

Meeting of:	Shared Regulatory Services Joint Committee
Date of Meeting:	Tuesday, 11 June 2019
Relevant Scrutiny Committee:	Homes and Safe Communities
Report Title:	Shared Regulatory Services Business Plan
Purpose of Report:	To seek Joint Committee approval for the Shared Regulatory Services Business Plan
Report Owner:	Dave Holland, Head of Shared Regulatory Services
Responsible Officer:	Miles Punter, Director of Environment and Housing Services
Elected Member and Officer Consultation:	Committee Reports – Legal and SRS – Accountant Consultation with stakeholders has been carried out.
Policy Framework:	This is a matter for the Shared Regulatory Services Joint Committee
<p>Executive Summary:</p> <ul style="list-style-type: none"> • The report sets out the process by which the draft SRS Business Plan for 2019/20 has been developed • The draft plan requires ratification by the Joint Committee and forms a part of the SRS Annual reporting process set out in the Joint Working Agreement. 	

Recommendations

- 1.** That the Joint Committee notes the content of this report and approves the SRS Business Plan for 2019/20.
- 2.** That the Head of the Shared Regulatory Service is authorised to make administrative amendments to the 2019 /20 Business Plan should the need arise.

Reasons for Recommendations

- 1.** The Joint Working Agreement (JWA) specifies (at clause 14) that each year the Head of Regulatory Services will develop a draft Business Plan under the direction of the Management Board
- 2.** The purpose of the Business Plan, as specified by the JWA, is to update the information contained in the previous Business Plan; and to identify the proposals for service activities, business and financial objectives, efficiency targets, business continuity planning, risk management, indicative staffing levels and changes, performance targets, costs and income. The JWA further specifies that a draft Business Plan is submitted to the Joint Committee for approval, and, once approved, circulated to each participant authority's Head of Paid Service.

1. Background

- 1.1** The draft SRS Business Plan reflects the aspirations set out in each of the participant Council's corporate plans, along with the national priorities agreed for Regulatory Services in Wales. Performance is monitored and measured with quarterly and annual reviews by the SRS management team and SRS Management Board. The SRS plan ensures that the partner Councils continue to meet statutory requirements and to continuously improve service delivery.
- 1.2** The draft SRS Business Plan has a 'golden thread' or 'line of sight' to the corporate priorities of the respective Councils. The strategic themes of the Shared Regulatory Service identify the areas of work that are delivered in support of these corporate priorities.
- 1.3** The draft SRS Business Plan has been the subject of consultation with the SRS officers, senior managers at the partner Councils and a range of stakeholders. The plan was presented to the Environmental Scrutiny Committee at Cardiff on May 7th 2019 and their response is included at Appendix A. The plan (Appendix B) is now presented to the Committee for approval. Members will be provided with a brief presentation identifying the key issues for 2019/20 at the Committee meeting.

2. Key Issues for Consideration

2.1 The draft plan has been developed through conversations with SRS officers and discussions with different stakeholders. Perhaps most pleasing was the recognition that we have produced a comprehensive plan, with a realistic acknowledgement of the challenges and resource limitations within which SRS is trying to deliver essential services. There is broad support for continued use of the existing strategic priorities namely:

- Improving health and wellbeing
- Safeguarding the vulnerable
- Protecting the local environment
- Supporting the local economy

All of which are underpinned by a fifth strategic priority, that of *Maximising the use of our resources*

2.2 The draft SRS Business Plan builds upon the plan approved by the Joint Committee in 2018. That plan focused primarily on the consolidation of the Shared Service with a mix of 'business as usual' and the conclusion of those implementation activities required to ensure effective service delivery. This Plan sets out the full range of services provided by SRS under the embedded operating arrangements, an indication of the activities planned for the 19/20 period, the financial projections for the year, and a review of performance for 2018/19.

The plan contains proposed service improvement targets aligned with the Well-being Objectives and Corporate Health priorities. These are set out in Section 6 of the Plan which outlines the proposed targets and includes all relevant performance indicators that will enable the partner Councils to demonstrate progress against achieving their corporate Plan Well-being Objectives. Targets have been set for those performance indicators that are continuing into 2019/20 where appropriate to do so. Consultation with stakeholders generated some minor changes to the Plan and Members are asked to approve the draft 2019/20 SRS Business Plan.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

3.1 The Well-being of Future Generations Act requires the SRS to underpin decision making by contributing to the seven well-being goals of the Act, following the five ways of working, and consequently undertaking actions that will have a positive impact on people living in the future as well as those living today. The draft SRS Business Plan contains a number of initiatives that contribute to the

well being objectives. Section 6 of the plan illustrates how the SRS priorities interface with the well being goals on matters such as safeguarding the vulnerable and protecting the environment.

- 3.2** The fundamental purpose of the SRS (here defined as trading standards, environmental health and licensing) is to protect residents, consumers, businesses and communities. The broad range of responsibilities can make it difficult to demonstrate succinctly their impact and value in terms of the well being; the SRS Business Plans provide members with greater detail and articulate how those statutory responsibilities, and subsequent activities, contribute toward wellbeing across the region. This Business Plan highlights the activities undertaken last year to promote the sustainable development principle and the proposed forthcoming programmes of action.

Aligning the Well-being Goals of the Act enables us to evidence our contribution to the National Well-being Goals. Promoting the five ways of working is reflected in our approach to integrated business planning. Setting consistently challenging yet realistic steps and performance improvement targets, the SRS is able to clearly demonstrate progress towards achieving the national goals. Importantly we seek to connect everything we do to the work of our partners. SRS cannot deliver its priorities alone, so we take a joined up approach to policy, strategy and delivery.

4. Resources and Legal Considerations

Financial

- 4.1** The financial resource implications arising from budget reductions in this period have been considered previously as part of the three year financial strategy for the service. The programmes of work identified in the plan can be delivered within budget.

Employment

- 4.2** There are no particular employment matters associated with the plan. The SRS budget reductions have seen a reduction in human resources available within the service and performance metrics and some aspects of scope of the SRs have been amended accordingly.

Legal (Including Equalities)

- 4.3** There are no particular legal and Human Rights implications arising from the draft SRS Business Plan.

5. Background Papers

The Joint Working Agreement between Bridgend, Cardiff and the Vale of Glamorgan Councils on the provision of a Shared Regulatory Service dated 2015 and revised July 2017.

Ref: RDB/RP/NM/07.05.2019

14 May 2019

Councillor Norma Mackie,
Chair of Licensing & Public Protection,
County Hall,
Atlantic Wharf,
Cardiff CF10 4UW.



Dear Councillor Mackie,

Environmental Scrutiny Committee – 7th May 2019

On behalf of the Environmental Scrutiny Committee, I would like to thank you and the officers for attending the meeting on Tuesday 7th May 2019 to discuss the item on the 'Draft Shared Regulatory Services – Business Plan 2019/20'. The comments and observations made by Members of the Committee on this item are set out in this letter.

Draft Shared Regulatory Services – Business Plan 2019/20

Members were concerned to hear that the service had experienced some recent issues around recruitment and retention, particularly for the Food Hygiene Service that is in the process of recruiting five new officers to replace staff who had left to pursue other employment opportunities. They hope that the current recruitment process is successful and that the temporary reduction in staff does not have a negative impact on the Food Hygiene Service's ability to carry out all of the necessary visits. They ask that the Shared Regulatory Service undertake a short review to assess what can be done to prevent such a sudden loss of staff in future, and that they share any findings and future actions from this work with the Committee.

During the meeting officers explained that the Shared Regulatory Service had a supply of 'cold calling zone stickers' that they could make available to any councillors who wanted them to distribute in their wards. The Committee thought that this would be very popular with local councillors and have asked for a supply to be sent to Cardiff Council's Member Services. On arrival,

Member Services could send out a short email explaining that they are available to all councillors for collection and distribution.

At the meeting a Member expressed his frustration at the outcome of a recent illegal tobacco investigation in his ward in which the Shared Regulatory Service had played a major role. He commented that they had caught the shop owner selling illegal tobacco, confiscated the contraband and then fined him £2,000. Despite this, it was obvious that the shop owner had quickly restocked and continued with the illegal trade. The fine and inconvenience were merely 'a part of the business plan'. The Member felt that the service needed to be able to apply more sanctions and pressure, but was told that this would not be possible as a dedicated resource would be required. This is something that is not affordable within the constraints of the current Shared Regulatory Service budget. An officer went on to explain that such an operation would only work if new powers were introduced in Wales, it was properly funded and supported by trading standards professionals. On this basis, the Committee ask that you work with the Shared Regulatory Service to lobby Welsh Government for more powers and money to tackle the illegal tobacco trade, because without such an investment the problem will persist.

The Committee is concerned that the future of the 'Out of Hours' service looks uncertain due to financial and other pressures. Members believe that this is an important service, which if lost would make it difficult to tackle a wide range of late night anti-social behaviour. Should a proposal be put forward to close the 'Out of Hours Service', then I would ask that you inform the Committee directly before a decision is taken so that scrutiny can be undertaken on the matter.

I would be grateful if you would consider the comments above and provide a response to the content of this letter. This information has also been included in a letter to Councillors Michael and Thorne, therefore, I am happy to receive a combined response.

Regards,

Handwritten signature of Ramesh Patel in black ink.

Councillor Ramesh Patel

Chairperson Environmental Scrutiny Committee

Cc:

- Andrew Gregory - Director of Planning, Transport & Environment
- Dave Holland – Head of the Shared Regulatory Service
- Christina Hill – Operational Manager, Commercial Services
- Helen Picton – Operational Manager, Enterprise & Specialist Services
- Will Lane – Operational Manager, Neighbourhood Services
- Davina Fiore - Director of Governance & Legal Services
- Members of Cardiff's Environmental Scrutiny Committee



Draft
Shared Regulatory Services
Business Plan
2019/20



**Shared
Regulatory
Services**
Gwasanaethau
Rheoliadol
a Rennir



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Introduction



2019/20 sees the fifth year of the Shared Regulatory service (SRS) providing a Regulatory service for Bridgend Cardiff and the Vale of Glamorgan. At the outset we sought to provide a service that would be resilient through the years of “austerity” that would save money for the partner councils and that would begin to deliver these services in a more market focused manner. 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 and we are seeing some real impact and significant outcomes for the people who live in the region.

Being successful carries expectation and in a time of reducing budgets delivering a service that meets the needs and desires of our stakeholders is becoming increasingly challenging. This summer, we will undertake a four year review of the service and hopefully demonstrate that the decision to create the SRS was well founded. We hope to be able to demonstrate that our work, our successes and to ensure those who fund the SRS understand fully how important that work is to the respective corporate agendas.

Without doubt, we will need to rethink, refocus and retrench in some aspects of our service offering. In other parts of the service we will reposition the service offering and deliver compliance through different means. The challenges faced over the next three years are set out in Section 3 of this plan and the most pressing is the recruitment and retention of our workforce. The success of the SRS is undoubtedly due to the quality and capability of our officers; those talents are being recognised by others and many have been lured away by offers of greater salaries and career development opportunities. We will put in place a strategy to deal with workforce development, but inevitably in an area where expertise is in short supply a competitive “transfer market” is developing.

The political uncertainty around the EU and trading arrangements has huge ramifications for the SRS and the successful delivery of its five priorities. Our goal of supporting local businesses will gain greater momentum as businesses begin to understand their new legal duties in a changed trading environment. Our goals of safeguarding the vulnerable and improving health and wellbeing will come under greater strain should the forecast reductions in GDP and living standards materialise.

Our goal is a simple one; continue our successful collaboration of Regulatory Services, and provide a great service for the people of the region. That is a challenge for any organisation, but for one like ours which is involved in so many different ‘businesses’ across three different Councils, one cannot understate that undertaking. More work, less money and the need to retain a talented, responsive group of officers in these circumstances add to that challenge. The world is changing around us and so to remain effective and relevant we have to change too, by offering elected members solutions to the challenges they face, by ensuring people understand the importance and impact of our role and by viewing change as progress and not a setback.

This SRS Business plan hopefully depicts an organisation that has embedded itself within the three Councils; an organisation that beginning to lead discussions and not waiting to be asked, an organisation that is providing solutions for stakeholders and not shrugging its shoulders, an organisation that is challenging unlawful practices and safeguarding the interests of the region. An organisation that the three Councils can be proud of.

Dave Holland
Head of Shared Regulatory Services

Our vision

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

Our priorities



Our outcomes



Our primary aims

We will achieve these outcomes by:-

- 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 1st 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 been tasked with the oversight of the project implementation and future operation of the service. 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 Pollution

Air Quality Management and regulates emissions from industrial processes.



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 privated 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 5.0pm
Friday: 8.30 am to 4.30pm

Cardiff

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

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 and communicable disease. 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, actively seeking 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 focused 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.



