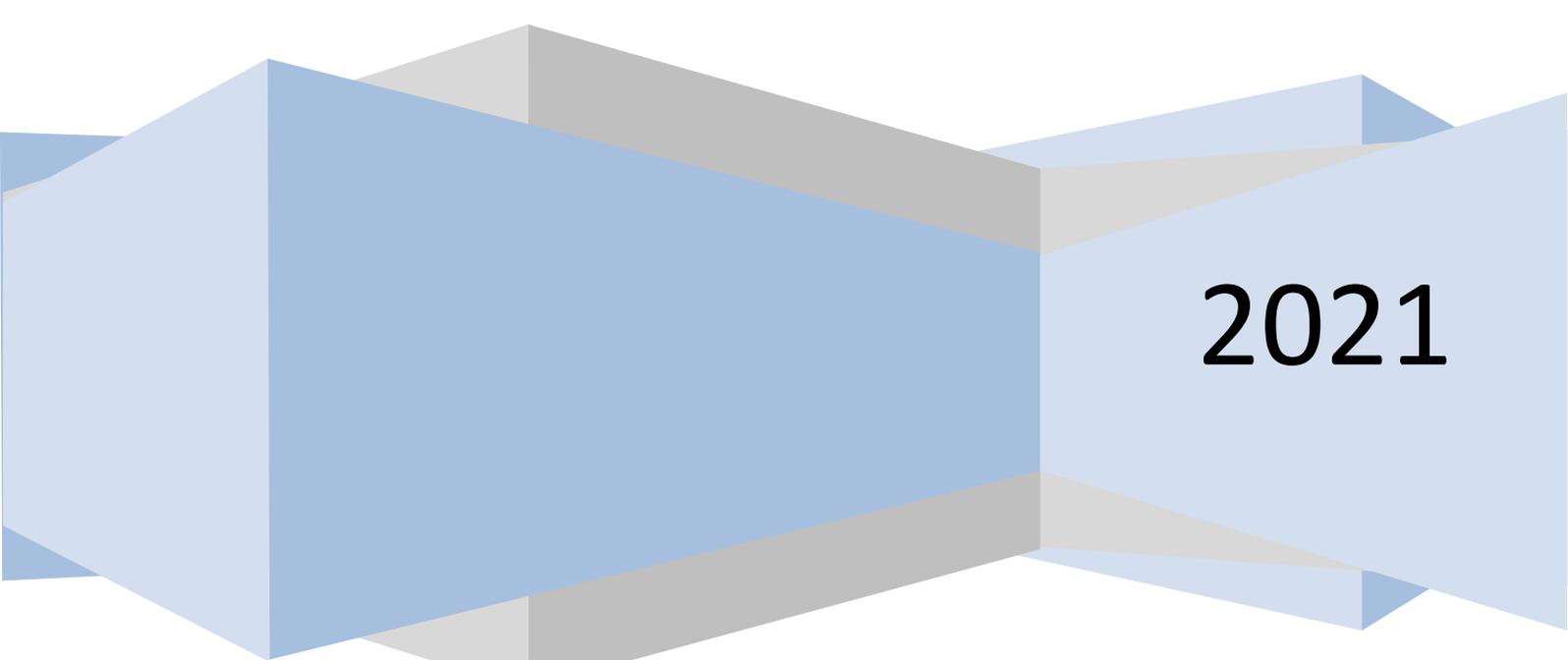


# Public Protection Service Delivery Plan 2021-23



2021

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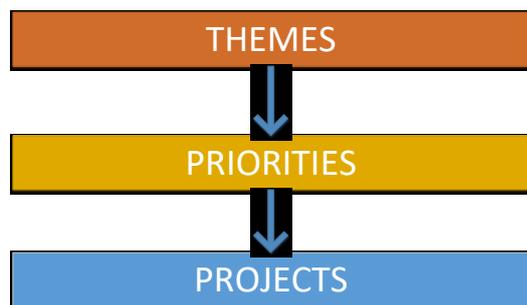
## 1. Introduction

The priorities of the Public Protection Partnership (PPP) are informed by the assessment of evidence from across a wide range of sources. This assessment was set out in a report to the Joint Public Protection Committee in June 2021. Those sources include assessment of resident concerns, Member and Council priorities, national priorities and new and emerging issues.

