuals £'000	Service Areas	2022/23 Original Budget £'000	2022/23 Latest Approved £'000	2022/23 Projected Outturn £'000	Variation £'000	Notes	Variation Last Reported £'000	Full Year Effect £'000
	Public Protection							
371	Community Safety	427	486	500	14	1	18	0
161	Emergency Planning	146	146	156	10	2	13	0
548	Mortuary & Coroners Service	603	603	787	184	3	96	0
1,466	Public Protection	1,469	1,453	1,453	0		-31	0
2,546	TOTAL CONTROLLABLE	2,645	2,688	2,896	208		96	0
617	TOTAL NON CONTROLLABLE	6	6	6	0		0	0
836	TOTAL EXCLUDED RECHARGES	811	816	816	0		0	0
3,999	PORTFOLIO TOTAL	3,462	3,510	3,718	208		96	0

Reconciliation of Latest Approved Budget

£'000

Original Budget 2022/23

3,462

Carry Forward Requests approved from 2021/22

Other

Provision for agency workers contract savings	-8
Adj to NI budget following reversal of 2022-23 increase in November	-8
Domestic Abuse team moved from CHN services	64

Latest Approved Budget for 2022/23

3,510

REASONS FOR VARIATIONS

1. Community Safety Dr 14k

There is a projected overspend of £18k in the costs of the Community Safety & Management Team, partially offset by a small underspend on the Nuisance & ASB Team.

2. Emergency planning Dr £10k

This projected overspend relates to the anticipated additional cost of emergency response standby allowances for the year.

3. Mortuary & Coroners Service Dr £184k

Major renovations to the mortuary facilities at the Princess Royal University Hospital continue meaning that post-mortems will instead be conducted in Denmark Hill. With finite facilities at this alternative site, a backlog is anticipated. As bodies will remain in storage for longer, the Council will inevitably incur additional costs. Further to this, there has been higher than anticipated demand on the service and higher than expected inflationary increases to service fees.

Waiver of Financial Regulations:

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

Virements Approved to date under Director's Delegated Powers

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

This page is left intentionally blank

Report No.
ES20258

London Borough of Bromley

PART ONE - PUBLIC

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

For Pre-Decision Scrutiny by the Public Protection & Enforcement PDS Committee on

Date: **Tuesday 28 March 2023**

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

Title: **PUBLIC PROTECTION & ENFORCEMENT DRAFT PORTFOLIO PLAN**

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

This report presents a draft Public Protection and Enforcement Portfolio Plan for 2023/24 for scrutiny by PDS Members and subsequent endorsement by the Public Protection and Enforcement Portfolio Holder.

2. **RECOMMENDATION(S)**

2.1 **That PDS Committee reviews and comments on the draft Portfolio Plan (Appendix 1) and provide comments to the Portfolio Holder before the final plan is published.**

2.2 **That the Public Protection and Enforcement Portfolio Holder:**

Endorse the outcomes, aims and performance measures set out in the draft 2023/24 Public Protection and Enforcement Portfolio Plan, taking into account the budget and views of the Committee.

Impact on Vulnerable Adults and Children

1. Summary of Impact: Public Protection and Enforcement services are used by all residents, including vulnerable adults and children. Where vulnerable adults or children may potentially be affected by a proposal or contract, the issues would be covered in that particular report, plan or contract rather than this strategic document.

Transformation Policy

1. Policy Status: Existing Policy
 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.
 - (5) To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.
-

Financial

1. Cost of proposal: Not Applicable
 2. Ongoing costs: Not Applicable
 3. Budget head/performance centre: Public Protection & Enforcement Portfolio
 4. Total current budget for this head: £2.7m
 5. Source of funding: Existing controllable revenue budget
-

Personnel

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

Legal

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

Procurement

1. Summary of Procurement Implications: Detail of the service contracts to which this portfolio plan relates are maintained on the Council's Contracts Database, summaries of which are reported to this Committee as part of the Contract Register on a bi-annual cycle. Contractor Performance is scrutinised on a regular basis and contracts are procured in line with all applicable legislation and the Council's Contract Procedure Rules.
-

Property

1. Summary of Property Implications: Not Applicable
-

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: Not Applicable

3. COMMENTARY

3.1 General

- 3.1.1 The actions listed in last year's Portfolio Plan were delivered and scrutinised via a report presented to the PP&E PDS Committee for. Below are some examples from each service area that show the support LB Bromley Public Protection teams provide to each other, other LB Bromley services and to our partner public agencies. It also hopes to illustrate the diversity of work undertaken by staff in the Public Protection Division.
- 3.1.2 During 2022/23 the Division will be introducing Idox Cloud as our principal case management system. This new database will replace our 20-year-old software and will allow for faster response times, more efficient and more mobile working, and help staff provide a faster customer experience for Bromley's residents and businesses.
- 3.1.3 Following the corporate website update, the teams in the Division are reviewing and refreshing our website content, to be more informative and useful to those who visit our pages seeking advice, help, and officer contact.

3.2 Trading Standards

- 3.2.1 Trading Standards continue to respond to urgent cases of scams and rogue traders to safeguard vulnerable residents from being defrauded.
- 3.2.2 One case involved a referral from a high street bank, where a victim of doorstep crime had been defrauded of £45,000 for simple preparatory building work. Trading Standards intervened within minutes and helped prevent the victim paying a further £55,000 into a criminal and sophisticated money laundering mechanism. This investigation is continuing with Trading Standards giving support to the victim.
- 3.2.3 Another case involved a referral from LB Bromley tree officers who were concerned about an elderly resident who was being charged nearly £4,000 for ridiculously overpriced tree work. Officers attended and noted the resident lived alone and was vulnerable, but the address where this was happening was just outside the Borough border in Greenwich. Given the vulnerability of the resident, the officers continued with the intervention, liaising with colleagues from LB Greenwich, and got estimates from the LB Bromley tree contractors, who valued the work being done at around £1,000. A call to the trader resulted in a reduced price and a significant saving for the resident. A meeting with Greenwich Trading Standards took place the following day, to hand over the case and make sure safeguarding concerns were shared.
- 3.2.4 The Trading Standards team run a programme of successful Scam Alerts, which continue to go from strength to strength, and are now notified to the public by LB Bromley's Communications team. So far this year 26 Alerts have been sent out to a direct and growing audience of several hundred subscribers which include local and national charities who support the elderly and vulnerable in the Borough. The enforcement focus is currently on scams and doorstep crime but the team have also acted on a range of issues such as used cars, underage sales and illegal vapes.

3.3 Community Safety

- 3.3.1 The Safer Bromley Partnership includes many of LBB's service areas and is organised and administered by the LB Bromley Community Safety team.
- 3.3.2 The Partnership includes other many other public sector agencies such as the MPS (Metropolitan Police Service), particularly the SNTs (Safer Neighbourhood Teams), LFB

(London Fire Brigade), LAS (London Ambulance Service), NHS, MOPAC (Mayor's Office for Policing and Crime), Probation, local Business Improvement Districts and registered social landlords, such as Clarion Housing Association. The team also work with charities and community groups in the 3rd sector, including Neighborhood Watch, local Crime Panels, faith leaders and food banks to keep Bromley residents as safe as possible.

3.3.3 The Community Safety team also work with other services within the council including Neighbourhood Management, Ward Security, Trading Standards, Licensing, CCTV, Social Care, the Youth Justice Service and Highways to name a few.

3.3.4 The Community Safety team recently grew, with the addition of 2 staff, an Interim Team Manager and a Violence Against Women & Girls and Domestic Abuse lead (VAWG & DA). This is in addition to our Serious Youth Violence lead, our Community Safety (offender management) lead and our Community Impact Day Coordinator.

