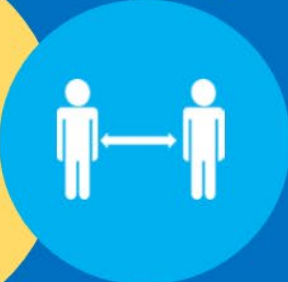




# Draft Shared Regulatory Services

## Business Plan

2021/22



Shared  
Regulatory  
Services

Gwasanaethau  
Rheoliadol  
a Rennir



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# Introduction



The 2021/22 SRS Business Plan represents our seventh programme of work. In the foreword to our last Business Plan, I wrote the following words:

*The Covid-19 outbreak, a world pandemic, has transformed so much. Going out to a restaurant, coffee with friends, going to a sports event or just visiting family, all of what we took to be the norm has stopped; we now live in “interesting times”.*

The spring of 2020 brought massive change to society on a scale unwitnessed in living memory. The closure of pubs, restrictions on travel, restrictions on whom you could visit, restrictions on the products you could purchase; in 2021, we are only now beginning to see the “light at the end of the tunnel”

Covid-19 remains a threat to the health and well-being of our societies. Our five priorities – safeguarding health and wellbeing, protecting the vulnerable, improving the local environment, supporting the local economy, maximising the use of our resources – all remain in place. Our conversations with elected members and stakeholders tell us that these priorities have never been more important. My personal reflection is that the SRS has adapted these broad aims to fit the context in a way I had never anticipated. The role our officers have played in the Test Trace and Protect regime, the work of the Joint Enforcement Teams, the investigation of clusters and incidents are not new to us, but the focus, intensity and draw on resource has been astonishing. The levels of camaraderie, the trust between organisations, and the commitment to each other has been a pleasure to see and to be a part of.

It is clear that the restrictions and public response has had an impact in reducing transmission of the virus and reducing hospital admissions and deaths. The vaccination programme will help to prevent onward transmission and hopefully the number of cases will diminish. However, it is likely that outbreaks will continue. The uncertainties on the level of adherence to new behaviours like social distancing and other restrictions; the impact of vaccines on transmission; the impact of new variants; and, the possibility of waning immunity all have a part to play in shaping our “new normality”

I commented last year that this would be the most rigid examination of our hypothesis that through collaboration we would create a more robust resilient service. There is no doubt in my mind that the SRS has passed that examination with the highest marks. I am reminded of the words of one of the Consultants in Communicable Disease – “we are saving lives”; I cannot think of a more appropriate tribute to the officers of the SRS.

This fantastic work has however taken a toll both on the established work programmes and the officers in the SRS. Our inspection regimes have suffered as officers were assigned new tasks, our work tackling noise nuisance, poor quality housing required new ways of working as the volumes of requests increased; everything changed. The term “Long Covid” is used to describe longer term health impacts of the disease, I would suggest it can also be used to describe the fatigue felt by officers having worked through the pandemic. Being brilliant in adversity is tiring.


Consequently, this SRS Business plan depicts an organisation that has had to become more reactive to the challenges emerging locally and nationally. We remain an organisation that is performing well; an organisation that is vibrant and ready to do things differently; an organisation that is doing all it can to keep people safe. The plan is written in a way that prompts us to reflect on the last 12 months and make assessments about the SRS operating model and use it to re-evaluate our relationships with our stakeholders.


**Dave Holland**  
Head of Shared Regulatory Services


# SRS vision, priorities and outcomes


*To be the leading provider of regulatory services that safeguard the health, safety and economic wellbeing of the region*


## Improving health and wellbeing


 The food chain is safe and free from risks


 Risks in the workplace are managed properly

 Noise and air emissions are controlled


 A safe trading environment is maintained


 Licensed premises operate responsibly


 The quality of private rented property is improved


 Infectious disease is controlled and prevented

## Protecting the environment


 The environment is protected from harmful emissions to land, air and water


 People will use energy efficient buildings and products


 Communities are protected from nuisance and are safer

 Animals are treated humanely


## Safeguarding the vulnerable

 Children are protected from harmful substances and products


 Older and vulnerable people are protected from rogue traders and scams

 Illegal money lending activities are prevented


 Taxi provision is safe and fair


 Vulnerable people are not subject to exploitation, slavery or trafficking

## Supporting the local economy


 A fair trading environment is maintained


 Informed and confident consumers


 Improved business practices and operation


 Accessible services responsive to business needs

## Maximising the use of resources

 SRS operates effectively and efficiently across all 3 areas

 Public and stakeholders can access our services

 Income generation underpins sustainable service delivery

 Staff are effective in their roles

## Delivering our priorities

- Understanding the needs of our customers and placing their needs at the heart of the services we deliver;
- Developing a flexible and agile workforce that is responsive to change and that have the right skills to deliver quality services that meet the needs of our customers and local communities;
- Maximising internal efficiencies to enhance service quality;
- Exploring opportunities to innovate and develop;
- Working together to future proof the service to meet financial challenges and future demands.

# 1. Overview of Services

## 1.1 Background

**Shared Regulatory Services (SRS) is a collaborative service formed between Bridgend, Cardiff and the Vale of Glamorgan Councils on 1<sup>st</sup> May 2015. The Service delivers a fully integrated service under a single management structure for trading standards, environmental health and licensing functions with shared governance arrangements ensuring full elected member involvement.**

SRS operates under a Joint Working Agreement (JWA) whereby the Head of SRS reports on service provision to a Joint Committee of elected members drawn from across the three parent Councils. An officer management board has oversight of the operation of the service and provides support to the Head of Regulatory Services to ensure the development and delivery of a shared vision and strategy for Regulatory Services

The detailed delegations of policy and functions from partners to the Joint Committee and Head of Service are set out in the Joint Working Agreement which includes:-

- The functions to be carried out by the joint service.
- The terms of reference and constitution of the Joint Committee, the management board etc.
- The terms of the proposed joint service such as staffing, the services to be provided by the host and other partners, financing and other functional issues.
- Financial Operating Model.

Consequently, the SRS works across the three Councils supporting a range of Committees and where needed, the three Cabinets, to deliver the Regulatory function. The workflow involves quarterly meetings with the officer Management Board followed by meetings of the SRS Joint Committee, details of which are then communicated to all three Cabinets. Officers meet members of the Joint Committee on a regular basis to ensure both regional and local issues are considered and managed appropriately.

All of the SRS Joint Committee meetings since April 2015 are held on the websites of each Council. The reports depict the genesis, development and future direction of the SRS.

## 1.2 Key services offered

**Shared Regulatory Services provides a diverse and comprehensive range of services that safeguard the health, safety and economic wellbeing of consumers, businesses and residents covering the main areas of environmental health, trading standards and licensing.** These broad areas encompass a wide range of services that deal with issues that can have a huge impact upon people when things go wrong or have not been enforced properly.



Food Hygiene and Standards

Food Hygiene and Standards protect public health by ensuring that the food we eat is without risk to the health and safety of consumers and is correctly described. This is achieved through regular food and feed safety and standards inspections of food business and guest caterers, operating the Food Hygiene Rating Scheme, providing practical advice, investigating food safety and food standards complaints, carrying out food and water sampling and undertaking checks on imported food.



Fair Trading

Fair Trading protects consumers and businesses by maintaining and promoting a fair and safe trading environment. This area of work ensures that businesses comply with a host of consumer protection statutes including those relating to:-

- Product safety;
- Age restricted sales;
- Counterfeiting;
- Environmental safety;
- Weights and measures
- False claims about goods and services;

The service investigates complaints, participates in criminal investigations and exercises, conducts inspections of businesses, undertakes a sampling programme, and helping businesses improve their trading practices.



Safeguarding

Our safeguarding work ensures we investigate cases of malpractice including rogue traders, scams and doorstep crime. We provide consumer advice to vulnerable residents and help them obtain redress.



Metrology

SRS has the only UKAS accredited Metrology laboratory in Wales providing calibration of weights and measures of length and capacity.



Housing Safety

Housing Safety protects public health by working with private landlords and owners to provide warm, safe and healthy homes for tenants. They ensure that Houses in Multiple Occupation are licensed through Mandatory and Additional Licensing Schemes, inspecting HMO's and improving physical and management standards of privately rented accommodation. Complaints from tenants about their rented accommodation are investigated. These can include complaints about damp, mould, heating disrepair, nuisance and student housing issues. Problems with empty homes that have fallen into disrepair are addressed and immigration inspections undertaken.



Noise Pollution

Pollution also protects public health by controlling noise and air emissions into the environment.

The service investigates noise complaints about issues such as amplified music, DIY activities, house and car alarms, barking dogs, and construction sites. It investigates air pollution complaints such as smoke, dust and odour and illegal burning, undertakes environmental monitoring, local Air Quality Management and regulates emissions from industrial processes.



Air Pollution



### Port Health

Port Health prevents the import of infectious and animal disease into the UK, ensuring ships comply with international agreed public health sanitation standards and improving the safety and quality of the food chain.



### Contaminated Land

Contaminated Land protects public health by reviewing and implementing the Contaminated Land Strategy which ensures the identification, inspection and remediation of historically contaminated sites. Private water supplies used for both domestic and commercial purposes (such as drinking, cooking, and washing) are regulated and Environmental Information Requests and Planning application consultations are responded to.



### Health and Safety at Work

Health and Safety protects the health, safety and welfare of staff, contractors and any member of the public affected by workplace activities by working with others to ensure risks in the workplace are managed properly. This is achieved by undertaking planned inspections and targeted initiatives, investigating reported accidents, diseases, dangerous occurrences and complaints, providing advice and guidance to employers and employees and securing safety standards at outdoor events.



### Communicable Disease

Communicable Disease protects public health by controlling and preventing cases and outbreaks of infectious disease by investigating confirmed sporadic and outbreak cases of communicable disease. The service provides and reviews advice and guidance on infection control, cleaning and disinfection, case and contact exclusions, provides training on food hygiene, nutritional and infection control, enforces health protection legislation to minimise the spread of communicable disease and contamination from radiation and chemicals that threaten health and leads on local and national communicable disease surveillance programmes.

**Pest Control** offers services to the Vale area for the treatment of pests and infestations. This could include, rats, wasps, mice, fleas, cockroaches etc.



### Animal Health and Welfare

Animal Health and Warden Services ensures the wellbeing of animals generally. This includes ensuring feeding stuffs provided to animals are safe and that animals are transferred humanely and animal movements are monitored to prevent the spread of diseases such as Rabies, Anthrax and Foot and Mouth. Our Wardens respond to complaints about straying animals such as dogs and horses.



### Licensing

Licensing determines applications for the grant, renewal, variation and transfer of many different authorisations which are the responsibility of the Councils. Applications for licences, certificates, registrations and permits are processed and enforcement undertaken in respect of statutory requirements such as alcohol, public entertainment, gambling, street trading, taxi licences, charitable collections and animal related licensing.



### Wales Illegal Money Lending Unit

The Wales Illegal Money Lending Unit is one of only 3 units operating across the UK. The Unit covers all 22 Local Authority areas in Wales with the key aim of tackling the problem of illegal money lending. The Unit is both proactive and reactive in its work providing education and promotion across Wales to various social groups and highlighting the dangers of illegal lending. The Team also carries out detailed investigations with a view to prosecuting offenders and has the capabilities to act swiftly where necessary to deal with victims of loan sharks.



### Working with Business

Shared Regulatory Services has adopted a more commercial approach by developing paid for services and marketing them to businesses. These commercial activities enhance and complement existing statutory services and provide income generation for the service. They include:-

- Bespoke and accredited training solutions to businesses to assist in achieving legal compliance;
- Paid for business advice visits and 'health' checks from our highly skilled and experienced officers to help and support businesses comply with legislation;
- Developing Primary Authority partnerships for businesses that trade across council boundaries where they can enter into a legally recognised partnership with the Service, receiving an agreed package of advice and support;
- Marketing the only UKAS Metrology Laboratory in Wales providing calibration of weights and measures of length and capacity;
- Extending training opportunities by assessing the potential for higher

accreditation levels to attract additional business;

- Identifying new funding sources;
- Exploring potential income generating services and developing paid for services.

Our new model of delivery sees all these services delivered across three service delivery sectors known as Neighbourhood Services which deals with activities relating to residential premises or having an impact on the local community, Commercial Services which deals with activities relating to business premises (generally where national standards apply) and Enterprise and Specialist Services which comprises a number of specialist areas of work and income generating services. The management and governance chart at 1.3 provides an outline of the specific services that sit within each sector.

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# 1.3 Management and Governance Arrangements

## Joint Committee



## Management Board



### Neighbourhood Services

Neighbourhood Services deal mainly with activities related to residential premises or have an impact on the local community and include:-

- Noise & Air Pollution
- Environmental Permitting
- Housing safety in private rented properties
- Licensing

### Commercial Services

The main function of Commercial Services is to ensure that businesses comply with a host of consumer and public protection requirements in areas such as:-

- Food Safety (retail premises)
- Health and Safety
- Trading Standards (retail premises)
- Communicable Disease
- Port Health

### Enterprise & Specialist Services

Enterprise & Specialist Services incorporates existing or potential income generating services with a commercial approach to marketing council services together with discreet specialisms including :-

- Contaminated Land & Air Quality
- Animal Health & welfare
- Pest Control (Vale only)
- Health & Safety (Projects and events)
- Food Safety and Trading Standards (non retail)
- Major investigations and safeguarding
- Wales Illegal Money Lending Unit
- Metrology Laboratory
- SRS Business Support
- Advice and training services
- Primary Authority Partnerships

## 1.4 Area profile

**Shared Regulatory Services covers the Council areas of Bridgend, Cardiff and the Vale of Glamorgan and serves over 600,000 residents.** Extending from St Mellons in the east to Maesteg in the west, the area encompasses Cardiff, the capital City of Wales with its array of cultural, financial and commercial organisations and the rural areas of Bridgend and the Vale of Glamorgan with their vibrant tourist and agricultural economies.



**Bridgend is situated on the south coast straddling the M4 corridor.** It comprises an area of 28,500 hectares and a population of just over 140,000 residents. To the north of the M4, the area consists of mainly ex-coal mining valley communities with Maesteg as the main centre of population. To the south of the M4, the ex-market town of Bridgend is the largest town, the hub of the economy and its employment base. To the south west on the coast lies Porthcawl, a traditional seaside resort, with a high proportion of elderly residents, which is subject to a major influx of tourists during the summer period.

**Cardiff is the capital city of Wales and is continuing to grow faster than any other capital city in Europe.** In population terms, it is the largest city in Wales with a population of 360,000. Measures of population however, belies Cardiff's significance as a regional trading and business centre. The population swells by approximately 70,000 daily with commuters and visitors. Cardiff is the seat of government and the commercial, financial and administrative centre of Wales. Cardiff boasts one of the most vibrant city centres in the UK and on a typical weekend, Cardiff's night time economy can attract over 40,000 people and sometimes more than 100,000 when the City's Principality Stadium hosts international events.



**The Vale of Glamorgan is bounded to the north by the M4 motorway and to the south by the Severn Estuary.** It covers 33,097 hectares with 53 kilometres of coastline, and a population of over 130,000 residents. The area is predominantly rural in character, but contains several urban areas of note such as Barry, Penarth, Dinas Powys and the historic towns of Cowbridge and Llantwit Major. Barry is the largest town, a key employment area and popular seaside resort. The rural parts of the Vale provide a strong agricultural base together with a quality environment, which is a key part of the area's attraction. The area includes Barry Docks area and Cardiff International Airport.



## 1.5 Access to service

The Service is currently accessed and delivered through 4 main delivery points across the region. The new service functions are delivered from a mix of customer-facing “satellite” offices located in each Council area and from three main office hubs. These locations have been established in each of the three council areas to provide customer services on a local basis and also provide work spaces for employees of the service to work from. Where necessary the service provides an out of hours facility for certain functions. Work on developing and agreeing a detailed accommodation brief has been completed and significant progress has been made implementing the plan which ensures ease of access to the service to meet diverse needs within each local authority area and includes arrangements for telephone, on-line and face to face access whilst at the same time exploring opportunities for efficiency savings.

### Current Service Delivery Points

SRS.wales  
Tel: 0300 1236696



<http://www.srs.wales>

#### Bridgend

---

Civic Offices  
Angel Street  
Bridgend  
CF31 4WB

**Normal offices hours:**  
Monday to Thursday: 8.30am to 5.00pm  
Friday: 8.30 am to 4.30pm

#### Cardiff

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Level 1  
County Hall  
Cardiff  
CF10 4UW

**Normal office hours:**  
Monday to Thursday: 8.30am to 5.00 pm  
Friday: 8.30am to 4.30pm

City Hall  
Cardiff  
CF10 3ND

#### Vale of Glamorgan

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Civic Offices  
Holton Road  
Barry  
CF63 4RU

**Normal offices hours:**  
Monday to Thursday: 8.30am to 5.00pm  
Friday: 8.30am to 4.30pm

## 1.6 Staff resources

Our organisational structure focuses upon generic working and the development of multi-disciplinary officers, while retaining the capacity to develop specialist professionals. The structure allows the deployment of people in different ways enabling the service to offer income-generating services that complement the more traditional services. The Service operates across 3 distinct sectors:-

**Commercial Services** ensure that businesses comply with a host of consumer and public protection requirements in areas such as food safety, health and safety at work, trading standards in retail premises, communicable disease and port health. This function is populated in the main by professionally qualified Commercial Services Officers and Technical Officers. Our original structure sought to change the balance of Commercial Services and Technical Officers so that more use was made of Technical Officers. This sought to enable professionally qualified officers in environmental health and trading standards to focus on the more complex issues and Technical Officers, with appropriate levels of qualification and competence, to fulfil a monitoring and 'triage' role supporting the Service undertaking inspections, compliance checks and providing information and issuing alerts to more qualified officers if they identify major non-compliance issues. This concept is now under review given the changes in food law.

**Neighbourhood Services** deals mainly with activities relating to residential premises or those that have an impact on the local community such as housing in the private rented sector, noise and air nuisance and licensing. This function consists of multi-disciplined and professionally qualified Officers known as Neighbourhood Services Officers and Technical Officers who deal with both Pollution and Housing issues. This move towards more generic working provides greater resilience to service provision across the three areas. The Licensing function retains local distinctiveness and governance arrangements within the three authorities, however opportunities have been taken to reduce the number of team managers to two across the three areas with enforcement managed by two Senior Enforcement Officer across the region.

**Enterprise and Specialist Services (ESS)** is the most diverse of the services and incorporates discrete specialisms such as air quality monitoring and management, contaminated land, pest control, animal welfare, major investigations, safeguarding, the Wales Illegal Money Lending Unit, our Industry team and the Business Support function. There is an intentional overlap of service provision between other sectors of the Shared Regulatory Service; this creates flexibility and resilience across all teams so that resources can be shared should the need arise, for example, the Major Investigations Team supports the whole of SRS in investigating and enforcing significant breaches of legislative requirements. ESS has a role in generating income, managing the UKAS Metrology Laboratory, delivering training and assessing the potential for higher accreditation levels to attract additional business, engaging in Primary Authority partnerships and developing paid for advice services. The Business Support function provides centralised administrative support to the whole service and has a presence in all three areas at local contact points providing the main customer interface for the Service.

# 2. Service aims & Strategic Priorities

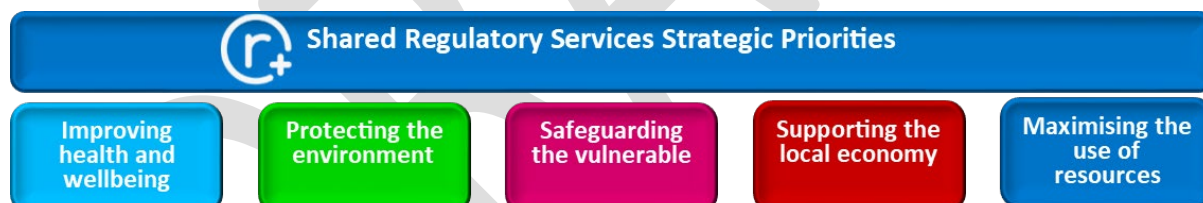
## 2.1 Vision, strategic priorities and aims

Shared Regulatory Services plays a key role in delivering the aspirations and priorities of Bridgend, Cardiff and the Vale of Glamorgan Councils through the delivery of a wide range of services. We have developed a vision supported by a set of strategic priorities that sets out our ambition of being a progressive and innovative organisation. This allows us to deliver high quality, customer focussed services that safeguard the environmental, social and economic wellbeing of our citizens.

Our vision:-

***To be the leading provider of regulatory services that safeguard the health, safety and economic wellbeing of the region***

As a regional organisation providing regulatory services across three local authority areas, we place the **corporate priorities** and outcomes of the three councils at the heart of all that we do (see table 1). In developing our own strategic priorities for Shared Regulatory Services, we have considered the priorities and desired outcomes of all the three authorities, together with the needs and aspirations of our partners and customers so they translate into priorities that meet local needs.



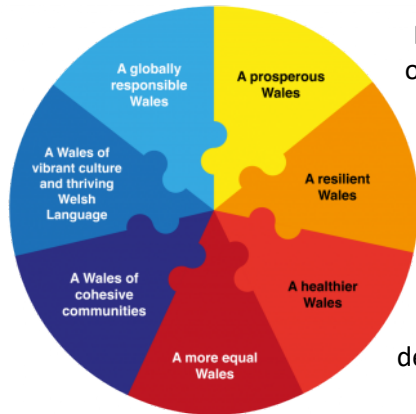
Supporting these strategic priorities, are a number of outcomes that the Service aims to deliver and which are evidenced throughout this Business Plan. Our vision and outcomes will be achieved through the following primary aims:

- Understanding the needs of our customers and placing their needs at the heart of the services we deliver;
- Developing a flexible and agile workforce that is responsive to change and that have the right skills to deliver quality services that meet the needs of our customers and local communities;
- Maximising internal efficiencies to enhance service quality;
- Exploring opportunities to innovate and develop, and
- Working together to future proof the service to meet financial challenges and future demands.