This document seeks to set out the planned output of the service set out using the Prevention / Intelligence / Enforcement model to addressing issues of priority and concern.

The key word is 'planned', it must always be remembered that in the field of public protection there is a large volume of service requests from residents and businesses and from other Council services. These help us identify the priority areas. Additionally within a local government setting there will inevitably be incidents, events and adjustments in the political landscape that require evaluation and assessment which may then lead to a change in the plan. Covid is one such example but over the years there have been others such as the Foot and Mouth outbreaks in the 2000's. The PPP must be ready and able to adjust its plans for such eventualities and has proved itself to be responsive faced with such demands.

## 2. Summary from the Strategic Assessment



The PPP aim to make it clear how they operate and show why it does the work it does. Communication and transparency is key to the success of the partnership and each project undertaken should be linked back to an evidence based approach.

## 3. Framework for Delivery 2021-2023

These priorities for the large part will apply from April 2022 to the new two authority shared service. Some will also apply to proposed buy-back provision with Wokingham in respect of trading standards. The Intelligence Team and Joint Case Management Unit will continue to support in-house Wokingham public protection services to deliver their identified priorities.

PPP have assessed the themes and determined the priorities, laid out in the Strategic Assessment. Each project should be considered in the context of the National Intelligence Model and PIE:

### Prevention

- What action can the PPP take that would stop a problem from occurring?

### Intelligence

- What information can the PPP gather to help make better decisions?

### Enforcement

- What action can the PPP take to ensure those breaking the law are taken to task?

## 4. eCrime

On-line trading has seen a significant increase in recent years and this has been accelerated by Covid and restrictions on high street trading creating convenience and choice. However, on occasions the internet has been a vehicle for fraud, unfair trading, environmental crime and licensing breaches. As a cross-cutting issue the PPP will look for opportunities to tackle resident and business detriment caused by eCrime across all its themes, priorities and projects.

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none"><li>• Active media campaigns</li><li>• Presence on online selling platforms</li><li>• Work with victims to reduce likelihood of becoming a repeat victim</li><li>• Identify target groups and support them</li><li>• Engagement of the Fraud Victim Support Officer</li></ul>	<ul style="list-style-type: none"><li>• Work with partner agencies including NTSB scams hub and e-crime team</li><li>• Encourage reporting from legitimate traders, consumers and Elected Members</li><li>• Make reporting eCrime easier</li><li>• Monitor emerging trends e.g. waste services provision etc,</li></ul>	<ul style="list-style-type: none"><li>• Target resources where intelligence shows most impact on local communities</li><li>• Develop additional staff to undertake complex eCrime investigations</li><li>• Provide dedicated case management support for eCrime investigations</li><li>• Look to national and regional agencies for support on complex cases</li></ul>

## 5. Climate Change

This is a new priority. Climate Change is one of the key issues of our time. All partner Councils have developed agendas around climate change. The service has input into a number of those areas.

### Prevention

- Advice and guidance for residents on 'Green' products
- Encouraging the switch to energy efficient products linked to energy performance certification
- Working with taxi and private hire operators to encourage / incentivise the move to electric vehicles
- Consider expansion of local food larder

### Intelligence

- Work with partner agencies including CitA and National Trading Standards to gather evidence of consumer detriment
- Encourage reporting from legitimate traders, victims and Elected Members of areas of concern

### Enforcement

- Investigate mis-selling of 'green' products
- Enforce legislation relating to energy performance certification in the private rented sector and in commercial sector
- Enforce other areas of legislation aimed at the reduction in consumption of single use plastics
- Prosecute over laden heavy goods vehicles.

## 6. Vulnerable Adults and Children

This cross-cutting issue includes safeguarding and investigations involving people from recognised vulnerable groups.