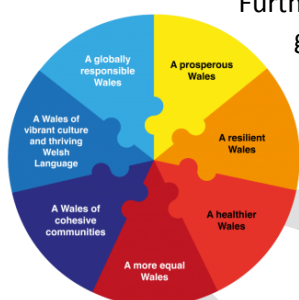
Supporting these strategic priorities, are a number of outcomes that the Service aims to deliver and which are evidenced throughout this Business Plan. Our vision and outcomes will be achieved through the following primary aims:

- 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 **Welsh 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. The following table highlights how Shared Regulatory Services contribute to these goals through its priorities.



Wellbeing goals	Shared Regulatory Services Strategic Priorities
A prosperous Wales	<ul style="list-style-type: none"> • Supporting the local economy • Maximising the use of resources
A resilient Wales	<ul style="list-style-type: none"> • Improving health and wellbeing • Protecting the environment
A healthier Wales	<ul style="list-style-type: none"> • Improving health and wellbeing • Safeguarding the vulnerable • Protecting the environment • Supporting the local economy
A more equal Wales	<ul style="list-style-type: none"> • Improving health and wellbeing • Safeguarding the vulnerable
A Wales of cohesive communities	<ul style="list-style-type: none"> • Improving health and wellbeing • Safeguarding the vulnerable
A globally responsible Wales	<ul style="list-style-type: none"> • Improving health and wellbeing • Protecting the environment • Supporting the local economy • Maximising the use of resources

2.2 Corporate priorities and outcomes of partner local authorities

Bridgend County Borough Council	City of Cardiff Council	Vale of Glamorgan Council
		

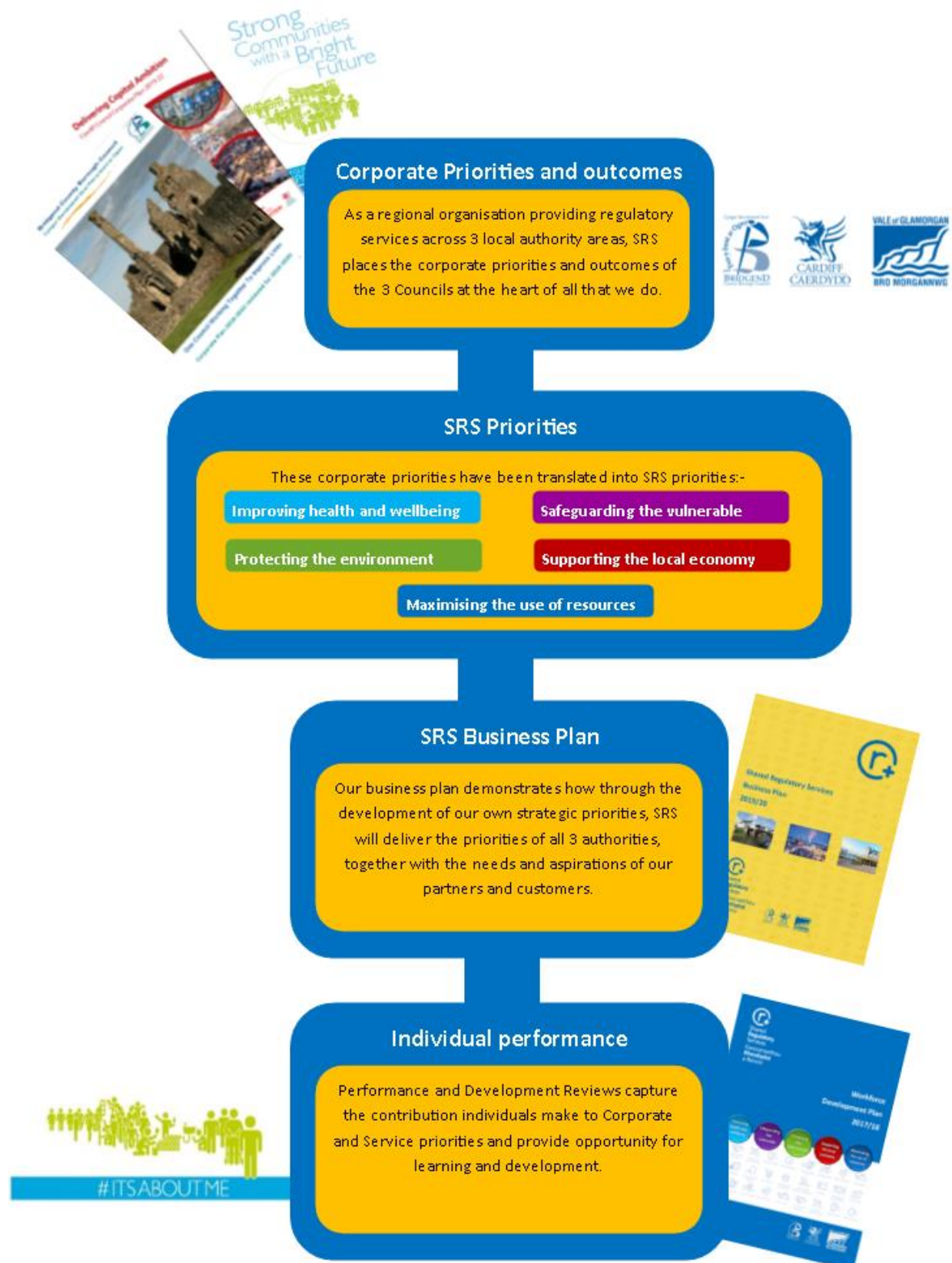
Corporate Priorities

<ul style="list-style-type: none"> • Supporting a successful economy; • Helping people to be more self reliant; • Smarter use of resources 	<ul style="list-style-type: none"> • Working for Cardiff; • Working for Wales; • Working for the future; • Working for public services 	<ul style="list-style-type: none"> • Reducing poverty and social inclusion; • Providing decent homes and safe communities; • Promoting regeneration, economic growth and employment; • Promoting sustainable development and protecting our environment; • Raising overall standards of achievement; • Valuing culture and diversity; • Encouraging and promoting active and healthy lifestyles; • Safeguarding those that are vulnerable and promoting independent living.
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Corporate Outcomes

<ul style="list-style-type: none"> • Supporting a successful economy; • Helping people to become more self reliant; • Smarter use of resources 	<ul style="list-style-type: none"> • 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 an resilient way; • Modernising and integrating our public services. 	<ul style="list-style-type: none"> • An inclusive and safe Vale; • An environmentally responsible and prosperous Vale; • An aspirational and culturally vibrant Vale; • An active and healthy Vale.
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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 four 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 2019/20, and our risk management approach (Appendix 1).

Delivering the SRS in the future - We are delivering the SRS with a reducing resource. Our current three year financial programme involves changes to working practices. 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. (RR1)

Managing complex financial processes – Managing resource in the new 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 (after only 2/3 years). Research indicates that better facilities now exist and the SRS will work with ICT to exploit these newer technologies to ensure that our officers can continue to operate as efficiently as possible. (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 in 2019/20. (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. The Shared Regulatory Service and the important services we provide will therefore need to be promoted actively 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 2017 and the Public Health (Minimum Price for Alcohol) (Wales) Act 2018, however, it is not always easy to predict the impact that new legislation may have on resources. The uncertainty on membership of the EU has the potential to exacerbate such matters. 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)

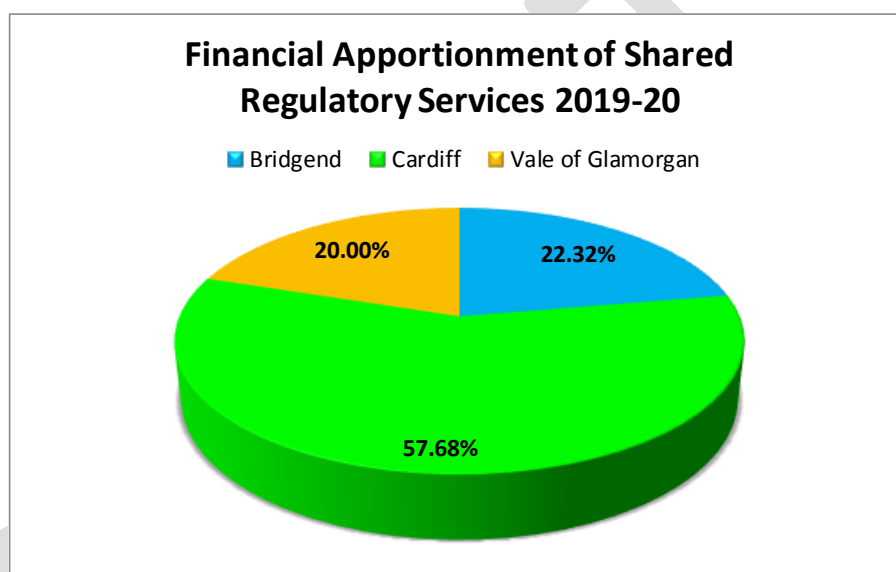
Out of Hours - The SRS operates an “out of hours” duty rota to enable the service to respond to incidents that arise outside normal office hours. These responses include responding to nuisance calls relating to burglar alarms, food incidents, etc. To date, officers have operated the rota on a voluntary 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. SRS management will review this position and put forward options for this aspect of the service. (RR6)

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4. Budget

4.1 Financial allocation

Bridgend, Cardiff and the Vale of Glamorgan Councils fund Shared Regulatory Services jointly through an agreed formula. 2019/20 represents Year 5 of the SRS and we are midway through the agreed budget reduction process of 5% year upon year. In this financial year, the service absorb the majority of the savings through a realignment of people and resource and use 2020/21 to ensure that changes are embedded and have not impaired service delivery. 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. 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 2019/20			
Area	Core £'000	AS £'000	Total £'000
Bridgend	1,308	420	1,728
Cardiff	3,381	1,412	4,793
Vale of Glam	1,172	497	1,669
Total	5,861	2,329	8,190

Gross Expenditure Budget 2019/20	
Authority	Proposed £000
Bridgend	1,728
Cardiff	4,793
Vale of Glamorgan	1,669
Gross Expenditure Budget 2018/19	8,190

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 Additional HMO Licensing Kennelling & Vets Pest Control

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.

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 developed early 2018 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 2018 sought the views of employees on a number of work place themes including learning and development. Whilst results were generally good in this regard, personal development 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.

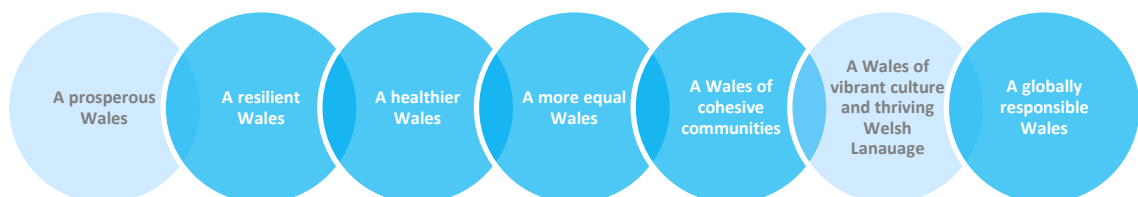
The following section of this Business Plan brings all these different elements together in order to highlight our achievements and performance during the last year together with the actions we aim to undertake in 2019/20 to deliver our priorities. This framework will be continually reviewed to ensure 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:-