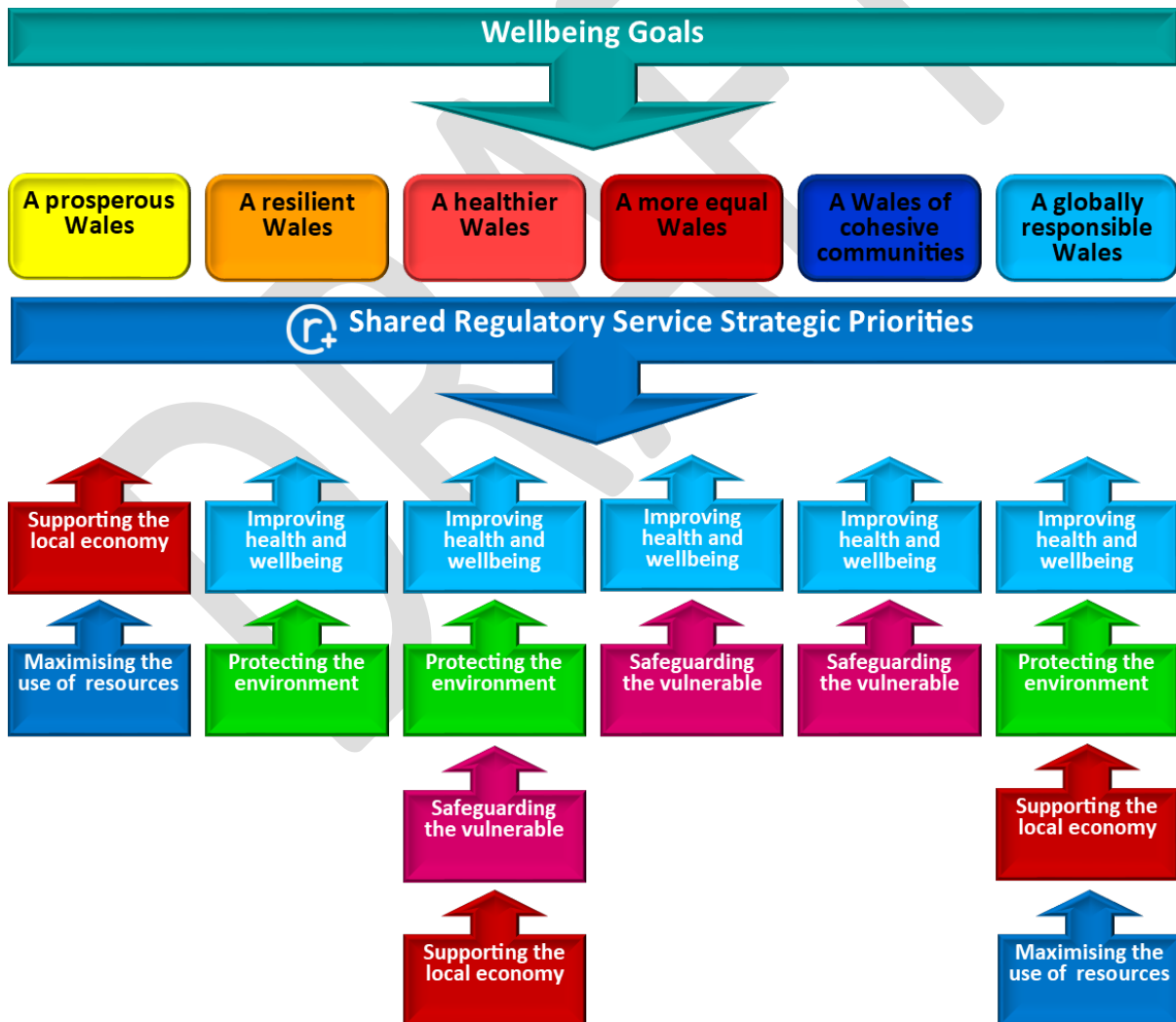
Nationally the service also contributes to the **National Enforcement Priorities for Wales** for local regulatory delivery which highlight the positive contribution that regulatory services, together with local and national partners, can make in delivering better outcomes, i.e.

- Protecting individuals from harm and promoting health improvement;

- Ensuring the safety and quality of the food chain to minimise risk to human and animal health;
- Promoting a fair and just environment for citizens and business;
- Improving the local environment to positively influence quality of life and promote sustainability.



Furthermore, the [Wellbeing of Future Generations Act 2015](#) sets out seven wellbeing goals to which public bodies, including local authorities, are expected to maximise their contributions. The goals provide a framework for focussing work on outcomes and delivery for the long term wellbeing of Wales. Shared Regulatory Services' core business activities, outcomes and strategic priorities are inter-related and make a significant contribution to these wellbeing goals. How Shared Regulatory Services contribute to these goals through its priorities is demonstrated below.



## 2.2 Corporate priorities and outcomes of partner local authorities

### Bridgend County Borough Council



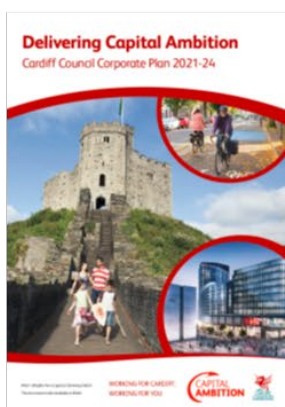
#### Priorities

- Supporting a successful sustainable economy
- Helping people and communities to be more healthy and resilient
- Smarter use of resources

#### Outcomes/Aims

- Improve learner outcomes
- Growth and prosperity
- Developing and enhancing community support and services
- Build resilient communities
- Better health and well-being
- Transforming the Council's estate
- Areas of corporate change
- Decarbonisation and environmental sustainability

### City of Cardiff Council



#### Priorities

- Cardiff is a great place to grow up
- Cardiff is a great place to grow older
- Supporting people out of poverty
- Safe, confident and empowered communities
- A Capital City that works for Wales
- Cardiff grows in a resilient way
- Modernising and integrating our public services
- Managing the Covid-19 pandemic

#### Outcomes/Aims

- Cardiff is a great place to grow up
- Cardiff is a great place to grow older
- Supporting people out of poverty
- Safe, confident and empowered communities
- A Capital City that works for Wales
- Cardiff grows in a resilient way
- Modernising and integrating our public services
- Managing the Covid-19 pandemic

### Vale of Glamorgan Council



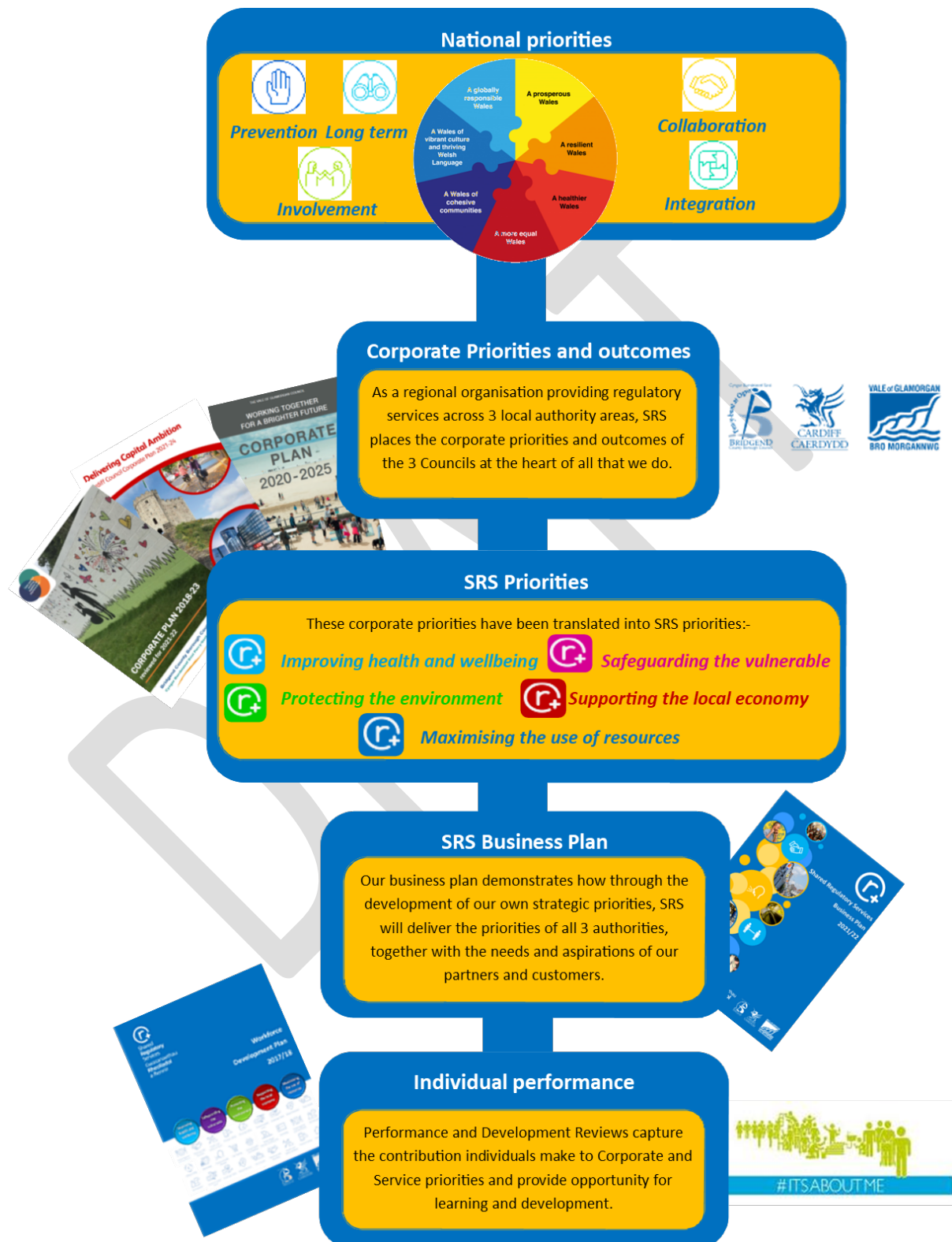
#### Priorities

- To work with and for our communities
- To support learning, employment and sustainable economic growth
- To support people at home and in their community
- To respect, enhance and enjoy our environment

#### Outcomes/Aims

- Inclusive and Safe
- Environmentally Responsible and Prosperous
- Aspirational and Culturally Vibrant
- Active and Healthy

## 2.3 Delivering our vision, aims and priorities





# 3. Challenges

Delivering a service across three local authority areas is an exciting but challenging role. In this context, we define challenges as new or demanding events that will require additional effort and determination to manage successfully; something that goes beyond our existing norms. Understanding the challenges ahead is therefore crucial to delivering the vision set out in section 2.

Even after six years, the Service continues to balance the development of a new and innovative operating model along with the expectation of delivering “business as usual”. There are many factors crucial to our success and the following information demonstrates the actions for the Service in 2021/22, and our risk management approach (Appendix 1).

**Delivering the SRS in the future** - We are delivering the SRS with a reducing resource. For example, our move toward the Intelligence Operating Model will mean delivering our services using a risk based approach to our activities, where appropriate. We have to examine and introduce new ways of prioritising our services which may result in a reduction in service provision, or the charging for some services and difficult decisions about the level of service provision. These efforts will help reduce the impact of reduced funding, but maintaining performance in light of the latest budget cuts may affect the service ability to maintain performance at existing performance levels. We will however seek to measure activities and outcomes to ensure performance is managed effectively and in a meaningful way.

**COVID-19** - The unprecedented challenges posed by COVID-19 has seen officers adjust to altered work and personal routines, not to mention coping with the uncertainty and anxiety we all face for our own health. In the short term, we will continue to focus our regulatory efforts principally on the most urgent issues facing the region and the public as a result of this health crisis. Taking regulatory action in the near term not related to the demands created by COVID-19 would need careful consideration with each potential risk being assessed on potential to cause harm. We will go forward pragmatically, considering whether to take regulatory action outside of that called for by the current dire and pressing public health crisis and its ramifications. As Government unwinds the temporary measures that have been put in place and SRS will need to find a way to return to “normal”. (RR1)

**Managing complex financial processes** – Managing resource in the Service is complex, but critical. Understanding the cost of providing a service funded through three local authorities is fundamental. Crucial to this is reflecting the provision of ‘core’ services that are consistently applied across all three areas and ‘authority specific’ services that are those that are specific to one or two authorities so that finances are understood. (RR2)

**ICT** – The success of Shared Regulatory Services is in part due to embracing the opportunities presented by technical and mobile working solutions. Agile working has become the norm for the service yet, through staff consultation sessions, our officers tell us that the technology currently deployed is becoming outdated. Research indicates that better facilities now exist and the SRS will work with officers and ICT to understand the benefits of exploiting these newer technologies to ensure that our officers can continue to operate as efficiently as possible within financial constraints. (RR3)

**Learning and development** – We have always committed to the resourcing of training to develop people within the organisation to ensure competency within their roles. Our focus has been more toward the immediate needs of officers to enable delivery of our five priorities. Perhaps more important now is the development of a longer term strategy for recruitment and retention. Our recent budget reductions caused a number of people to secure positions elsewhere and we now face a skills gap akin to that of 2015/16. We have not yet achieved a point where the Workforce Plan drives SRS development activities. The creation of a recruitment strategy and the development of

retention “initiatives” will be a key target for SRS management during 2021/22. We know people enjoy working in the SRS; our recent appointment of students through Covid shows us that people will join the SRS, our goal must be to retain our officers and ensure they achieve the job satisfaction that underpins service excellence. (RR4)

**Remaining relevant to the three Councils** – The creation of SRS delivering services across three local authority areas resulted in the transfer of the administration of services and staff to the Vale of Glamorgan Council who act as the host authority for the Service. The Service, although jointly funded by the participant authorities, also has a single consistent identity and branding which is not associated with any one Council. Notwithstanding this, the Covid-19 pandemic and the key involvement of SRS in TTP and the enforcement of Coronavirus Regulations has put the service in the spotlight but we will still need to actively promote the Shared Regulatory Service and the important services we provide across the three Councils to ensure their continuing support for the venture. (RR7)

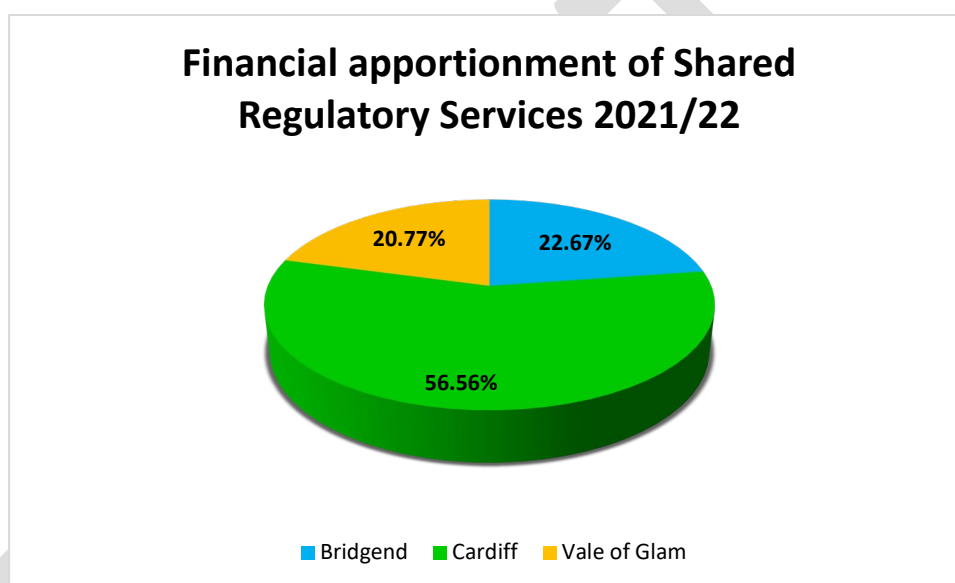
**New legislation** – The implementation of new legislation and any requirements imposed by such legislation can place additional burdens on the Service. It requires new processes to be developed, awareness raising to be undertaken with stakeholders, staff training and additional inspections etc. Generally new requirements can be planned for and effectively resourced, for example the Public Health (Wales) Act and the Public Health (Minimum Price for Alcohol) (Minimum Unit Price) (Wales) Regulations, however, it is not always easy to predict the impact that new legislation may have on resources, as the last 12 months has shown. We are prepared to adapt the Service accordingly to ensure businesses can continue to function and consumers are not disadvantaged. The great uncertainty is the quantum of change and the unknown time scales within which that change must take place. (RR5)

**Out of Hours** - The SRS operates an “out of hours” duty rota to enable the service to respond to incidents that arise outside normal office hours. These responses include responding to nuisance calls relating to burglar alarms, food incidents, etc. To date, officers have operated the rota on a voluntary basis across the service. However, the number of officers willing to participate in the rota is reducing to the extent that the service delivery is becoming uncertain. Coupled with this has been the success of the Joint Enforcement Teams which has raised stakeholder expectation. SRS management need to understand the consequences of that success and review this position and put forward options for these aspects of the service. (RR6)

# 4. Budget

## 4.1 Financial allocation

Bridgend, Cardiff and the Vale of Glamorgan Councils fund Shared Regulatory Services jointly through an agreed formula. 2021/22 represents Year 7 of the SRS. As a direct consequence of the impact of Covid-19 on the service, no savings were required in respect of 2021/22. In this financial year, we will reflect upon the likely need for budget reductions and begin discussions with the partner Councils for the next three year period. The methods of apportionment for operating the core service and the cost contribution percentages are set out in the Joint Working Agreement and based upon the population of each Council. This will not revise the bottom line position of the budget. There are also arrangements in place to deliver “authority specific” services to individual partner Councils.



## 4.2 Resource Implications (Financial and Employment)

The following table summarises the gross expenditure budget for the Service.

SRS Gross expenditure budget 2020/21			
Area	Core £'000	AS £'000	Total £'000
Bridgend	1,347	430	1,764
Cardiff	3,360	1,452	4,853
Vale of Glam	1,234	508	1,714
Total	5,941	2,390	8,331

The budgets detailed above summarise the overall budget contribution agreed by each of the partner authorities. Each contribution consists of two elements – core and authority specific services.

Core services are those functions common to the partner authorities as they share statutory responsibility for the activity, such as trading standards. Core service costs are then pooled and recharged to the partner authorities based on the relative population split within the three authorities.

Authority specific budgets such as Licensing are unique to each partner authority and it is the sole responsibility of each authority to fund its own provision.

The approved authority specific services are as follows:-

Bridgend	Licensing Kennelling & Vets Costs Empty Homes
Cardiff	Licensing Additional HMO Licensing at Cathays & Plasnewydd Empty Homes Night time Noise Port Health Student Liaison
Vale	Licensing Kennelling & Vets Pest Control Burials

Both core and authority specific services are recharged to partner authorities inclusive of a management charge, which incorporates management, admin and hosting costs. These include the provision of a multifunctional admin team, professional support in the form of finance, IT and HR, together with the senior management within the Shared Regulatory Service.

The budget is monitored quarterly via the Management Board and Joint Committee and the details of such monitoring form part of the quarterly update reports, available at the websites of each partner Council.

## 4.3 Maximising resources

Our goals of supporting the local economy and maximising resources now challenge us to operate in a more commercial and entrepreneurial way. For our business customers, we aim to deliver high quality technical services. We have created an environment that allows us to focus upon supporting local enterprises enabling them to operate successfully in an increasingly competitive business environment.

Our agile working practices allow our specialist officers to use technology to deliver improved productivity, efficiency savings and better customer service. Furthermore, these practices provide opportunities to reduce the accommodation footprint of the Service across the region, reducing

operational costs. As we generate additional income, we will enhance service delivery and ensure resilience in the SRS moving forward.

The removal of the traditional professional silos means that officers are part of joined up multi skilled teams and have better understanding of our internal processes and the needs of our customers. The reshaped SRS will continue to eliminate unnecessary bureaucracy and simplify processes; we will harmonise practices wherever possible and achieve efficiencies by doing things once (and not three times as happened in the legacy organisations).

Understanding the costs involved in providing services is crucial. We review regularly SRS fees and charges across the three authorities to ensure we know what it costs to provide services and ensure that we recover those costs where possible.

We listen to our customers and stakeholders to identify their needs and expectations. We seek to develop our services so they are easier for customers to access and are more effective and cheaper. We believe that better engagement will help us make better decisions and consequently deliver better outcomes.

We recognise the need to understand, measure and manage our performance across the Service. We continue to work on developing our measures so that we will eventually have a suite of measures that ensures performance is managed effectively and in a meaningful way, and that we are having a positive impact on those customers that interact with us.

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# 5. Workforce Development

Operating a Shared Regulatory Service across three distinct areas presents many challenges for the Service and its workforce. We aim to use our Workforce Development Plan to ensure our officers have the right mix of experience, knowledge and skills required to fulfil our goals. Our Plan illustrates how we want to encourage and support our officers to develop new skills and work in different ways. Investing in people is a fundamental element of our maximising resources priority.

The Workforce Development Plan provides a framework to blend:-

- Organisational culture
- Leadership and management
- Core skills
- Recruitment, retention and progression
- Communication and employee engagement
- Employee performance management

Continued Professional Development (CPD) is actively encouraged and officers are offered opportunities to attend a wide range of training courses, seminars, meetings and briefings to help maintain competency and improve technical, legal and administrative knowledge. In addition, 'in house' technical training days support cross discipline training and increase awareness of related enforcement activities. The service has continued to provide legal competence training for officers along with a number of professional development courses. While this is a cost effective way of increasing the skills base of our workforce, perhaps the greater consequence is the potential to forge a stronger team.

The SRS Staff Survey undertaken in early 2020 sought the views of employees on a number of work place themes including learning and development. Results were generally very good and showed a good level of improvement from the last survey undertaken in 2018. There was, however, one area of people development that, whilst still a good result, was identified as an opportunity for improvement. It will therefore be important during the forthcoming year, to ensure that personal development is actively encouraged through the performance review process and through the provision of suitable development opportunities linked to SRS business objectives.