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none"><li>• Active media campaigns to highlight areas of detriment and risk</li><li>• Work with those at risk to reduce the risk of them becoming victims of crime or abuse.</li><li>• Identify at-risk groups and support them through targeted interventions</li></ul>	<ul style="list-style-type: none"><li>• Work with partner agencies</li><li>• Encourage reporting from concerned citizens and Elected Members</li><li>• Encouraging reporting of safeguarding issues</li><li>• Develop more accurate victim profiles and use these to inform prevention, enforcement and target resources</li></ul>	<ul style="list-style-type: none"><li>• Target resources where intelligence shows most impact on local communities</li><li>• Develop staff to undertake complex investigations that impact on vulnerable adults</li><li>• Provide dedicated case management support for investigations</li><li>• Targeted enforcement of legislation; controlling sale of alcohol, knives and gambling</li></ul>

## 7. Safeguarding (including Modern Slavery)

A further cross-cutting issue is looking at the importance of safeguarding and exploitation with the intention of reducing the detrimental impacts on health and individual and group / family safety and security.

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none"><li>• Ensure all staff have an understanding of safeguarding including referral process. This will include regular programmed training.</li><li>• Continue to have a cross-cutting lead for safeguarding</li><li>• Ensure staff involved in the delivery of services in identified risk areas have a good understanding of the identification of modern day slavery</li></ul>	<ul style="list-style-type: none"><li>• Work with partner agencies to identify safeguarding issues</li><li>• Encourage reporting from legitimate traders, concerned citizens and Elected Members of safeguarding issues</li><li>• Be an integral part of local authority and partner existing safeguarding mechanisms</li></ul>	<ul style="list-style-type: none"><li>• 'Make every visit count' by being alert to safeguarding issues</li><li>• Develop staff to undertake complex investigations involving safeguarding issues</li><li>• Look to national and regional agencies for support in complex cases involving safeguarding issues</li><li>• Require safeguarding training with taxi / private hire and HtS Transport</li></ul>

## 8. Safer Streets

As part of the wider community safety agenda work with a range of delivery partners to create safer streets for all our residents:

### Prevention

- Support and promote SaferStreets website and reporting
- Work with licensed sectors including pubs, clubs, restaurants, taxis and private hire to raise awareness of risk
- In conjunction with partner agencies work to develop and deliver targeted initiatives to improve public safety
- Work with event organisers through SAG to manage public safety

### Intelligence

- Work with partner agencies to improve the intelligence picture in order to drive preventative measures and assist with the targetting of enforcement.
- Consider the implications arising from SaferStreets submissions in a public protection context
- Encourage reporting of risk concerns by the licensed sectors

### Enforcement

- Target resources where intelligence shows most impact on local communities and most risk of harm
- Require relevant safeguarding steps through the licensing process
- Enforce licence conditions
- Enforce legislation relating to sale of alcohol, knives, fireworks and intoxicating substances

## 9. Doorstep Crime and Mass Marketing

### Prevention

- Active media campaigns to raise awareness
- Promote trader approved schemes and no cold-calling zones
- Support victims through scam friends initiatives including call blockers / doorbell cameras etc.
- Talks to community groups / NAGs etc
- Publicise the outcome of prosecutions as a deterrent

### Intelligence

- Work across established intelligence networks to build local intelligence pictures including police, neighbourhood watch etc.
- Deliver training as part of the PCSO / Police training programme to raise awareness and intelligence gathering
- Encourage reporting from legitimate traders, victims, Elected Members and concerned citizens
- Promote reporting routes for incidents

### Enforcement

- Target resources where intelligence shows most impact on local communities
- Develop staff to undertake complex investigations
- Provide a Rapid Action Response Team
- Carry out intelligence led operations and doorstep crime patrols
- Look to national and regional agencies for support in complex cases