3.3.5 The Community Impact Days (CIDs) continue to be successful with 7 held so far this year. The aims of the CIDs are to a) improve the visual environment, b) reduce recorded anti-social behaviour (ASB), and c) reduce incidents of arson within the target areas. The wards where the CIDs are held include Penge, Mottingham, St Paul's Cray and St Mary's Cray. The CIDs have made a significant difference to community confidence and addressed concerns such as excess fly tipping and the blight of graffiti. They have made a real difference to the number of arson incidents, which have reduced by over a third across the Borough in the last 5 years. The CIDs held so far this year have resulted in:

- 28,896 kgs (almost 3 Tonnes) of waste removed
- 398 m² of graffiti removed
- 192 vehicle stops
- 6 arrests, and
- 38 abandoned vehicles removed

3.3.6 These results refer to the 'hard' elements delivered by the CIDs. The 'softer' elements include community reassurance, information stalls, education welfare and fire safety home visits, drop-in centres, and many other occasional activities such as catalytic converter marking, all of which result in better networking between partners, better service to the public and increasing public confidence in public agencies to keep their neighbourhoods as safe as possible.

3.3.7 The team also work with the CCTV team and Police SNTs, to address locations where regular ASB is reported, such as empty buildings, parks, car parks, woodlands, housing estates, graveyards and small shopping parades.

3.4 Private Rented Sector Housing Enforcement

3.4.1 Following the introduction of a new Private Rented Sector Housing Enforcement Policy and improved amenity standards for Houses in Multiple Occupation (HMOs), earlier in the year, the Article 4 Direction, brought in by Planning Services, went live across the Borough in September 2022. This means that all HMOs must now have planning permission. The teamwork with the Planning officers to make sure that residential developments meet all the new amenity standards as they are built or remodelled.

3.4.2 There are currently 242 licensed HMOs in the borough, with another 142 in the process of being licensed. This is a total of 384 HMO properties in LB Bromley, the number of which has been steadily increasing along with the increased need for affordable housing for single person households. The HMO licensing process ensures minimum standards for fire safety, heating, ventilation and amenities, such as toilets, bathrooms, kitchens, cookers and fridge-space. Making sure these standards are met protects the health and wellbeing of Bromley residents.

Developers who make unapproved alterations or who do not license their HMO properties are now being successfully prosecuted.

- 3.4.3 The team are also working hard to minimise condensation and mould in rented property, which is on the rise due to increasing levels of households falling into fuel poverty.

3.5 Noise & Nuisance and Licensing & Health & Safety

- 3.5.1 The Noise & Nuisance team investigate around 2300 requests for service a year, covering noise and other potential nuisances such as smoke, odour, accumulations, dogs, etc. The team also get involved in filthy and verminous premises, hoarding, and other vermin and drainage concerns. The Noise & Nuisance team have successfully recruited two new staff to replace colleagues who moved on earlier in the year and the team is currently at full strength.

- 3.5.2 The Licensing and Health & Safety enforcement officers oversee the management of over 800 licensed premises and thousands of workplaces across the borough. Licensed premises include pubs, bars, restaurants, clubs, beauty salons and nail bars, wedding venues, riding stables, dangerous wild animal enclosures, cat and dog breeders and scrap metal merchants to name a few.

- 3.5.3 Along with all the static licensed premises, the Licensing and Health & Safety staff work with partners and event organisers to deliver a programme of safe and varied temporary cultural events across the borough, from the Wireless and Souttown festivals to fireworks displays and community fetes, to the hundreds of pubs, parks and community venues holding occasional events outside of their standard licenses using Temporary Event and Time-limited Event Licenses.

- 3.5.4 These teams recently came together under one manager and officers of both teams now work together closely and capitalize on the links between their caseloads, to use the licensing and enforcement powers available to both teams in consort and to best effect. This includes using noise abatement notices and license reviews to clamp down on poorly managed licensed premises and making sure controls are put on all types of licenses, to keep them safe and enjoyable for patrons and any nuisance or disruption to residents is minimised.

3.6 Pollution Control

- 3.6.1 The Pollution Control team are consulted on over 650 planning applications a year. The team work to ensure the developments that get planning permission are environmentally and socially sustainable. They do this by applying planning conditions to control noise transmission, the health and environmental impacts of brownfield land, the protection of indoor and outdoor air quality (e.g., from odours, fumes, and smoke), applying minimum room size standards and ensuring adequate emergency evacuation measures, etc. Also, the team make sure that demolition and construction activities stay within the requirements of national and London environmental standards, to minimise impacts on neighbouring land uses by controlling noise, dirt, dust, the age of plant and machinery on site, the methods of work, and the hours of site operation.

- 3.6.2 So far this year the team has revised the Borough's contaminated land strategy and produced the Annual Status Report (ASR) for air quality. The ASR reports to the UK Government on the Council's progress in delivering our Air Quality Action Plan. The last ASR shows that air quality in the borough has met all the UK air quality targets for the last 2 years and continues its downward trend.

3.6.3 The team are also working with Thames Water to address missed drainage connections. This action mitigates environmental pollution from poorly managed wastewater drains and sewers to protect health, biodiversity and the wider environment.

3.7 Food Safety

3.7.1 The work done by the food safety team is proactive as well as reactive, we prevent problems from occurring, and therefore we are a service that is usually hidden from the public's view. We have a major influence upon everyone's daily life both locally and nationally as we ensure that the food chain is safe, from farm to fork.

3.7.2 There are currently 2,600 registered food businesses operating in Bromley the food team carries out an average of 1,000 inspections a year. The team are responsible for inspecting and risk rating all businesses and organisations involved in the production, storage, preparation and sale of food.

3.7.3 The teamwork with business operators to resolve any hygiene issues and get them trading again as soon as possible. There have been 5 voluntary closures in the last year, one example was the voluntary closure of a brewery which had problems with rats entering the premises due to structural building faults. Officers supported the business in rectifying the structure allowing the business to re-open within a few days.

3.7.4 The food team investigates complaints about food businesses and food purchased in the borough, some complaints trigger a full investigation because of their public health significance, others will receive an advisory response. On a typical day the team could be responding to complaints about alleged food poisoning, it is important to remember that food poisoning is not always caused by the last meal or snack you have consumed, and your illness may be unrelated to food poisoning. Some of the other daily issues are complaints about poor conditions in food premises, infestations of insects and rodents, poor hygiene practices, contamination, foreign bodies found in food, food sold past its 'Use By' date, food allergens, food labelling, and food that is not of the nature, substance or quality expected by the consumer.

3.7.5 The team also seize, test and destroy unfit foods when they are identified, usually by complaint or inspection, and do regular sampling to ensure the foods in the borough is safe to eat. Most of the food premises in the Borough have a Food Hygiene Rating of 5, the best rating on the scale.

3.8 Neighbourhood Management

3.8.1 The Street Enforcement team has been responding to customer complaints, along with undertaking site and residential visits concerning all matters of highway enforcement. This ranges from the investigation and removal of unauthorised traveller encampments on LBB land, fly tipping, abandoned vehicles, illegal encroachment onto highway land, overhanging vegetation onto footways, and the removal of illegal skips, cones, hoarding and other obstructions on the highway.

3.8.2 The Neighbourhood Management realignment which took place in February 2022 resulted in the duties of 3 Highways Enforcement & 1 Street Scene Enforcement Posts merging to create a new Senior Enviro Crime Officer post & 3 Enviro Crime Officers. This coincided with a new Environmental Investigation manager who has placed more emphasis on enforcement of Environmental Crimes. Recent successes include the seizure of two vehicles linked to fly tipping within Bromley and five case files awaiting hearings at local Magistrates Court.