We intend our workforce plan to drive our organisational development, both through preparing us for the future by being able to forecast likely challenges and by a more effective process of talent identification, identifying skill gaps, and retaining our officers within the organisation.

## 6. Turning actions into outcomes

We continue to work to integrate our vision, priorities, outcomes and our primary aims and our performance to provide a comprehensive picture of the work the service undertakes and the positive impact it makes.

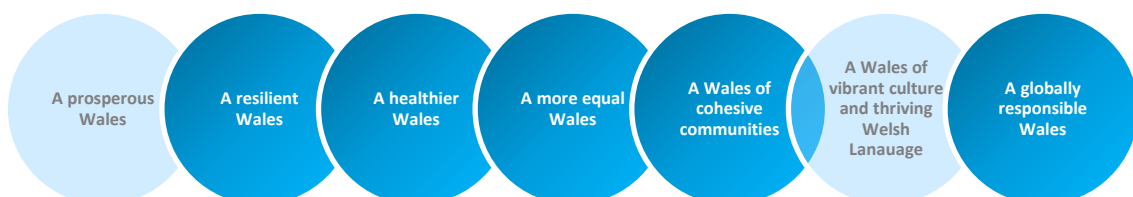
The following section of this Business Plan brings all these different elements together in order to highlight our achievements and performance during the last year together with the actions we aim to undertake in 2021/22 to deliver our priorities. This framework will be continually reviewed to ensure it remains relevant and meaningful to stakeholders.

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# Improving health and wellbeing



In addition, our outcomes also contribute to the following wellbeing goals:-



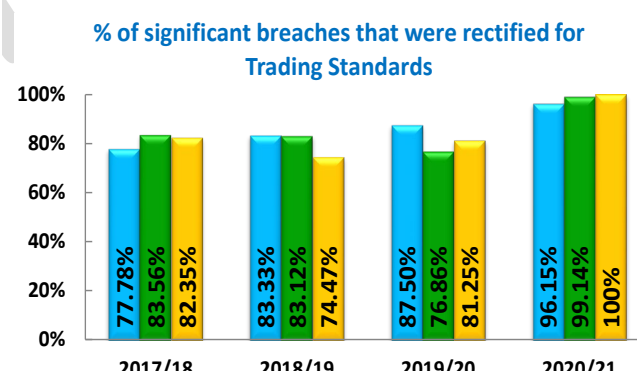
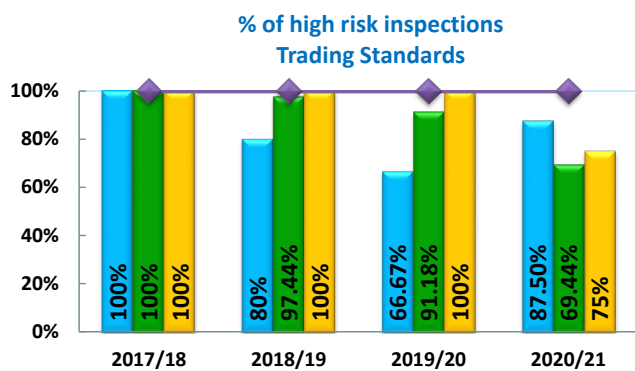
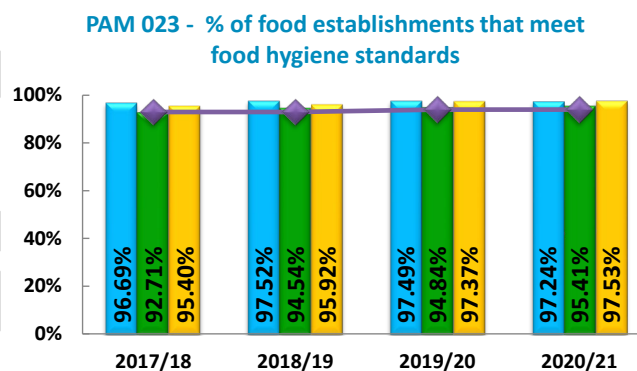
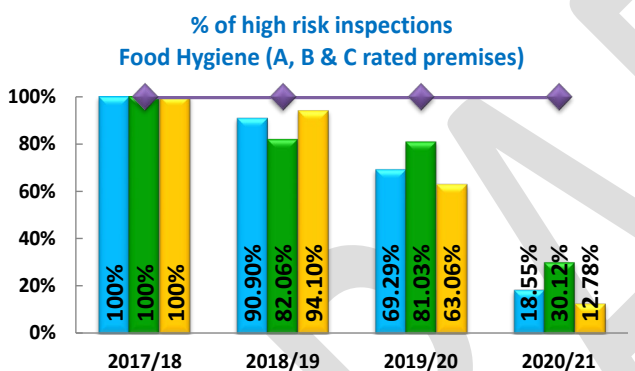


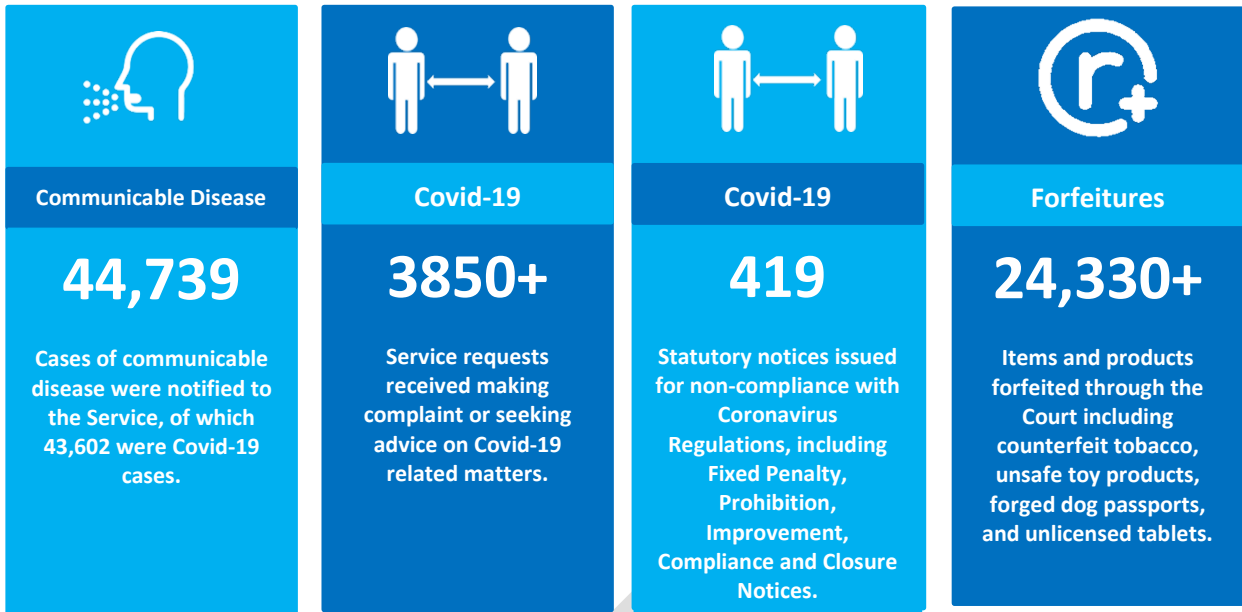
# 6.1 Improving health & wellbeing

## Introduction

Improving health and wellbeing is a key priority for Shared Regulatory Services. The Service delivers a diverse range of services to businesses, consumers and residents many of which are “taken for granted”. Their contribution toward our stated outcomes, and their impact upon communities, should not be overlooked. Work undertaken to ensure that food, from farm to fork, is safe, that infectious disease, noise and air emissions are controlled, that risks in the workplace are managed properly, allows people to live in healthy environments. Add to this our activities to ensure the quality of private rented property, the promotion of a safe trading environment and our regulation of licensed premises to ensure they operate responsibly and it is evident that the work undertaken by the SRS is hugely important to the health and wellbeing of the region.

## How we performed





% of private rented properties and HMOs improved through the removal of category 1 hazards 2019/20			
	Bridgend	Cardiff	Vale of Glam
Total no. of assessments which contain category 1 hazards	22	307	34
No. of HMOs and non HMOs where all category 1 hazards have been resolved as a result of local authority action.	11	103	23
% Total resolved	50%	33.55%	67.65%

## What we have achieved



### The Food chain is safe and free from risks

**Increase in businesses that are broadly compliant** - The number of food businesses with a food hygiene rating of more than 3 increased once again in Cardiff and the Vale of Glamorgan, while Bridgend stayed at a similar high level to the previous year. (Bridgend 97.24% Cardiff 95.41 % and Vale of Glamorgan 97.53%). The results show a positive upward trend, year on year, exceeding targets and highlighting the growing number of businesses that are improving their standards, which can be attributed to the success of the intervention programme for food businesses. That programme ensures that any food safety issues identified are followed up by either enforcement, advice or training and subsequently revisits to ensure compliance with food safety law.

**Prosecutions** – SRS is committed to enforcing the laws we regulate, instigating legal proceedings against those businesses or individuals that flout the law. During 2020/21, the service successfully

prosecuted a number of individuals/businesses in relation to food offences and the following cases showcase a few selected examples.

- **Cardiff restaurant and takeaway fined for numerous food hygiene offences** – During a routine inspection of a restaurant and takeaway, inspecting officers discovered a significant infestation of cockroaches which led to the premises voluntarily closing. Numerous follow up visits were conducted however cockroach activity remained and no improvements were observed. The business was issued with a food hygiene rating of 0 and a prosecution instigated for numerous offences. The court considered committing to the Crown Court due to the seriousness of offences however the case was heard at the Magistrates Court where both owners received fines of £4000 and £3000 and ordered to pay costs of £350 and a victim surcharge of £181.
- **Cardiff restaurant owner received suspended prison sentence for food hygiene offences** – In another case, an inspection of a business in Cardiff officers found mouse and insect infestation throughout the ground floor and basement of the premises and no food hygiene management system in place and food being repackaged in the basement. Remedial notices were issued which were subsequently breached. The case was committed to the Crown Court for sentence and the judge considered the defendant's culpability in respect of each offence was very high. The judge subsequently sentenced the owner to 6 months imprisonment for the food hygiene offences and 8 months imprisonment for breaches of the Remedial Notices to run concurrently and suspended for 2 years. Costs of £500 were awarded and a victim surcharge was applied of £140.

**Port Health and infectious disease** – During 2020/21 significant engagement was made with the relevant stakeholders at the seaports of Cardiff and Barry and Cardiff International Airport to ensure that enhanced measures and controls were implemented to minimise the risk of importation of Covid-19 and its onward spread. This included the need to secure procedures to address the notification of any illness in passengers or crew, the display of relevant informative posters, announcements to passengers and the monitoring of vessel and aircraft movements. The enhanced measure denied vessels to berth, or aircraft outside the common travel area to disembark, until a declaration of no illness on board was submitted to the Port Health Authority.

During the last year a total of 325 ships and 421 flights arrived that required checks to be made. Crew changes were overseen including one British crew with COVID symptoms requiring to disembark at the seaport of Barry to self isolate. Additional measures were also required to be considered for a compassionate flight to Wales to visit a terminally ill person, and suitable arrangements were made for a returning traveller who had been in South Africa and needed to self isolate in a local hotel. Furthermore 11 investigations were undertaken in relation to flights arriving into Cardiff International Airport to establish contacts of a positive case travelling on the plane during the infectious period.



## Risks in the workplace are managed properly

**Shooting Club fined for Health and Safety offences** – Following an incident whereby a tree branch had fallen in high winds striking 2 teenagers whilst they participated in a paintballing day, investigations were conducted by SRS Officers. This led to a successful prosecution in the courts for

failing to ensure so far as reasonably practicable, that the health and safety of persons not in their employment were not exposed to risk associated with falling trees, falling tree limbs and branches whilst trading as a paintball leisure activity. The courts found there to be a high degree of culpability resulting in fines of £4000 and costs of £10,000.

**Food business owner sentenced to imprisonment** – In another case, SRS received a referral from South Wales Fire and Rescue about carbon monoxide fumes emanating from the defendant's commercial food business and into a residential property directly above. The Fire service had been called out by one of the residents and detected elevated readings of carbon monoxide in the flat, in addition to the adjoining property. In their professional opinion the high readings were as a direct result of the charcoal grill used in the rear kitchen of the restaurant. Although the defendant agreed not to use the grill, SRS officers when visiting the premises found the grill to be lit and in use so a Prohibition Notice was served. Considerable assistance was provided by SRS officers to find a competent engineer to assess the existing ventilation system and carry out all necessary modifications, but during subsequent visits, the defendant was discovered using the grill in breach of the Notice. As a result proceedings were instigated for offences under the Health and Safety at Work etc, Act 1974 for failing, without a reasonable excuse to comply with the requirements of the Prohibition Notice. In sentencing the District Judge accepted culpability was very high and that the defendant deliberately and repeatedly flouted the law putting profits above the safety of residents. The defendant was sentenced to 12 weeks imprisonment to run concurrent on all the charges.



## Infectious Disease is controlled and prevented

**Test, Trace and Protect** – The commitment made by SRS during the year to support the Test, Trace and Protect Scheme (TTP) has been hugely significant. Senior officers have been at the heart of the TTP initiative from the outset working across the two health boards while 30+ officers have been redeployed at various times of the year to work on the scheme. This has involved the tracing of people who have tested positive for Covid-19 and linking with health professionals to identify trends and incidents to restrict the spread of the disease. During the year incidence rates were closely monitored so that the SRS input into TTP could be tailored accordingly. This allowed demand to be met during spikes in the number of cases and during the second wave of the pandemic, while at the same time allowing the flexibility for staff made available to TTP to devote time to their substantive roles during quieter times.

**Communicable Disease** – The work of the Communicable Disease Team during the last year was impacted considerably by the Covid 19 pandemic, where 44,739 cases of communicable disease were reported, 43,602 of which were cases of Covid 19. This was a massive increase on the 2149 cases received in 2019.

642 communicable disease outbreaks were investigated and managed (last year there were 85), 636 of which were related to Covid 19 with the 2 most common settings being schools and care homes. Furthermore 4550 confirmed cases of Covid 19 in care and educational settings were escalated to the regional response team from Test, Trace and Protect.

The last year has seen a decline in the number of suspected food poisoning cases and this can be attributed to the Covid-19 pandemic which saw commercial food businesses close or revert to takeaway food only for a large part of the year. The re-opening of food businesses also required measures to be put in place to prevent the transmission of the virus which resulted in reduced

numbers of customers visiting premises. A similar decline was seen in cases of Campylobacter which is the most common causative pathogen after Covid 19. It is thought this decline was once again as a result of the Covid 19 pandemic where less people were presenting themselves to GP surgeries, making less visits to commercial food businesses, less social gatherings and people were washing their hands and using hand sanitiser more frequently. The number of other pathogens of public health significance also declined during the year for similar reasons but the reduced contact between individuals in different residences reduced person to person transmission of cases such as Giardia and Cryptosporidium, and the closure of swimming pools and petting farms would also have contributed to the reduction of Cryptosporidium, particularly as these are common sources of the parasite.

**Covid 19 Enforcement** -- When the UK was put into lockdown in March 2020 it became the responsibility of SRS to enforce the Health Protection (Coronavirus Restrictions) (Wales) Regulations across the region. As a consequence SRS officers have throughout the year undertaken 4500+ visits to businesses to establish if restrictions are being complied with and to offer guidance and advice. These visits included checks to ensure those businesses that were required to close, were closed, that adequate social distancing measures and signage were in place and that hand sanitiser was made available. If it was found that businesses were failing to meet the regulations, statutory notices were issued compelling businesses to comply. In total SRS officers issued 419 such notices for non-compliance across the region, including Closure Notices, Improvement Notices, Prohibition Notices, Compliance Notices and Fixed Penalty Notices depending upon the current regulations in place at the time. Two prosecutions were also instigated during the year. As regulations changed, and case numbers increased, SRS put in place a reciprocal commitment with South Wales Police to form three Joint Enforcement Teams (JET) undertaking coordinated enforcement activity in a range of sectors across each of the three local authority areas. These teams made up of SRS officers and colleagues from each of the 3 local authorities focus upon engaging with business, encouraging compliance and most recently upon ensuring that returning travellers observe the isolation requirements.

Covid enforcement has been challenging, not least because of the changing regulations throughout the year, which officers, and businesses, were required to be conversant with. In addition, as restrictions continued, the attitude displayed towards officers by some individuals changed resulting in officers being abused and harassed. Going into 2021/22, the pandemic and the resultant restrictions are still with us, and the JET teams will be continuing their enforcement work for the foreseeable future.



## Noise and Air Emissions are controlled

**Increase in noise and air complaints** – 2020/21 saw an increase in noise and air complaints with numbers increasing from 5053 in 2019/20 to 5892 in 2020/21. This was largely due to lockdown restrictions in the early part of the year when people were spending more time at home and enjoying the unusually good weather. Furthermore the service also saw an increase in the number of complaints regarding smoke from bonfires which was particularly concerning due to the respiratory effects of Covid. SRS adjusted correspondence to include information stressing the

importance of controlling these emissions and issued joint messaging from the South Wales Police and through social media.

**Noise Prosecutions** – The last year saw 3 successful prosecutions against individuals for noise offences. One defendant was found guilty of 2 offences under the Environmental Protection Act 1990 in respect of loud music and shouting and fined £440, costs of £180 and a victim surcharge of £44, while another was found guilty of 5 offences for failing between September 2019 and December 2019 to comply with a noise abatement notice and fined £660 with costs of £200 and victim surcharge of £32. In the third case 2 individuals pleaded guilty for breaching 2 noise abatement notices for loud amplified music and shouting. Both were given conditional discharges for 12 months and order to pay costs of £180 each. In the third case, the defendant



## A safe trading environment is maintained

**Face masks and hand sanitiser** – In response to the Covid-19 pandemic, officers from SRS have provided advice and assistance to the 3 partner Councils by testing and providing practical support in assessing product certification of hand sanitisers and face coverings. 60 samples of hand sanitisers (31 different brands) were submitted in total for testing 27 of which tested unsatisfactory. This was due to labelling information and/or did not comply with the minimum alcohol content required for hand sanitiser to be effective in destroying Covid-19. As a result of sample failures in respect of misleading claims and labelling, 2280 litres of one brand of non-compliant hand sanitiser was seized by the department and an investigation is going. In addition to hand sanitiser, the service also tested 17 masks from different retailers and procurement teams to assess whether they met relevant safety standards. 14 of these masks failed tests with 11 of these failures were labelling issues only, 3 of which failed on more serious matters.

**Car Trader fined or exposing unsafe vehicles for sale** – Following receipt of a number of complaints about trading practices, officers from SRS visited the car trader business to provide guidance and advice. Subsequently a further inspection was carried out together with a vehicle examiner. A number of breaches were identified in terms of the way the vehicles were described and that material information was omitted from adverts. As a result of the check made by the vehicle examiner, six vehicles were deemed to be exposed for sale in an unsafe condition and suspension notices under the General Product Safety Regulations were issued on those vehicles and proceedings instigated against the business. These proceedings were concluded in 2020 resulting in the company being fined £2000 and ordered to pay costs of £500 while the trader was fined £800 and ordered to pay costs of £500.

**Trader fined for displaying for sale unsafe toys** – This case concerned the sale and supply of unsafe squishy toys which were being imported and supplied in Cardiff. An inspection undertaken by SRS officers at the defendants cash and carry business discovered a number of squishy toys on display for sale which were not labelled in accordance with toy safety legislation. Subsequent testing by the public analyst also confirmed the toys had failed the tension and small parts cylinder test as per British Standards. The defendants all pleaded guilty to offences under the Toy (Safety) Regulations 2011 and were each fined £2000, ordered to pay costs of £250 and a victim surcharge of £100.



## Licensed premises operate responsibly

**The Public Health (Minimum Price for Alcohol) (Minimum Unit Price) (Wales) Regulations 2019** came into force on 2 March 2020 in order to address alcohol related harm by varying the affordability of alcohol to protect the health of harmful and hazardous drinkers who tend to consume greater amounts of low-cost/ high-alcohol content products. Under this new law, it is an offence to supply alcohol below the applicable minimum price which is calculated according to the alcoholic strength of a product and the volume in which it is sold. The minimum unit price (MUP) for the purposes of calculating the cost of alcoholic drinks is £0.50. This is a novel piece of legislation for the trade with penalties for failing to comply ranging from a £200 fixed penalty notice to a maximum fine of £1000 if the matters proceeds to court. In order that the trade is fully aware of the requirements of the law, Welsh Government is funding SRS officers to visit the 650+ off-licensed premises across the region.

A programme of visits to these premises began in March 2020, however the impact of the Covid-19 pandemic resulted in further visits being delayed until later in the year. Notwithstanding this the service inspected 350 retail premises across the SRS region to check compliance, of which 26 of were identified as selling alcohol below the minimum unit price and issued with a warning and guidance to future compliance. This programme of visits will continue into 2021/22 and intelligence received from these visits will be used to target those outlets failing to comply or where advisory support is required.



## The quality of private rented property is improved

**HMO Licensing** - HMOs often present the worst physical and management standards, as well as having a detrimental impact on the neighbourhoods in which they are situated particularly in relation to street scene. Despite the significant impact of the Coronavirus pandemic on the work of the service, the Cardiff Housing Enforcement Team took 4 successful prosecutions in Cardiff during 2020/21 comprising 33 separate offences including non-compliance with Housing Act notices and a variety of management offences in dangerous houses in multiple occupation. In addition to this enforcement work, the Housing Enforcement Team continued to provide a response and advice service dealing with over 2000 service requests of which just under 500 related to hazards in private rented housing and over 1000 in relation to housing related advice and guidance. Of particular concern and possibly linked to issues around lockdown restrictions were the number of complaints about potential nuisance or filthy and verminous properties which resulted in a number of particularly challenging works in default cases.