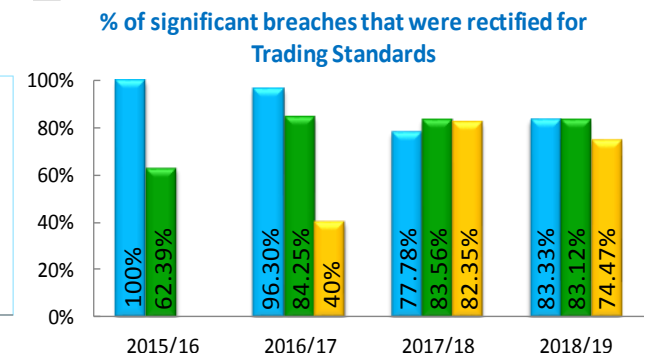
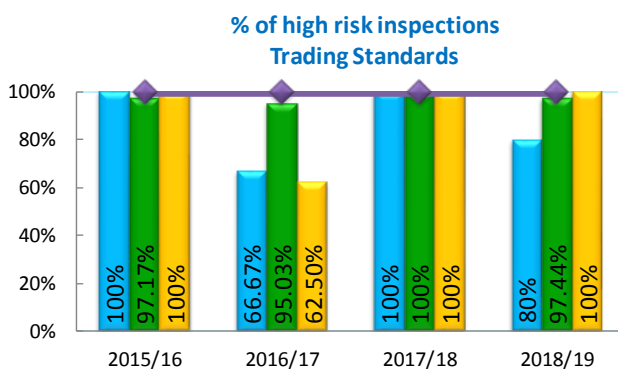
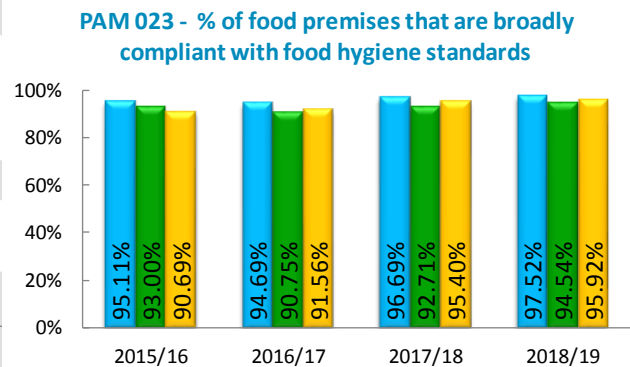
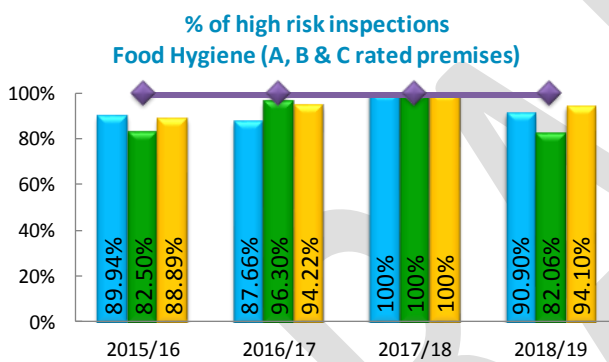


6.1 Improving health & wellbeing

Introduction

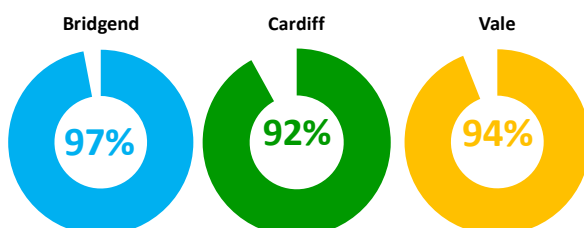
Improving health and wellbeing is a key priority for Shared Regulatory Services. The Service delivers a diverse range of services to businesses, consumers and residents many of which are “taken for granted”. Their contribution toward our stated outcomes, and their impact upon communities, should not 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

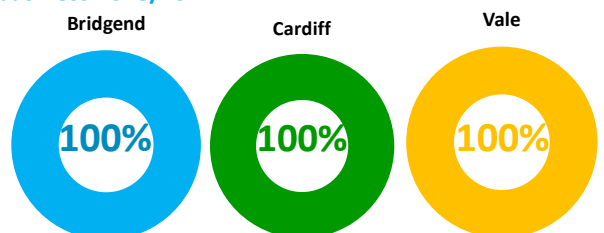


NB Results not collected in Vale until 2016/17.

Businesses who felt food safety inspection helped them improve food hygiene standards in their business 2018/19



Training delegates who felt the training received will help them improve standards of compliance in their business 2018/19



Comments received 2018/19

"The inspector was really pleasant and approachable. He helped us understand the inspection and made it clear how to improve certain areas".

"Inspector was professional, helpful and gave clear advice and information".

"I felt more confident in my practices after the inspection"

"Very approachable inspector did not make me feel uncomfortable at any time and felt able to ask any questions to improve my service".



% of private rented properties and HMOs improved through the removal of category 1 hazards 2017/18

Bridgend	Total no of assessments which contain category 1 hazards	54
	No. of HMOs and non HMOs where all category 1 hazards have been resolved as a result of local authority action	33
	% total resolved	61%
Cardiff	Total no of assessments which contain category 1 hazards	54
	No. of HMOs and non HMOs where all category 1 hazards have been resolved as a result of local authority action	9
	% total resolved	16.66%
Vale	Total no of assessments which contain category 1 hazards	60
	No. of HMOs and non HMOs where all category 1 hazards have been resolved as a result of local authority action	19
	% total resolved	31.66%

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 in each authority area during 2018/19 from the previous year. (Bridgend from 96.69% to 97.52%, Cardiff 92.71 % to 94.54%, Vale of Glamorgan 95.40% to 95.92%). The results show a positive upward trend, year on year, exceeding targets and highlighting the growing number of businesses that are improving their standards. This translates to an additional 83 premises in Bridgend, 131 in Cardiff and 55 in the Vale over the last 2 years achieving a satisfactory rating, some of 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.

Surveys - In addition to routine inspections of food businesses, SRS participated in food safety and food standards surveys which entail various sampling programmes across a range of businesses. Examples of such surveys include:-

- **Shopping Basket Survey** - The Shopping Basket survey was set up by the Welsh Food Microbiological Forum to test 10 different food types to consider their microbiological safety. Food types include pate, cakes, salad, meat, coleslaw, smoked fish, cheese, fruit and spice. This survey was undertaken in Cardiff where 95 samples were taken. Where foods return as unsatisfactory or borderline, re-sampling takes place to see if the issues are a one off, or whether there may be an ongoing issue. Letters are sent to the branch, primary authority and head office, where applicable and to the manufacturers of failed products. Where issues are possibly localised, for example, temperature issues or issues with self-service then they are referred for investigation. In total 7 samples returned as borderline and 4 returned as unsatisfactory, all of which have been re-sampled.
- **Ice Survey** - The Ice survey was a follow up from previous surveys focusing on the microbiological safety of ice in coffee shops with the focus this time being on leisure and licensed premises. Samples were taken from any ice machines, bagged ice or ice buckets. 33 samples were taken across Cardiff and the Vale of Glamorgan and 9 returned as unsatisfactory. All have been resampled and investigated with 3 ongoing cases. Further testing of 20 premises within the Cardiff region is planned for 2019/20 as part of a focussed ice compliance survey.
- **Nozzle-Dispensed Cream Survey** - This survey focused on nozzle dispensed cream in an SRS designed survey that collected samples from across Cardiff and the Vale of Glamorgan. In total 14 samples were taken however 4 returned as borderline. These were resampled and investigated to gain microbiological safety of the products.

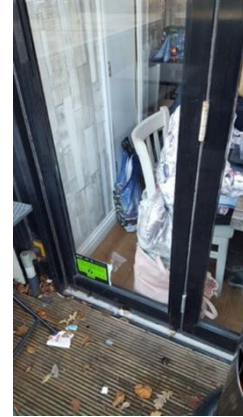
Prosecutions – SRS is committed to enforcing the laws we regulate, instigating legal proceedings against those businesses or individuals that flout the law. During 2018/19, the service successfully prosecuted a number of individuals/businesses in relation to food offences and the following cases showcase a few selected examples.

- **Cardiff Restaurant fined £10,500, for a string of food hygiene offences** - A Cardiff Restaurant was fined £10,500 ordered to £4065 and a victim surcharge of £170 after pleading guilty to 16 food hygiene offences following intervention by officers from Shared

Regulatory Services. Visits were made to the business between October and December 2017 to find that the restaurant didn't have a food safety management system in place, failed to protect food from contamination, failed to ensure food handlers' personal cleanliness and that they were adequately trained, failed to comply with a remedial notice and failed to keep the premises in good repair.

- **Cardiff Restaurant manager and company fined £5000 for not displaying a food hygiene rating sticker** -

Following receipt of complaints that a restaurant was not displaying their food hygiene rating sticker showing a rating of 2, SRS officers undertook a number of visits to the restaurant to investigate the complaints. Initially, as a result of these investigations, a fixed penalty notice was issued for £200 which was paid, however further complaints were made about the premises. Officers re-visited the premises a number of times which subsequently revealed that a sticker had been placed in the bottom left hand corner of a full length window which was being obscured by table and chairs. Legislation states that the sticker must be put up 'close to the entrance...where it is capable of being easily read by the customer before they enter' and this was explained to the manager. Following further correspondence, the sticker was eventually moved to a satisfactory position, however following a further complaint, it was found to be blocked by a large patio heater and couldn't be seen. SRS received significant press attention as a result of this case and also received a letter from the Food Standards Agency congratulating the department on the successful result of the case.



- **Barry Businessman fined £6,350 after pleading guilty to 14 food offences** –



In this particular case, a businessman pleaded guilty to 14 food offences which occurred in 3 premises in the Vale of Glamorgan during 2017. He was fined £3350 for the breach of a Hygiene Improvement Notice and £1000 for each of the 3 offences that concerned the cleanliness of working utensils, failure to ensure an adequate number of wash basins and failure to ensure appropriate facilities were in place to maintain adequate personal hygiene. He was also ordered to pay investigation costs of £1500 and a victim surcharge of £335.

- **Three takeaway owners fined for selling unsafe food** – Three owners of takeaways in the Barry and Bridgend areas were prosecuted following test purchases carried out in relation to allergens. Orders were made of rice dishes where the businesses were specifically told it was for someone who was allergic to egg. However, when tested the food was later found to contain egg or egg protein. In one case, 77 times the amount of egg required to cause a reaction in an allergic person was found. Furthermore, these purchases were conducted only a few months after informal test purchases had been carried out when all three business had failed and subsequently been provided with advice. The businesses were fined in total £1800, £1975 in costs and £265 victim surcharges. One owner was given a Community Order to undertake 300 hours of unpaid work.

Risks in the workplace are managed properly

Managing Infection Control Workshops - SRS officers in partnership with Welsh Government and Vector Air and Water Systems delivered 2 half day 'Managing Infection Control Workshops' to

residential care homes in SRS in June. The workshops were developed to address concerns identified from previous health and safety visits that indicated that care homes were continuing to struggle with effective management and control of Legionella in hot and cold water systems. The interactive sessions while focused on legionella also included talks on the prevention and control of Norovirus and Influenza in care homes. 56 delegates attended the workshops from 40 care homes and feedback from attendees was really positive with 89% indicating that the workshop was very good or excellent value to their business, 98% reporting that they had learned something from attending and 86% saying that they would be making changes within their business as a result of what they had learned..

Golf Course Safety Project and Vale Employers Engagement Project (VEEP) – The Golf Course Safety project was initiated following 2 fatalities associated with the management of contractors on golf courses in Newport, and a spate of golf-buggy related incidents in Monmouthshire. Targeted inspections focusing on contractor management, green keeper safety, golf buggy safety initially took place during 2016/2017, with revisits to assess compliance taking place during 2017 and 2018, the most recent taking place between July and October 2018. Whilst the majority of clubs were found to have made significant improvements to their health and safety management systems, with many electing to engage with a more specialist health and safety consultancy for the golfing sector, a few clubs were identified as being consistent poor performers. These verification visits however provided an opportunity for officers to identify common areas of weakness amongst the golf club duty holders which subsequently informed the topic areas for the ‘VEEP’ Business Forum held in November.

The forum which was supported by the Health and Safety Executive (HSE); Public Health Wales (PHW); Institute of Occupational Health and Safety (IOSH); and relevant sectors of private industry attracted a total of 95 delegates which included representatives from golf courses across SRS and some neighbouring local authority areas and external stakeholders. Topic areas included tree management, noise at work, hand arm vibration, COSHH, legionella, management of contractors, managing health and safety, occupational health and Healthy Working Wales. Feedback from delegates was very positive.



Brewery fined £140,000 after customer fell through cellar door - A brewery was fined £140,000, ordered to pay costs of £11,835 and a victim surcharge of £170 following a successful prosecution instigated by Shared Regulatory Services for a health and safety offence. The incident which occurred in 2018 occurred at a pub in Barry when a customer was left with serious injuries after falling through a cellar door which had been left open for cleaning staff. The customer fell down a concrete flight of stairs and was found unconscious after suffering a fractured skull and a bleed on the brain.

Safety in cellars has been a national health and safety priority following a number of fatalities and serious injuries to both employees and members of the public in Wales and throughout the UK in recent years, which has included falls through unguarded cellar hatches and unlocked cellar doors,

and exposure to low level oxygen atmospheres in cellars as a direct result of beverage gas cylinder leaks. Building on work undertaken by SRS during 2017/18, the service undertook 99 unannounced proactive visits to pub, clubs and golf clubs to assess cellar safety during the last year.

Infectious Disease is controlled and prevented

Communicable Disease - SRS received reports of 1926 cases of communicable disease between 1 April 2018 – and 31 March 2019, of which 1619 were laboratory confirmed. All 1926 (100%) cases were actioned within the target response time. The most common causative pathogen, Campylobacter makes up 57% of confirmed lab reports notified and 48% of all communicable diseases (confirmed and suspected) investigated. Other notable pathogens include Cryptosporidium, Giardia, Salmonella including paratyphoid, Shigella, E. coli O157, Legionella and Hepatitis A and E..