3.9 Parking Enforcement

- 3.9.1 Managing parking across the Borough has now settled since the covid pandemic and officers are beginning to understand the new behaviours of motorists. The Civil Enforcement Officers (CEOs) are patrolling the Borough for both on and off-street enforcement, helping to keep the traffic flowing and ensuring there are parking spaces availability where needed. The CEOs are also actively patrolling to identify Disabled Badges being misused, with dozens of successful cases being prosecuted at court and the badges removed from circulation.
- 3.9.2 Bromley Council continue to enforce moving traffic contraventions (MTCs) such as box junctions and banned turns, with 13 cameras installed in September and October 2021 to enforce such offences. Enforcement of these restrictions helps to reduce congestion on the roads and in turn help to reduce pollution levels.

Draft Portfolio Plan 2023/24

- 3.10 **Appendix 1** sets out the draft Public Protection and Enforcement Portfolio Plan for the 2023/24 financial year. There are 5 priority areas identified within the draft plan.
- 3.11 Committee is invited to comments on the proposed plan and suggest any changes it considers appropriate. The Plan is aligned to the ambitions of the updated, high level and over-arching Corporate Strategy "Making Bromley Even Better 2021 to 2031".

Priorities

- 3.12 **Priority 1: We will keep Bromley safe.** We will take an intelligence-led, partnership approach, working with public sector agencies, local businesses, and communities. Our aim is to improve public safety and reduce crime and enviro-crime. We will do this through the employment of both reactive and proactive enforcement activity, for regulated activities, processes, and premises and the wider environment.
- 3.13 **Priority 2: We will protect consumers.** We will maintain community safety, trading standards and environmental health services, to protect the residents of Bromley, particularly the vulnerable members of our community. We will ensure there is a fair-trading environment by encouraging commercial compliance with pricing, measurement, and intellectual property rights, including with lettings and landlords. We will achieve this through effective, responsible, and proportionate enforcement.
- 3.14 **Priority 3: We will support and regulate businesses.** We will follow the approach detailed in our Enforcement Policy with a risk-based, targeted, flexible, and proportionate approach to regulatory inspection and enforcement. There will be a graduated approach of advice, education, warning, and proportionate enforcement for all but the most serious of issues. This will ensure that our regulators are efficient, effective, and helpful, and avoid imposing unnecessary burdens on those businesses being brought into compliance.
- 3.15 **Priority 4: We will protect and improve the environment through custodianship and effective and responsible enforcement.** We have developed environmental strategies to improve local air quality and address land contamination. Progress is monitored and the documents are regularly updated. We will respond to residents' concerns about their locality, we will provide compliance advice and take proportionate regulatory enforcement. We will manage parking issues through effective enforcement, to balance the needs of motorists, residents, and businesses. We will make a difference to people's lives by promoting healthier, fairer, and safer environments at home, work, leisure and in the wider environment by having appropriate work instructions, policies, and protocols. We will promote behaviour change and support compliance by working with volunteers, business, partners, and the wider community. We will take appropriate action to ensure the street environment meets local needs. We and our partners will

undertake and support enforcement activity, around issues relating to anti-social behaviour, illegal incursion, dog-related nuisance, and drinking and drug abuse in our parks and open spaces.

- 3.16 **Priority 5: We will provide value for money.** We will focus on service outcomes, using rigorous financial evaluation to establish the impact of service programs and their value to the public. We will proactively review external sources of funding, consider activities that provide income, annually review our fees and charges, benchmark our costs and performance against other local authorities, and, through regular review, ensure we are utilizing efficient operating models.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 Public Protection and Enforcement services are used by all residents, including vulnerable adults and children. Where vulnerable adults or children may potentially be affected by a proposal or contract, the issues would be covered in that particular report, plan or contract rather than this strategic document.

5. TRANSFORMATION/POLICY IMPLICATIONS

- 5.1 The activities in this report reflect the Council's priorities and aims as set out in:

- [Making Bromley Even Better \(Corporate Strategy\)](#)
- Plans and Policies as specifically referenced within each priority area of the Portfolio Plan.

Non-Applicable Sections:	Financial, Personnel, Legal, Procurement
Background Documents: (Access via Contact Officer)	Public Protection and Enforcement Portfolio Plan 2021/22 Public Protection and Enforcement Portfolio Plan 2022/23

6. FINANCIAL IMPLICATIONS

- 6.1 There are no direct personnel implications.

7. PERSONNEL IMPLICATIONS

- 7.1 There are no direct personnel implications.

8. LEGAL IMPLICATIONS

- 8.1 There are no direct legal implications.

9. PROCUREMENT IMPLICATIONS

- 9.1 Most of the Portfolio Plan's priorities are underpinned by contracts and where these have a Total Contract Value (TCV) greater than £200k, they are reported in the Corporate Contract Register. The procurement status of contracts with a TCV >£50k is also reported to the PDS Committee for detailed scrutiny.
- 9.2 PDS Committee also scrutinises 'Procurement Strategy' and 'Award of Contract' reports and monitors individual contracts and scrutinises the contractors themselves as appropriate.

10. PROPERTY IMPLICATIONS

10.1 There are no property implications.

11. CARBON REDUCTION/SOCIAL VALUE IMPLICATIONS

11.1 There are no direct carbon reduction/social value implications, but the plan does identify service areas where carbon reduction and social values are reviewed.

12. CUSTOMER IMPACT

12.1 There are no direct Ward Councillor views.

13. WARD COUNCILLOR VIEWS

13.1 There are no direct Ward Councillor views.



Public Protection and Enforcement

Portfolio Plan for 2023/24

DRAFT

Introduction

Message from Cllr Angela Page

Public Protection and Enforcement Portfolio Holder



Bromley is widely and rightly seen as a safe borough. Nevertheless, safety and protection is and remains an absolute priority, with a sustained focus, not just for the Council but for partners, including the Police, others and our residents. The Safer Bromley Partnership supports this work, where partners, voluntary and resident group representatives come together so that issues can be shared and tackled holistically.

Many of our responsibilities and related services are outlined and empowered by legislation but it is only by sustained focus that we can improve and help ensure that our borough continues to enjoy its safe reputation and this Portfolio Plan outlines our priorities and how we are achieving this.

We are working with businesses across the borough, to give advice where needed but also to check they are complying with the right standards, be this food safety or selling age restricted products and ensuring businesses are properly licensed. Prosecution is always a last resort but we will do this where needed and where we have evidence, including prosecuting flytippers and those who do not dispose of their waste responsibly.

Environmental protection is important and we are taking action as also outlined in our Air Quality Management strategy and Contaminated Land Strategy as well tackling untidy sites through the planning process.

As well as working with businesses, we will also continue to work with residents, who are also consumers, particularly those that are perhaps seen as more vulnerable, to help protect them for the perils of rogue traders and scammers who are ever present.

Finally and most importantly this work involves us all. We all have a part to play, from taking our own crime prevention steps to sharing relevant information with friends, neighbours and family to help keep them safe. Also, if you do come across something which is not right, please report it as needed.

Our priorities

This Portfolio Plan is shaped around the delivery of the following priorities:

Priority 1 We will keep Bromley safe

We will take an intelligence-led, partnership approach, working with public sector agencies, local businesses, and communities. Our aim is to improve public safety and reduce crime and enviro-crime. We will do this through the employment of both reactive and proactive enforcement activity, for regulated activities, processes, and premises and the wider environment.

Priority 2 We will protect consumers

We will maintain community safety, trading standards and environmental health services, to protect the residents of Bromley, particularly the vulnerable members of our community.

We will ensure there is a fair-trading environment by encouraging commercial compliance with pricing, measurement, and intellectual property rights, including with lettings and landlords. We will achieve this through effective, responsible, and proportionate enforcement.

Priority 3 We will support and regulate businesses

We will follow the approach detailed in our Enforcement Policy with a risk-based, targeted, flexible, and proportionate approach to regulatory inspection and enforcement.

There will be a graduated approach of advice, education, warning, and proportionate enforcement for all but the most serious of issues. This will ensure that our regulators are efficient, effective, and helpful, and avoid imposing unnecessary burdens on those businesses being brought into compliance.