As less site visits were undertaken during the year, any evidence was obtained remotely, limiting officer options for enforcement action. However, where visits were undertaken, 114 Housing Act 2004 notices were served, of which 55 were formal actions, 14 Prohibition orders were served 6 of which were suspended because of the impact of making someone homeless during lockdown. Dealing with HMO licensing during the year posed significant challenges in terms of processing and approving applications due to the inability to inspect properties prior to issue, but despite this, 196 HMO licences were issued. The team continued joint working with Rent Smart Wales (RSW) to address problem landlords with a total of 15 landlord fit and proper person reviews and 2 letting agent audits completed and improvement action plans issued. RSW have also continued to make investigation referrals with 120 cases received including some Rent Homes Fee investigation cases. Significant work has also been completed to robustly defend multiple HMO licensing appeals at Residential Property Tribunal where ten cases were successfully defended in the Council's favour.

**Cardiff Landlord fined for failing to disclose information** - In this case, a private landlord in Cardiff who owns several properties and manages properties for family members applied for a number of properties to be licensed by the SRS as Houses of Multiple Occupation (HMO's). As a consequence these properties were required to be inspected to ensure they complied with current legislation under the Housing Act 2004. To enable this, officers required information to be provided by the landlord/owners but the landlord was not voluntarily forthcoming with the required information. A number of formal notices were served on the landlord requiring him to complete and return the required information within the stipulated time, which he failed to do so. The landlord was subsequently prosecuted, pleading guilty to offences under the Local Government (Miscellaneous Provisions) Act 1976 for failing to disclose information when requested to do so. He was fined a total of £5040, ordered to pay costs of £800 and a victim surcharge of £181.

**Cardiff landlord fined following complaints about property condition** – This case concerned complaints from tenants of a ground floor flat in Adamsdown, Cardiff. A visit from officers of the SRS discovered a number of failures on behalf of the landlord including failure to supply an adequate fire alarm system, failure to provide adequate structural fire protection and satisfactory means of escape, failure to provide evidence of maintenance of gas and electrical installations and failure to eliminate or prevent damp. The landlord had also failed to provide information requested by officers and obtain the necessary licences. The defendant pleaded guilty to the offences and was fined £4100, ordered to pay costs of £1400 and a victim surcharge of £181.

**Illegal Evictions and pre-occupancy checks** - In Bridgend and the Vale of Glamorgan we investigated and gave advice regarding 10 cases of illegal eviction which allowed us to prevent the households from becoming homeless in the majority of cases. We also provided a valuable service to the Housing Solutions Departments by conducting pre-occupancy inspections of 8 properties. This was a greatly reduced number from previous years due to the Covid pandemic, however we were able to ensure that some of the most vulnerable persons accessing the private rented sector were able to live in properties free from Category 1 hazards which would have an impact on their health and safety.

Restrictions were put in place during the lockdowns experienced throughout 2020-21 to prevent landlords from evicting tenants and SRS Officers have given advice to both landlords and tenants regarding the implications of their tenancies.

## Emerging issues

**COVID-19** - The unprecedented challenges posed by COVID-19 has seen officers adjusting to altered work and personal routines, not to mention coping with the uncertainty and anxiety we all face for our own health. SRS has, and continues to play a key role in tackling the Covid crisis through its



involvement in Test, Trace, Protect, and the enforcement of the Coronavirus Regulations, which has required the service to adapt and re-prioritise the services delivered throughout the last year. As we look to the future, the position is looking more optimistic. Case numbers have lowered, people are being vaccinated and businesses are beginning to re-open, but the virus is still very much with us and we are still a long way from a return to 'normal'. This will require the service to continue to monitor the situation and adjust resources as circumstances change, which is likely to impact on our ability to deliver 'business as usual'.

**Backlog of programmed inspections** - Government restrictions on social distancing, non-essential travel and the closure of certain businesses to reduce the spread of Covid-19, resulted in routine inspections being suspended for a large part of 2020/21, with officers focussing on high risk premises only together with reactive complaints. Inspections of food businesses, for example, are normally programmed each year to ensure all businesses are inspected at regular intervals at a frequency relevant to the risk category of the business. The inability to inspect these premises has inevitably led to a backlog of programmed inspections, particularly in relation to 'C' rated and new business inspections where a backlog already existed pre-pandemic. Similarly the Private Sector Housing team have been unable to visit rental properties to carry out inspections as part of the HMO Licensing regime, only undertaking inspections where significant risks to the tenant are identified. While inspections to food businesses has now resumed, routine inspections to rental properties has yet to be resumed. It is envisaged that clearing the backlog of inspections will take a significant resource and take some time to complete.

**Food Standards Agency Recovery Plan** – In recognition of the backlog of inspections created as a result of the Covid-19 pandemic, the Food Standards Agency are currently developing a Recovery Plan to enable local authority food teams to identify and focus on those food businesses that are trading and pose the greatest risk to public health. Given the backlog that already existed pre-pandemic coupled with the backlog caused by the pandemic, it is envisaged that while the recovery plan is welcomed, the service will have difficulties in delivering the proposals, without additional resource. The service will however work with the FSA to ensure a risk based approach is adopted.

**New Food Businesses** – New food businesses are required to register with the service if a new business is planned, the nature of an existing business changes or if there is a change of ownership following the creation of new legal entities such as a new limited company, sole trader and partnership. All new businesses are required to be inspected and the Food Law Code of Practice requires that where possible, they be inspected within 28 days of opening. This requirement places a significant impact on the resources of the Food Safety and Trading Standards functions due to the large number of applications received. During 2020/21 1031 applications were received, 597 in Cardiff, 211 in Bridgend and a further 223 in the Vale of Glamorgan all of which are required to be inspected alongside the planned programme of inspections. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention.

**Exiting the EU** – Now that the UK has left the EU, SRS is keeping abreast with potential changes as they occur in order to be prepared for any eventuality. The United Kingdom's status as a "Third Country" to those that remain within the EU and the countries within the EU becoming "Third Countries" to the United Kingdom has resulted in changes to the import of products of animal origin. Imported products of animal origin and any higher risk products not of animal origin and any higher risk products not of animal origin must be imported through a Border Control Post. Currently neither the ports nor airport in the SRS region possess this status in relation to food, but it is anticipated that trade patterns may change in the future and potentially require an enhanced monitoring role for the SRS.

**Implementation of infection control measures directed by Public Health Wales at points of entry** – The impact of Covid-19 on travel has seen various restrictions imposed during the last year, which will no doubt continue into 2021/22 due to the continuing presence of the virus. While it is hoped that such restrictions will gradually be lifted as the Covid-19 outbreak comes under control within

the UK, the 'variants of concern' originating in other countries means that it is inevitable that additional control measures will be required to be implemented at Cardiff International Airport and Cardiff and Barry seaports which will be the responsibility of the port health officers to ensure are adhered to.

**Increase in 'cloud' kitchens** – 'Cloud' kitchens, also known as ghost kitchens, refers to food that is prepared at separate premises rather than a restaurant. This is a relatively new format, whereby orders are placed online, without the option for the public to enter the premises. While a number of these businesses are legitimate and regulated, others are operated out of home kitchens by people with no training and could be sold without clear information on ingredients and allergy information via social media platforms such as Facebook.

**Public Health (Wales) Act** – This new legislation brings together a range of practical actions for improving and protecting health by way of a number of new requirements that effect several areas of the SRS. Although not fully enacted, the legislation has already introduced a prohibition of intimate piercing of under 18s and now enables food authorities to retain fixed penalty notice receipts resulting from offences under the Food Hygiene Rating (Wales) Act. Over the coming years, different elements of the legislation will be introduced including a licensing scheme for special procedures such as acupuncture, body piercing, electrolysis and tattooing, and the restriction of smoking in areas such as school playgrounds and hospital grounds. In time, it will create a national register of retailers of tobacco and nicotine products and create a prohibition of handing over tobacco and/or nicotine products to a person under the age of 18 years. It is unclear when these additional elements will come into force due to delays as a result of the Covid 19 pandemic but it is anticipated that there will be a resource implication associated with this. The scheme aims to strengthen existing registration requirements and as such will place additional responsibilities in administering and enforcing the new requirements including the delivery of training, undertaking professional interviews of applicants and the management of a new database.

**Renting Homes Act** – Implementation of the Renting Homes Act has been delayed, however if implemented, it will require all landlords, for the first time, to issue a written statement of the occupation contract to the tenant or licensee clearly setting out the rights and responsibilities of landlords and contract-holders. The new Act requires landlords to ensure the property is fit for human habitation at the time of occupation which is broadly based on the HHSRS hazards and is likely to have some implications for the service. Whilst the new fitness standard is intended as a civil remedy for tenants to seek their own address without recourse to the Council, it is anticipated that we may receive service requests running in parallel with the tenant's civil case and a request to supply inspection notes or expert advice in support of the claim. Staff will therefore need to be aware of this new legislation and appropriate training will be required to ensure they are able to advise landlords and tenants alike. The Act has received Royal Assent but it is not known when it will be implemented.

**Building Safety White Paper** – In January, the Welsh Government issued a White Paper setting out its proposals for a comprehensive reform of legislation that contributes to building safety in Wales. It focuses on legislative change across the lifecycle of buildings as well as setting out aspirations for a sea-change in the way buildings are designed, constructed and managed. Whilst Wales has a good record on fire safety, the tragic fire at Grenfell Tower showed the need to make changes and improvements to the building safety system. An independent review and the inquiry into the Grenfell Tower fire, together with the work of the Building Safety Expert Group have identified areas for improvement. The proposals in the White Paper build on the work set out in the Building Safety Expert Group's report – 'Road map to Safer Buildings in Wales'. It is a long and wide ranging document with many proposals put forward, these include:-

- The new Building Safety Regime will cover all multi occupied residential buildings.
- The scope of the regime would capture a house converted into two flats, a licensed house in multiple occupation (HMO), through to a high rise apartment block.

- Introduces the concept of Category 1 and 2 buildings dependent on the nature of the risk, with category 1 buildings subject to the greatest requirements.
- The Hackett Review identified that there was a conflict of interest as a result of developers choosing their own provider for building control services. For Category 1 buildings, the draft Bill proposed to remove this element of choice – the local authority will provide the building control for all residential buildings over 18m or more in height.
- All buildings within the scope of the regime would as minimum have to be registered – a process which would clearly identify the accountable person; have to have an annual fire risk assessment undertaken by a suitably qualified person; and have to record the outcomes of the fire risk assessment.

The White Paper also outlines a number of potential regulatory regimes being considered which include single or multiple regulators and a scheme of mandatory registration of new buildings. Any additional enforcement responsibility as a result of the White Paper will require the new resource to be identified.

**Joint Inspection Team** - The White Paper above represents a significant change in the landscape of building safety. It should be noted however that the regime will not be retrospective and does not provide an immediate solution for leaseholders and occupiers in buildings which are currently defective due to cladding or compartmentation issues. To understand fully the scope of the non-compliances Welsh Government propose to fund in 2021 a Joint Inspection Team (JIT) to work alongside local authorities to help them enforce against landlords / responsible parties using existing powers. The JIT would be a multi-disciplinary team representing expertise from the existing enforcement bodies. It is proposed that JIT would accompany local authority staff to high rise residential buildings to inspect buildings, report on the state of the building and identify any hazards or defects that could form the basis for enforcement action. The team would then advise the local authority on how to take enforcement action if appropriate. This is similar to an existing JIT that has been established in England and the SRS have been in discussion with WG surrounding the establishment of the JIT and its composition in Wales.

## What we plan to do next

Improving health and wellbeing	Lead Responsibility
<b>The food chain is safe and free from risks</b>	
Develop and adopt the Food and Feed Law Enforcement Plan 2021/22 and undertake interventions in accordance with the plan and the arrangements in place to discharge food safety duties. ***	C Hill
Adopt the guidelines issued by the Food Standards Agency Recovery Plan in relation to the prioritisation of food business programmed inspections and backlog.	C Hill
Develop and adopt the Port Health Plan 2020/21	C Hill
<b>Risks in the workplace are managed properly</b>	
Develop and adopt the Section 18 Health and Safety Service Plan 2021/22 and undertake interventions in accordance with the plan and the arrangements in place to discharge health and safety duties. ***	C Hill

## Noise and air emissions are controlled

Develop a Noise policy including service standards.

W Lane

## A safe trading environment is maintained

Incorporate regular surveillance of on line selling into trading standards work due to the volume of goods being sold on line.

C Hill

Identify and provide advice to estate/letting agents within the SRS region in connection with consumer protection legislation. Specific advice to include omitting to inform purchases of cladding safety concerns in respect of properties offered.

C Hill

## Licensed premises operate responsibly

Deliver a programme of inspections together with a public awareness campaign to ensure retailers are complying with the Minimum Unit Pricing (MUP) controls for alcohol. Some visits have been conducted during 2020-21 and the programme will be completed during 2021-22.\*\*\*

C Hill/H Picton

## The quality of private rented property is improved

Drive up standards in the private rented sector through:

- Enforcement action against rogue agents and landlords letting and managing properties;
- Intelligence-led enforcement actions for unsafe properties and rogue landlords;
- Work with Rent Smart Wales to address problem landlords.\*\*

W Lane

Review HMO licensing Fees Structure and process to maximise resources available and implement split fees in line with the Provision of Services Regulations 2009

W Lane

Review Cathays Additional Licensing scheme in preparation for consultation and re-declaration.

W Lane

Continue investigations into HMOs in the Bridgend and Vale areas, not registered with Rent Smart Wales in order to ensure compliance

W Lane

## Infectious disease is controlled and prevented

Secure approval and deliver the Communicable Disease Service Plan 2020/21 and undertake interventions in accordance with the plan and the arrangements in place to discharge these duties.\*\*\*

C Hill

Support partners in management of outbreaks and leading on all matters pertaining to the control of communicable disease\*\*\*

C Hill

Ensure continued support for high risk settings, including care homes by investigating cases and outbreaks of covid 19 and other communicable diseases in private sector care homes , providing advice, carrying out interventions and where necessary taking escalated enforcement action. \*\*

C Hill

Work in partnership to respond to the Covid-19 pandemic by leading on Test, Trace, Protect service and supporting care homes, schools and nurseries. \*\*\*

C Hill

Support local businesses to trade in a covid-19 safe environment by ensuring compliance with social distancing and other Covid 19 controls through the provision of advice and increased enforcement activity. \*\* & \*\*\*

All OMs

\*\* - Cardiff Corporate Plan \*\*\* Vale Service Plan

## What we will measure during 2020/21

Performance Measures 2020/21	Target
% of food businesses meeting food hygiene standards (broadly compliant).	94%
% of high risk businesses (category A & B) that were liable to a programmed inspection that were inspected for food hygiene.	100%
% of high risk businesses (category C) that were liable to a programmed inspection that were inspected for food hygiene.	90%
% of high risk businesses that were liable to a programmed inspection that were inspected for trading standards.	100%
% of significant breaches rectified by intervention during the year for trading standards.	N/A
No. of private rented properties and HMOs improved through the removal of category 1 hazards.	100

DRAFT

# Safeguarding the vulnerable



In addition, our outcomes also contribute to the following wellbeing goals:-



# 6.2 Safeguarding the vulnerable

## Introduction

Our safeguarding work seeks to ensure that children are protected from harmful substances and products, that older and vulnerable people are protected from unscrupulous individual and traders, that illegal money lending activities across Wales, are challenged robustly and that the public feel safe when using taxis as public transport. We will do this in partnership with our Council colleagues and other agencies to help people who need our support. Safeguarding the vulnerable is a central theme to many of the activities undertaken by SRS.

## How we performed



**Older and vulnerable people are protected from unscrupulous traders and scams**

**Bridgend rogue trader jailed** – A Bridgend individual who callously targeted four older residents in Bridgend and Cardiff was jailed for 3 years following investigations by SRS Officers. The trader convinced residents that they needed roofing and other work completed at their properties which was subsequently carried out to a very poor standard at significantly inflated prices of between £4500 and £24,900. In one case the trader admitted to stealing over £12,000 from one of the properties. He used a range of different business names to hide behind. The trader pleaded guilty to the charges and received a prison sentence totalling 3 years and 6 months in respect of fraud and theft. A Proceeds of Crime case will follow.

**Suspended sentence for Bridgend rogue trader** – A rogue trader who took £6,000 from an elderly Bridgend resident was found guilty following a doorstep crime investigation by SRS Officers. The trader claimed that he had spotted a problem with the roof of the resident's property which he quoted a price of £550 for repairs. The residents agreed to these repairs, but no paperwork was provided so the resident never knew who he was dealing with or what the required cancellation rights were for the work. Over the following days, the trader claimed that far more work was needed than agreed and convinced the resident to hand over £6000 which he tried to increase to £9000, which is when SRS Officer became involved. An investigation commenced where a warrant was executed at the trader's property with cash and flyers being seized. A charter surveyor also assessed the work indicating that it should have cost no more than £1,700. After pleading guilty to offences under the Consumer Protection from Unfair Trading Regulations 2008, the court sentenced Charles Price to 16 months custody suspended for 2 years, 200 hours community service and 8 days rehabilitation. The victim was awarded compensation of £3,200, the exact amount seized from the trader's property.

**Doorstep crime and Scams** – SRS respond to instances of doorstep crime and scams, supporting the victims and family where possible. Often individuals are elderly and vulnerable and the impact the service makes supporting these individuals can be difficult to demonstrate, however, the following in addition to successful prosecutions, provides some indication of the interventions taken.

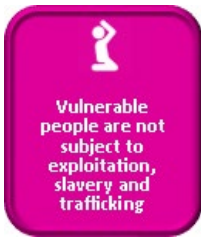
During the year, the service participated in 8 rogue trader operations, some of which were in conjunction with South Wales Police where traders were disrupted, advice given and intelligence gathered. The service dealt with 114 Doorstep Crime and 112 Scams cases and 36 doorstep crime and scam victims were identified throughout the year with £10,070 in redress being achieved for consumers. One victim of a scam was told she needed to move her money as her account was compromised. Scammers spoofed the local police station number to look like the Police. £700 was refunded following assistance provided by SRS Officers who assisted the victim in writing to the bank to explain she was the victim of a push payment scam. The victim was vulnerable due to English not being her first language, and being on benefits, and the amount taken was a significant sum of money to lose. SRS involvement in this case, led to the following compliment being received *"...I have got great news. They will refund my money. Thank you for your help and god bless you"*.

Furthermore, Controlled Cold Calling Zones across Cardiff, Porthcawl and Bridgend were contacted with new stickers and advice letters. 4 training sessions were delivered to partners and front line services and GP surgeries and pharmacies across the region were supplied with new awareness raising material on scam and frauds to be displayed in practices and front windows, delivering key preventative advice.

**Covid-19 Scams** – Scammers and rogue traders will always seek to exploit any excuse to make a profit at the expense of others and unfortunately, the Covid-19 pandemic presented the ideal set of circumstances for some to prey on the very fears of the public. SRS received complaints from residents about a whole range of covid related frauds. These included scams such as driveway cleaning marketed as preventing the spread of the virus and the door to door sale of 'COVID testing kits' (at a time when genuine testing was in its infancy and very difficult to access). Other scams were sent to unsuspecting residents via email and text notifying them that they had been seen out on more than just the one occasion per day for exercise (which was all that was permitted at the time) and as a result they must pay a fixed penalty notice.

**Call blockers** can put an end to nuisance or malicious calls. They can be installed at the homes of residents being repeatedly targeted by scams and once fitted, prevent all calls coming through other than those from recognised friends and family numbers. SRS installed 8 call blockers during the last year in residents' homes helping to reduce nuisance and scam calls. Since 2014, SRS has installed 59 call blockers to protect older and vulnerable people across Bridgend, Cardiff and the Vale of Glamorgan blocking up to 5 nuisance or scam calls a day.





## Vulnerable people are not subject to exploitation, slavery and trafficking

**Raising awareness** - Safeguarding is a key issue for all three Councils. SRS will continue to play a key role in raising awareness across the partner Councils of the SRS role and how it can integrate with the wider Council agendas. The WAO report for the safeguarding of children recognised the excellent work undertaken by the SRS highlighting that the Council could consider ways in which it could extend its safeguarding training offer, for example building on the Child Sexual Exploitation awareness training given to taxi drivers and the safeguarding training for those working in the night time economy. Each Council is now developing safeguarding plans and SRS will support those initiatives as they progress



## Children are protected from harmful substances and products

**Underage sales operations** – Three underage sales operations took place across the SRS region during 2020/21 in response to intelligence received or as part of market surveillance. Test purchases were made at 20 premises resulting in 3 premises in Bridgend being found to be selling age restricted items to children. Two of the premises were found to be selling alcohol and were served with departmental warnings, while another found to be selling tobacco was given an officer caution.

**Vale of Glamorgan trader fined for selling a craft knife to underage volunteer** – This case concerns a small trader in Penarth selling a variety of household goods. A test purchase was carried out by SRS officers and a volunteer aged 15 years was sold a craft knife at the shop. The defendant pleaded guilty to an offence under the Criminal Justice Act 1988 and she was fined £2000, ordered to pay costs of £1290 and a victim surcharge of £170.

### Operation to address the supply of nitrous oxide (NOS) to consumers

Nitrous oxide (NOS), also known as 'laughing gas', is a substance with several legitimate uses in medicine and catering; it is also a popular recreational drug amongst young people. When inhaled, this substance can make users feel euphoric and relaxed, with some reporting hallucinations. However, inhaling nitrous oxide can be dangerous, and can lead to loss of blood pressure, fainting and even heart attack. Prolonged exposure to nitrous oxide may also result in bone marrow suppression and poisoning of the central nervous system. These risks are likely to be exacerbated if the exposure to the gas is combined with alcohol or other drugs. Nitrous oxide is now being used recreationally in several settings such as clubs, private residences and parks, and is particularly prevalent at festivals. It is commonly sold in small metal canisters containing the gas which is then either transferred into a balloon for inhalation using a bottle opener or a 'cracker'.