Of the 232 (19%) who returned their customer feedback forms:

- 54% reported changing their behaviour as a result of the interview. Examples include more frequent hand washing, washing hands after handling egg shells and not washing raw meat packaging or raw chicken.
- 99% cases interviewed were very satisfied or satisfied with the service. Comments include 'the officer was very thorough and knowledgeable', 'everything was explained clearly and in a nice way', 'the lady I spoke to was extremely well informed, helpful, pleasant and sympathetic' and 'It is good to know that this service is available, thank you for the service'.

64 communicable disease outbreaks were investigated. The 2 most common settings were schools and care homes. 30 (47%) associated with schools and 22 (34%) associated with care homes.

Swimming pool Survey - Cryptosporidiosis is a protozoan infection which can cause symptoms such as profuse watery diarrhoea and cramping abdominal pain in humans. It is most commonly associated with young children in the 0-5 year age range and has several modes of transmission including person-to-person spread and bathing in contaminated water sources; including leisure waters such as swimming pools. The illness spreads via Oocysts, which appear in the faeces at the onset of symptoms, and can continue to be excreted for several weeks - even after symptoms have subsided. The main problem with Oocysts is their ability to be highly resistant to chemical disinfectants; including chlorine. Following analysis of 2017 data which identified an increasing trend of cases being reported to SRS, 38 confirmed cases (Bridgend 5; Cardiff 22; Vale 11), and a number of leisure pools being implicated in a significant proportion of the cases, SRS undertook a number of unannounced enforcement visits across the region. In total 44 leisure pools were visited, (Bridgend 9; Cardiff 22; Vale 13), which included pools in privately operated leisure centres, hotels and caravan parks. The aim of the visits was to identify how duty holders were managing the risk of pool user exposure to Cryptosporidium. The results of this survey highlighted a number of deficiencies which were dealt with via formal warning letters requiring an action plan to be developed. One pool and spa that had to be closed during the officer visit due to problems with low temperature and low chlorine levels, received a follow up visit which on re-inspection was found to be satisfactory.

Noise and Air Emissions are controlled

Community Concerns - Throughout the year Officers have responded to community concerns regarding a number of high profile environmental issues. The Barry Biomass plant in Barry Docks was granted a permit to operate by National Resources Wales, leading to a great deal of media coverage

and local opposition from residents and environmental groups. During the testing and commissioning phases SRS Officers responded to a large number of complaints regarding noise, lighting and emissions from the plant and ensured regular liaison with the regulator NRW. We will continue to investigate complaints of statutory nuisance and work with NRW to ensure the conditions attached to the Environmental Permit are complied with.

Community concerns in Cardiff and the Vale of Glamorgan were also expressed regarding the disposal of material dredged as part of the construction of Hinkley Point C nuclear power station in Somerset at a licensed marine disposal site off the coast of Cardiff. In liaison with National Resources Wales and Welsh Government, Officers provided updates and information on public health concerns to local politicians and gave evidence to Scrutiny Committee

Anti-Social Behaviour - In investigating cases of noise nuisance, Officers routinely work with external stakeholders such as the Police, local authority Anti-Social Behaviour Teams and organisations such as Victim Support. Often this is because creating noise disturbance is just one aspect of anti-social behaviour that needs to be addressed to provide solutions to the community issues raised. One such case that highlights this last year was the noise nuisance being suffered by a vulnerable elderly couple which formed part of wider offending and disturbance from the property involved. The SRS Officer acted as a focal point to not only investigate the allegations of noise nuisance but also to pull in additional resources from other stakeholders. A noise abatement notice was served and as a result of other actions taken the problems were resolved.

The Officer from victim support who assisted the couple concerned sent in the following testimony on behalf of the couple:-

“Just wanted to pass on some really positive feedback from a couple... that SRS, South Wales Police and Victim Support have all been working with in relation to anti-social behaviour from their neighbours – specifically noise pollution. When I first met this couple a few months ago they were unable to cope with the ongoing anti-social behaviour and were seriously considering taking their own lives. The wife’s mental and physical health had been greatly impacted and the couple were struggling with day to day life. They didn’t know what to do and felt that they couldn’t go on any longer. But thanks to the multi-agency work that has taken place in recent months, that is no longer the case... The couple cannot speak highly enough of you and all the effort you have put into this case. I just wanted to forward this information to you both as positive feedback can be a rare thing in our jobs and not only have people worked so hard to get a good outcome on this case but the impact on the victims has been enormous. They can now move beyond this traumatic experience knowing that they are safe in their own home.”

A safe trading environment is maintained

Trampolines – In 2018, the SRS began an investigation into the safety of trampoline parks. These indoor activity areas have become increasingly popular and attract significant numbers of children. SRS investigated the construction materials used at one site and determined that the products used were of concern. The application of the law to these relatively new play environments was unclear. Following a legal opinion, the SRS intervened and required the operator to undertake a number of corrective actions before reopening the facility to the public. The SRS will now extend this piece of work in 2019 to the other similar venues in the region.

Cosmetic Contact Lenses – Cosmetic contact lenses (non-corrective contact lenses designed to change the colour or appearance of the eye) are regulated under UK legislation which requires that they can only be supplied by or under the supervision of a registered optometrist, suitably qualified

dispensing optician or medical practitioner. There are also a number of serious risks of infection associated with these contact lenses. Following on from an exercise undertaken in 2017, whereby businesses were sent advice regarding the legislative requirements, and undertook a number of test purchases, SRS Officers conducted a follow up exercise last year to check compliance. 16 premises were given reminders not to sell zero powered/cosmetic lenses unless an optician was present and one business was found to be in breach of a General Product Safety Regulation Notice issued in 2017. This business is now the subject of an investigation.

Fake Chanel and Mac make-up containing 'unsafe' levels of lead were on sale in Cardiff

A Cardiff man admitted 16 offences under the Trade Marks Act 1994 and 7 offences under the Cosmetic Products Enforcement Regulation following legal proceedings brought by SRS. The defendant ran a counterfeiting business from his home and when officers raided the property they seized a significant amount of counterfeit clothing, goods, designer label stickers and labels as well as make-up products. Upon testing, it was found that the clothing was fake and the counterfeit Chanel, Kylie and Mac make-up products had dangerous levels of chemicals in them, containing 35 times the permitted levels of lead and 7 times the permitted level of chromium posing a risk for people to use. The defendant was given a community order for 12 months and has to carry out 240 hours of unpaid work. He was also handed a 25-hour rehabilitation order, and was ordered to pay costs of £300 in addition to a victim surcharge. All items were destroyed.



Poppers – Poppers or Alkyl Nitrates are classed as inhalants and are vasodilators which mean they dilate blood vessels. They belong to the nitrate class of drugs. Others include Amyl Nitrite, Butyl Nitrate, Isopropyl Nitrate and Isobutyl Nitrite. Historically poppers have been used to enhance sexual experience and have been sold under names including Liquid Gold, Rush, Pure Gold and Bang and are often marketed as room odourisers. There are a number of physical and psychological effects associated with the use of poppers and while the level of harm generally experienced from the inhalation of poppers is low, use can result in a range of clinical conditions and should be avoided by certain individuals. Under UK consumer legislation an offence may be committed if it is reasonable for a seller to suspect that a substance would be misused or not used in a way for which it was intended. At the beginning of the year, officers undertook a project to highlight the risks of poppers and legal responsibilities of retailers by producing a leaflet and distributing to 30 premises identified across the SRS region providing guidance on the product.

Licensed premises operate responsibly

Review of Gambling Policy -The Gambling Policy for all 3 authorities has been reviewed and published. The review was undertaken to meet the requirements of the Gambling Act 2005. Previous years reviews have focused upon young people and ensuring they are not able to gamble at premises licensing by the Councils. More recently, gambling is being recognised as a public health problem. While only a minority of gamblers are identified as problem gamblers, research is emerging that suggests that the financial, health and social harms that arise from gambling can impact upon families, communities and wider society. The increase in on-line gambling, the increase in the advertising of gambling products all plays a significant role. Research suggests, such developments increase gambling behaviours and possibly shape a more permissive social attitude to gambling. The

Councils role here is limited, but the SRS is working with a range of organisations in Wales to contribute where possible to mitigate the impact gambling has upon vulnerable individuals.

A Bridgend chip shop owner fined for installing Gambling machines – It is against the law to provide gaming machines in takeaways, cafes, taxi offices or at any other non-gambling premises where children can be exposed to gambling and illegal slot machines. Following a routine inspection by Licensing Officers, a Bridgend chip shop was found to have gambling machines installed that could have been used by children. The owner pleaded guilty to three offences under the Gambling Act 2005 after installing the machines at his chip shop. He was fined £253 for the one offence with no separate penalty for the others. He was ordered to pay legal costs of £350, investigation costs of £920 and a victim surcharge of £30, which came to £1,553 in total. A forfeiture order on cash taken from the two machines was also granted, together with a destruction order on the machines.

The quality of private rented property is improved

Furnished lets Survey - Over the last few years, there has been growing concern regarding the safety of domestic appliances and electrical goods and their connections to large fires such as Grenfell and Lakanal where many people lost their lives. In response to these concerns SRS Officers carried out a survey to assess the level of compliance within the domestic rental sector of the property market. The project focussed on the obligations of landlords to provide compliant goods as part of tenancies. Using a number of pieces of legislation, SRS were able to assess the level of protection afforded to tenants in relation to items provided by landlords, in a bid to protect consumers and allow legitimate trade to thrive. Six main areas were the focus of the survey which included upholstered furniture, electrical items, gas appliances, window blinds, wood burners and Energy Performance Certificates (EPC). 690 items were inspected overall and generally non-compliance was low with a small number of items of upholstered furniture including chairs, sofas and mattress/bed bases were identified as non-compliant and significant amount of blind cords. All electrical items such as washing machines, tumble dryers, fridge freezer, microwave etc. were found to be compliant. The results of the survey have been presented to Rent Smart Wales and it is expected that there will be further interest from Landlords not included in the survey particularly in relation to the safety of blind cords. As a result of carrying out joint visits the project also raised awareness of safety issues within private sector housing and officers have been encouraged to refer concerns.

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. The Cardiff Housing Enforcement Team took prosecutions on 6 properties in Cardiff during 2018-19 for a range of offences including neglect of proper management standards, failure to obtain a HMO licence or to register with Rent Smart Wales and breach of a Prohibition Order, with fines totalling £70,000. In addition to this enforcement work, the Housing Enforcement Team dealt with over 900 complaints about property conditions, issued over 400 works notices and licensed over 500 HMOs, bringing the total licensed in Cardiff to 3,500. The team carried out over 100 fit and proper person checks for Rent Smart Wales, with a small number of these becoming more significant investigations into landlord performance. The team carried out Rent Smart Wales audits of 9 managing agents, identifying action plans for improvement in each case and will follow up during 2019-20. A series of joint inspection were carried with Trading Standards; officers carried out training for the Cardiff Landlord Forum and other Cardiff Council services; officers defended their enforcement actions at Residential Property Tribunal, in each case being successful.



Illegal Evictions and pre-occupancy checks - In Bridgend and the Vale of Glamorgan we investigated and gave advice regarding 15 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 61 properties 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.

Landlord ordered to pay over £22,000 after poor management of properties in Cardiff – A Cardiff landlord was ordered to pay over £22,000 at Cardiff Magistrates’ Court on April 26th for 19 offences relating to poor management of ‘three self-contained flats’ at a property that he owns and rents out in the city. The case came to light after a Police Community Support Officer (PCSO) grew concerned about a vulnerable tenant and their living conditions at the property and contacted the council. Subsequently an SRS Officer visited the property in September and October 2017. Offences under housing legislation related to a number of issues including an inadequate fire alarm system, lack of proper structural fire protection and a means of fire escape; an inadequate heating system; insufficient electrical sockets, un-restricted first floor windows, failure to maintain the electrical installations, as well as other issues such as loose floor coverings, inadequate guarding to stairs and failure to maintain the garden boundary wall. The defendant was also convicted of two offences relating to his failure to apply to Rent Smart Wales for a licence to manage or let properties. Overall the defendant was fined £16,600 for all 19 offences, ordered to pay £5,385 in legal costs with a victim surcharge of £100.