Priority 4 We will protect and improve the environment through custodianship and effective and responsible enforcement

We have developed environmental strategies to improve local air quality and address land contamination. Progress is monitored and the documents are regularly updated.

We will respond to residents' concerns about their locality, we will provide compliance advice and take proportionate regulatory enforcement.

We will manage parking issues through effective enforcement, to balance the needs of motorists, residents, and businesses.

We will make a difference to people's lives by promoting healthier, fairer, and safer environments at home, work, leisure and in the wider environment by having appropriate work instructions, policies, and protocols.

We will promote behaviour change and support compliance by working with volunteers, business, partners, and the wider community.

We will take appropriate action to ensure the street environment meets local needs.

We and our partners will undertake and support enforcement activity, around issues relating to anti-social behavior, illegal incursion, dog-related nuisance, and drinking and drug abuse in our parks and open spaces.

Priority 5	We will provide value for money
-------------------	--

We will focus on service outcomes, using rigorous financial evaluation to establish the impact of service programs and their value to the public.

We will proactively review external sources of funding, consider activities that provide income, annually review our fees and charges, benchmark our costs and performance against other local authorities, and, through regular review, ensure we are utilizing efficient operating models.

All 5 priorities will be delivered in accordance with a commitment to improve customer service. We will ensure our decision making is transparent and supported by sound governance and will ensure high quality contract monitoring and strong internal performance management.

Priority 1 We will keep Bromley safe

Our Ambitions:

The priority aligns to the following *Making Bromley Even Better* ambitions:

- 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
- Priority 2 – For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence, and making choices
- Priority 3 – For people to make their homes in Bromley and for business, enterprise and the 3rd sector to prosper
- Priority 4 – For residents to live responsibly and prosper in a safe, clean, and green environment great for today and a sustainable future.

Strategic links:

This priority has links with the following strategic plans and local policies:

- Making Bromley Even Better (Ambitions 1, 2, 3 and 4)
- Bromley Child Sexual Exploitation Strategy
- Bromley Safeguarding Children Partnership Policies
- Bromley Safeguarding Adults Board Strategy 2020-23
- Children's and Young Peoples Plan
- Domestic Abuse Strategy 2021-24
- Homelessness Strategy 2018-23
- Local Violence & Vulnerability Plan (previously the Violence Reduction Action Plan)
- Police and Crime Plan 2021-23
- Public Protection Enforcement Policy
- Private Rented Sector Housing Enforcement Policy
- Safer Bromley Partnership Strategy 2020-23
- Youth Justice Strategy 2020-23

What are we going to do?

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
Manage areas noted for enviro-crime and anti-social behaviour (ASB)	Address enviro-crime and anti-social behaviour through the delivery of targeted, intelligence-led operations with partners	1. Deliver 12 Community Impact Days	31 st March 2024	Head of Service for Community Safety, Environmental and Domestic Regulation

<p>Develop and deliver the Safer Bromley Partnership Board's Community Safety Partnership Strategy 2020-23</p>	<p>Deliver to:</p> <p>Priority 1 – Safer Neighbourhoods</p> <p>Priority 2 – Reducing Violence Against Women and Girls</p> <p>Priority 3 – Keeping Young People Safe</p> <p>Priority 4 – Standing Together Against Hate and Extremism</p>	<ol style="list-style-type: none"> 2. Safer Bromley Partnership Board to be held quarterly and chaired by the Assistant Director of Public Protection or Director of Environment 3. Public Protection will present quarterly updates to the Safer Bromley Partnership Board on progress against the Safer Bromley Partnership Strategy priorities 4. Successful scrutiny of the Safer Bromley Partnership action outcomes by the Public Protection & Enforcement Policy Decision Scrutiny Committee (in their role as Crime and Disorder Committee) 5. Attend the Tactical Tasking Coordination Group (TTCG) monthly to track local crime trends 6. Attend the Joint Action Group to deliver a coordinated approach to solving ASB problems 7. Attend the quarterly Prevent meetings 8. Reduction of non-domestic violence with injury 	<p>31st March 2024</p>	<p>Director of Environment</p> <p>Assistant Director of Public Protection</p> <p>Head of Service Community Safety, Environmental and Domestic Regulation</p> <p>Head of Service for Trading Standards and Commercial Regulation</p>
---	--	---	-----------------------------------	---

		9. Reduction in residential burglary 10. Protection of elderly and vulnerable people from becoming victims of scams 11. Produce an annual crime needs assessment 12. Attend daily meetings with the Police to track and respond to emerging community safety issues 13. Manage the Domestic Homicide Review process 14. Sign off the Domestic Homicide Review process		
Maintain a strategic lead officer for serious youth violence and gangs	Maintain a strategic lead officer to address serious youth violence (SUV) and gangs through the production, delivery and regular review of the Violence and Vulnerability Action Plan.	15. Governance of the Local Violence and Vulnerability Action Plan (previously the Violence Reduction Action Plan) 16. Maintain and regularly review the Local Violence and Vulnerability Action Plan 17. Community Safety representation at the Youth Justice Service Board	Quarterly 31 st March 2024	Head of Service Community Safety, Environmental and Domestic Regulation SUV and Gangs Strategic Lead
Fulfil the council's duties under the Civil Contingencies Act 2004	Prepare, exercise, test and update our Civil Contingencies arrangements, and ensure that, whilst responding to	18. Appropriate incident response 19. Delivery of emergency planning training programme	31 st March 2024	Emergency Planning and Corporate Resilience Lead

	<p>an incident and/or business interruption, our core essential public services continue to be delivered.</p> <p>To work in partnership to strengthen our resilience and ensure Bromley is prepared to respond and recover from emergencies professionally and effectively.</p>	<p>20. Ongoing testing and exercise regime for above plans</p> <p>21. Continued development of the Resilience Standards for London</p> <p>22. Development and review of service and Corporate Business Continuity Plans</p> <p>23. Further development of multi-agency working arrangements and collaboration</p>		
Monitor the CCTV system for the purposes of public safety, crime prevention, and crime detection.	<p>Keep residents safe through appropriate and proportionate use of CCTV in the public realm (KPI1A).</p>	<p>24. Monthly CCTV contract meetings with the monitoring and maintenance providers to assess progress against the KPIs</p> <p>25. Provision of all requested CCTV evidence (100%)</p> <p>26. Review CCTV provision annually</p>	31 st March 2024	<p>Head of Service for Trading Standards and Commercial Regulation</p> <p>Contracts and Projects Manager</p>
Recognise that financial abuse of the elderly (and/or other vulnerable residents) is akin to a hate crime	<p>Provide a rapid response service to all victims of doorstep crimes and scams (KPI2B)</p>	<p>27. 100% of rapid response interventions responded to within 2 hours</p>	31 st March 2024	Trading Standards Manager
Protect the borough's most vulnerable residents from rogue traders	<p>Act against rogue traders, particularly those who target the vulnerable, through early intervention and enforcement working with a range of partners (KPI1C)</p>	<p>28. Deliver 50 awareness raising or training events to vulnerable groups and partners</p> <p>29. Disseminate x25 TS Alerts on emerging topics</p>	31 st March 2024	Trading Standards Manager

		including doorstep crime and scams		
Keep our young people safe and contribute to public health and wellbeing	Address the sale of age-restricted products, particularly alcohol, tobacco, fireworks, corrosives, and knives, through test purchase operations (KPI1D)	30. Undertake a programme of 'Challenge 25' compliance checks and test purchasing for age restricted products 31. Take robust enforcement action against businesses that sell age restricted products to children and young people	31 st March 2024	Trading Standards Manager
Regulate and improve residential conditions in HMOs	Validate and issue licences for Houses in Multiple Occupation (HMO) (KPI1E).	32. Issue a decision on 100% of validated applications for an HMO license	31 st March 2024	Environmental Protection & Housing Enforcement Manager

Priority 2 We will protect consumers

Our Ambitions:

The priority aligns to the following *Making Bromley Even Better* ambitions:

- 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
- Priority 2 – For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence, and making choices
- Priority 3 – For people to make their homes in Bromley and for business, enterprise and the third sector to prosper
- Priority 4 – For residents to live responsibly and prosper in a safe, clean, and green environment great for today and a sustainable future.