These small metal canisters are sold in bulk online and may be presented for use as a whipped cream propellant. A multi agency operation visiting premises suspected of selling nitrous oxide to children took place during 2020/21 where a total of 16 premises were inspected and given guidance in relation to the regulations covering the sale of this substance for recreational use.



## Taxi provision is safe and fair

**Fit and proper Operators** – Across Bridgend, Cardiff and the Vale new conditions for Private Hire Operators were introduced that build upon the recommendations of the Department of Transport placing public safety squarely at the forefront of the agenda. The new conditions enhance checks to ensure that Operators are fit and proper and do not pose any threat to public safety. The conditions include general operating processes and complaint reporting systems, DBS checks on staff involved in the handling of personal and sensitive data, checks on working hours of drivers and notification of convictions.

**Changes to taxi policy in response to trade requests** – The last year has been challenging for many businesses, including the taxi trade who saw demand for their services diminish due to the various lockdowns and business closures. In addition, the protection of drivers and customers from the transmission of the coronavirus was of concern. In response to requests from the trade, a new vehicle policy was adopted to enable the installation of screens in taxi and private hire vehicles to provide additional protection to drivers and passengers from the risk of transmission of the coronavirus. This policy ensured that any screens installed were safe and do not impinge on any other safety features of vehicles such as the deployment of airbags and was based on the recommendations of the Welsh Expert Licensing panel.

A further illustration of how SRS has responded positively to the taxi trade during the year is the new vehicle age policy and testing guidelines for the taxi trade introduced in Bridgend. Prior to the introduction of this policy, new vehicle licences would only be granted on brand new vehicles, however the taxi trade felt this was too onerous on their businesses. As a result, the new policy enables older vehicles to be licensed subject to stricter testing measures to ensure vehicles are in a satisfactory condition to be licensed.

**Private Hire Vehicle drivers fined for having no insurance** – Private Hire drivers are required to only carry those passengers that have pre-booked, and are not insured if they pick up off the street. During 2020/21 three cases were brought against drivers who plyed for hire and failed to have insurance with fines of £120 being awarded in each case for no insurance and fines ranging from £80 to £120 in respect of plying for hire. In a separate case a company was fined £200 per offence for 11 counts of failing to produce insurance totalling £2,200.

**Taxi driver fined for overcharging** – Following an incident when a driver overcharged passengers and failed to use his meter, Magistrates imposed a fine of £120 in respect of each offence and ordered the defendant to pay £600 prosecution costs and £34 victim surcharge.

**Dealing with inappropriate behaviour and vehicle defects** – There are occasions where SRS receive complaints asserting inappropriate behaviour on the part of taxi drivers. While the majority of taxi drivers are respectable individuals and the journeys they provide take place without issue, there are occasions when the SRS has to act to protect the public, particularly the vulnerable. Last year 18 drivers were referred to Committee for consideration due to incidents of inappropriate behaviour.

In addition SRS Officers also make regular checks of licensed vehicles to ensure they are free from defects and are fit to continue to be licensed. Where it is found that vehicles do have defects and are unfit to be licensed, suspension notices are issued until the vehicle is repaired. During 2020/21 195 suspension notices were issued across the SRS region.



## Illegal money lending activities are prevented

**Wales Illegal Money Lending Unit** - Dealing with the personal and 'social' fallout linked to the criminality of illegal money lending is difficult to quantify. Reporting rates are often low and victims are sometimes unwilling to name the lender for fear of repercussion. In 2020/21, 23 pieces of intelligence were received and 8 investigations commenced as a result. Approximately £101,000 of loans were identified across all cases. 7 victims across Wales were identified, all of which received support and 4 victims had debt 'written off' at the point of intervention.

**Illegal Money Lending Education and Training** - The Wales Illegal Money Lending Team (WIMLU) is small and with responsibilities for the whole of Wales it is reliant on other public agencies, housing providers and third sector organisations to be its eyes and ears. These are the 'front line' people who will encounter the victims of loan sharks through their daily activities and provide the richest vein of intelligence available. To exploit this and encourage reporting WIMLU proactively seeks opportunities to present to these organisations on our work. The Coronavirus lockdown led to the immediate and indefinite postponement of Client Liaison training programmes, however, new forms of engagement emerged very quickly. These new forms of engagement have evolved into useful tools to raise awareness of loan sharks, not least because the harsh economic consequences of lockdown have underlined concerns that loan sharks will exploit the financially vulnerable. The new forms of awareness raising included the increased use of Social Media, Zoom and Skype etc and has enabled the C.L.O'S to join informal monthly meetings with their role equivalents in England, Scotland and Northern Ireland which has proved to be very useful in pooling ideas, experiences and materials. In 2020/21, Client Liaison Officers provided 31 training sessions to a number of organisations training 398 individuals.

**POCA Community Based initiatives** - Despite the best of intentions, it wasn't possible to progress the Proceeds of Crime Community Awards initiative in 2020-21 as a result of the disruption caused by the COVID 19 pandemic and restrictions. Proceeds of Crime funds have however been set aside by the Wales Illegal Money Lending Unit to pilot a new initiative encouraging responsible borrowing from Credit Unions. Working with the Cambrian Credit Union in North Wales, the pilot exercise will establish the effectiveness of a 'Near Miss' scheme in which individuals who have narrowly missed out on satisfying the Credit Union borrowing criteria, can benefit from having small loans underwritten by Proceeds of Crime funds. A fixed amount of POCA monies has been set aside for the year long pilot initiative, which assuming a positive evaluation, can be rolled out to all Credit Unions in Wales.

## Emerging issues

**Ageing population** - On a national level, we are living in an ageing population with increasing levels of loneliness and cognitive impairments such as dementia. Nearly half of all people over 75 live alone. In addition, the Social Services and Well-Being Act 2015 places a duty of care to protect persons at risk from financial abuse; with partnership working and cooperation at the heart of it.

Preventing crime, and supporting safe, confident, resilient communities, is a key aspiration that we share with South Wales Police. This is putting further strain on already stretched resources as the potential number of victims to scams and doorstep crime increases and expectations of successful interventions rise.

The pandemic and government restrictions resulting from Covid-19 has highlighted the opportunities that fraudsters will seize upon to take advantage of a situation. Within days, new scams and frauds relating to Covid-19 were being highlighted including text messages designed to obtain bank details or monies. There have been reports of doorstep callers offering ineffective drivewashing disinfecting services and taking peoples bank cards for shopping and not returning. There is now a greater need to try and protect more vulnerable residents and a likely increase in reporting during and after the lockdown restrictions.

Awareness raising activities are crucial to crime prevention, but it invariably increases the demand for the service. We will work with South Wales Police to deliver the Police and Crime Plan and endeavour to enhance the protection available to the most vulnerable in our communities.

**Economic impact on lending** - The harsh economic consequences of the Covid pandemic have underlined concerns about the type of borrowing undertaken by individuals. As a service we have seen loan requests from Welsh borrowers for as little as £7. People who are struggling to make ends meet can easily fall prey to loansharks and scammers. Recent research commissioned by The Wales Illegal Money Lending Unit (WIMLU) reveals that Welsh citizens are using Reddit to look for loans from other users to make ends meet. The most shocking finding was that less than 45% of loans to Welsh borrowers were given by lenders who were in good standing, and nearly a third (31%) of lenders either had no track record of lending, or were subsequently banned from reddit due to account violations. The majority of these loans are for relatively small amounts of money and are mostly to cover cash flow problems and everyday living expenses. Any registered Reddit user, provided their account meets basic criteria, can request a loan by simply posting in new thread on the relevant subreddit. This thread can be responded to by any other Reddit user who wishes to provide the loan on the terms requested by the borrower, wherever they are in the world, with the finer details of the transaction are finalised via private messaging. This type of lending is completely unregulated and open to abuse.

## What we plan to do next

### Safeguarding the vulnerable

Lead  
Responsibility

Support the 3 partner Councils in fulfilling their safeguarding responsibilities.  
\*\* & \*\*\*

All OMs

### Children are protected from harmful substances and products

Carry out underage sales exercises in relation to the sale of tobacco, alcohol and sale of knives. \*\*\*

C Hill

### Illegal money lending activities are prevented

Review the 'Near Miss' Pilot Scheme and consider other Proceeds of Crime funded community opportunities.

H Picton

Support victims of illegal money lending to access debt advice, rebuild their finances and make a sustainable transition to legal credit and carry out enforcement to remove loan sharks from communities \*\*\*

H Picton

## Vulnerable people are not subject to exploitation, slavery or trafficking

Continue a programme of training and awareness of Child Sexual Exploitation, slavery and trafficking to protect vulnerable residents.	W Lane
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## Taxi provision is safe and fair

Engage and respond to any further consultation from Welsh Government on their public transport consultation to introduce national standards for taxis.	W Lane
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Undertake enforcement exercises to ensure compliance with the provisions of the Equalities Act and to ensure compliance with taxi regulations.	W Lane
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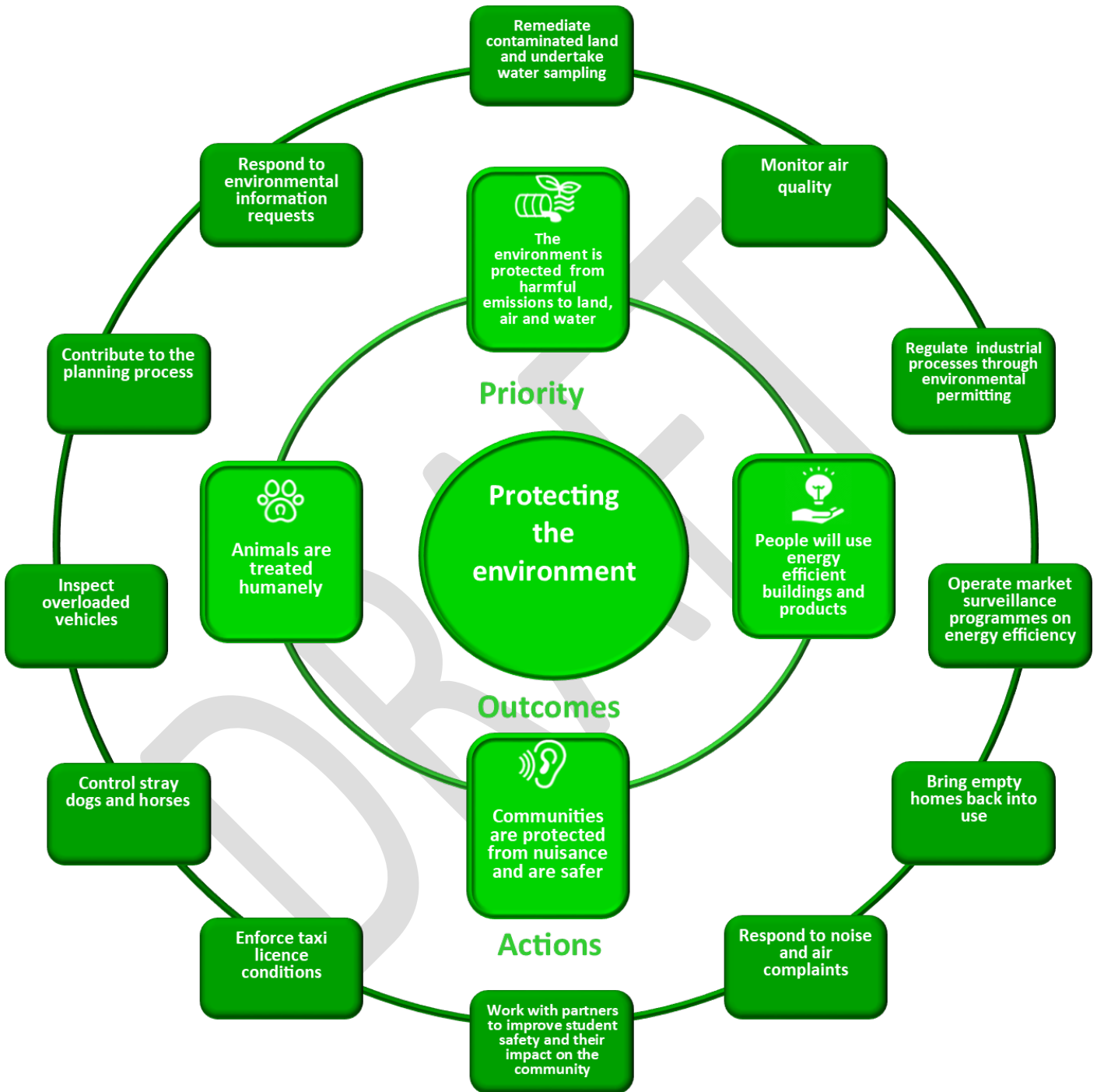
Evaluate taxi enforcement activities undertaken throughout the year.	W Lane
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\*\* - Cardiff Corporate Plan \*\*\* Vale Service Plan

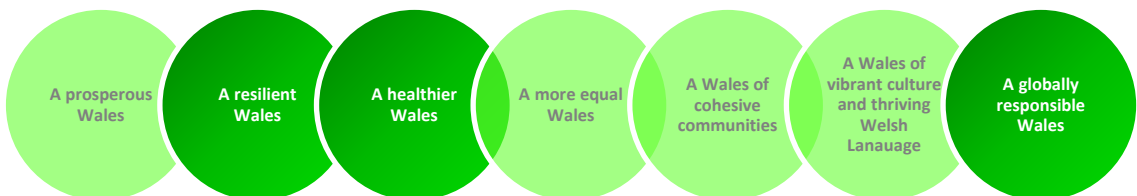
## What we will measure during 2020/21

Performance Measures 2020/21	Target
<ul style="list-style-type: none"> <li>% of reported scams/doorstep crime incidents prevented /resolved through intervention.</li> </ul>	80%
<ul style="list-style-type: none"> <li>% of licence holders receiving disciplinary action following receipt of notifications of safeguarding concerns.</li> </ul>	Not applicable
<ul style="list-style-type: none"> <li>No. of people reached through education or training on scams and doorstep crime.</li> </ul>	500

# Protecting the environment



In addition, our outcomes also contribute to the following wellbeing goals:-

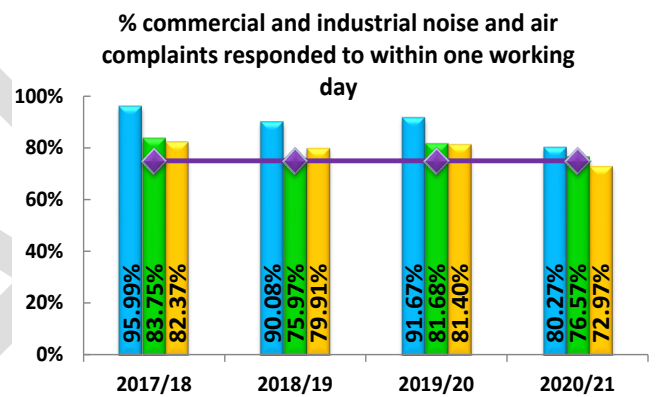
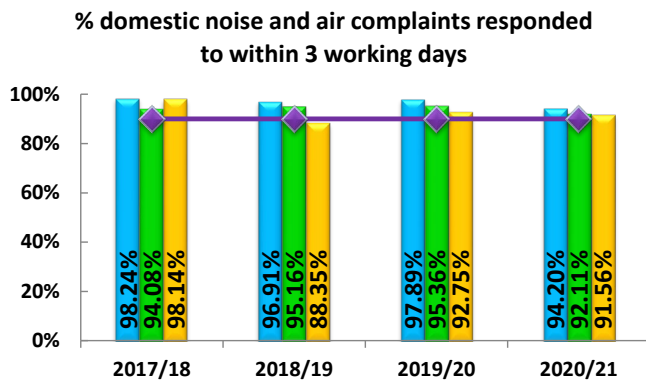


# 6.3 Protecting the environment

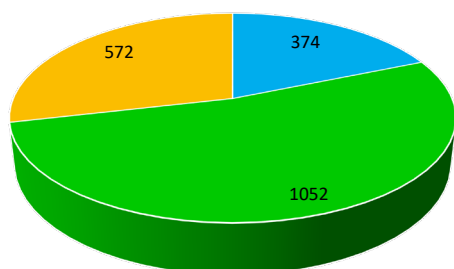
## Introduction

Protecting the environment is a core strategic priority of SRS. Many of the activities listed here such as water sampling, monitoring air quality, and remediating contaminated land contribute toward promoting a better environment which in turn means better long term prospects for the health and wellbeing of our communities. However, the work in protecting the environment goes further, we ensure communities are protected from nuisance and are safer by investigating noise complaints, dealing with stray dogs and horses. We have a key role to play in the wider climate change and future generations agendas through our enforcement role on energy efficiency controls on properties and products. The impact of these activities is less apparent in the short term for communities, but has an important role for future generations.

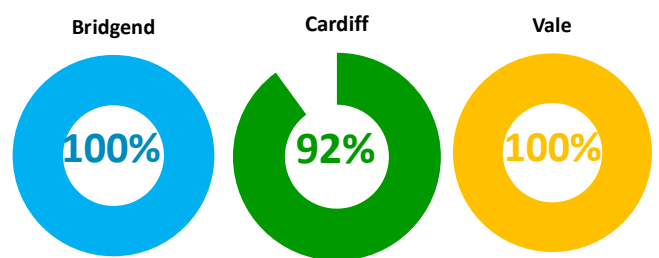
## How we performed



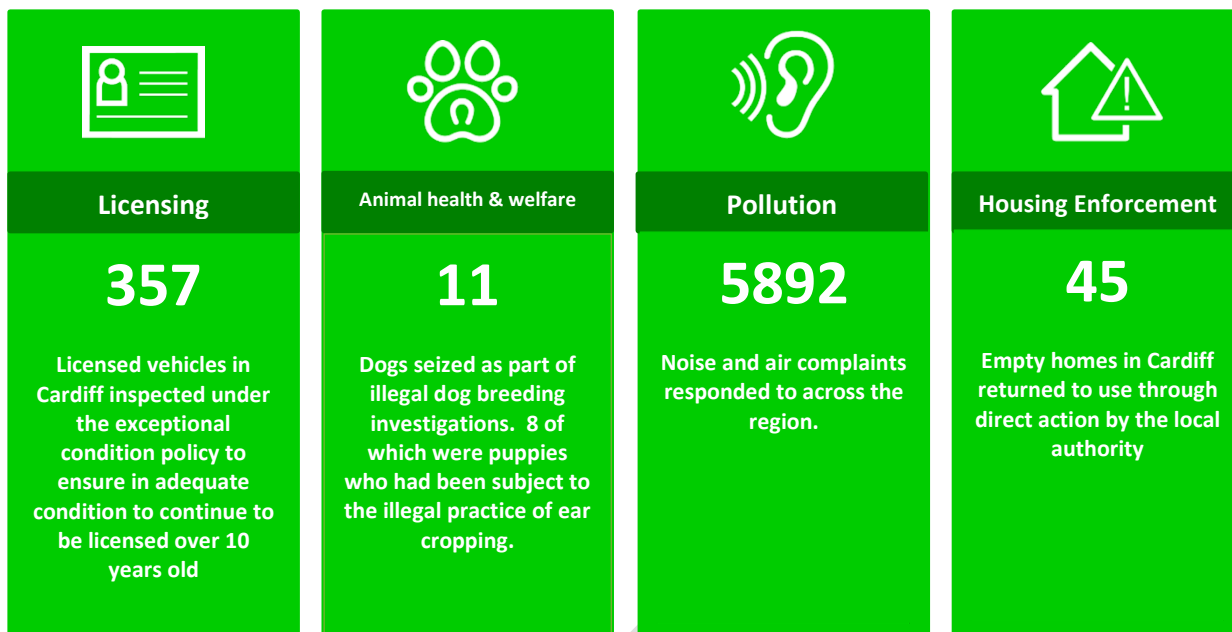
No. of air quality samples taken during 2020/21



% of alarm complaints responded to within one day 2020/21



■ Bridgend ■ Cardiff ■ Vale



## What we have achieved



### The environment is protected from harmful emissions to land, air and water

**Air Quality** - The issue of Air Quality is never far from the headlines and the impact of poor air quality on health is well documented. Indeed air pollution continues to be the largest environmental risk linked to deaths in the population with long term exposure (over several years) contributing to a reduction in life-expectancy primarily due to an increased risk of mortality from cardiovascular and respiratory causes. At a national level, the UK and devolved Governments have legal obligations to achieve nitrogen dioxide annual average limit value (40ug/m<sup>3</sup>) compliance in 'the shortest possible time'. This stems from an EU directive and was meant to be achieved by 2010; the EU provided time extensions to this date and the Westminster Government recently published the *UK Plan for tackling roadside nitrogen dioxide concentrations* (July 2017).

During 2020/21, SRS ensured that the **Bridgend, Cardiff and the Vale of Glamorgan** Councils met their statutory obligations under the Environment Act by producing air quality reports for each area and reporting to the respective Cabinets. These progress reports relate to the 2019 data sets for each of the three Council areas. It remains to be seen how the 2020 datasets will be interpreted when next year's progress reports are compiled given the significant reduction in road traffic during Covid 19 lockdowns.

In **Cardiff**, SRS continued to play a significant role in supporting the implementation of the Clean Air Plan through the secondment of two members of SRS staff to Cardiff Council. Following approval of funding by Welsh Government, a package of measures is being progressed to reduce nitrogen dioxide levels across Cardiff. These include the implementation of electric buses, bus retro fitting programme to clean up older polluting buses, reviewing the Taxi Licensing Policy to only grant new



licences to vehicles which comply with the latest emission standards and City Centre transportation improvements and further active travel measures.

Works are also ongoing to strengthen the monitoring network whereby automated monitoring stations have been implemented around the City. This includes an Automatic Urban and Rural Network equivalent monitoring site which has been commissioned on Castle Street. SRS has also supported a green infrastructure-based project on Cowbridge Road West with staff monitoring the benefits of a green wall for a period of the year.

