



Public Protection and Enforcement

Portfolio Plan for 2024/25

Introduction

Message from Cllr Angela Page

Public Protection and Enforcement Portfolio Holder



Keeping residents safe remains an enduring priority for the Council, with much of this work brought together in our Public Protection and Enforcement Portfolio. Many partners and agencies, including the Police, also have key roles to help protect residents or those visiting or working in our Borough. Our work with the London Fire Brigade and the Police in leading the Safer Bromley Partnership, come together as part of this approach, supporting crime reduction and improving safety.

Often, our responsibilities and related services are outlined and empowered by legislation. It is by using our legislative powers, to advise, inspect and enforce that directly protects residents, including the most vulnerable. In support of the legislative frameworks, we are working with businesses across the borough, giving advice where needed but also checking compliance, including in the important areas of food safety, selling age restricted products and ensuring businesses are properly licensed. Prosecution remains a last resort but we will do this where needed and where we have evidence, including prosecuting flytippers or motorists who undermine the integrity of the Blue Badge concessionary parking scheme.

Environmental protection is important, which includes our work to take legal action if needed where evidence shows there has been breaches of planning control.

As well as outlining the priorities and service targets for the year ahead in our Portfolio plan, I want to thank the many residents and resident groups who also do so much to help protect us all. This includes reporting problems to the appropriate agency but also sharing information and news, which helps us all be aware of current issues, including helping protect the most vulnerable. As part of this, we will continue to share information about the perils of rogue traders and scammers who are ever present, remembering that residents are also consumers, thereby helping protect us all.

Our priorities

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

Priority 1 **We will keep Bromley safer**

We will take an intelligence-led, partnership approach, working with public sector agencies, local businesses, and communities. Our aims are to improve public health and public safety and to reduce crime and enviro-crime. We will do this through the employment of both reactive and proactive enforcement activity for all our regulated activities, processes, premises and act to protect 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 most 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 working with lettings and landlords. We will achieve this through effective, reasonable, 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 that is rooted in the public interest.

There will be a graduated approach of advice and education, followed by a warning, and, enforcement action, for all but the most serious of issues. This ensures that our regulators are efficient, effective, and helpful, and avoid imposing unnecessary burdens on 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 contaminated land. Progress on their delivery is monitored, and the strategic documents are regularly reviewed and updated.

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

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

We will make a positive 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 collaborating 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 undertake and support enforcement activity around issues relating to anti-social behavior, illegal incursions, dog-related nuisance, and nuisance 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 the availability of external sources of funding and consider service changes and workstreams to generate income.

We will annually review our fees and charges, benchmark our costs and performance against other local authorities, and regularly review our operating models to ensure that they are as efficient as possible.

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 safer

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
- Bromley Child Sexual Exploitation Strategy
- Bromley Safeguarding Children Partnership Policies
- Bromley Safeguarding Adults Board Strategy
- Children's and Young People's Plan
- Domestic Abuse Strategy
- Homelessness Strategy
- Local Violence & Vulnerability Plan (previously the Violence Reduction Action Plan)
- Police and Crime Plan
- Public Protection Enforcement Policy
- Private Rented Sector Housing Enforcement Policy
- Safer Bromley Partnership Community Safety Strategy
- Youth Justice Strategy
- Early Help Strategy – Our vision for 2030

What are we going to do?

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD OFFICERS
Planned interventions in 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 2025	Head of Safer Communities
Develop and deliver the Safer Bromley	Deliver the agreed aims, objectives, and actions	2. Hold quarterly Safer Bromley Partnership Board meetings to ensure	31 st March 2025	SBP Co-Chairs & Vice Chair;

<p>Partnership's Community Safety Strategy April 2024- March 2027</p>	<p>of the Community Safety Strategy</p> <p>See published document on www.bromley.gov.uk</p>	<p>continuous improvement and achievement of the agreed delivery plan.</p> <ol style="list-style-type: none"> 3. All relevant partners will provide quarterly updates to the Safer Bromley Partnership Board on their part of the delivery plan. 4. The Public Protection & Enforcement Policy Decision & Scrutiny Committee (in their role as Crime and Disorder Committee) will scrutinise the delivery activity of the Safer Bromley Partnership 		<p>LBB Assistant Director of Public Protection MET Superintendent – Neighbourhoods LFT Borough Commander</p>
<p>Maintain a strategic lead officer for serious violence</p>	<p>Maintain a strategic lead officer to address serious violence (SV) through the production, delivery and regular review of the Violence and Vulnerability Action Plan and the Serious Violence Duty.</p>	<ol style="list-style-type: none"> 5. Maintain, review, and manage the governance of, partner reporting on, and the delivery of the Local Violence and Vulnerability Action Plan 6. Attend Ensure the Serious Violence Duty is embedded in the Community Safety Strategy 	<p>Quarterly</p> <p>31st March 2025</p>	<p>Head of Safer Communities</p>
<p>Fulfil the council's duties under the Civil Contingencies Act 2004</p>	<p>Prepare, exercise, test and update our Civil Contingencies arrangements, and ensure that, whilst responding to 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</p>	<ol style="list-style-type: none"> 7. Deliver the emergency planning training programme 8. Take part in regular exercises for potential civil contingencies 9. Deliver appropriate responses to civil incidents 10. Take part in exercises and testing of emergency planning arrangements 11. Continue to develop resilience Standards for London 12. Development and annual review of Divisional and Corporate Business Continuity Plans 	<p>31st March 2025</p>	<p>Emergency Planning and Corporate Resilience Lead</p>