Strategic links:

This priority has links with the following strategic plans and local policies:

- Making Bromley Even Better (Ambitions 1, 2, 3 and 4)
- Bromley Safeguarding Children Partnership Policies
- Bromley Safeguarding Adults Board Strategy 2020-23
- Children's and Young Peoples Plan
- Public Protection Enforcement Policy
- Private Rented Sector Housing Enforcement Policy
- Safer Bromley Partnership Strategy 2020-23

What are we going to do?

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
Ensure a safe and competitive trading environment	Address traders and businesses who put consumers at risk and disadvantage and reputable compliant businesses at a trading disadvantage. Continue the effective use of all available intelligence. Highlight emerging issues and target resources at activities that will have the greatest impact	33. Apply a risk-based, targeted, flexible and proportionate approach to regulatory enforcement using the Public Protection Enforcement Policy.	31 st March 2024	Trading Standards Manager Food Safety Manager Licencing, Health & Safety, ASB & Statutory Nuisance Manager

Priority 3	We will support and regulate businesses	
Our Ambitions: The priority aligns to the following <i>Making Bromley Even Better</i> ambitions: <ul style="list-style-type: none"> • 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 • Priority 2 – For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence, and making choices • Priority 3 – For people to make their homes in Bromley and for business, enterprise and the third sector to prosper. • Priority 4 – For residents to live responsibly and prosper in a safe, clean, and green environment great for today and a sustainable future. 		Strategic links: This priority has links with the following strategic plans: <ul style="list-style-type: none"> • Making Bromley Even Better (Ambitions 1, 2, 3 & 4) • Annual Food Safety Service Plan • Public Protection Enforcement Policy • Bromley Health & Wellbeing Strategy 2019-23

What are we going to do?

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
Ensure a minimum standard of hygiene in food businesses to reduce the occurrence of ill health through food borne disease	Deliver the the Food Safety Agency (FSA) Recovery Plan Ensure Food Safety services are delivered in accordance with the Food Law Code of Practice (FLCoP) Inspect 100% of high-risk food businesses to ensure food safety standards are met	34. Respond to 100% of food alerts from the FSA 35. Participate in intelligence-led and regional food sampling programmes, for both analysis and examination 36. Continue to work to the FSA Recovery Plan to complete due and reduce overdue food hygiene inspections as set out in the Food Safety Service Plan	31 st March 2024	Food Safety Manager

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
	<p>Ensure through education and enforcement, that food intended for human consumption produced and/or sold in Bromley is safe and complies with all relevant food safety requirements</p> <p>Undertake intelligence-led food sampling, participating in regional sampling programmes and when responding to food alerts</p>			
Investigation of outbreaks and food related infectious disease	Ensure that specialist colleagues from Public Health and Public Health England are supported in investigating and managing disease outbreaks	36. Respond to 100% Infectious Disease Notifications	31 st March 2024	Food Safety Manager
Regulate food and licensed premises, ensuring the legal and licensing objectives are complied with	Investigate and take appropriate action concerning complaints about food premises and licensed premises and those with reported health and safety issues – to protect the health and welfare of the public (KPI3A and KPI3B).	37. Respond to 75% complaints/ enquiries about food and food premises within 5 working days 38. Investigate 100% all complaints raised against licensed premises 39. Investigate 100% of all complaints pertaining to health and safety that are within the Local Authority's remit 40. Inspections of high-risk food businesses (due within year) undertaken (100%) (Risk A and B food premises) 41. Inspection of UNRATED food businesses (% complete) (Number of inspections or closures if no longer trading	31 st March 2024	Food Safety Manager Licensing, Health & Safety, ASB & Statutory Nuisance Manager

Priority 4

We will protect and improve the environment through custodianship and effective enforcement

Our Ambitions:

The priority aligns to the following *Making Bromley Even Better* ambitions:

- 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
- Priority 2 – For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices
- Priority 3 – For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
- Priority 4 – For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future

Strategic links:

This priority has links with the following strategic plans and local policies:

- Making Bromley Even Better (Ambition 1, 2, 3 & 4)
- Air Quality Action Plan 2020-25
- Contaminated Land Strategy
- Net Zero Carbon Strategy 2027
- Public Protection Enforcement Policy
- Private Rented Sector Housing Enforcement Policy
- Revised Amenity Standards for HMOs
- Statement of Gambling Policy 2022-25
- Statement of Licensing Policy 2021-26
- Planning Services Enforcement Policy

What are we going to do?

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
Monitor the effectiveness of the Biggin Hill Noise Action Plan	Continue to monitor noise complaints relating to aviation movements including enforcement for any infringement of the	42. Review the actions of the Safety and Noise Review Board (SANARB) regarding actions taken against those who have failed to abide by the	31 st March 2024	Environmental Protection & Housing Enforcement Manager

	adopted Biggin Hill Airport Noise Action Plan	airport's operators published noise control procedures		
Monitor construction and development and investigate reported breaches of planning control	Ensure breaches of planning control are investigated and, where necessary, remedied through appropriate enforcement in accordance with the Council's Planning Enforcement Policy (KPI4A).	43. Investigation of reported breach of planning controls completed (100%)	31 st March 2024	Development Control Manager
Investigate and enforce complaints of enviro-crime in accordance with the regulatory framework	Keep the borough's streets clean and green and reduce litter, dog fouling and fly-tipping, through a programme of contracted work, education, and enforcement activity	44. Present annual Enviro-crime report to PDS	31 st March 2024	Environmental Investigation Manager
Control parking in the borough for the benefit of all residents	Continue to deliver parking enforcement services through APCOA, the Council's contracted service provider	45. Parking Appeals against no of PCNs issued heard by adjudicators (No.) 46. Parking ETA cases won by LBB (% of cases heard) Planning Services Enforcement Policy	31 st March 2024	Head of Service Shared Parking Services. Assistant Director of Traffic and Parking

Priority 5	We will provide value for money			
Our Ambitions:			Strategic links:	
<p>The priority aligns to the following <i>Making Bromley Even Better</i> ambitions:</p> <ul style="list-style-type: none"> Priority 5 – To manage our resources well, providing value for money, and efficient and effective services for Bromley’s residents. 			<p>This priority has links with the following strategic plans and local polices:</p> <ul style="list-style-type: none"> Making Bromley Even Better (Ambition 5) LBB Budget Environment Department Budget Public Protection Budget Public Protection Fees & Charges 	

What are we going to do?