Breach of prohibition orders preventing properties to be used for human habitation- Two prosecutions were undertaken in relation to breaches of prohibition orders served under the Housing Act which prohibited two properties in the Vale and Bridgend to be used for human habitation due to the presence of serious category one hazards. The property in the Vale did not have any heating or hot water and there were also issues in relation to gas and electrical safety. The solid fuel appliance within the property if used, would have presented an imminent risk to the health and safety of any tenants as the flue was defective and would allow carbon monoxide to discharge into the property. In addition there were issues in relation to electrical safety and no smoke detection. Despite these conditions and the existence of Prohibition Orders in relation to the premises the Landlords of the properties continued to let the properties without regard to the safety of the tenants. The tenants in both cases were vulnerable and moved into the properties as they had very limited options. Both Landlords pleaded guilty, and with regard to the Vale case received a fine of £1090, which included offences in relation to failing to register the property and obtain a licence in relation to Rent Smart Wales legislation. In the Bridgend case the Landlord received a fine of £1646.

Emerging issues

Import and export of products post Brexit – The uncertainty of the outcome of Brexit requires the SRS to keep abreast with the potential changes as they occur and be prepared for any eventuality. The biggest potential change will arise from the United Kingdom’s status as a “Third Country” to those that remain within the EU and the countries within the EU will become “Third Countries” to the United Kingdom. This will require imported products of animal origin to go through a Border Inspection Post facility and any higher risk products not of animal origin to be imported through a Designated Point of Entry. Currently neither the ports nor airport in the SRS region possess either of these 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

New Businesses – The prosperity and increasing popularity of the City of Cardiff means that the number of new food businesses attracted to the City is constantly increasing. During the last year a total of 540 new businesses were identified. This places a significant impact on resources of the Food Safety and Trading Standards functions, particularly as the Food Law Code of Practice requires

new food businesses, where possible, to be inspected within 28 days of opening. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention. Businesses are deemed to be new businesses following the creation of new legal entities such as new limited companies, sole traders and partnerships and if the nature of business changes.

FSA Audit of the implementation and operation of the Food Hygiene Rating Scheme – The Food Standards Agency completed an audit of the arrangements for the implementation and operation of the Scheme across all 22 local authorities in Wales. The report was recently published in 2019 and has identified 13 recommendations and many examples of good practice in relation to the implementation and operation of the Scheme in Wales. There are a number of recommendations such as the Local Authority making a commitment to undertake all interventions in accordance with the frequency specified in the Food Law Code of Practice and the need to comply with Internal Monitoring Procedures which will be difficult to meet with the current staff resource dedicated to food safety. To address this, improvement of staff resource will have to be considered including the retention and recruitment of staff, utilisation of alternative interventions and the best use of existing resource. Dealing with these challenges means that other health promotion activities associated with food are likely to be limited, however when resources permit, we will support local initiatives that improve health and wellbeing.

Public Health (Wales) Act 2017 – 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 yet 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 2013. 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 looking increasingly likely that the licensing scheme for special procedures will take effect in 2020 but it is currently unclear how this will impact on resources. The scheme aims to strengthen existing registration requirements and as such will place additional responsibilities on local authorities to administer and enforce the new requirements.

Beauty Industry - High profile complaints in the media relating to the beauty industry are suggesting that beauty treatments such as lip fillers are becoming an issue. Currently these treatments are unregulated and can be administered by non-medical personnel and have yet to be included as a special procedure under the Public Health (Wales) Act 2017. Whilst there are enforcement actions available under the Health and Safety at Work Act these can only be applied if a practitioner is operating from commercial premises. There are therefore concerns that we could see a growing trend in complaints as media attention increases.

Increase in communicable disease cases - The service is currently experiencing a cluster of confirmed legionella cases in the Barry area which exceeds the expected number of cases for the time of year. This may require more investigative work being carried out in conjunction with the HSE and Public Health Wales. Furthermore, the number of confirmed TB cases across the region and particularly in Cardiff have increased which requires a greater amount of resource to assist Public Health Wales. The recent move to PCR testing has also seen an increase in case notifications.

Health and Safety enforcement - In July 2018, the All-Party Parliamentary Group on Occupational Safety and Health reported to Parliament on the role of local Government in health and safety regulation and made a number of recommendations for change. The report noted that workplace

health and safety enforcement at premises within the purview of local Councils is done through Regulatory Services officers who are also responsible for many other enforcement areas including food safety, housing, environmental nuisance and trading standards. The report expressed concern at the reduction in the number of proactive visits undertaken by Councils, attributing this to HSE policy guidance and the reduction in funding to Regulatory Services. The report noted that fewer employers are being brought to justice, despite there being no reduction in injury or ill-health statistics. There is an acknowledgement that inspections not only ensure that the law is being complied with but also that inspectors assist employers by giving advice and support and promoting good practice. The All Party Group recognised the financial restraints that many local councils are working under together with the many competing demands on their services and acknowledged the very useful service that both the HSE and local authorities provide. In doing so, they made a number of recommendations, one of which was to extend the “fee for intervention” currently used by the HSE, to local authorities. Such a fee currently allows the HSE to charge for the cost of the original visit, as well as the cost of ensuring that the breach is rectified through return visits, reports, getting specialist advice etc. where a material breach of the law is found. An independent review of the “fee for intervention” concluded that it had been effective in shifting the cost of health and safety regulation from the public purse to those businesses that break health and safety laws. Whilst this is purely a recommendation at this stage, SRS would welcome any legislative changes to recover costs in the same way as the HSE.

Grenfell Fire - Following the tragic fire and loss of life in Grenfell Tower in North Kensington there has been a nationwide review of the use of a particular type of cladding known as Aluminium Composite Material (ACM) which was used in the Tower. Within Cardiff in the last 12 months, the SRS has begun to take a more prominent role in respect of the affected high-rise and remains in consultation with Welsh Government and the Fire Service as to the potential changes in policy and practice as a consequence of Grenfell. Recently, the Minister for Housing and Regeneration convened an Expert Group, to develop a ‘road map’ to respond to the issues raised by the Independent Review of Building Regulations and Fire Safety (the ‘Hackitt’ review). The Head of Service attends this group as a representative of the Regulatory services in Wales. A new addendum to the Housing Health and Safety Rating System guidance (HHSRS) to clarify how an HHSRS assessment of fire risk where aluminium composite material (ACM) cladding is present in high rise buildings should be conducted has been introduced in England. The SRS is encouraging the Welsh Government to introduce the addendum promptly in Wales and to make other policy changes to Housing law.

Renting Homes Act - The Renting Homes Act will require all landlords, for the first time, to issue a written statement of the occupation contract to the tenant or licensee. The statement will clearly set 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 and for the duration of the tenancy contract together with several protections for tenants and landlords. Whereas the legislation does not introduce any new powers for SRS directly, the issues that tenants can seek redress for in a court of law could overlap with the work undertaken by the service. Staff will 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.

HMO licensing – the Mandatory Licensing definition in England has expanded to include all HMOs having 5 or more occupants, significantly increasing the number of licensable HMOs, and Welsh Government are considering whether to roll out those changes across Wales. This would have significant resourcing demands particularly in Cardiff if introduced. The Plasnewydd Additional Licensing Scheme expires in November 2019, and it will be a significant project to consult upon and arrange for a further 5 year extension of the scheme. It will be key to determine the resources

required to support any extension of mandatory provisions or the extension of additional licensing schemes.

Student Liaison Officer - The Housing Minister and First Minister have signalled an interest in student issues and the impact of student populations upon existing neighbourhoods across Wales. The Student Liaison Officer position remains empty and discussions continue with the 3 universities about renewal of funding and support for this position.

Empty Homes - Cardiff Council has taken the decision to restrict discounts available to vacant homes and to charge a premium to those vacant for more than one year. It is anticipated that this will have a profound impact on the number of long term vacant houses in Cardiff, and it is likely that it will have a positive impact on the work of empty homes officers who will work closely with Council Tax to advise owners of empty homes on how they can renovate houses and return them to beneficial occupation. It is possible that income from the Council Tax premium will be earmarked for work to return empty homes to use, and may be used to support the work of the Housing Enforcement Team in Cardiff.

Dangerous conversions - There appears to be a growing theme of landlords carrying out poor quality and dangerous conversions to create small self-contained flats. This is also happening in other areas across Wales and it appears to be a response to changes in housing benefit rates. This is placing a demand on the Housing Enforcement Team with a significant increase in recent years in the number of properties where Prohibition Orders are served. 40 premises were closed during 2018-19. The emerging challenge of unscrupulous rogue landlords, coupled with the greater focus on their fitness and propriety introduced by Rent Smart Wales, will require additional focus and resource if the matter is to be seriously addressed.

What we plan to do next

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 2019/20 and undertake interventions in accordance with the plan and the arrangements in place to discharge food safety duties.	C Hill
Develop and adopt the Port Health Plan 2019/20.	C Hill
Engage with changes to the Food Law Code of Practice and ensure appropriate staff are trained and competent to deliver the required assessments against the framework.	C Hill
Undertake a survey of FHRs sticker displays at premises and on takeaway menus.	C Hill
Review public health requirements for Cardiff Airport as a point of entry and consider implications on resources.	C Hill
Implement recommendations made in the Food Hygiene Rating Scheme Audit conducted by the FSA.	C Hill
Review the food registration process with a view to streamlining new business procedures and making the process more robust whilst also exploring the feasibility of	C Hill

promoting on-line food registration via the government website.

Building upon the food standards training received, commence the undertaking of food standards inspections by food safety officers. **C Hill**

Risks in the workplace are managed properly

Develop and adopt the Section 18 Health and Safety Service Plan 2019/20 and undertake interventions in accordance with the plan and the arrangements in place to discharge health and safety duties. **C Hill**

Undertake an all-wales agreed inspection programme in relation to Hand Arm Vibration (HAVS). **C Hill**

Engage with Welsh Government on the implementation of the Public Health (Wales) Act 2017, undertaking actions to support the provisions of the legislation including preparing businesses and internal procedures in readiness for the implementation of the new special procedures licensing regime. **C Hill**

Noise and air emissions are controlled

Undertake consultation with the public, taxi trade and stakeholders on proposed policy changes to the age, emission and testing standards of vehicles in order to deal with the air quality challenges faced by Cardiff Council. **W Lane**

A safe trading environment is maintained

Following on from investigations undertaken in 2018, carry out a joint enforcement exercise of trampoline parks across the region. **C Hill**

Licensed premises operate responsibly

Undertake a review of the Statement of Licensing Act Policy (SLP) and Cumulative Impact Zone in line with the revised Section 182 Guidance in Cardiff and Bridgend and publish, following consultation with stakeholders and obtaining Council approval. **W Lane**

Undertake a study/survey to understand the gambling patterns of the young to determine any discernible impact on public health. **W Lane**

The quality of private rented property is improved

Build upon the work undertaken in Bridgend in 2018/19 to identify HMOs and landlords not registered with Rent Smart Wales in preparation for changes identified in the Renting of Homes Act. **W Lane**

Agree an enforcement approach with partner Councils and Rent Smart Wales in relation to the Renting of Homes Act. **W Lane**

Where appropriate take forward prosecutions for offences relating to housing standards, HMO Licensing and Rent Smart Wales. **W Lane**

Review the effectiveness of the Plasnewydd Additional Licensing scheme and consider consultation on its re-declaration for another 5 years **W Lane**

Work with the Fire and Rescue Service and Welsh Government in response to the Grenfell Fire by ensuring the remediation of any buildings under the remit of SRS. **W Lane**

Implement a training programme for SRS employees on the implications of the Renting Homes Act. **W Lane**

Infectious disease is controlled and prevented

Secure approval and deliver the Communicable Disease Service Plan 2019/20 and undertake interventions in accordance with the plan and the arrangements in place to discharge these duties.