	respond and recover from emergencies professionally and effectively.	13. Ensure multi-agency working arrangements and collaboration for civil contingencies		
Use CCTV to monitor for the purposes of public safety, crime prevention, and crime detection.	Keep residents safe through appropriate and proportionate use of CCTV in the public realm.	14. Hold monthly CCTV contract meetings with the monitoring and maintenance providers to assess progress against the contract KPIs 15. Provide requested CCTV evidence packages 16. Review the Borough's CCTV provision annually	31 st March 2025	Head of Safer Communities
Protect the elderly and vulnerable from financial abuse due to doorstep crime, and fraud/scams	Provide a rapid response service to all victims of doorstep crime and fraud/scams	17. Respond to rapid response interventions within 2 hours	31 st March 2025	Trading Standards Manager
Protect the Borough's most vulnerable residents from rogue traders	Act against rogue traders through early intervention, enforcement, and by working with a range of partners	18. Deliver awareness raising or training events to vulnerable groups and partners 19. Develop and disseminate TS Alerts on relevant emerging Trading Standards topics, including doorstep crime and scams	31 st March 2025	Trading Standards Manager
Keep our young people safe and contribute to public health and wellbeing	Address the sale of age-restricted products, (e.g., alcohol, vapes, tobacco, etc.) through test purchase operations	20. Undertake a programme of 'Challenge 25' compliance checks and complete an underage test purchase at premises that fail the Challenge 25 checks 21. Take robust enforcement action against businesses that sell age-restricted products to children and young people who do not meet the age requirement/s set in law.	31 st March 2025	Trading Standards Manager
Regulate and improve residential conditions in HMOs	Validate and issue licences for Houses in Multiple Occupation (HMO)	22. Inspect validated HMO license application premises within 28 days (KPI-1F) Issue a decision on validated HMO license applications	31 st March 2025	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
- Bromley Safeguarding Children Partnership Policies
- Bromley Safeguarding Adults Board Strategy
- Children’s and Young Peoples Plan
- Public Protection Enforcement Policy
- Private Rented Sector Housing Enforcement Policy
- LB Bromley’s amenity standards for Houses in Multiple Occupation
- Safer Bromley Partnership Strategy
- Early Help Strategy – Our vision for 2030

Our actions

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
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<p>Ensure a safe and competitive trading environment for business</p>	<p>Address traders and businesses who put consumers at disadvantage and compliant businesses at a trading disadvantage.</p> <p>Continue the effective use of all available intelligence, highlight emerging issues and target regulatory resources at activities that will have the greatest impact</p>	<p>1. Apply a risk-based, targeted, flexible, and proportionate approach to regulatory enforcement using the Public Protection Enforcement Policy.</p>	<p>31st March 2025</p>	<p>Trading Standards Manager</p> <p>Food Safety Manager</p> <p>Licencing, Health & Safety, Statutory Nuisance & ASB Manager</p> <p>Environmental Protection & Housing Enforcement Manager</p>
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Priority 3

We will support and regulate businesses

Our Ambitions:

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

Strategic links:

This priority has links with the following strategic plans:

- Making Bromley Even Better
- Food Hygiene & Safety Plan

- 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.

- Public Protection Enforcement Policy
- Bromley Health & Wellbeing Strategy
- LB Bromley Licensing Policy
- LB Bromley Gambling Policy

Our actions

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
<p>Ensure a minimum standard of hygiene in food businesses to reduce the occurrence of ill health through food borne disease</p>	<p>Deliver the FSA and Member approved Food Plan</p> <p>Ensure Food Safety is delivered in accordance with the Food Law Code of Practice</p> <p>Undertake intelligence-led food sampling, participating in regional sampling programmes and when responding to food incidents</p>	<ol style="list-style-type: none"> 1. Deliver the FSA and Member approved Food Plan 2. Respond to relevant food alerts from the FSA 3. Participate in food sampling programmes in accordance with LB Bromley's food sampling priorities 4. Respond to serious food incidents and premises presenting an imminent risk to the public's health 	<p>31st March 2025</p>	<p>Food Safety Manager</p>
<p>Investigation of outbreaks and food related infectious disease</p>	<p>Work with specialist colleagues from the UK Health Security Agency (was PHE) South London Health Protection Team in investigating and managing infectious disease outbreaks & infected individuals</p>	<ol style="list-style-type: none"> 5. Respond to Infectious Disease Notifications in accordance with the agreed multi-agency protocol 	<p>31st March 2025</p>	<p>Food Safety Manager</p>
<p>Regulate food and licensed premises, ensuring the legal and licensing objectives are complied with</p>	<p>Investigate and take appropriate action concerning complaints about food safety, licensing or health & safety issues – to protect the health and welfare of the public.</p> <p>Through education and enforcement, ensure that food intended for human consumption produced and/or sold in Bromley is hygienic, safe and complies with all relevant food law requirements</p>	<ol style="list-style-type: none"> 6. Respond to complaints/enquiries about food and food premises within 5 working days 7. Respond to all complaints/enquiries raised against licensed premises within 5 working days 8. Respond to all complaints/enquiries pertaining to health and safety at work, which are within the Local Authority's remit, within 5 working days 9. Deliver food hygiene rating inspections in accordance with the commitments made in the Food Plan 	<p>31st March 2025</p>	<p>Food Safety Manager</p> <p>Licensing, Health & Safety, Statutory Nuisance & ASB Manager</p>