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
Ensure fees and charges are fair and representative of their cost	Benchmark and review all fees and charges annually	47. All fees and charges reviewed annually	31 st March 2024	Assistant Director of Public Protection
Maximise external funding into the division	Positively look for and apply for external grant funding to support the delivery of projects and the delivery of discrete workstreams	48. Applications made to all relevant and suitable grants available	31 st March 2024	Assistant Director of Public Protection
Maximise service value	Positively explore partnership and joint working arrangements to add value to service delivery	49. Devise and adopt memorandums of understanding, joint working protocols and partnership arrangements that add value to both established and any new service areas	31 st March 2024	Assistant Director of Public Protection

Performance Indicators

Number	Performance Indicators	23/24 Target
Priority 1	We will keep Bromley safe	
1A	Number of evidence packs requested from CCTV	95%
1B	Rapid response interventions responded to within 2 hours (%)	100%
1C	To disseminate 25 Alerts on emerging topics including doorstep crime and scams	x25
1D	Complete all test purchases following all failed Challenge 25 test purchase which result in a sale of an age restricted product	100%
1E	HMO licenses issued where valid applications are received	100%
Priority 2	We will protect consumers	
2A	Number of awareness raising & training events to vulnerable groups & their partners	x50
Priority 3	We will support and regulate businesses	
3A	Due Inspections of high-risk food businesses undertaken (%) (Risk A and B food premises)	95%
3B	Inspection of UNRATED food businesses (% complete) (Number of inspections or closures if no longer trading)	95%
Priority 4	We will protect and improve the environment through custodianship and effective and responsible enforcement	
4A	Completed cases, where investigation identifies a breach of planning control (%)	100%

Report No.
ES20262

London Borough of Bromley

PART ONE - PUBLIC

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

Date: **Tuesday 28th March 2023**

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

Title: **PP&E Contract Register**

Contact Officer: Lucy West, Head of Performance Management and Business Support
Tel: 020 8461 7726 Email: Lucy.West @Bromley.gov.uk

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

Ward: All Wards

1. Reason for report

- 1.1 This report presents an extract from February 2023's Contracts Register of contracts with a whole life value of £50k or higher, for detailed scrutiny by PDS Committee – all PDS committees will receive a similar report each contract reporting cycle, based on data as at 19 January 2023 and presented to ER&C PDS on 2nd February 2023.
- 1.2 The Contracts Register contained in 'Part 2' of this agenda includes a commentary on each contract to inform Members of any issues or developments. A covering report will also be included where additional commentary is required.
-

2. **RECOMMENDATIONS**

That the Public Protection and Enforcement PDS Committee:

- 2.1 Reviews and comments on the Contracts Register as at February 2023.
- 2.2 Note that in Part 2 of this agenda the Contracts Register contains additional, potentially commercially sensitive, information in its commentary.

Impact on Vulnerable Adults and Children

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

Corporate Policy

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

Financial

1. Cost of proposal: - N/A
 2. Ongoing costs: - N/A
 3. Budget head/performance centre: Public Protection and Enforcement portfolio
 4. Total current budget for this head: £2.7m
 5. Source of funding: Existing controllable revenue budget for 2022/23
-

Personnel

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

Legal

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

Procurement

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

Customer Impact

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

Ward Councillor Views

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

3. COMMENTARY

Contracts Register Background

- 3.1 The Contracts Database is fully utilised by all Contract Managers across the Council as part of their Contract Management responsibilities, which includes the updating the information recorded on the database. The Register is generated from the Contracts Database which is administered by Corporate Procurement and populated by the relevant service managers (Contract Owners) and approved by their managers (Contract Approvers).
- 3.2 As a Commissioning Council, this information is vital to facilitate a full understanding of the Council's procurement activity and the Contracts Registers is a key tool used by Contract Managers as part of their daily contract responsibilities. The Contract Registers are reviewed by the Procurement Board, Chief Officers and the Corporate Leadership Team.
- 3.3 The Contracts Register is produced four times a year for members and is a 'snapshot' at the time of each report – though the CDB itself is always 'live'. The quarterly reporting cycle is based on the Executive, Resources and Contracts PDS timetable with reports for each Portfolio prepared and distributed at the same time. There may be a timelag between the quarterly reporting cycle and the next available date of the relevant Policy, Development and Scrutiny Committee for each Portfolio. Report authors for each Portfolio have the opportunity to provide updates on any contracts through the accompanying Part 2 report.
- 3.4 Each PDS committee is expected to undertake detailed scrutiny of its contracts – including scrutinising suppliers – and hold the Portfolio Holder to account on service quality and procurement arrangements.

Contract Register Summary

- 3.5 The Council has 246 active contracts across all Portfolios as of 19 January 2023 for the February 2023 reporting cycle as set out in Appendix 1.
- 3.6 The summary for the Public Protection and Enforcement Portfolio is as follows:

Item	Category	May 2022	September 2022	February 2023
Total Contracts	£50k+	7	6	8
Concern Flag	Concern Flag	0	0	0
Risk Index	Higher Risk	3	2	3
	Lower Risk	4	4	5
Procurement Status for Contracts approaching end date	Red	0	0	0
	Amber	1	1	1
	Green	4	4	4
	Neutral	2	1	3

4. IMPACT ON VULNERABLE ADULTS & CHILDREN

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

5. POLICY IMPLICATIONS

- 5.1 The Council's renewed ambition is set out in [Making Bromley Even Better 2021 - 2031](#) and the Contracts Database (and Contract Registers) help in delivering the aims (especially in delivering Ambition Five – Resources & Efficiencies). For Ambition Five, this activity specifically helps by supporting 'robust and active contract management'.

6. PROCUREMENT IMPLICATIONS

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

7. FINANCIAL IMPLICATIONS

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

8. PERSONNEL IMPLICATIONS

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

9. LEGAL IMPLICATIONS

- 9.1 There are no direct legal implications but the Contracts Database does identify those contracts which have a statutory basis and also those laws which should be complied with in delivering the contracted services.
- 9.2 A list of the Council's active contracts may be found on Bromley.gov.uk to aid transparency (this data is updated after each ER&C PDS meeting).

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


Appendix 1 Key Data (All Portfolios)

Item	Category	May 2022	September 2022	February 2023
Contracts (>£50k TCV)	All Portfolios	214	236	246
Flagged as a concern	All Portfolios	1	0	1
Portfolio	Executive, Resources and Contracts	63	79	83
	Adult Care and Health	49	49	49
	Environment and Community Services	17	20	23
	Children, Education and Families	34	41	45
	Renewal and Recreation and Housing	44	41	38
	Public Protection and Enforcement	7	6	8
Risk Index	Higher Risk	71	73	74
	Lower Risk	143	163	172
Procurement Status for Contracts approaching end date	Red	1	0	1
	Amber	18	23	18
	Green	60	72	78
	Neutral	135	141	149

Appendix 2 - Contracts Register Key and Background Information

Contract Register Key

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

Register Category	Explanation
Risk Index	Colour-Ranking system reflecting eight automatically scored and weighted criteria providing a score (out of 100) reflecting the contract's intrinsic risk – reported as either Higher Risk or Lower Risk
Contract ID	Unique reference used in contract authorisations
Owner	Manager/commissioner with day-to-day budgetary / service provision responsibility
Approver	Contract Owner's manager, responsible for approving data quality
Contract Title	Commonly used or formal title of service / contract
Supplier	Main contractor or supplier responsible for service provision
Portfolio	Relevant Portfolio for receiving procurement strategy, contract award, contract monitoring and budget monitoring reports
Total Contract Value	The contract's value from commencement to expiry of formally approved period (excludes any extensions yet to be formally approved)
Original Annual Value	Value of the contract its first year (which may be difference from the annual value in subsequent years, due to start-up costs etc.)
Procurement Status	<p>For all contracts automatically ranked by the Database as approaching their end date, a manual RAG rating is assigned by the Assistant Director Governance & Contracts to reflect the status of the contract. The RAG ratings are as follows:</p> <p>Red – there are potential issues with the contract or the timescales are tight and it requires close monitoring.</p> <p>Amber – appropriate procurement action is either in progress or should be commencing shortly.</p> <p>Green – appropriate procurement action has been successfully taken or there is still sufficient time to commence and complete a procurement action.</p>
Start & End Dates	Approved contract start date and end date (excluding any extension which has yet to be authorised)
Months duration	Contract term in months
Attention 	Red flag or Red RAG indicates that there are potential issues, or that the timescales are tight and it requires close monitoring. Further commentary may be provided in the Part 2 report.
Commentary	<p>Contract Owners provide a comment –where contracts approach their end date. Corporate Procurement may add an additional comment for Members' consideration</p> <p><i>The Commentary only appears in the 'Part 2' Contracts Register</i></p>
Capital	Most of the Council's contracts are revenue-funded. Capital-funded contracts are separately identified (and listed at the foot of the Contracts Register) because different reporting / accounting rules apply

Contract Register Order

1.2 The Contracts Register is ordered by Procurement Status, Portfolio, and finally Contract Value. Capital contracts appear at the foot of the Register and 'contracts of concern' (to Corporate Procurement) are flagged at the top.