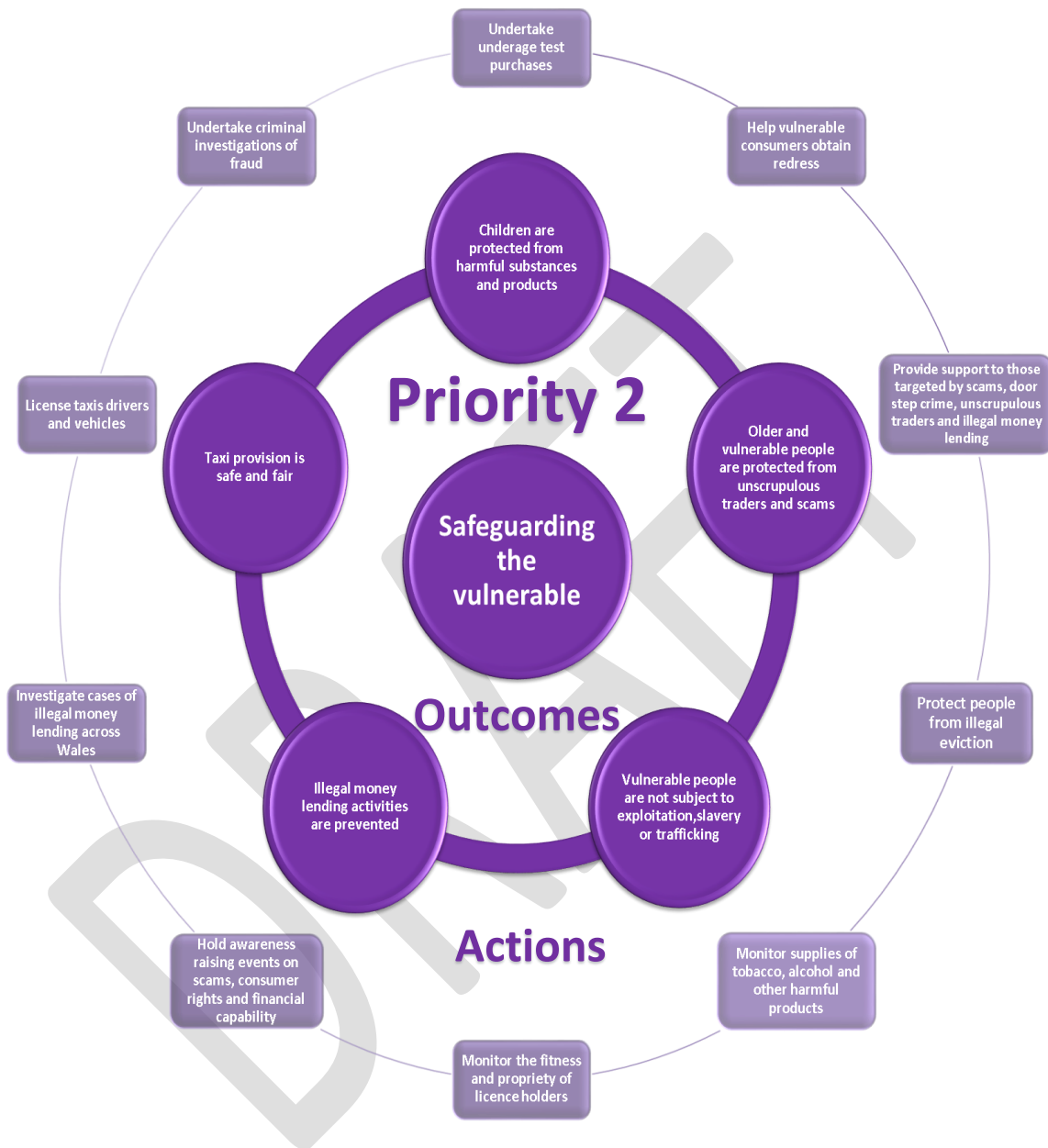
C Hill

What we will measure during 2019/20

Performance Measures 2019/20	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
% of private rented properties and HMOs improved through the removal of category 1 hazards.	TBC

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



What we have achieved

Older and vulnerable people are protected from unscrupulous traders and scams

Doorstep crime and Scams – SRS respond to instances of doorstep crime and scams every day, 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, but the following do give some indication of the impact of our interventions.

One ongoing investigation is that of a consumer who was repeatedly targeted and cold called by rogue traders offering to do roofing repair work. Over a number of visits the consumer paid £4750 by bank transfer, then a further £1000 in cash, and an additional £6000 by bank transfer again. No work was carried out at all. SRS Officers contacted the consumer's bank, Yorkshire Building Society, explained the circumstances and tried to get the bank transfers cancelled. This financial activity was completely out of character for the customer, and having reviewed the payments, the bank reimbursed the full amount to them.

During the year, the service participated in 8 operations resulting in over 100 traders being spoken to and given legal advice. Amongst these operations were 2 mini mobile rogue trader operations across Cardiff North, stopping and checking doorstep traders for legal compliance and reassuring householders and 6 Rapid Response visits made in relation to doorstep crime activity. Furthermore training was also provided to 3 neighbourhood police teams on doorstep crime incidents; how to recognise these crimes and what actions to take for prevention and investigation.

Safeguarding/Scams – A series of proactive operations initiatives were carried out through the year to highlight scams and improve awareness throughout the year. June was Scams Awareness Month and a number of activities were undertaken including a Bro Radio interview on scams and how to spot them, a Friends against Scams training session for Vale staff and members and the provision of online training for Vale employees. Attendance at the Vale show in August also provided an opportunity to promote awareness and during National Safeguarding Week in November a number of talks were given to our partners and the public. Furthermore officers attended community events including talks to Evergreens Group, lunch and friendship groups. Officers have also been working with local community safety teams and PCSOs in some areas to carry out risk assessment visits of referrals from the National Trading Standards Scams Team. SRS is now receiving 5 referrals per month for each local authority area and it is hoped to continue and extend working with police partners on these referrals to identify and provide safeguarding interventions for vulnerable victims or consumers.

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. In one case a referral was received from a social worker concerned about a lady who was being bombarded by sales and nuisance telephone calls. A call blocker was installed but there was still concern for payments being made. The client had a Lasting Power of Attorney (LPA) in place, and the case officer together with the LPA went through the bank statements of the victim to identify potential scam or suspicious payment authorities. Together they jointly visited the lady's bank and identified a number of direct debits to cancel. These totalled £122.80 per month, so an ongoing saving was immediately achieved. A Sky subscription of approximately £50 per month was one of the cancelled contracts; the lady unfortunately suffers from Dementia so did not watch TV much at all. Further, two direct debit guarantee claims were also made relating to two companies providing insurance and cover services,

obtaining a refund of £537. In addition, due to the meeting at the bank, the house insurance payment was queried, as this was also high. The bank then did a reviewed of the customer's house insurance and reduced the payments.

SRS installed 16 call blockers during the last year in residents' homes helping to reduce nuisance and scam calls.

Cardiff Rogue Trader jailed – A rogue builder from Cardiff was given a prison sentence of 16 months for defrauding elderly and vulnerable victims following an investigation by SRS Officers. The court heard how the offender attempted to defraud a total of £39,950 from three victims over a 6 month period, but was only able to collect a total of £23,100 before he was arrested by the police. The victims included a couple in their 80's, who paid £18,850 for work carried out to their roof which on further examination by an independent surveyor confirmed that the only work undertaken was pressure washing their drive at a value of £300. The second victim, an elderly gentleman who lived alone, paid a total £4,250 for painting work to the front of his property which the Independent surveyor valued at a mere £700. The third victim, who was 79, lived alone and suffered with mobility and other health issues was cold called by the offender, who claimed, once again, that she needed work to her roof. The initial price for the work was estimated at £8,500 but this soon doubled in value to £16,050. On the day that the money was due to be collected, the matter was reported to the police and the offender was arrested in the vicinity of the victim's home. In each instance, the offender used a false alias and the court heard he had previous convictions for fraud, making false representation and theft. The offender was sentenced to two years imprisonment, reduced to 16 months through his early guilty plea and a Criminal Behaviour Order was also made for three years which restricts him from trading as a builder or cold calling without permission from SRS.

Bridgend kitchen and bathroom business took deposits for work that was never started – A married couple who ran a kitchen and bathroom business in Maesteg, caused financial loss of around £40,000 to a dozen victims taking substantial cash deposits from their customers who were mostly retired and sometimes never even started the work. Substantial deposits were taken, always at least 50% of the total price and in one case the total payment was taken upfront. The court heard how some of the work started late, some was carried out to a "very poor standard", and some was never finished. On other occasions the work was never even started. One victim paid £5000 cash deposit for a new kitchen and ended up paying more for further work on the floor and plaster work. She was told work would take between 2 and 3 weeks but it took 3 months for the parts to arrive and even then the refrigerator was damaged. Furthermore she was left without water for more than 2 months and lost more than £11,000 having been initially quoted £5,900 for the work. Another elderly victim was left without water for 2 months after paying £750 deposit for a new kitchen sink and worktop. A pensioner paid £2,000 for a walk-in shower but never had the work carried out. Similar scenarios by other victims were highlighted by the prosecution. Customers also tried to get in touch with the defendants by phoning, sending messages, and visiting in person but were not able to reach them. The husband was given a 20-month jail term suspended for 18 months while his wife was given a six-month jail term suspended for 12 months. A hearing under the Proceeds of Crime Act was agreed and finalised for £33,000.

Vulnerable people are not subject to exploitation, slavery and trafficking

Raising awareness – During the last year, SRS officers have participated in training to recognise exploitation, slavery or trafficking during the course of their duties. The interactions that SRS Officers have with commercial businesses and private sector housing facilities have a vital part to play in identifying victims and directing them towards help and assistance. The training received has

included 'cuckooing' and the influx of County lines drug gangs and also Team managers have received a briefing from Welsh Government on this subject. Furthermore 30-40 Neighbourhood Services Officers attended at event at Bridgend Police Headquarters on modern slavery in December. The training was very well received by officers, opening up channels of communication for reporting matters of concern. Consideration is now being given to extending this training to other areas of the service

Child exploitation – In order to strengthen improvements in safeguarding, particularly in relation to children, a programme of training and awareness of Child Sexual Exploitation (CSE) with the taxi community and other stakeholders was undertaken in Bridgend where training sessions were held with the trade in conjunction with South Wales Police and Social Services. A recent initiative, Operation Brake, involved Licensing Officers in Bridgend working with South Wales Police to raise awareness of child Sexual exploitation within the night time economy in Bridgend. Officers visited licensed premises and taxi ranks in the town centre to engage with workers in the night time economy on how to spot the signs of child sexual exploitation and how to report anything suspicious. This operation involved partnership working to highlight this crucial issue which impacts on the most vulnerable young persons within our communities. In Cardiff, the hackney carriage/private hire driver's written knowledge test was also updated to include a section on CSE, based on the booklet produced in conjunction with Cardiff Children's Services. Drivers must pass this test to show that they can spot the signs of vulnerability and what to do if they see an issue to become a licensed driver.



Children are protected from harmful substances and products

Knives Project in Cardiff - Following a spate of tragic incidents involving the use of knives, Cardiff was identified as one of two areas of concern in Wales with regard to the prevalence of knife crime. In order to play a key role in tackling this disturbing trend, SRS successfully bid for nearly £20,000 of Home Office funding to undertake compliance checks to identify the extent of which young people were able to purchase knives and other bladed instruments across the city and identify problem sectors of the trade. 250 test purchases took place of knives, bladed articles and axes across SRS using trading standards volunteers under the age of 18. The failure rate was 11% with 28 out of 250 premises selling to a person under the age of 18. A variety of products were sold including kitchen knives, Stanley knives and an axe. Following the test purchasing exercise all of the premises that failed were sent a warning letter and invited to engage with SRS to discuss the sale and the training that is provided to staff. Most of the premises made contact and further visits were carried out by officers to offer advice and education. Fifteen premises that failed have recently been re tested with South Wales Police assisting and all of the premises passed. Some premises had removed all knives from the shop whilst others had taken extra steps to reduce accessibility of the product by placing them behind the till areas to reduce the risk of theft. A further thirteen premises are due to be re tested at the end of April.

Underage sales of e-cigarettes – Since October 2015, it has been illegal for retailers to sell electronic cigarettes to someone under the age of 18. During the year, officers undertook a number of exercises to identify businesses failing to comply with the law. In total 65 test purchases were carried out by a volunteer under the age of 18 and 10 were found to be non-compliant. Two premises are facing prosecution following the sale of e-cig liquid to a trading standards volunteer under the age of 18.

Taxi provision is safe and fair

16 Private hire drivers prosecuted in Cardiff - Sixteen private hire drivers were prosecuted for illegally plying for hire in Cardiff and driving without insurance last summer. These prosecutions resulted from a 'mystery shopping' exercise in Cardiff which targeted private hire vehicles that are not allowed to pick up customers from the street without prior booking through an operator or an app. Fourteen of the drivers were driving Cardiff licensed private hire vehicles while the remaining two were from Newport and Rhondda Cynon Taff. The majority of drivers were fined £300, ordered to pay £150 in costs and a victim surcharge of £30 and eight penalty points on their licence.

Cardiff Hackney Carriage taxi driver prosecuted – A Hackney Carriage Driver was ordered to pay just under £1000 earlier this year for three offences, namely failing to use the meter, charging more than the authorised fare and failing to display his drivers' badge. The defendant was fined a total of £360, ordered to pay costs of £600 and a victim surcharge of £30.

Bridgend Driver prosecuted – In Bridgend, an unlicensed driver was found guilty of two offences concerning his operation of a motor vehicle as a private hire vehicle when he was not licensed to do so and also driving without the required insurance. He was fined £660 for driving without insurance and was given 8 penalty points on his licence. No separate penalty was imposed for the other offence. He was ordered to pay legal costs of £500, SRS costs of £350 and a victim surcharge of £66.