In **Bridgend**, work has progressed well in respect of agreeing the Air Quality Action Plan for the Park Street Air Quality Management Area. Detailed transport and air quality monitoring will now take place in order to identify and agree the most appropriate infrastructure mitigation measures, at which point the draft Action Plan can be consulted upon and later implemented. Welsh Government has extended the timeline for achieving implementation by six months (until the end of June 2021) as a result of the disruption caused by the COVID 19 pandemic. Relocation of real-time air quality monitoring equipment into the Park Street AQMA is also progressing well again, with the concrete base now installed and a usage agreement in place with the occupiers of the land. Real time monitoring will enable residents to access local air quality data via a link to the SRS website, and it is hoped that this will assist in local engagement on the matter ahead of consultation on the draft Action Plan.

In the **Vale of Glamorgan** Cabinet has given final approval to the revocation of the Air Quality Management Area on Windsor Road, Penarth. Since this AQMA was declared in 2013, air quality has improved dramatically, and this improvement has been sustained over several years. The revocation will be supported by a publicity campaign to reassure residents and interested parties that air quality monitoring will continue along Windsor Road even after the AQMA has been revoked, to ensure there is no worsening of nitrogen dioxide levels in the future.

**Environmental Sampling** – SRS completed the assessment and sampling of all statutory private water supplies across the region and ensured statutory returns were supplied to the Drinking Water Inspectorate as required. This involved 43 visits across the region to take samples including 15 water samples at Knapp Lake. Furthermore SRS took 1998 air quality samples across the region .



## Animals are treated humanely

### Vale of Glamorgan Horse Trader and breeder receives prison sentence and lifetime ban for animal cruelty offences

– This case was brought to trial under the Animal Welfare Act by SRS after animals were found in shocking conditions at 3 locations across the Vale and Bridgend. In August 2019, SRS officers discovered a flock of Jacob sheep with fleeces still unshorn during one visit despite it being late into the summer. Several sheep carcasses were also found and it emerged



that a number of the remaining sheep were suffering from the effects of maggots and associated wounds. Under veterinary supervision the worst affected sheep were put down and the remainder

seized. In January 2020, SRS found horses being kept in appalling condition at 3 sites. They were found to be standing in extremely deep mud, there was a lack of clean fresh water, and some had no forage. Two of the sites were strewn with hazards such as sharp metal and barbed wire and at one site the horses were kept overcrowded, in filthy conditions with nowhere to lie down. The trader was charged with unnecessary suffering in relation to 8 horses some of which were significantly underweight while others had long-standing wounds caused by ill-fitting rugs. Officers were left with no choice but to seize a total of 240 horses from across the 3 locations. The trader was subsequently found guilty on 32 counts including failing to ensure a suitable environment for animals and sentenced to 6 months in prison. He was also banned for life from keeping animals after a history of prosecution for mistreatment that had previously seen him receive a 5 year disqualification. The judge told the defendant that the evidence had been compelling and took a dim view of the fact that he had obstructed officers during the course of their duties at one of the sites. The trader's co-defendant had previously pleaded guilty to 31 of the charges was sentenced at the same hearing to a 12 week custodial sentence suspended for 12 months. She will have to wear an electronic tag for that period and be subject to a night-time curfew between 9pm and 6am and also disqualified from keeping any animals for life, except for a number of specified pets. This conviction follows many months of partnership working between local authorities, South Wales Police, Redwings and the RSPCA and having to seize and care for the animals on this scale was undertaken at great expense. Nic de Brauwere, Redwings Head of Welfare & Behaviour and Senior Veterinary Surgeon said *"I witnessed first hand the shocking conditions and desperate lack of care at these sites, which included ponies with untreated wounds, not enough food and water and many that were severely underweight living in totally unsuitable conditions. I am therefore very pleased and relieved to see a successful prosecution and robust sentencing, which will prevent more horses facing*



*neglect at the hands of these individuals. This is by no means the first case Redwings has dealt with involving horses from this owner and the sheer amount of charity time, energy and resources that we have invested in protecting these animals over the years is difficult to put into words. We'd like to offer our sincere thanks to SRS who persisted with this crucial case throughout the past year, despite challenges presented by the pandemic, and to our fellow welfare charities who have supported us every step of the way..."*

**Increase in dog breeding** – The high value of certain dog breeds together with the increase in consumer demand for puppies has led to an increase in complaints about dog breeding resulting in an increase in complaints and the investigation of a number of ongoing cases some of which are complex with multi agency involvement and links to organised crime. The largest illegal dog breeding case during the last year uncovered evidence of unlicensed breeding, the over-breeding of dogs, illegal importation and mutilation. Execution of a warrant at a property resulted in the seizure of 3 adult dogs and 8 puppies, some of which appeared to have had their ears cropped. Informations have been laid in court and we await progress of the case in the court system.



## People will use energy efficient buildings and products

**Empty Homes** – In Bridgend interventions made by SRS have led to 4 properties listed in the Bridgend Council’s top 20 priority properties becoming occupied in the last financial year, with a further 2 properties being sold and new owners engaging with the authority to bring the properties back into beneficial use. One other property is also being renovated. We continue to work with and encourage the owners of empty properties to bring them back into use, through enforcement action where necessary. Following the non-compliance with a Notice served under the Town and County Planning Act, SRS successfully completed the work in default and is continuing to encourage the owner to bring the property back into use. To further improve the information available on empty homes, the opportunity was also taken to overhaul the SRS webpages to provide comprehensive information to members of the public and empty property owners with a range of information on how to bring an empty property back into beneficial use. Furthermore all auction houses with links to South Wales and local estate agents have been contacted and provided with ‘A property owner’s guide to empty homes’ brochure and letter from the empty property co-ordinator introducing the services that Bridgend County Borough Council offer to empty property owners.

In Cardiff 63 properties were returned to use or new units created as a result of empty homes work. This is a result of a combination of both proactive and reactive work involving informal negotiation and formal enforcement in order to assist owners in bringing their properties back into use or to require improvements to eradicate associated nuisances. Lockdown restrictions and the difficulties that these imposed on sale and repairs during the year has had an impact on results for 2020-21 but during the last quarter an increase in qualifying completions and an improvement in results was observed. Looking ahead, we are hopeful that the expected easing of lockdown measures will result in anticipated works that may lead to increased levels of occupation being progressed in a more timely manner. Due to the problematic nature of the work and the many reasons properties become and remain empty, casework is fairly bespoke depending how receptive an owner is. That said, the work does follow a general process in order to open a dialogue with owners and where that fails, formal enforcement in the form of statutory notices, as mentioned above, in addition to such measures as compulsory purchase and enforced sale are available. During 2020/21 two Compulsory Purchase Orders commenced in the previous year are now vested with the Council while further details are resolved prior to their disposal on the open market.



## Communities are protected from nuisance and are safer

**Straying horses and dogs** - Our Animal Health and Welfare team have continued to proactively work across the area to reduce the instances of straying horses and associated welfare issues while continuing to give advice to owners, patrolling and picking up straying dogs and other animals across the region and working with residents across the region to improve responsible ownership.

**Student Liaison** – The role of Student Liaison Officer is a role jointly funded by Universities in Cardiff. The role has a number of aims, not least of which is working with students to encourage neighbourliness and improving community health and safety respect in the residential areas that students reside. The last year has seen a focus on Covid-19, working with partners and students providing guidance on the requirements enabling them to stay safe. This has included creating communications links between residences and the TTP Student Team for direct support relating to cases and safety measures, identifying managers at Halls of Residence and inviting providers to best practice network to exchange experience/solutions to shared problems relating to Covid-19, and ensuring the Cardiff Digs website reflects consistent messaging. In addition to the work of the SLO, the SRS Pollution Team contributed to strategic meetings for developing guidance and interpreting guidance for the safe movement of students back into the City and when they left and worked proactively with the Police, Welsh Government, University of South Wales, Cardiff University, Cardiff Metropolitan University and Public Health Wales in interpreting Covid guidance and developing and distributing guidance via landlords to ensure students were aware of the requirements and stayed safe. The team together with the South Wales Police partnership went out into the community to welcome students back to the City over several key dates in the summer providing advice to students who were taking up new tenancies and giving advice on being a good neighbour while police gave advice on Covid regulations. The team also responded to complaints with the police engaging with those causing noise and anti-social behaviour to educate them before taking enforcement action.

**Noise in the community** – As indicated previously, 2020/21 saw an increase in the number of noise complaints received about noise from domestic settings which was largely due to lockdown arrangements. This provided an opportunity for greater partnership working with the Police in addressing noise problems due to them being the first point of contact for receiving complaints alleging covid regulation breaches. Furthermore Pollution officers also worked with the Covid Joint Enforcement Teams to address noise nuisance working with licensed premises during the reopening of hospitality to ensure disturbances were kept to a minimum.

## Emerging issues

**White Paper on Clean Air (Wales) Bill** – In January 2021, a White Paper was published on the Clean Air (Wales) Bill. The White Paper proposes measures to reduce emissions and deliver vital improvements in air quality through planning, regulation and health communication measures. The Bill envisages a strategic approach to enhance air quality which would see a Clean Air Plan or strategy being reviewed every 5 years, as well as the necessary powers to set targets, with PM<sub>2.5</sub> being the priority. This would be supported by a clear and effective Air Quality Management legislative framework comprising:-

- A clarified and enhanced LAQM regime (to take a proactive approach)
- Consolidated road charging powers to implement Clean Air Zones or Low Emission Zones
- Strengthened powers to address vehicle idling
- Enhanced smoke control powers to tackle domestic burning (see Reducing Emissions for Domestic Burning of Solid Fuels below).
- A duty on inter-sectoral workforces to adhere to guidance to tackle air pollution.

The aim is to achieve emission reduction ambitions by 2030; and depending on the specific pathway chosen in achieving this goal, it is estimated that the cost of action in Wales will be approximately £10m per annum. In return, it is estimated that the associated reductions in overall population exposure to air pollution would result in monetised health benefits of approximately £100m per annum.

**Reducing Emissions for Domestic Burning of Solid Fuels** – Running alongside the White Paper above, Welsh Government is also seeking responses on a specific consultation on reducing emissions for domestic burning of solid fuels. It has been found that residential sector emissions have risen considerably since 2002 despite falling significantly in the preceding years because of declining coal use. Indeed, it is believed that such emissions are now at the same level as in 1990 with the increase in popularity of wood burning or multi fuel stoves (particularly in urban areas) coinciding with a rise in particulate matter emissions. Views are sought on a number of proposals, including:-

- The phasing out of the sale of bituminous/traditional house coal for domestic burning.
- Prohibiting the sale of wet wood for domestic delivery and/or use unless in quantities above a certain limit;
- Applying sulphur standards and smoke emission limits to all manufactured mineral solid fuels, and
- Applying standards to manufactured biomass fuels.

**Animal Welfare and Pest Control during the Covid-19 Pandemic** – The emergence of the Covid-19 pandemic during the last year has changed the way we live our lives potentially creating issues in relation to animal welfare and pest control. There are concerns that the economic fallout from the pandemic will result in a spike of straying and abandoned dogs which owners are no longer able to feed and look after; the rise in dog ownership during the year as a result of people working from home could also lead to issues with separation anxiety when the owners return to work; lack of socialisation of young dogs as a result of the lockdown has the potential for aggressive behaviour to become more common in future; fewer pest control treatments being carried out in domestic properties, as a result of residents being anxious about having callers, and also in schools while they are shut, has the potential for infestations to become more common place. Furthermore the service will need to make up ‘lost ground’ in respect of animal health and animal feed inspections not completed for the duration of the pandemic.

**Illegal dog breeding** – Investigations into illegal dog breeding have highlighted a hidden industry with a particular area of concern being that of ‘backyard’ breeding. The high value of certain breeds together with the increase in consumer demand for puppies has made the sector attractive to organised crime groups due to the lower risk and weaker sanctions, and opportunists looking to capitalise on the increased demand. As a result there appears to be an increasing incidence of unlicensed breeding which requires further investigation. Officers will continue to work with partner agencies to investigate such reports and take appropriate enforcement action.

## What we plan to do next

### Protecting the environment

Lead  
Responsibility

### The environment is protected from harmful emissions to land, air and water

Complete the public consultation and agree and implement the Action Plan for the Park Street, Bridgend AQMA.

H Picton

Ensure good air quality in Cardiff by implementing and evaluating the:

- Clean Air Plan as approved by Welsh Government to ensure compliance with the EU Limit Value for Nitrogen Dioxide (NO<sub>2</sub>) in the shortest possible time by the end of 2021;
- Wider Clean Air Strategy measures to ensure a continued reduction of NO<sub>2</sub>

H Picton

concentrations is achieved across the city.

Consult upon policy changes to the age, emission and testing standards of vehicles in order to deal with the air quality challenges to include:

- Requiring vehicles to have a minimum Euro 6 emission standards
- Developing a medium-term strategy to ensure the Cardiff taxi fleet are all Ultra Low Emission Vehicles.

W Lane

## People will use energy efficient buildings and products

Work with landlords to return empty properties back into use helping to increase the availability of affordable housing for sale or rent in Bridgend and Cardiff.

W Lane

## Animals are treated humanely

Promote a register for all breeders, home boarders etc. that have a licence.

H Picton

Carry out investigations into illegal dog breeding.

H Picton

## Communities are protected from nuisance and are safer

Explore the feasibility of extending the number of pest control contracts by engaging with the farming community, schools and commercial sector.

H Picton

Engage with students and residents during Freshers Week in Cardiff providing community advice on housing, environmental and social issues.

W Lane

\*\* - Cardiff Corporate Plan \*\*\* Vale Service Plan

## What we will measure during 2020/21

### Performance Measures 2020/21

### Target

• For noise complaints requiring attendance on site, the average time between receipt and the officer attending on site.

Under consideration

• % of domestic noise and air complaints responded to within 3 working days

90%

• % of commercial and industrial noise and air complaints responded to within one working day

75%

• % of alarm complaints responded to within one day.

90%

• % of stray dogs returned to owner or rehomed.

90%

• % of empty private sector properties brought back into use during the year through direct action by the local authority (Cardiff and Bridgend only)

TBC

• Number of additional dwellings created as a result of bringing empty properties back into use (Cardiff and Bridgend only)

TBC

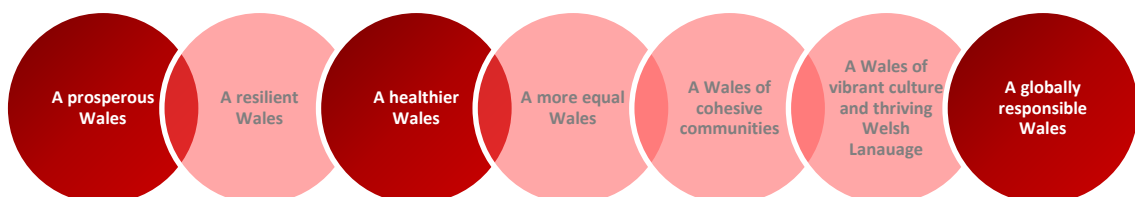
• Nitrogen Dioxide (NO<sub>2</sub>) concentrations within Air Quality Management Areas.

Annual mean ratified concentrations of (NO<sub>2</sub>) not to exceed 35µg/m<sup>3</sup>

# Supporting the local economy



In addition, our outcomes also contribute to the following wellbeing goals:-



# 6.4 Supporting the local economy

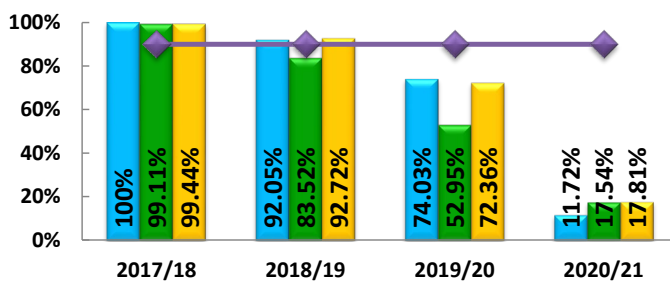
## Introduction

A strong local economy is a key component in the quality of life experienced by local people. The work of SRS has a significant, but often unseen, impact upon the local economy. The provision of timely advice and guidance on regulation can benefit the economic viability of businesses resulting in improved business practices; our growing role in the field of Primary Authority is testament to this assertion. Much of our market surveillance activity focuses upon maintaining balance in the “marketplace”; the equitable enforcement of regulations helps businesses to compete on equal terms ensuring a fairer trading environment. Our role as regulator also extends to information and education to support consumers to enable them to become better informed and confident. In an age where people can purchase goods and services without leaving home, the importance of the principle of “*caveat emptor*” has never been more relevant.

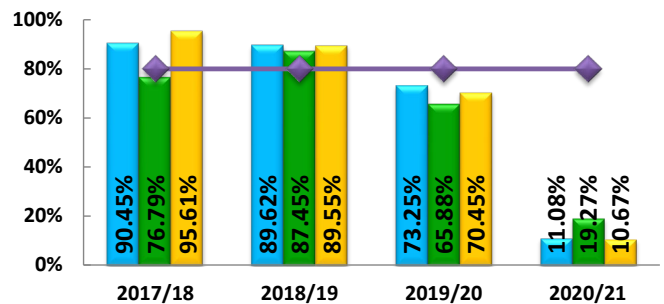
## How we performed



% of new Food Hygiene businesses identified and visited



% of new Trading Standards businesses identified and visited



Working with business

**4500+**

Visits made to check and advise on compliance with Coronavirus Regulations in respect of social distancing and business closures.



Working with business

**28**

Primary Authority Partnerships in place, 10 of which are support for business from a devolved Welsh perspective.



Working with business

**9819**

Businesses, premises and individuals proactively advised of how to operate safely and comply with Coronavirus Regulations



Working with business

**90%**

Of businesses who responded to customer satisfaction survey in 20/21 indicated that they had changed their practices and procedures as a result of advice given by officers



# What we have achieved



## A fair trading environment is maintained

**Bridgend rogue trader received suspended jail term** - A roofer who misled customers and took thousands of pounds without completing or carrying out work pleaded guilty to committing fraud following investigations by SRS officers. The court heard that 8 separate complaints were made against the roofer between 2013 and 2018 after he took substantial deposits for work which was either not completed or not started. One property suffered flooding as a result of the unfinished work. In addition a further 6 complaints were made for misleading commercial practices carried out in the Swansea area which saw the roofer accepting deposits totalling £16,784 that was either not started or not completed. After pleading guilty to fraud and engaging in misleading practices, the roofer was sentenced to 24 months imprisonment suspended for a further 24 months and ordered to complete a 10 day rehabilitation course and carry out 100 hours of unpaid work.



**Illicit tobacco** – There has been a steady increase in the number of premises, particularly in Cardiff, supplying illicit and counterfeit tobacco to consumers. SRS officers regularly carry out inspections often involving partner agencies including South Wales Police and Wagtail who provide tobacco detection dogs to assist with the location of the product whilst on site. This allows officers to locate ‘hides’ that are used by retailers to conceal the product that often require specialist skills to detect and open. SRS have carried out multiple inspections in retail premises resulting in large seizures of illicit and counterfeit tobacco products. In August officers carried out a multi disciplinary operation in Cardiff to address the sale of illicit tobacco with South Wales Police, Post Office auditors and the Wagtail tobacco detection dogs. Nine premises in total were inspected and 5,680 cigarettes and a quantity of hand rolling tobacco was seized. These investigations are ongoing however 2020/21 also saw the successful conclusion of 2 cases regarding the sale of illicit tobacco. In one case the defendant had been trading on facebook as a seller selling counterfeit and illicit tobacco and arrange to meet customers in supermarkets car parks to hand over the tobacco. A substantial amount of tobacco was procured by officers following a number of test purchases and the execution of a warrant. The defendant was sentenced to a 12 month community order, ordered to carry out 50 hours of unpaid work and a 10 day rehabilitation requirement. Costs were ordered for £175 and a Forfeiture Order was granted. In another case officers from SRS since 2017 had conducted checks and test purchases at a retail premises discovering both counterfeit tobacco and tobacco which did not carry the required health warnings for sale. The defendant had been given a Simple Caution and later prosecuted but had nonetheless continued with his criminal activities culminating in the latest prosecution. Officers discovered that since 2016 the defendant had traded in significant quantities of counterfeit and illicit tobacco amounting to approximately £200,000 in trade value and a subsequent financial investigation discovered that the defendant had illegally gained and transferred from his and his wife’s bank accounts over £90,000 to bank accounts abroad. The defendant was sentenced to a total of 25 months imprisonment of which he will serve half in custody and the remainder on licence. A

forfeiture order was granted for all the items seized. In addition to these cases, 3 forfeiture orders were granted in respect of tobacco which did not carry the required health warnings.

**Ebay seller order to pay £130,000 under the Proceeds of Crime Act** – This case spans several years finally concluding in May 2021 and concerns an ebay seller in the Vale of Glamorgan. In 2017, SRS were alerted to the presence of an Ebay seller in the Vale of Glamorgan selling goods described as precious metals, which were found not to be after testing, resulting in several infringements of the Hallmarking Act 1973. This prompted further investigations by SRS officers who purchased further items from the Ebay shop which were sent off for testing and examination. Following the testing it was confirmed that the jewellery items infringed the Hallmarking Act 1973, the cosmetic items were dangerous and did not comply with the Cosmetic Product Safety Regulations 2013 and the items displaying trademarks had not been approved or given permission for them to be used by the Trademark holders breaching the Trademarks Act 1994. In 2018 a warrant was executed at the home address of the Ebay seller where hundreds of items of jewellery, cosmetic products and £12,845 was seized. In 2019 the defendant pleaded guilty to 2 offences under the Trademarks Act 1994, 2 offences under the Cosmetic Product Safety Regulations 2013, 2 offences under the Consumer Protection from Unfair Trading Regulations 2008 and 6 offences under the Hallmarking Act 1973 which resulted in the seller receiving a 14 month prison sentence suspended for 18 months and a timetable was set for a Confiscation investigation under the Proceeds of Crime Act 2002. During the Confiscation investigation assets uncovered included a house and vehicle alongside the cash that had been seized. The seller was also found to have withdrawn 2 large amounts of cash from other bank accounts after officers had left his address when executing the warrant, totally £24,900. This case was finally concluded in May 2021 when the seller was ordered to pay £130,000, as part of a Confiscation Order under the Proceeds of Crime Act 2002. He was given 3 months to settle the order or be subject to a 12 month custodial sentence in default of payment. An order for the forfeiture of the items seized on the day of the warrant was also made.