Risk Index

- 1.3 The Risk Index is designed to focus attention on contracts presenting the most significant risks to the Council. Risk needs to be controlled to an acceptable level (our risk appetite) rather than entirely eliminated and so the issue is how best to assess and mitigate contract risk. Contract risk is assessed (in the CDB) according to eight separate factors and scored and weighted to produce a Risk Index figure (out of 100). The Risk Index is reported as either 'Higher Risk' or 'Lower Risk'.

Risk Management

Contract Risk Status

45.4

[Hide Risk Details](#)

Ref	Risk Type	Analyses Result	Score
1	Company Size	Mutiple Suppliers / Sizes	0.6
2	Total Contract Value	>£100k <£500k	2.0
3	Annual Contract Value	>£50k <£100k	12.0
4	Budget & projected spend variance	Default Score used	10.0
5	Sector	Other	5.0
6	Contract Term (Remaining Agreed Term)	1-2 yrs	1.2
7	Contract Type	Framework Contract	4.6
8	Procurement Status Ragging		10.0






Procurement Status

- 1.4 The Database will highlight contracts approaching their end date through a combination of the Total Contract Value and number of months to expiry . For all contracts highlighted by the Database as potentially requiring action soon, a commentary is provided on the status of the contract and a manual RAG rating is assigned.

This page is left intentionally blank

Contract Register Report - £50k Portfolio Filtered - Public Protection and Enforcement

February 2023

	Main Contract Data						Finance Data				Contract Terms				
Risk Index	Contract ID	Owner	Approver	Contract Title	Supplier Name	Portfolio	Total Value	Original Annual Value	Current Annual Value (Estimated)	Proc Status	Start Date	End Date	Months Duration	Attention	Capital
Higher Risk	4947	Sarah Newman	Colin Brand	Domestic Violence Against Women and Girls Service - VAWG	Bromley & Croydon Women's Aid	Public Protection and Enforcement	619,955	179,000			01/04/2020	31/03/2023	36		
Higher Risk	4859	Robert Vale	Colin Brand	CCTV Monitoring	Enigma CCTV Ltd	Public Protection and Enforcement	1,441,000	288,200	602,610		01/04/2019	31/03/2024	60		
Higher Risk	4858	Robert Vale	Colin Brand	CCTV Repair and Maintenance Contract	Tyco Fire & Intergrated Soultion (UK) Ltd	Public Protection and Enforcement	691,081	135,573	147,330		01/04/2019	31/03/2024	60		
Lower Risk	3763	Sarah Newman	Colin Brand	Dogs & Pest Control Services	SDK Environmental Ltd	Public Protection and Enforcement	370,000	60,500	149,960		01/02/2018	31/01/2023	60		
Lower Risk	6320	Sarah Newman	Colin Brand	** Now Live ** Stray Dog and Rehoming Service	SDK Environmental Ltd	Public Protection and Enforcement	186,000	62,000			01/02/2023	31/01/2026	36		
Lower Risk	4941	Louise Watkinson	Colin Brand	Mortuary Contract	Princess Royal University Hospital Mortuary via Kings College Hospital NHS Foundation Trust (with LB Bexley)	Public Protection and Enforcement	1,011,000	180,000	446,630		01/10/2019	30/09/2025	72		
Lower Risk	3799	Louise Watkinson	Colin Brand	Coroners Service	London Borough of Croydon	Public Protection and Enforcement	448,640	224,320			01/04/1966	31/08/2029	762		
Lower Risk	6276	Louise Watkinson	Colin Brand	Idox - Public Protection Department	Idox Software Ltd	Public Protection and Enforcement	248,619	138,993	138,993		01/06/2022	31/05/2025	36		

This page is left intentionally blank

Report No.
ES20260

London Borough of Bromley

PART ONE - PUBLIC

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

Date: **Tuesday 28th March 2023**

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

Title: **PP&E RISK REGISTER**

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

Chief Officer: 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.
-

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 \(MBEB\) 2021-2031](#) 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 24 risks (~19% of the Council's total). The PP&E Portfolio currently has 17 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 15 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 \(MBEB\) 2021-2031](#) 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
Background Documents: (Access via Contact Officer)	None

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

TfL London Borough														DATE LAST REVIEWED:			02/03/2023
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			FURTHER ACTION REQUIRED	RISK OWNER			
						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	4	All E&PP	Business Continuity Arrangements Lack of up-to-date, tried and tested, BCP for all Council services	Cause(s): -Failure to implement and keep up-to-date effective service and corporate Business Continuity Plans Effect(s): -Non-provision of critical services following an incident (internal or external)	Service Delivery	2	4	8	1. Corporate Risk Management Group now encompasses Business Continuity 2. Full suite of BC plans in place across all Directorates, including E&PP 3. Overarching corporate BC plan developed identifying prioritisation of all services 4. All E&PP BC plans now transposed on to new corporate BCP template 5. Corporate BC management policy & strategy document signed off by leader and chief exec 6. Ensure all service providers have up to date Business Continuity Plans	2	3	6	1. CLT adoption of BCM which will monitor delivery on behalf of COE going forwards. 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			
4	14	All E&PP	Income Variation (Highways and Parking) Loss of income when the Council is looking to grow income to offset reduced funding	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 repaving highway improvements and behaviour change projects if funding is reduced to implement Local Implementation Plan (LIP).	Angus Culverwell			
5	18	All E&PP	Town Centre Markets Loss of town centre market business as a result of high inflation and the cost of living crisis.	Cause(s): High inflation rates and the cost of living crisis-reducing peoples disposable income or reducing the footfall to busy places like the market. - Electric infrastructure issues with the g/fas affecting LBB's ability to provide power to market traders Effect(s): -Reduction in market stall occupancy -Loss of income from market stalls) -Poor public & trader perception	Financial	4	3	12	1. BID Teams and Economic Development organise town centres events 3. Regular advertising / promotion of market and availability of stalls 4. Review of market operational costs to reduce costs where possible 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 BID to seek their involvement in cross-promotion of Bromley Town Centre. 7. Markets Manager 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. The Market Team conduct ongoing monitoring of Bromley town footfall, trader numbers, capacity of the market so that ad hoc traders can be brought in wherever possible to fill any vacant stalls. 3. The Market Team liaise with R&R in regards to initiatives for the town centre. 4. The Market Team are progressing the development of a communications strategy for promotion of the market with the communications team. 6. The Market Team continue to liaise with Highways to ensure that the g/fas units are maintained. 7. The Market Team are supporting the testing specialist markets as part of R&R's Town Centre recovery planning	Peter McCready			
6	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. 2. 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			