## 10. Improving Standards in the Private Rented Sector

### Prevention

- Actively working with landlords to raise awareness of legal requirements / best practice with a view to raising standards
- Working to raise awareness of our work with elected members in order to assist in advising constituents and making referrals
- With RBFRS and Building Control work to understand and tackle high risk settings
- Identify those at risk from poor housing standards and support them

### Intelligence

- Work with partner agencies
- Encourage reporting from legitimate landlords, tenants, Elected Members and affected neighbours
- Make reporting of poor housing standards and tenant issues easier
- Survey residential areas to identify unlicensed Houses in Multiple Occupation (HMOs)

### Enforcement

- Clear inspection program of targeted residential properties, HMO's including mobile home and caravan sites
- Develop staff to undertake complex housing and licensing investigations and knowledge about property tribunals
- Provide dedicated case management support
- Ensure landlords comply with fees, deposits

## 11. Air Pollution

### Prevention

- Active awareness campaigns around air quality including idling, especially in risk settings
- Actively engage in the planning and transport policy process including EV
- Contribute to the development and delivery of health and well-being strategies
- Work with young people to raise awareness of air quality issues with a view to raising awareness and nurturing change

### Intelligence

- Routinely carry out NOx monitoring across all three Council areas
- Extend PM2.5 monitoring as part of the two year Defra funded project as well localised targeted monitoring
- Encourage reporting from those concerned or affected by air pollution
- Make reporting of air quality pollution incidents easier
- Deliver annual status reports

### Enforcement

- Develop and deliver an enforcement campaign around vehicle idling and emissions testing
- Clear inspection programme for appropriate permitted industrial processes
- Provide dedicated case management support for investigations, breaches of environmental protection legislation and businesses whose industrial processes breach relevant relevant to air quality
- Enforce legislation on wood sold for wood burners

## 12. Food Safety and Standards

### Prevention

- Food business inspections and visits
- Link work with commercial businesses and private water supplies
- Active media campaigns on food related matters including hygiene, safety, allergens, health claims etc,
- Identify vulnerable groups and support them e.g. allergen exposure
- Enhanced support for the poorest performing food businesses
- Promote Food Hygiene Rating Scheme

### Intelligence

- Food sampling to look at safety standards and identify food fraud
- Work with partner agencies
- Encourage reporting from legitimate traders, concerned consumers, residents and Elected Members re: poor labelling, standards, unhygienic premises and contaminated food easier
- Monitor data from Public Health England on infectious disease risk profiles
- Monitor data from private water supply risk assessments

### Enforcement

- Clear inspection program of high and medium risk food businesses
- Develop staff to undertake complex food hygiene and standards investigations
- Provide dedicated case management support for food hygiene and standards investigations
- Investigation of confirmed infectious disease cases linked to food businesses
- Investigate food complaints that have caused harm
- Investigate private water supply complaints and compliance issues

### 13. Childhood Obesity

Prevention	Intelligence	Enforcement
<ul style="list-style-type: none"><li>• Active awareness campaigns on risk factors</li><li>• Work with local health groups, schools and early years education providers</li><li>• Provide a comprehensive nutrition awareness programme at Key Stage 1, 2, 3 and 4</li><li>• Maximise participation in targeted healthy eating schemes / programmes</li></ul>	<ul style="list-style-type: none"><li>• Work with partner agencies</li><li>• Encourage reporting and referrals from health professionals for targeted awareness work</li><li>• Research Joint Strategic Needs Assessments and understand local Indices of Multiple Deprivation and the effects of deprivation as a risk factor for childhood obesity</li></ul>	<ul style="list-style-type: none"><li>• Incorporate healthy eating into routine inspection and sampling processes</li><li>• Enforce examples of misleading claims with particular emphasis on foods aimed children</li></ul>

## 14. Alcohol and Tobacco Consumption

### Prevention

- Encourage responsible retailing
- Work with local health groups, schools, trade associations and all local charities with shared objectives
- Work to deliver the tobacco PHSE input at key stage 2, 3 and 4 and alcohol awareness input at Key Stage 3, 4 and 5
- Maximise participation in targeted health projects designed to reduce consumption and smoking rates