Welsh Government Consultation on Taxi Legislation - The Welsh Government consulted on the matter of improving public transport in Wales in December 2018. It is widely recognised that the existing legislation is archaic and that a new piece of primary legislation provides an ideal opportunity to implement a system that reflects an evolving transport regime. The public are often unaware of the distinction between hackney carriage and private hire vehicles and it rarely makes a difference to them whether they make a booking via a telephone, smartphone app or hail a vehicle from the roadside. The consultation proposals in the main aim sought to tackle-

- The variation of taxi and private hire standards across the 22 Welsh local authorities.
- The inability to take enforcement action against vehicles operating 'out of area', and
- The difficulties in sharing relevant safeguarding information.

In addition, the consultation proposed that the existing taxi and private hire licensing regime be redirected to a single national licensing authority, namely a Joint Transport Authority.

A presentation on the consultation was taken to each of the three Public Protection Licensing Committee's and the Joint Committee and opinion sought on the response to the consultation. All four committees welcomed the proposals relating to national standards, enforcement on out of town vehicles and sharing of information for safeguarding purposes. There was a strong feeling however that direct enforcement of legislation and decisions regarding fitness and propriety of taxi drivers should be retained and not devolved to a JTA. A response to the Consultation was drafted for each of the three Cabinets to reflect that position and it was included as part of each Council's wider response back to Welsh Government on the Transport White Paper as a whole.

Dealing with inappropriate behaviour - In the last year the SRS received a number of 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 saw 11 immediate revocations of drivers licences for inappropriate behaviour. Additionally, the Committees

of the partner Councils imposed sanctions in a further 29 cases for issues such as refusing to take fares.

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. In 2018/19, 17 victims across Wales were identified, 4 of which received direct support and together £50,500 of debt was 'written off'. They continue to be supported to allow them to re-establish themselves in terms of conventional budgeting and 'normal' financial capability. Time and again we see very significant benefits to physical and mental health when the pernicious burden of a loan shark is removed from their day to day life often providing the catalyst for wide ranging improvements in quality of life.

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. In 2018/19, Client Liaison Officers provided training to 1220 frontline members of staff and attended over 50 community events.

POCA Community Based initiatives - In November 2018, a total of £37,000 was awarded to eight community based initiatives under the first Stop Loan Sharks Awards for Wales. The funds were made available from monies confiscated from loan sharks under the Proceeds of Crime Act with the purpose of raising awareness of the problems caused in our communities by loan sharks, and how those affected and the wider public can report concerns. Awards were granted to organisations across Wales for the development of educational and promotional materials and fun days together with a short film on unsafe borrowing.

Illegal money lending prosecutions – The prosecutions arising from two of the cases investigated by the WIMLU resulted in significant penalties. In the first prosecution, the defendant pleaded guilty to one offence of illegal money lending. In this case, lending had gone on for a significant period of time and extortionate rates of interest were charged to a single victim who was vulnerable. The offender received a sentence comprising a 12 month's Community Order, 200 hours unpaid work, attendance at a 10 day thinking skills programme, £1,400 compensation, £3,600 costs and a victim surcharge of £85. In the second case, a 77 year old man from Rhyl, loaned £390,000, with £218,000 interest charged over a period of 20 years, receiving repayments of £469,000. The offender pleaded guilty to charges of illegal money lending and money laundering and received 6 months imprisonment for each offence suspended for a period of 12 months. At a later POCA hearing a Confiscation Order was made to the sum of £16,250 from an agreed Criminal Benefit Total of £483,958 and compensation was ordered to be paid to 9 victims and to the sum of £6,424.

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. 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.

Changing socio – economic landscape - As technology develops and enables vulnerable people greater capacity to interact socially, the potential for unscrupulous individuals to perpetrate frauds and consumer detriment is expanding. Only about 10% of crime is the traditional ‘street’ crime with a shift to more online, behind closed door crime such as internet based crime. It is therefore becoming ever more important to identify “invisible” victims (those subject to crimes in their own homes) and bringing justice to “invisible” traders such as those operating over the internet or abroad. Locally, there is a challenge to prevent the repeat targeting of elderly or vulnerable consumers, and this will require proactive partnership working with agencies such as South Wales Police.

Illegal Money Lending - Loan sharks are illegal lenders of money who often target low income, desperate and vulnerable people. The current economic climate, together with problems associated with the roll out of the Universal Credit (UC) benefit and the six week wait for applicants to receive their first UC payment can only compound the problems facing families with bills to pay. Longer term, the Resolution Foundation think tank has suggested that 2.5 million low income households will be more than £1000 per year worse off when they move from individual benefits onto Universal Credit. As a result there are concerns that illegal money lending will be on the increase in the coming months and years. Grant funding for the Unit is now provided by HM Treasury, and is derived from a levy on the UK financial sector and collected by the Financial Conduct Authority. A recent business case to HM Treasury has resulted in some additional funding for the Wales Unit which will enable an Intelligence Analyst to be embedded into the team. This addition to the team will enhance the Unit’s intelligence led approach to investigations. Crucial to preventing this is the work of the Wales Illegal Money Lending Unit who seek to increase awareness of the problems of illegal money lending amongst partners and discourage their use taking action against illegal money lenders whilst supporting victims and understanding their needs creating a climate where victims can come forward without fear of reprisals.

Tackling modern slavery – Modern slavery is an umbrella term, encompassing human trafficking, slavery, servitude and forced labour. Anyone can become a victim of modern slavery and Councils can play a key role in tackling the issue. Modern slavery intersects with many different areas that Councils deal with including those provided by SRS, namely Trading Standards, Licensing and Environmental Health and Private Sector Housing all of whom may encounter perpetrators and victims whilst inspecting premises and regulating other businesses.

Licensing Issues - Concern continues to be expressed, particularly in Cardiff about the safety of vulnerable individuals who work within or are participants in the night-time economy. These issues are diverse and sometimes convoluted. In response the SRS is adopting new guidance on determining the suitability of applicants and licensees in the Hackney Carriage and Private Hire trades entitled ‘Safe and Suitable?’. In the same vein, the SRS will contribute to and use the National Register of Taxi Licence Revocations and Refusals (NR3). This is a mechanism for licensing authorities to share details of individuals who have had a hackney carriage/private hire driver’s licence revoked, or an application for one refused and will assist in determining whether applicant’s are ‘fit and proper’ to obtain a licence.

There remains Trade disquiet, particularly in Cardiff, over the number of vehicles registered outside of the city who are operating regularly there. There are at least three separate but connected causes for concern, all relating to ‘cross border hire’. First, Private Hire Vehicle drivers favour certain

licensing districts where there may be less stringent licensing regimes, but then operate in different areas to those that licensed them. Secondly, an authority has no power to regulate ‘out of area’ licensed vehicles operating in its area. Thirdly, regulating Private Hire Vehicle operating app based technology for bookings provides for a grey area legally. Underlying all of these issues are undertones of unfair trade and the potential for the exploitation of the vulnerable.

The paper on improving public transport may resolve these issues in due course, but more immediately, external legal opinion was sought on the legality of cross border operations using app based bookings. That legal opinion along with a recent high court decision suggests that that no contravention of the legislation is taking place by taxi operators utilising app based technology in the area covered by the SRS. We will however keep this under review as legislation and case law evolves. We will continue to undertake mystery shopper exercises and other enforcement exercises to ensure that all taxis and private hire vehicles comply with the legislation.

What we plan to do next

Safeguarding the vulnerable

**Lead
Responsibility**

Children are protected from harmful substances and products

Undertake an underage sales exercise in relation to the newly introduced Public Health (Wales) Act 2017 and the arrangement of intimate piercings, taking appropriate action against those practitioners that commit offences.

C Hill

Conduct an underage sales exercise in relation to the sale of e-cigarettes to persons under the age of 18.

C Hill

Older and vulnerable people are protected from rogue traders and scams

Improve access to safeguarding information on SRS website by reviewing and improving information on web pages.

H Picton

Raise awareness of scams, doorstep crime and other safeguarding issues by developing leaflets and guidance and participating in community events.

H Picton

Build relationships with trade federations such as the Federation of Master Builders to scope out current trading practices across the region and inform future priorities for intervention including intelligence, education and enforcement activities.

H Picton

Purchase and roll out ‘Memocam’ motion detectors as a safeguarding tool to victims of doorstep crime.

H Picton

Illegal money lending activities are prevented

Repeat the Proceeds of Crime funded community projects exercise which invites applicants from across Wales to bid for funding to progress projects and initiatives linked to the prevention and raising awareness of illegal money lending activities.

H Picton

Promote awareness of WIMLU work and practices across the 19 local authorities.

H Picton

Vulnerable people are not subject to exploitation, slavery or trafficking

Build upon work undertaken in 2018/19 to reinforce awareness of child sexual exploitation amongst the taxi trade across the 3 authorities.	W Lane
Continue a programme of training and awareness of Child Sexual Exploitation, slavery and trafficking to protect vulnerable residents.	W Lane

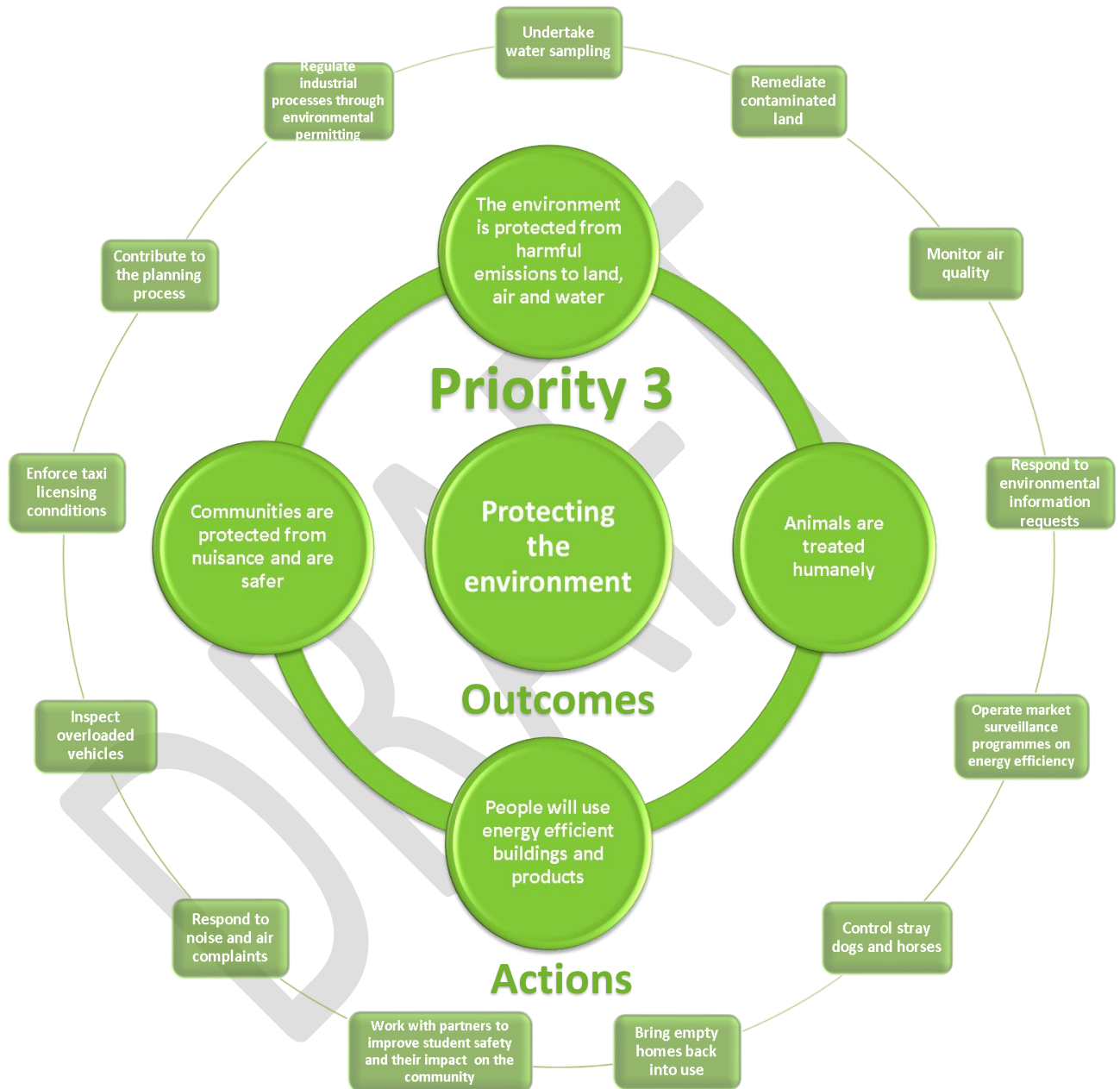
Taxi provision is safe and fair

Review taxi policy for vehicle and driver standards.	W Lane
Undertake taxi demand survey in Cardiff	W Lane
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
Review and align vehicle age policy guidance for Bridgend and Vale of Glamorgan taxi provision.	W Lane
Explore options for introducing a knowledge test for taxi drivers in Bridgend and reviewing existing test in Vale of Glamorgan.	W Lane