Public Protection and Enforcement (PP&E) Risk Register

													DATE LAST REVIEWED:	02/03/2023
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			FURTHER ACTION REQUIRED	RISK OWNER
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
7	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
8	28	Public Protection	Dogs Contract Failure to deliver the contract to the required service levels	Cause(s): -Insolvency of contractor Effect (s): -Inability to deliver statutory functions -Reputational damage	Service Delivery	2	4	8	1. Identification of named Contract Manager 2. Regular contract management meetings with service provider 3. Review of contract specification to identify change control requirements	2	2	4	1. Contract recently awarded in February 2023 for an initial 3 year term with 2 years discretionary extension 2. The new contract is for a Stray Dog & Rehoming service. Pest control services have been decommissioned in accordance with PDS decision	Sarah Newman
9	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 was presented and an option approved at PPE & PDS in January 23. This decision is now out of the call-over period and will be actioned. Effect: Occasional inability to deliver Out of Hours Noise Service.	Service Delivery	4	4	16	1. Annual review with MOPAC on service outcomes 2. Exploring the cost of a centrally funded OOH service and options for delivery models discussed with Portfolio Holder & Committee 3. Amend website to manage customer expectation 4. Consider making the OOH rota mandatory in new EH enforcement work 5. Commence making arrangements to deliver recent decision. Current anticipated go-live for new OOH Noise service arrangements is September 2023, depending on successful recruitment of appropriately qualified and experienced staff to fill the new rota	2	4	8	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. Report presented at PPE PDS Committee in January 2023 3. Continue to encourage officers to participate in rota as the number of volunteers remains low 4. Enact decision and make arrangements for a go-live for the approved revised OOH Noise Service arrangements. Indicative timeline for implementation is new service launched ready for peak demand in 30/06/23.	Sarah Newman
10	30	Public Protection	Integrated Offender Management post: Failure to contribute to London wide IOM	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	3	9	1. Annual review with MOPAC on service outcomes. Funding is secure April 2023 - March 2025	2	2	4	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
11	31	Public Protection	Community Impact Day Co-ordinator post: Failure to deliver ASB and arson problem solving and partnership activity	Cause(s): -This post receives funding from a MOPAC grant for 3 years which is confirmed 1 year at a time, thus is vulnerable. This post is responsible for delivering targeted community project work to reduce crime, particularly arson 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	3	9	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 result. CIDs would have to be reduced in scope and outcomes 2. Funding for this post is secure from April 2023 - March 2025	2	2	4	1. Review of CID focus, arrangements and activities to allow for MOPAC project delivery at reduced cost. 2. 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
12	32	Public Protection	Serious Youth Violence & Gangs Officer post Failure to deliver gang problem solving and partnership activity	Cause(s): -This post has funding from MOPAC for 3 years, which is provided 1 year at a time, thus is vulnerable. The post is responsible for the strategic coordination of gang intervention and partnership working to reduce 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 and serious youth violence reduction work with partners. -The salary shortfall of this post is currently met by Public Protection salaries budget.	Service Delivery	3	3	9	1. Annual review with MOPAC on service outcomes 2. Reapply for funding in Autumn 2024	2	2	4	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
13	33	Public Protection	The provision of 24/7 CCTV Monitoring	Cause: -Impact of sickness on staff in the control room Effect: -Loss of officers through sickness arising from a potential future pandemic or serious allergies leading to an inability to provide 24-7 CCTV monitoring .	Service Delivery	3	4	12	1. The CCTV Supervisor takes steps to ensure the room is protected from overcrowding. Two members of staff also have a nut allergy and there is clear signage at entry points about the risk posed and the need to keep nuts out of the room.	1	3	3	1. Monitor and review monthly with Contractors	Rob Vale
14	34	Public Protection	Loss of Income from Licensed Premises Fees	Cause: - Wider economic trends and their impact on licensed premises and hospitality sector's viability further impacting on achieving income targets 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 received the income for the first 11 months of the financial year and have not received any requests to refund existing licences. However, there is a future risk that the expected income target may not be met due to failing businesses.	Financial	3	3	6	1. For most businesses the licence is a minor cost. They are more concerned with business overheads such as energy, staffing, material and equipment costs and rent and rates. 2. Expected income targets are almost fully met as we approach the end of the fiscal year but a lengthy economic downturn could impact on income significantly. 3. An accurate future forecast is not available in the current economic climate. The Division is starting to see increased churn with regard to food premises, but the effect is not yet as profound for licensed premises.	2	2	4	1. Monitor and review income quarterly	Sarah Newman



Public Protection and Enforcement (PP&E) Risk Register

													DATE LAST REVIEWED:	02/03/2023
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			FURTHER ACTION REQUIRED	RISK OWNER
						LIKELIHOOD	IMPACT	RISK RATING		LIKELIHOOD	IMPACT	RISK RATING		
15	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 elevated excess deaths 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
16	39	Public Protection	Dysfunctionality of Uniform Information Management System	Cause - This is a legacy data system and there has been a lack of investment and technological improvements it is now barely functional or fit for purpose. Effect - The dysfunctionality of Uniform affects how data is/is not recorded, retrieved and analysed. Data is not always able to be saved or retrievable and there are significant difficulties with providing reliable data reports. - There are significant issues and blockages to connecting to the system remotely which is preventing the required advances in service efficiency.	Service Delivery	5	4	20	1. Software updates in May 21 improved the performance of the Uniform system. 2. The division is currently in the process of upgrading the software to Idox Cloud which is expected to be implemented in Autumn 2023.	3	4	12	1. Idox Cloud will mitigate the reliance on the local Civic Centre servers as the new system is Cloud based. The project commenced in late September 22 and is currently on course to be fully implemented in Autumn 2023.	Rob Vale
17	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 & Riddor) 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 risk assessments 8. All corporate policies and procedures followed by all staff and managers.	2	4	8	1. Ensure Workplace Risk Assessments updated annually and biennial reviews conducted 2. Encourage routine reporting of accidents and incidents using AR3 form (and reporting of RIDDOR incidents) 3. Ensure the necessary ongoing communication and training is provided. 4. Ensure resource exists to discharge statutory functions 5. Ensure staff returning to the office following illness do so in accordance with corporate HR processes and procedures. 6. Ensure that recent H&S concerns noted during inspections of depots at Beaverwood, Central Depot (Waldo Road) and Churchfields are addressed and updates will be provided to the quarterly Corporate Health and Safety Board.	Lucy West

ENDS

This page is left intentionally blank

Report No.
CSD

London Borough of Bromley

PART ONE - PUBLIC

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

Date: **28th March 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 detailed work programme for the next municipal 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: 2023/2024 revenue budget
-

Personnel

1. Number of staff Six 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 2023/2024 with the Chairman and officers.

Background Documents:	Minutes of the previous meeting. Previous Work Programme Report The Public Protection and Enforcement Portfolio Plan
-----------------------	--

PUBLIC PROTECTION AND ENFORCEMENT PDS--- 28th March 2023
Matters Outstanding
PPE Performance Overview report
Portfolio Holder Update
PPE Draft Portfolio Plan
Budget Monitoring
Public Protection Risk Register
Contracts Register
Presentation from Bromley Youth Council
Resilience and Business Continuity Annual Update
Update from SLAM
Work Programme
PUBLIC PROTECTION AND ENFORCEMENT PDS---28th June 2023
Matters Outstanding
PPE Performance Overview report
Portfolio Holder Update
PP&E Draft Portfolio Plan
Budget Monitoring
Contracts Register Report
Public Protection Risk Register
Scrutiny and Minutes of the previous meeting of the Safer Bromley Partnership Strategic Group
Enforcement Activity Update
Work Programme
PUBLIC PROTECTION AND ENFORCEMENT PDS---12th September 2023
Matters Arising
Portfolio Holder Update
PPE Performance Overview
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
PUBLIC PROTECTION AND ENFORCEMENT PDS---14th November 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
PUBLIC PROTECTION AND ENFORCEMENT PDS---24th January 2024
Matters Arising
Portfolio Holder Update
PPE Performance Overview
Budget Monitoring
Contracts Register Report
Public Protection Risk Register
Scrutiny and Minutes of the previous meeting of the Safer Bromley Partnership Strategic Group
Update Concerning Bromley and Lewisham Probation Delivery Unit
Work Programme
PUBLIC PROTECTION AND ENFORCEMENT PDS---19th March 2024
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
POSSIBLE FUTURE PRESENTATIONS and AGENDA ITEMS
Report on LBB's contract with the Coroner.
Review of Out of Hours Noise Service
POSSIBLE FUTURE VISITS
Coroners' Court.

This page is left intentionally blank

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

Document is Restricted

This page is left intentionally blank