**Covid-19 Unfair trading** – At the start of the pandemic, SRS became aware of incidents of ‘price gouging’ or profiteering whereby the price of essential commodities fluctuated depending on demand. This was at a time when supply chain issues coupled with panic buying left some shelves empty in retail establishments and included items such as hand sanitiser which was in high demand. Furthermore a number of residents experienced difficulties in obtaining refunds for bookings cancelled as a result of the pandemic and lockdown restrictions, for example holidays, weddings, concerts and other events.



## Improved business practices and operation

**Supporting businesses through the pandemic** – When the UK was put into lockdown on 23 March 2020, the government put into place a limited number of reasons for people to be allowed to leave their homes and imposed restrictions on the opening of businesses. As a consequence, many businesses had to close or implement safeguards to prevent the spread of the virus, and it became the responsibility of SRS to enforce the Health Protection (Coronavirus Restrictions) (Wales) Regulations across the region. During the year these regulations have been updated as we moved from various tiers according to the current risks, and throughout this SRS have been at the forefront of not only enforcing these regulations but providing guidance to businesses in order that they can operate safely. The last year has been, and continues to be a challenging and unsettling time for all

concerned but the unique position of SRS in regulating a diverse range of businesses has enabled us to provide targeted guidance and advice to different business sectors by way of mailshots, the SRS website, through Primary Authority partnerships, regular visits to businesses and responding to service requests.



## Accessible services responsive to business needs

**Primary Authority** - The Primary Authority scheme enables a business to enter into a statutory partnership with a local authority through which it can receive assured advice. Provided this advice is followed, the Primary Authority (PA) is able to challenge intended enforcement action by other local authorities. SRS now has some 28 Primary Authority partnerships in place with both local and national businesses and is able to charge for the work done as part of these arrangements on the basis of full cost recovery. 2021/22 is likely to see further consolidation of this work.

**Overnight accommodation** – During the course of the year the various lockdowns that were imposed required hotels, caravan sites and overnight accommodation to remain closed and were not allowed to open their doors to guests in the traditional sense. However, at the request, or with the permission of the local authority, they could accommodate key workers and the homeless. These restrictions did raise difficulties for some occupants of caravan sites as their alternative accommodation was not available due to their vulnerability and requirement to isolate. SRS officers however, worked with businesses to facilitate the process allowing these occupants to stay safely on site and facilitated the process to ensure that the authorisations issued were not abused and only used for bona fide circumstances. This was achieved through consideration of each particular context and the authorisation of individuals to stay at overnight premises on a case by case basis.

## Emerging issues

**New Food Businesses** – New food businesses are required to register with the service if a new business is planned, the nature of an existing business changes or if there is a change of ownership following the creation of new legal entities such as a new limited company, sole trader and partnership. All new businesses are required to be inspected and the Food Law Code of Practice requires that where possible, they be inspected within 28 days of opening. This requirement places a significant impact on the resources of the Food Safety and Trading Standards functions due to the large number of applications received. During 2020/21 1031 applications were received, 597 in Cardiff, 211 in Bridgend and a further 223 in the Vale of Glamorgan all of which are required to be inspected alongside the planned programme of inspections. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention.

**Post COVID-19** – The Coronavirus Regulations put in place to regulate businesses and the behaviours of people during the pandemic, the former being enforced by SRS. These are temporary regulations and at some point in 2021, the Regulations will cease to exist and consideration will need to be given as to what controls may need to be in place to ensure Covid is not allowed to impact the local economy as it did in 2020. This may be through an enhanced set of health and safety controls which will place additional duties upon the Council.

**EU Exit** - The EU-UK Trade and Cooperation Agreement (TCA) signed at the end of 2020 represents a new era in how the UK administers many aspects of consumer and environmental law. In many cases, the short-term impacts will be minimal, since previously applicable EU laws have simply been renamed and will effectively continue under the guise of UK-only legislation. In the longer term however, there is the possibility of real divergence as the UK adapts these laws to suit its own requirements. In some cases, the legislative impact of the TCA remains unclear, and its full implications won't be known for some time. SRS officers will monitor these changes and provide advice and support to manufacturers, exporters and importers in the region to minimise the impact on their operations and the many livelihoods that depend upon them.

**Major events** - SRS plays an important role in the successful staging of major events across the three local authority areas. In addition to dealing with any licensing matters associated with a particular event, SRS plays an important role in ensuring that food sold at events is safely prepared and stored, and that it is labelled correctly. In the case of stadium concerts and sporting events, input may be required to assist brand holders to protect trademarked goods and safeguard against the supply of counterfeits. Furthermore the impact of the Covid 19 pandemic means that additional considerations must be made for events to be undertaken in a covid safe way. Major events staged through the participant Councils go through a detailed planning process via the respective Events Safety Advisory Group in Bridgend and the Vale of Glamorgan, and in Cardiff via the Events Liaison Panel. SRS plays a role throughout the planning stages with respect to food safety, health and safety and brand protection. While summer is traditionally the busiest time for events, June, July and August were exceptionally busy for events. This is due in part to the success of the City of Cardiff Council in promoting itself on the world stage as the home of successful events. All of this has an impact on the Shared Service in terms of meeting demand from other areas of responsibility, at a time of diminishing staff resource, and in covering weekend and evening work.

**On-line retailing** - The Internet is undeniably driving change, and large retailers have responded by embracing multi-channel sales strategies and while the high street has not, as yet, been put out of business, their traditional physical stores are beginning to become a secondary outlet. It would seem inevitable that, in the longer term, the size and composition of the high street will be significantly impacted, as on-line shopping becomes a far more mainstream activity. Information technology and the fast developing digital environment are also causing a change in the way people interact, including in the way they interact commercially. Modern consumers increasingly access goods and services across the world through the tap of a phone screen or the click of a mouse. The internet presents an enormous opportunity for consumers and this became even more evident during the last year, as shops were required to close, and customers relied heavily upon the ability to shop online, whether it be to order groceries, or other consumer products. The Office of National Statistics report that the proportion spent online soared to 35.2% in January 2021 from 19.5% in January 2020. The internet expands the size of the market and therefore gives access to more providers and more choice. It also makes it possible to compare products, suppliers and prices on an unprecedented scale. The internet is the most empowering tool consumers have ever had. A consequence of this for the law enforcement agencies like the SRS is that the "visible" high street has moved to an activity undertaken behind closed doors. Monitoring the market place through traditional market surveillance methods thus needs to change else the SRS will only be able react to incidents and not prevent them.

**Power to the People – Stronger Consumer Choice and Competition** - In September 2020, the UK Government commissioned an independent review of competition policy, with the purpose of identifying the reforms needed to best position the country for prosperity in a post-EU exit and post-COVID world. Led by Bob Penrose MP, the review concluded in February 2021 with the publication of a report entitled 'Power to the People – Stronger Consumer Choice and Competition so markets work for people, not the other way around'

When properly aligned, the UK's competition regime can encourage innovation, promote productivity, and crucially, enable consumers to get a better deal. The review has explored options for encouraging competition in the UK, cutting red tape and improving consumer confidence. While acknowledging the long-established principles of consumer protection, the importance of empowering consumers and giving them the confidence to spend is seen as being central to economic recovery. The report includes proposals to guard against new scams as well as to ensure that citizen-consumers can expect fair treatment when they shop; particularly when online transactions are involved. Making the best possible use of data, technology and digital skills is seen as vital to the modern economy, and accordingly, the report makes recommendations to secure the future funding of the Competition and Markets Authority's (CMA) new Digital Markets Unit. Likewise, the report calls for the small claims court and alternative dispute resolution services to become universally available, 24/7, and be as cheap and simple to use as an app on your phone.

Recognising the role and value of regulators in this field, the Penrose report recommends a strengthening of both the CMA, and local authority Trading Standards Services (LATS). In the case of the latter, it also highlights the danger of an 'enforcement gap' becoming embedded if TS services are insufficiently resourced, with the following commentary reflecting the scale of the problem: *'LATS teams have been hollowed out in some – but by no means all - parts of the country by Councils facing budget pressures'* and *'Almost half of all LATS do not believe that their team has sufficient skills to cover the full range of Trading Standards responsibilities'*

In response, the report recommends the creation of a new statutory duty for minimum standards in local Trading Standards services 'including powers to mount antitrust and consumer investigations, and provide ring-fenced resources so they can deliver them well'. It goes on to suggest that the new statutory duty should define the outcomes which have to be achieved, but leave local Councils to decide how best to deliver them, thereby allowing local control and creativity. The UK Government has said it will consider the report's recommendations and respond to them in due course, as part of the wider agenda to rebuild the economy.

## What we plan to do next

### Supporting the local economy

Lead  
Responsibility

#### A fair trading environment is maintained

Continue operations to investigate and disrupt the business of those selling illicit and counterfeit tobacco products

C Hill/H Picton

Review the impact on line trading and the existing trading standards market surveillance mechanisms.

C Hill

#### Improved business practices and operation

Work with key businesses to support employment and skills development through the provision of accredited training and offerings such as food safety, health and safety and Hazard and Critical Point (HACCP) \*\*\*

H Picton

#### Accessible services responsive to business needs

Consolidate the advice and support requirements for our current Primary Authority partners

H Picton

Develop on line training for businesses on Food Safety and other regulatory areas.

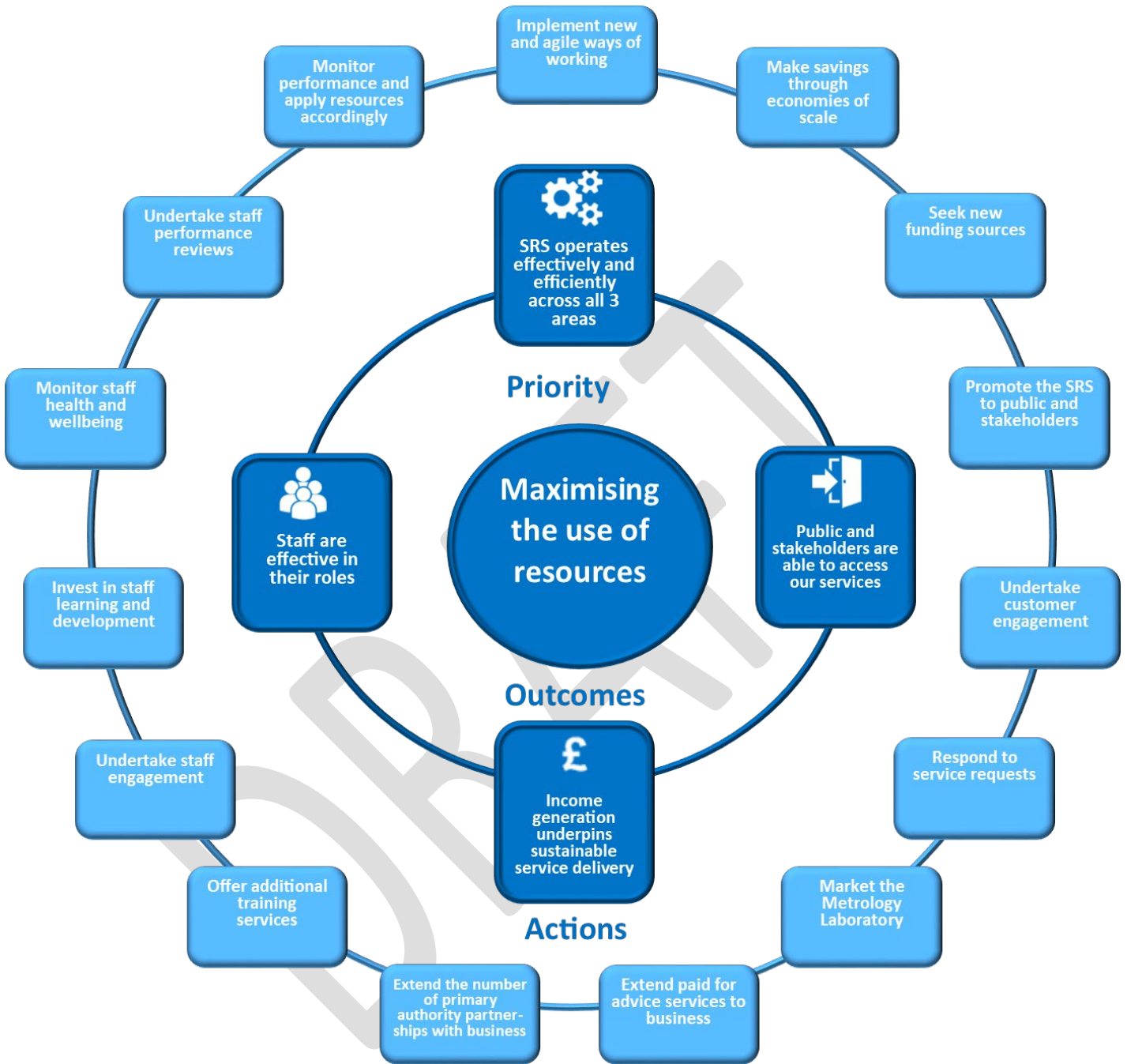
H Picton

## What we will measure during 2020/21

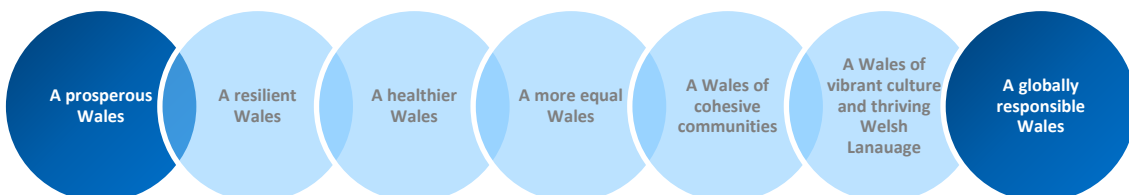
Performance Measures 2020/21	Target
<ul style="list-style-type: none"><li>• % of new businesses identified which were subject to risk assessment visit or returned a self-assessment questionnaire during the year for food hygiene.</li></ul>	90%
<ul style="list-style-type: none"><li>• % of new businesses identified which were subject to risk assessment visit or returned a self-assessment questionnaire during the year for Trading Standards</li></ul>	80%
<ul style="list-style-type: none"><li>• % of businesses who felt that interaction with SRS has helped them improve standards of compliance in their business.</li></ul>	85%
<ul style="list-style-type: none"><li>• % of businesses satisfied with our paid for business advice services.</li></ul>	Baseline being set
<ul style="list-style-type: none"><li>• % of individuals who feel that the training they received through SRS will benefit their business.</li></ul>	95%

DRAFT

# Maximising the use of resources



In addition, our outcomes also contribute to the following wellbeing goals:-



# 6.5 Maximising the use of resources

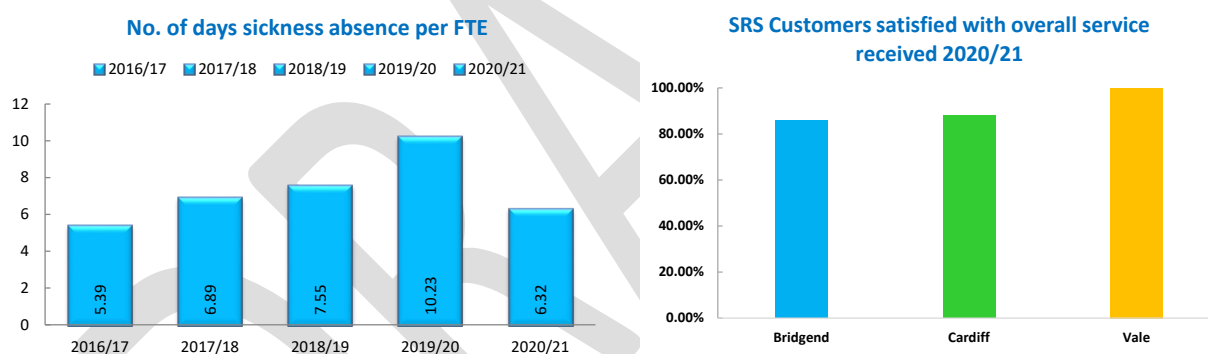
## Introduction

Maximising the use of resources was the original catalyst for creating SRS, and our work in this area continues. Reducing “triplication” of effort, introducing better processes, making our systems work without constant intervention, improving access into the service will all benefit our business and increase customer satisfaction.

We are generating income, where possible, to underpin service delivery; activities like marketing our metrology laboratory, offering paid for advice services, building Primary Authority partnerships and extending our training provision to business are examples of our move to a more “commercial” culture.

Above all, we recognise that crucial to the success of SRS are the people who work within the service. We will ensure that our officers are effective in their roles by investing in learning and development opportunities, by engaging them fully in the development of the service, and by fostering an environment where people are encouraged to think, lead and innovate.

## How we performed



<b>Staff development</b>	<b>Customers</b>	<b>Customers</b>	<b>Income generation</b>
<p><b>30+</b></p> <p>Officers developed through redeployment to Test, Trace, Protect and 5 officers gained managerial experience through redployment to managerial roles in the JET teams and TTP.</p>	<p><b>24,020</b></p> <p>Service requests received seeking advice or making complaint about issues that SRS regulate. 3850 of which were Covid-19 related.</p>	<p><b>95%</b></p> <p>Of businesses who responded to customer satisfaction survey in 20/21 said they were able to access the services and facilities provided by SRS</p>	<p><b>£67,000+</b></p> <p>Of income generated through more commercial based activities during 2020/21</p>



# What we have achieved



## SRS operates effectively and efficiently across all 3 areas

**Covid-19 – Changing the way we work and deliver services** - When the UK was put into lockdown on 23rd March 2020, the government put into place a limited number of reasons for people to be allowed to leave their homes. For SRS and many council services, this meant that offices were closed and employees had no choice but to work from home. As a service committed to mobile/remote working, SRS was in a better position than many, with the majority of employees already equipped to work remotely or from home. There were however teams such as Business Support and Licensing who traditionally kept a presence in the office with no facilities to work remotely, together with other services who maintained an office presence to cover 'on call' rotas and deal with complaints received. Both scenarios presented challenges for the service, particularly in the early stages of the pandemic, but SRS successfully adapted to new ways of working. The following provides a flavour of the types of changes that have occurred during the year.

- All staff have now been provided with the equipment needed to work from home such as laptops and mobile phones.
- Business Support and Licensing teams have now moved to working from home keeping a minimal presence in the office .
- Where attendance is required at the office for cover, this is done on a strict rota basis to minimise the numbers in the office.
- Committee meetings, internal and external meetings moved online via MS Teams. This method of communication is also used to keep in contact with colleagues.
- During the suspension of visits to premises, virtual inspections were undertaken where appropriate.
- The printing of correspondence was moved online, enabling letters to be emailed to a hybrid mail provider who would print and send correspondence, removing the need for employees to attend the office.
- Taxi driver and vehicle applications and licence payments were moved online. This has had several benefits for applicants as they are no longer restricted to applying for a licence during office hours and can now apply at any time of the day. They also no longer need to travel, park and wait in queues to be served.
- Hackney Carriage and Private Hire vehicle licences were extended for 6mths in line with government safety guidelines to support the taxi trade during the early part of the pandemic.
- The Noise app introduced prior to the pandemic, has been a really effective tool in dealing with noise complaints, negating the need for officers to monitor noise nuisance themselves.
- In order to support food businesses that changed their operations to take-away during the pandemic, SRS Officers provided telephone support and advice.

**Customer Satisfaction** – SRS delivers a diverse range of regulatory services on behalf of Bridgend, Cardiff and the Vale of Glamorgan Councils and we place great importance on receiving customer feedback which enables us to understand what we are doing well and what can be improved. As well as monitoring customer satisfaction through surveys, the results of which can be found throughout this plan, we also receive specific feedback from individuals or groups that we have

helped expressing their gratitude for our intervention. During the last year, we received a number of such compliments, a selection of which can be found below-

*"... I recently had need for the support of your team in dealing with an absolute nightmare of neighbours... After 18 years of living with 'neighbours from hell'... I finally had EXCELLENT support from members of your team... I cannot thank your team enough... After 18 years, and constant emails, letters and phone calls... I finally believe that at long last I am getting somewhere. It's all down to the professionalism and support provided by your team. I cannot thank you all enough. Many many thanks".* Noise Pollution complainant.

*"...I wanted to get in touch to say a massive thank you to you both you for your assistance... I've now received a full refund from them for the faulty watch winder and am hopeful that they do not intend to take legal action (which they had threatened). I have not heard from them since as clearly they would have seen, on return of the item, that there were no grounds for it. I am 100% sure that without your willingness to engage with me, and the efforts... this would not have been the outcome and I cannot thank you both enough".* Consumer.

*"It is clear from an outsider's perspective that your team has been stretched to the absolute limit this year. In all my interactions with your staff, they have been polite, helpful, pleasant and even upbeat!. My queries have been answered in a timely fashion and always without grumble or frustration. What a wonderful demonstration of absolute professionalism... The Communicable Disease Team are the unsung heros of this crisis. Please know that many of us recognise the fantastic work you have undertaken!".* School Headteacher.

*"On behalf of myself, my wife and son, we just wanted to thank you for all your help and assistance through very difficult and disruptive circumstances. Your advice and professionalism gave us a calm voice of reason when faced with a stressful situation none of us had faced before. It made a massive difference for us to talk to a professional that was prepared to listen and act to resolve the situation".* Parent of private sector housing tenant.

*"... thank you for your work in issuing advice so we could reopen... Your swift communication, helpfulness and clarity in the advice you gave is very much appreciated, especially given the busy context and what must have been a stressful time for you and your colleagues in the regulatory services department. Thank you so much".* Business owner



## Public and stakeholders are able to access our services

**Access to SRS services** – The ability of the public and stakeholders to access SRS services is one of many desired outcomes for SRS and has been particularly important during the last year as offices closed and people worked from home. The following examples show how SRS ensures access to services.

