



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

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>
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		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:

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- 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	<p>Deliver the the Food Safety Agency (FSA) Recovery Plan</p> <p>Ensure Food Safety services are delivered in accordance with the Food Law Code of Practice (FLCoP)</p> <p>Inspect 100% of high-risk food businesses to ensure food safety standards are met</p>	<p>34. Respond to 100% of food alerts from the FSA</p> <p>35. Participate in intelligence-led and regional food sampling programmes, for both analysis and examination</p> <p>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</p>	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).	<p>37. Respond to 75% complaints/ enquiries about food and food premises within 5 working days</p> <p>38. Investigate 100% all complaints raised against licensed premises</p> <p>39. Investigate 100% of all complaints pertaining to health and safety that are within the Local Authority's remit</p> <p>40. Inspections of high-risk food businesses (due within year) undertaken (100%) (Risk A and B food premises)</p> <p>41. Inspection of UNRATED food businesses (% complete) (Number of inspections or closures if no longer trading)</p>	31 st March 2024	<p>Food Safety Manager</p> <p>Licensing, Health & Safety, ASB & Statutory Nuisance Manager</p>

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
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- 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%