### Intelligence

- Work with partner agencies
- Encourage reporting from health professionals, legitimate traders, residents and Elected Members
- Make reporting of any underage sales easier
- Research Joint Strategic Needs Assessments and understand local Indices of Multiple Deprivation

### Enforcement

- Clear inspection program for licenced premises
- Pursue licence reviews for non compliant premises/events
- Routine targeted test purchase campaigns
- Provide dedicated case management support for licensing investigations

## 15. Animal Welfare Standards

### Prevention

- Active awareness campaigns
- Presence on online selling platforms for animals to raise awareness of legal activity
- Work with animal owners, farmers and licenced establishments to maintain standards
- Publicise welfare related cases

### Intelligence

- Work with partner agencies to build an effective intelligence picture
- Encourage reporting from legitimate traders, consumers, residents and Elected Members
- Carry out targeted intelligence gathering merging risk areas e.g. puppy sales

### Enforcement

- Conduct risk based inspection program of high and medium risk businesses
- Develop staff to undertake complex welfare investigations
- Carry out targeted enforcement initiatives looking at fraud and unlicensed breeding and sales
- Establish robust systems of enforcement and stray dog collection

## 16. Environmental Protection

### Prevention

- Update contaminated land strategies
- Develop awareness of duty of care responsibilities for waste
- Carry out initiatives to deter environmental crime e.g. fly-tipping, fly-posting, graffiti, dog fouling etc.
- Publicise legal actions as a deterrent

### Intelligence

- Work with partner agencies including police and Environment Agency to build intelligence picture
- Encourage reporting from legitimate traders, residents and Elected Members of environmental crimes
- Make effective use of covert and overt enforcement techniques
- Monitor on-line offers of waste services

### Enforcement

- Targeted enforcement campaigns with partner agencies
- Use intelligence to direct localised enforcement to gather intelligence and detect and investigate crime
- Develop staff to undertake complex environmental crime investigations
- Draw links between environmental crime and other forms of crime e.g. doorstep crime and fraud

## 17. Impact of Nuisance on Communities including Noise

### Prevention

- Active media campaigns
- Seek to attach conditions to construction and demolition sites
- Seek to impose conditions to licenced premises where appropriate
- Identify events with a risk of creating noise nuisance and develop noise management plans

### Intelligence

- Work with partner agencies
- Encourage reporting from those suffering from the impact of commercial and residential nuisance including noise
- Make reporting noise easier by using the Noise App.

### Enforcement

- Undertake a range of statutory nuisance enforcement actions and licensing investigations
- Pro-actively monitor events that meet agreed risk criteria
- Pursue licence reviews for problematic premises/events
- Provide dedicated case management support for nuisance and licensing investigations

## 18. Unsafe Consumer Goods

### Prevention

- Support OPSS, regional and local safety campaigns
- Raise awareness on online selling platforms
- Work with businesses to maintain / improve their compliance levels
- Media campaigns

### Intelligence

- Work with partner agencies to identify risk areas
- Encourage reporting from legitimate traders, victims and Elected Members
- Make reporting unsafe consumer goods easier

### Enforcement

- Conduct market surveillance and test purchasing of targeted goods/suppliers
- Support national enforcement initiatives e.g. fulfillment houses and construction products
- Use enforcement powers to remove unsafe goods from the market and investigate criminal breaches

## 19. Health and Safety at Work

### Prevention

- Safety Advisory Group
- Publication of legal actions
- Provision of advice including Covid advice and guidance
- Work with businesses to maintain / improve their compliance levels
- Media campaigns

### Intelligence

- Consideration of RIDDOR notifications as a form of intelligence
- Encourage reporting of matters of concern for employees
- Engagement with HSE and partner agencies to identify matters of concern

### Enforcement

- Conduct inspections / audits in accordance with national plans
- Inspect high risk premises e.g. petroleum and explosives storage
- Investigate accidents at LA enforced premises
- Attend events and carry out compliance checks