- **SRS website** – The improvement of the SRS website is an ongoing process which sees web pages being added or updated to provide valuable up to date information for SRS customers. This has been particularly true during the last year where we have provided regular guidance for businesses on how to comply with the Coronavirus Regulations and operate safely while highlighting the notices issued to businesses under the regulations. It is these updates, coupled with the increase in noise pollution complaints which have largely contributed to the significant increase in users during 2020/21 with 72,271 recorded together with 203,431

page views, an increase of 25,806 and 63,738 respectively from 2019/20. Our Noise and Air Pollution web pages consistently receive the most page views.

- **Equalities** – Following the inclusion of equalities information in our customer satisfaction surveys, we are now able to carry out equality monitoring of our customers in order to identify any issues or concerns and more specifically access to our services. During 2020/21, 95% of businesses who responded to our customer satisfaction survey said they were able to access the services and facilities they needed from SRS.
- **Twitter account** – Since launching our own Twitter account @SRS\_Wales in 2017, the SRS continues to increase the number of followers which stood at 550 on 1 April 2021. This means of communicating with our customers enables the service to be promoted whilst conveying key messages to residents and businesses alike.
- **Noise app** – This app can be downloaded by customers making complaint about noise enabling them to record short bursts of the disturbance and submit to the service to determine if a nuisance has occurred. This app has come into its own during the last year at a time when noise nuisance complaints increased as more people stayed at home, enabling complaints to be triaged, and reducing the need for officers to visit homes to monitor disturbances.



## Income generation underpins sustainable service delivery

**UKAS Accredited Metrology Laboratory** - The Metrology laboratory based in Cardiff undergoes an annual audit by the United Kingdom Accreditation Service (UKAS) to maintain its accreditation. The metrology laboratory was first established in 1995, but since the creation of SRS there has been a drive to enhance the income generating capacity of the laboratory. Calibration work has been undertaken for a significant number of businesses, the majority of whom are regular and returning customers. These businesses represent a broad range of sectors including avionics, food, pharmaceutical and medical where accuracy and confidence in their weighing equipment is fundamental to their operations. Building upon the success of the 2019 UKAS audit and the transition to the new standard, we have seen an increase in income from the Metrology Laboratory during the last year in the order of 20%.

**Income generation** – A key priority for SRS, is the adoption of a more commercial approach by developing 'paid for' services and marketing them to business. These commercial activities are aimed at complementing existing services whilst also providing income generation. We do this by developing Primary Authority partnerships with businesses of which we currently have 28 in place. Furthermore, the Service provides accredited training in areas such as food safety, Health and Safety and allergens. These courses were suspended during the last year due to the coronavirus pandemic which did have an impact on income but the service is currently looking at delivering these courses in a different way. Income is also generated via our Metrology Lab services and Air Quality/Local Site Operator Licences. During 2020/21 the income generated was £67,743.



## Staff are effective in their roles

**Investing in Staff Learning and Development** – SRS is committed to developing staff to ensure they are effective in their roles. Learning and development can take many forms from traditional study to the taking up of secondments. During the last year, the service has invested in a number of learning and development activities to support the business including the following examples:-

- SRS regularly offers opportunities to employees who are interested in developing themselves by offering to match fund suitable applications for external study. This has resulted in a number of employees pursuing academic qualifications such as M.Sc. qualifications in Environmental Health and Public Service Management, several of whom have now successfully completed their studies and are able to apply their learning in the workplace.
- Secondments provide development opportunities for both the employee who is seconded and the employee who fills the empty position and during the last year the number of secondments within the service increased significantly. Within SRS we now have four team managers seconded to different stakeholders which has enabled their roles to be filled on a temporary basis by existing employees. Furthermore maternity leave of one Operational Manager enabled an existing Team Manager to be seconded to the role. The creation of our JET teams enforcing Coronavirus Regulations also provided opportunities for 3 employees to be seconded to Team Manager roles. And finally, two of our officers have been seconded to TTP to take on a co-ordinating role across the wider public health network. The ability to ‘act up’ provides valuable development opportunities and experience for officers, whilst also contributing to the effective management of the service.
- Training in food standards work continued amongst our food safety officers to enable them to undertake food standards interventions at the same time as a food safety inspection of low risk food standards. This training and the concept of generic working not only provides team members with learning and career development opportunities but benefits the service by building a more cohesive and resilient approach to inspections.
- The demands on SRS brought upon us by the Covid-19 pandemic required SRS employees to respond by agreeing to be redeployed to other roles. Our commitment to the Track, Trace, Protect Scheme saw 30+ officers be redeployed to act as clinical leads and contact tracers over the last year at various times with 2 officers acting as managers, and Licensing Enforcement Officers re-deployed to enforce the Coronavirus Regulations at businesses across the region extending their work experience and personal development.

## Emerging issues

**Covid-19 pandemic** – The lockdown measures introduced in March 2020 as a result of the Covid-19 pandemic has impacted considerably on the work undertaken within the service and the ability to undertake inspections and visits. This has required the service to modify the way we work and will impact on service delivery as we enter the new financial year. In light of these significant changes, it will be necessary to continue to review service delivery during the lockdown and consider what long term changes need to be made including accessibility of service, risk assessments for officers and collaborative working arrangements with other organisations.

**Review of ICT and mobile working solutions** – An essential component of the operating model for SRS was the introduction of technical and mobile working solutions that enable employees to work remotely. This has contributed to the success of the service, but as agile working becomes the norm for many within the service, we are finding that the technology deployed is becoming outdated. The Covid-19 outbreak reinforced this as many more staff transitioned to working from home. It is clear that as technology improves, better facilities now exist which could further enhance the work of SRS and its remote working capabilities as we move forward. SRS will continue working with staff via the ICT Review working group and ICT to explore options for improving equipment and systems to ensure that we deliver services both efficiently and effectively.

**Retention of staff** –Filling vacancies continues to be challenging and SRS has struggled to recruit suitable individuals into certain areas of the service. The shortage of applicants with the right skills, abilities and experience in the different professions has created a more competitive market. These shortages, attributable to an aging professional demographic, increasing turnover due to retirement and a reduced investment in sponsorship of students by the Councils, have to be addressed if we are to deliver effective regulatory services. Consequently, SRS managers drafted a recruitment and retention strategy for the service which was approved by the Joint Committee in September 2019. .

The strategy sets out how SRS will recruit and retain officers with the requisite skills, experience, behaviours and beliefs to undertake their job roles effectively. Our 2020 staff survey shows that the majority of our officers are content with their employment within the SRS, yet the SRS delivery model remains at if we are unable to attract, recruit and retain a high calibre workforce. The impact of the new strategy will be monitored over the year to determine its efficacy.

## What we plan to do next

### Maximising the use of resources

Lead  
Responsibility

#### SRS operates effectively and efficiently across all 3 areas

Maximise mobile working opportunities by reviewing ICT and mobile working needs across the service via the ICT Working Group including evaluating options for virtual communication between staff and other stakeholders to ensure service continuity with particular emphasis on:-

- The introduction of portable devices to enable use of electronic inspection forms
- Exploring opportunities to use tools such as ‘Yammer’ to improve communications, sharing of ideas and innovation.

H Picton

Promote the Intelligence Operating Model across SRS with a view to rolling out to other areas of the service, where appropriate

H Picton

Develop a recruitment strategy together with retention initiatives to address skill gaps within the Shared Regulatory Service.

D Holland

Meet the recommendations outlined in the Welsh Audit Office report ‘Delivering for less’.

D Holland

Review Licensing fees and charges across the service and investigate additional sources of income through Council Tax premium on empty homes and allocate this to improve empty homes performance.

W Lane

Develop partnerships that have been forged across SRS during the last 12 months to enhance service delivery.

All OMs

## Public and stakeholders are able to access our services

Undertake a post covid review to determine how adaptations made during the pandemic together with lessons learnt may be incorporated into routine processes.	All OMs
Improve engagement and consultation with stakeholders including service users and residents and review the effectiveness of current mechanisms used to access Shared Regulatory Services. ***	All OMs

## Staff are effective in their roles

Complete the PDR process with all SRS employees.	All OMs /TMs
Review Workforce Development Plan.	C Hill

\*\* - Cardiff Corporate Plan \*\*\* Vale Service Plan

## What we will measure during 2020/21

Performance Measures 2020/21	Target
Average days sickness per FTE.	8.00
% of Staff Performance Development Reviews completed.	100%
% of staff who feel they are able to achieve the right balance between work and home life.	100%
% of staff working in SRS who are satisfied with their job in SRS.	100%
% of customers and Council members satisfied with their ability to access the facilities and services they need from SRS.	90%

# Appendix 1 – Risk Register

Possible Impact or Magnitude of Risk	Catastrophic	<b>MEDIUM</b> 4	<b>MEDIUM/HIGH</b> 8	<b>HIGH</b> 12	<b>VERY HIGH</b> 16
	High	<b>MEDIUM/LOW</b> 3	<b>MEDIUM</b> 6	<b>MEDIUM/HIGH</b> 9	<b>HIGH</b> 12
	Medium	<b>LOW</b> 2	<b>MEDIUM</b> 4	<b>MEDIUM</b> 6	<b>MEDIUM/HIGH</b> 8
	Low	<b>VERY LOW</b> 1	<b>LOW</b> 2	<b>MEDIUM/LOW</b> 3	<b>MEDIUM</b> 4
<small>Low 1-2 Low/Medium 3 Medium 4-6 Medium/High 8-10 High 12-16</small>		<b>Very Unlikely</b>	<b>Possible</b>	<b>Probable</b>	<b>Almost Certain</b>
<b>Likelihood/Probability of Risk Occurring</b>					

Risk Description	Inherent Risk Score (Feb 2021)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
RR1: Insufficient resources, and capacity to deliver planned services will result in loss of service provision and reduction in performance. NB.The risk is exacerbated by the	4	3	<b>High 12</b>	The Service is examining new ways of prioritising services and using risk based approaches to activities in line with reduced resources, however the Covid 19 pandemic has placed substantial demands on the service in terms of Test, Trace Protect and the enforcement of the Coronavirus Regulations. To mitigate this capacity has been improved following a successful bid during	4	3	<b>High</b>

Risk Description	Inherent Risk Score (Feb 2021)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
demands placed upon the SRS due to the Covid 19 outbreak.				2020/21 and the recruitment of graduates to backfill posts seconded to covid work. Despite this the service has yet to fully return to “business as usual” and a backlog of normal planned work remains that requires significant resource to complete.			
RR2: Inability to recruit professional officers to vacant posts.	4	3	High 12	The traditional supply of professional officers from universities has greatly reduced, and it now takes longer to qualify which has resulted in a shortage of applicants for vacancies within the service. SRS however has developed a recruitment strategy, and is exploring several options to address this. Furthermore, the service has recruited a number of Foundation Modern Apprentices and students to support the work of the service.	3	3	Medium/ High 9
RR3: The complexities of resource allocation may result in a lack of understanding and misalignment of resources.	3	3	Medium/ High 9	Dedicated accountant appointed for the Service. Governance arrangements in place to address lack of understanding. Review and standardisation of financial processes ongoing.	2	2	Medium 4
RR4: The lack of functioning ICT systems could hinder the ability to work as a single service unit and affect the Service’s ability to work smarter and more efficiently.	3	3	Medium/ High 9	The web based Tascomi database implemented across all 3 authorities facilitates remote access together with laptops and mobile devices rolled out to staff enabling more agile working. This technology however has become outdated and in order to improve remote working capabilities and deliver services efficiently and effectively, working groups across SRS have identified a need to move to more portable devices that facilitate better	2	2	Medium 4



Risk Description	Inherent Risk Score (Feb 2021)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
				remote/mobile working. Specifications have been submitted to ICT with a view to them sourcing and costing suitable devices, however the current demands placed on ICT have resulted in delays then responding with the information needed.			
RR5: Failure to identify and resource staff learning and development needs to address changes in roles and immediate needs and long term goals of the service could result capability issues amongst staff which would affect the Service's ability to deliver services.	3	3	Medium/ High 9	SRS is committed to the resourcing of training to develop people to ensure competency and #it's about me performance reviews are undertaken annually. Recent budget reductions however, have caused a number of people to secure positions elsewhere and we now face a skills gap akin to that in 2015/16. To address this a recruitment strategy was developed and approved by Joint Committee on 10 September 2019.	1	3	Medium/ Low 3
RR6: Implementation of new legislation may create additional demands on service delivery.	4	3	High 12	Whilst workloads are reviewed and monitored and processes are in place to regularly report to partner authorities, it is not always easy to predict the impact that new legislation may have on resources. This has been particularly during the last year as a result of the Covid-19 pandemic when SRS became responsible for enforcing the Coronavirus Regulations across the 3 areas which required a change of focus and placed additional demands on the service. These Regulations change frequently and while we have improved capacity within the service, the impact of these regulations	4	3	High

Risk Description	Inherent Risk Score (Feb 2021)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
				significantly impacts our planned “business as usual” activities, with a significant backlog of work accumulating.			
RR7: An inability to recruit officers to the Duty Officer regime may result in inadequate cover and failure to deal with emergencies out of hours.	3	2	Medium 6	The Duty Officer regime operates on a 24/7 basis over 365 days a year providing a single point of contact out of office hours dealing with SRS emergencies. Cover is provided by officers on a voluntary basis however there have been periods where it has become difficult to recruit officers resulting in shortage of cover which has required managers to step in a short notice. Steps have recently been taken to address this lack of resilience following the recruitment of new officers to the service who have subsequently volunteered to work the rota. Therefore, whilst the risk has reduced, there will be a need to keep arrangements under review.	1	2	Low 2
RR8: The positioning of Shared Regulatory Services under a host authority, together with unique branding may result in the Service becoming divorced from its constituent Councils or marginalised.	2	2	Medium 4	The Service remains relevant to all 3 authorities through links into Corporate Plans of 3 authorities, attendance at the various Council/Executive meetings and maintaining strong links with members and senior officers within each legacy authority with opportunities to promote successes taken where possible. The advent of Covid-19 has seen the critical involvement of SRS in the Test, Trace and Protect system and enforcement of Coronavirus regulations garner greater attention and recognition across the 3 authorities.	1	2	Low 2

# Appendix 2 – Action Plan

## Improving health and wellbeing

Lead  
Responsibility

### The food chain is safe and free from risks

Develop and adopt the Food and Feed Law Enforcement Plan 2021/22 and undertake interventions in accordance with the plan and the arrangements in place to discharge food safety duties. \*\*\*

C Hill

Adopt the guidelines issued by the Food Standards Agency Recovery Plan in relation to the prioritisation of food business programmed inspections and backlog.

C Hill

Develop and adopt the Port Health Plan 2020/21

C Hill

### Risks in the workplace are managed properly

Develop and adopt the Section 18 Health and Safety Service Plan 2021/22 and undertake interventions in accordance with the plan and the arrangements in place to discharge health and safety duties. \*\*\*

C Hill

### Noise and air emissions are controlled

Develop a Noise policy including service standards.

W Lane

### A safe trading environment is maintained

Incorporate regular surveillance of on line selling into trading standards work due to the volume of goods being sold on line.

C Hill

Identify and provide advice to estate/letting agents within the SRS region in connection with consumer protection legislation. Specific advice to include omitting to inform purchases of cladding safety concerns in respect of properties offered.

C Hill

### Licensed premises operate responsibly

Deliver a programme of inspections together with a public awareness campaign to ensure retailers are complying with the Minimum Unit Pricing (MUP) controls for alcohol. Some visits have been conducted during 2020-21 and the programme will be completed during 2021-22.\*\*\*

C Hill/H Picton

## The quality of private rented property is improved

Drive up standards in the private rented sector through:

- Enforcement action against rogue agents and landlords letting and managing properties;
- Intelligence-led enforcement actions for unsafe properties and rogue landlords;
- Work with Rent Smart Wales to address problem landlords.\*\*

W Lane

Review HMO licensing Fees Structure and process to maximise resources available and implement split fees in line with the Provision of Services Regulations 2009

W Lane

Review Cathays Additional Licensing scheme in preparation for consultation and re-declaration.

W Lane

Continue investigations into HMOs in the Bridgend and Vale areas, not registered with Rent Smart Wales in order to ensure compliance

W Lane

## Infectious disease is controlled and prevented

Secure approval and deliver the Communicable Disease Service Plan 2020/21 and undertake interventions in accordance with the plan and the arrangements in place to discharge these duties.\*\*\*

C Hill

Support partners in management of outbreaks and leading on all matters pertaining to the control of communicable disease\*\*\*

C Hill

Ensure continued support for high risk settings, including care homes by investigating cases and outbreaks of covid 19 and other communicable diseases in private sector care homes , providing advice, carrying out interventions and where necessary taking escalated enforcement action. \*\*

C Hill

Work in partnership to respond to the Covid-19 pandemic by leading on Test, Trace, Protect service and supporting care homes, schools and nurseries. \*\*\*

C Hill

Support local businesses to trade in a covid-19 safe environment by ensuring compliance with social distancing and other Covid 19 controls through the provision of advice and increased enforcement activity. \*\* & \*\*\*

All OMs

## Safeguarding the vulnerable

Lead  
Responsibility

Support the 3 partner Councils in fulfilling their safeguarding responsibilities.  
\*\* & \*\*\*

All OMs

## Children are protected from harmful substances and products

Carry out underage sales exercises in relation to the sale of tobacco, alcohol and sale of knives. \*\*\*

C Hill

## Illegal money lending activities are prevented

Review the 'Near Miss' Pilot Scheme and consider other Proceeds of Crime funded community opportunities.

H Picton

Support victims of illegal money lending to access debt advice, rebuild their finances and make a sustainable transition to legal credit and carry out enforcement to remove loan sharks from communities \*\*\*

H Picton

## Vulnerable people are not subject to exploitation, slavery or trafficking

Continue a programme of training and awareness of Child Sexual Exploitation, slavery and trafficking to protect vulnerable residents.

W Lane

## Taxi provision is safe and fair

Engage and respond to any further consultation from Welsh Government on their public transport consultation to introduce national standards for taxis.

W Lane

Undertake enforcement exercises to ensure compliance with the provisions of the Equalities Act and to ensure compliance with taxi regulations.

W Lane

Evaluate taxi enforcement activities undertaken throughout the year.

W Lane

## Protecting the environment

Lead  
Responsibility

### The environment is protected from harmful emissions to land, air and water

Complete the public consultation and agree and implement the Action Plan for the Park Street, Bridgend AQMA.

H Picton

Ensure good air quality in Cardiff by implementing and evaluating the:

- Clean Air Plan as approved by Welsh Government to ensure compliance with the EU Limit Value for Nitrogen Dioxide (NO<sub>2</sub>) in the shortest possible time by the end of 2021;
- Wider Clean Air Strategy measures to ensure a continued reduction of NO<sub>2</sub>

H Picton

concentrations is achieved across the city.

Consult upon policy changes to the age, emission and testing standards of vehicles in order to deal with the air quality challenges to include:

- Requiring vehicles to have a minimum Euro 6 emission standards
- Developing a medium-term strategy to ensure the Cardiff taxi fleet are all Ultra Low Emission Vehicles.

W Lane

## People will use energy efficient buildings and products

Work with landlords to return empty properties back into use helping to increase the availability of affordable housing for sale or rent in Bridgend and Cardiff.

W Lane

## Animals are treated humanely

Promote a register for all breeders, home boarders etc. that have a licence.

H Picton

Carry out investigations into illegal dog breeding.

H Picton

## Communities are protected from nuisance and are safer

Explore the feasibility of extending the number of pest control contracts by engaging with the farming community, schools and commercial sector.

H Picton

Engage with students and residents during Freshers Week in Cardiff providing community advice on housing, environmental and social issues.

W Lane

## Supporting the local economy

Lead  
Responsibility

### A fair trading environment is maintained

Continue operations to investigate and disrupt the business of those selling illicit and counterfeit tobacco products

C Hill/H Picton

Review the impact on line trading and the existing trading standards market surveillance mechanisms.

C Hill

### Improved business practices and operation

Work with key businesses to support employment and skills development through the provision of accredited training and offerings such as food safety, health and safety and Hazard and Critical Point (HACCP) \*\*\*

H Picton

### Accessible services responsive to business needs

Consolidate the advice and support requirements for our current Primary Authority partners

H Picton

Develop on line training for businesses on Food Safety and other regulatory areas.

H Picton

## Maximising the use of resources

Lead Responsibility

### SRS operates effectively and efficiently across all 3 areas

Maximise mobile working opportunities by reviewing ICT and mobile working needs across the service via the ICT Working Group including evaluating options for virtual communication between staff and other stakeholders to ensure service continuity with particular emphasis on:-

H Picton

- The introduction of portable devices to enable use of electronic inspection forms
- Exploring opportunities to use tools such as 'Yammer' to improve communications, sharing of ideas and innovation.

Promote the Intelligence Operating Model across SRS with a view to rolling out to other areas of the service, where appropriate

H Picton

Develop a recruitment strategy together with retention initiatives to address skill gaps within the Shared Regulatory Service.

D Holland

Meet the recommendations outlined in the Welsh Audit Office report 'Delivering for less'.

D Holland

Review Licensing fees and charges across the service and investigate additional sources of income through Council Tax premium on empty homes and allocate this to improve empty homes performance.

W Lane

Develop partnerships that have been forged across SRS during the last 12 months to enhance service delivery.

All OMs

### Public and stakeholders are able to access our services

Undertake a post covid review to determine how adaptations made during the pandemic together with lessons learnt may be incorporated into routine processes.

All OMs

Improve engagement and consultation with stakeholders including service users and residents and review the effectiveness of current

All OMs

mechanisms used to access Shared Regulatory Services. \*\*\*

## Staff are effective in their roles

Complete the PDR process with all SRS employees.

All OMs /TMs

Review Workforce Development Plan.

C Hill

DRAFT