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
		<ul style="list-style-type: none"> 10. Undertake food hygiene inspections of high-risk (Categories A&B) food businesses within each quarter 11. Undertake food hygiene inspections of unrated food businesses within each quarter 12. Undertake annual overdue food hygiene inspections for the business year in each quarter 		

Priority 4

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

Our ambitions:

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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 polices:

- Making Bromley Even Better
- Air Quality Action Plan
- Contaminated Land Strategy
- Net Zero Carbon Strategy
- Public Protection Enforcement Policy
- Private Rented Sector Housing Enforcement Policy
- Revised Amenity Standards for HMOs
- Statement of Gambling Policy
- Statement of Licensing Policy
- Planning Services Enforcement Policy

Our actions

ACTION	DETAIL	MEASURES OF SUCCESS	TARGET DATE	LEAD
Monitor the effectiveness of environmental controls at Biggin Hill Airport	Monitor complaints of environmental issues relating to aviation including any infringement of the adopted Biggin Hill Airport Noise Action Plan	<ol style="list-style-type: none"> 1. Review and note the actions of the Safety and Noise Airport Review Board (SANARB) regarding the sanctions put in place for those who have failed to abide by the airport's published noise control procedures 2. Keep the airport's responses to complaints regarding environmental issues under review. 3. Attend the Airport Consultative Committee 	31 st March 2025	Environmental Protection & Housing Enforcement Manager
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.	<ol style="list-style-type: none"> 4. Investigation of reported breach of planning controls completed (100%) 	31 st March 2025	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	<ol style="list-style-type: none"> 5. Present annual Enviro-crime report to PDS 	31 st March 2025	Environmental Investigation Manager
Control parking in the borough for the benefit of all residents	<p>Continue to deliver parking enforcement services through APCOA, the Council's contracted service provider.</p> <p>Parking Enforcement officers monitor the use of blue badges. The team prosecute cases of misuse of a blue badge once this has been witnessed by a Civil Enforcement Officer. Although it's not an essential requirement when prosecuting, a disabled</p>	<ol style="list-style-type: none"> 6. Parking Appeals against no of PCNs issued heard by adjudicators (No.) 7. Parking ETA cases won by LBB (% of cases heard) Planning Services Enforcement Policy 	31 st March 2025	<p>Head of Service Shared Parking Services.</p> <p>Assistant Director of Traffic and Parking.</p>

	badge can be confiscated at the time of the abuse.			
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Priority 5 We will provide value for money

Our ambitions:

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

- Priority 5 – To manage our resources well, providing value for money, and efficient and effective services for Bromley’s resident

Strategic links:

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

- Making Bromley Even Better
- LBB Budget
- Environment Department Budget
- Public Protection Budget
- Public Protection Fees & Charges

Our actions

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	1. All fees and charges reviewed annually	31 st March 2025	All Assistant Directors
Maximise external funding into the Department	Positively look for and apply for external grant funding to support the delivery of projects and discrete workstreams	2. Applications/bids will be made to relevant and suitable grants available	31 st March 2025	All Assistant Directors
Maximise service value	Positively explore partnership and joint working arrangements to add value to service delivery	3. Devise and adopt memorandums of understanding, joint working protocol and partnership arrangements that add value to both established and any new service areas	31 st March 2025	All Assistant Directors

Key Performance Indicators

Key Performance Indicator Number	Performance Indicators	24/25 Target
Priority 1	We will keep Bromley safer	
1A	% Of evidence packs requested from CCTV team successfully provided	95%
1B	% Of rapid response interventions responded to within 2 hours	100%
1C	To disseminate 25 Alerts on emerging topics including doorstep crimes and scams	x25
1D	% of premises that have failed a Challenge 25 check that have had a subsequent under-age (UA) test purchase completed	100%
1E	% Of validated HMO license applications where a decision has been made per quarter.	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	% Of high-risk (Categories A&B) food hygiene inspections due each quarter that were completed	95%