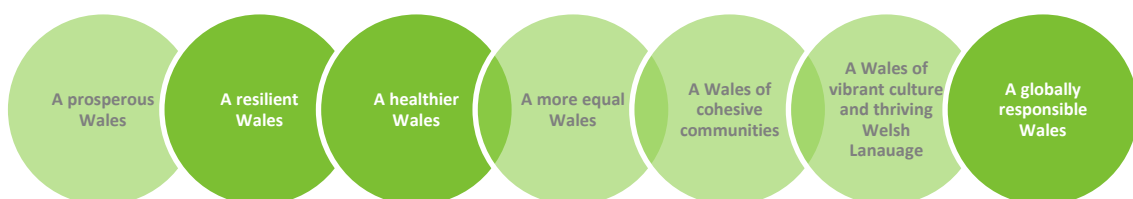
What we will measure during 2019/20

Performance Measures 2019/20	Target
<ul style="list-style-type: none"> % of reported scams/doorstep crime incidents prevented /resolved through intervention. 	80%
<ul style="list-style-type: none"> % of licence holders receiving disciplinary action following receipt of notifications of safeguarding concerns. 	Not applicable
<ul style="list-style-type: none"> No. of people reached through education or training on scams and doorstep crime. 	500

Protecting the environment



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



6.3 Protecting the environment

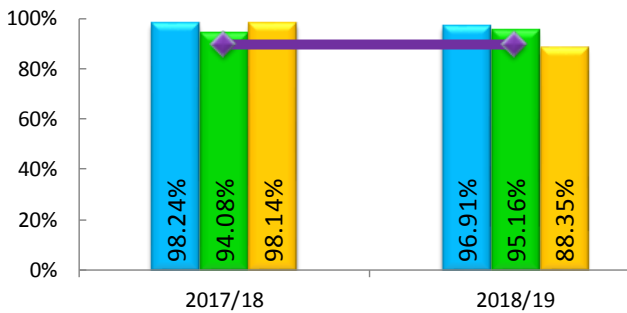
Introduction

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.

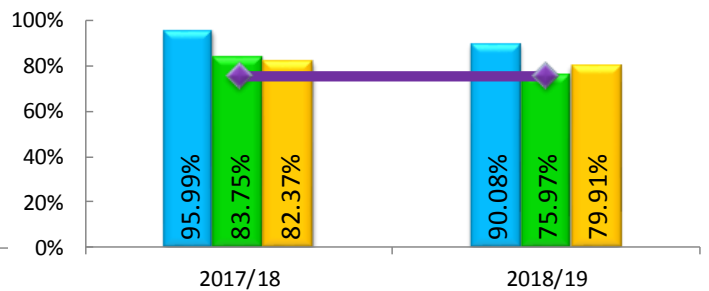
How we performed



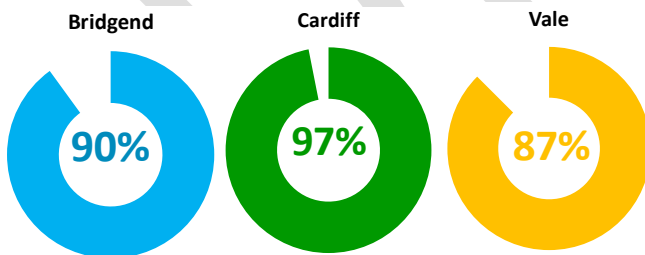
% domestic noise and air complaints responded to within 3 working days



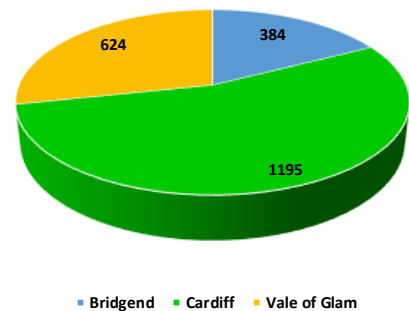
% commercial and industrial noise and air complaints responded to within one working day

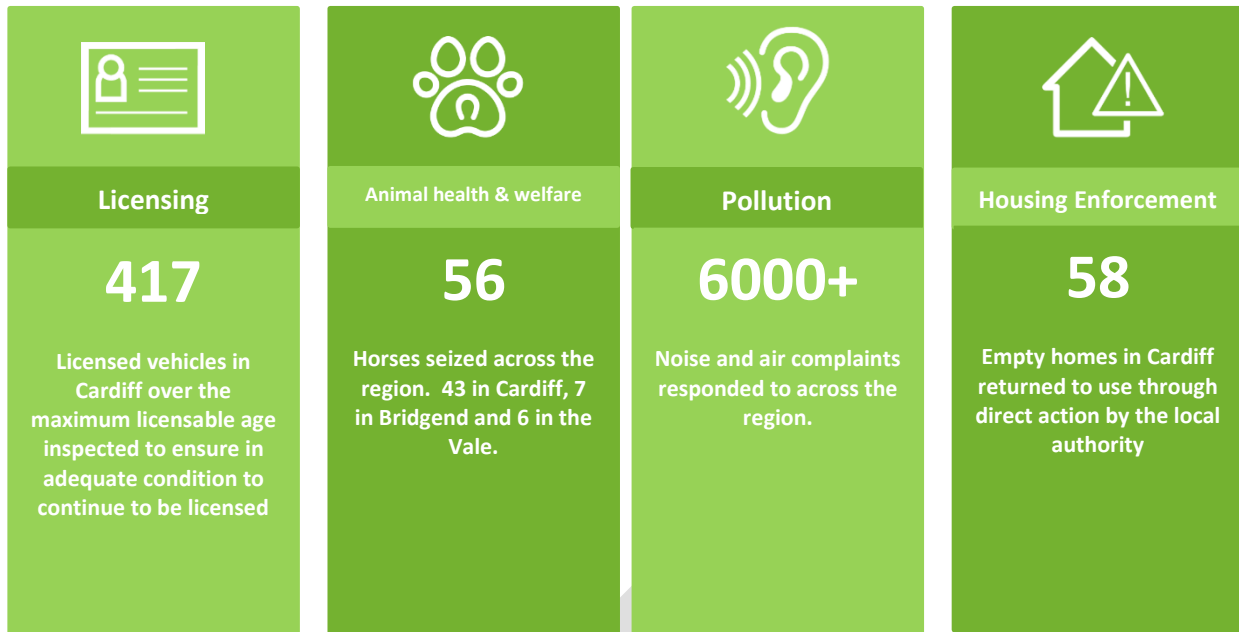


% of alarm complaints responded to within one day 2018/19



No. of Air Quality Samples taken during 2018/19





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/m³) 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 the last year, 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. Failure to produce said reports could have led to the issue of a Welsh Government direction under Section 85(3) of the Environment Act 1995.

In Cardiff, SRS continued to play a significant role in assisting the City of Cardiff Council as it identifies the most effective way to improve air quality going in the city going forward. The SRS Team Manager Specialist Services Environment has been seconded to Cardiff Council for a period of at least nine months in the role of Project Manager for the Council's Air Quality Strategy.

In Bridgend, the monitoring at a new location during 2017 and 2018 identified average nitrogen dioxide levels (NO₂) that breach the annual objective set for NO₂. As a result of this finding, Bridgend County Borough Council approved a recommendation made by SRS to designate an Air Quality Management Area (AQMA) at the new location in the town centre (in Park Street) to take effect in January 2019.

In the Vale of Glamorgan, Cabinet approved a recommendation made by SRS to revoke the Windsor Road, Penarth AQMA as a result of improvements in air quality over a number of years. The monitoring of air quality will however continue in the area to ensure that the greatly improved standard of air quality is maintained.

As part of the overall piece of work around Air Quality in Cardiff the Licensing team is reviewing the emission standards of the licensed taxi fleet in the City. A report to the Public Protection Committee in March outlined proposals to consult with the public, trade and stakeholders on policy changes to the age, emission and testing standards of vehicles in order to deal with the air quality challenges faced by Cardiff Council. This will form part of a wider strategy to implement a phased policy of vehicle improvement, beginning with removing the oldest and more polluting vehicles from the city's roads and transitioning to the long-term target of achieving a 100% zero emission fleet of licensed vehicles.

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. In addition, 35 samples were taken from lakes, streams, rivers and sea water, while 58 water samples were taken at temporary events. Furthermore SRS took 2203 air quality samples across the region and 2 Radon samples at schools.

Animals are treated humanely

RSPCA Awards – SRS were once again recognised at the RSPCA Cymru Paw Prints awards in 2018 in both the Dog Warden service and Animal Licensing categories. The hard work of our Animal Wardens and Animal Health and Welfare Officers throughout the year resulted in SRS not only maintaining the silver standard achieved in 2017 for Animal Licensing, but achieving a gold standard for the first time in respect of the Dog Warden services. This achievement is made all the more remarkable given the fact that during the course of the year a new kennelling provider was appointed, and the RSPCA Cymru awards really are a reflection of the success of the new arrangements.

The aim of RSPCA Cymru in giving these annual awards is to shine a light on organisations across Wales who have 'gone the extra mile' for animals, and entries are judged by an external panel of animal welfare experts. Two of the SRS team, together with the Chair of the Joint Committee attended the RSPCA annual dinner and awards ceremony in Cardiff Bay on 5th November, where Lesley Griffiths AM, Welsh Government Cabinet Secretary for Energy, Planning and Rural Affairs presented the awards.



People will use energy efficient buildings and products

The Energy Efficiency (Private Rented Property)(England and Wales) Regulations 2015 require private non-domestic (and domestic) landlords to ensure that properties they rent in England and Wales reach at least an Energy Performance Certificate (EPC) rating of E before granting a new tenancy to new or existing tenants. Last year, SRS officers conducted a pilot project to assess the level of compliance within the domestic rental sector. The project focused on obligations of letting agents to provide EPCs in a timely manner; ensuring that the information provided was accurate whilst also educating businesses about upcoming amendments to the energy efficiency of

properties. Overall, there was a high level of compliance concerning EPCs, but the anticipated improvement in the insulation and energy “footprints” of these buildings is not yet evident.

Cardiff Healthy Travel Charter involved a number of major public sector organisations in Cardiff committing to support and encourage their staff and visitors to their sites to use healthy modes of transport, by signing up to the Charter. This links closely to the work undertaken by SRS to assist the Council deal with air pollution in parts of Cardiff where it exceeds EU legal limits, increasing the risk to health. SRS is at the heart of this public sector initiative working together and leading by example on critically important issues for current and future generations.

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.

Freshers Week – SRS Officers engaged with students and residents during Freshers Week in Cardiff during community advice sessions and orientation talks on a broad range of housing, environmental and social issues. Officers worked closely with SWP to ensure that rented houses next to sensitive noise premises were visited and advised of potential problems linked to noisy parties and how the Police, University and the Council would investigate any complaints of anti-social behaviour received.

Empty Homes – This year the targets set for both PAM13 and PAM14 have been exceeded in Cardiff. This is a result of a combination of both proactive and reactive work, with an ongoing caseload of approximately 200 empty properties. Casework involves both 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. 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 line with the Council’s Empty Property Policy 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 2018/2019 the compulsory purchase procedure has been commenced on 3 long term problematic empty properties, one of which is currently being renovated by the owner. Naturally, the work also involves investigating complaints from neighbouring residents and Councillors.

Since October 2018, Bridgend Council have provided SRS with additional funding to finance an Empty Property Coordinator role for 3 days a week in the area. Dialogue with the landlord of one empty property in Maesteg has already seen results with the renovation of the property progressing rapidly without the need for grants or loans due to the timescales involved. The frontage of one long term vacant property has been renovated in the owner’s default in order to improve its appearance and remove blight from neighbouring properties, and others are underway.



Emerging issues

The Equine Identification (Wales) Regulations 2019 came into force on 12 February 2019. They replace the earlier 2009 regulations and prohibit the keeping of a horse unless it has been properly identified through an identification issuing body. The regulations require foals to be micro-chipped by a veterinary surgeon within specific time scales and retrospective micro-chipping of older horses by 2021. Furthermore the regulations place additional responsibilities on horse owners when selling or transferring ownership to ensure correct ownership is registered. The regulations give enforcing authorities the power to prosecute for failure to comply with the regulations or deal with offences by way of civil sanctions. These can include the issue of compliance notices and if such notices are not acted upon, the issue of a penalty notice requiring the offender to pay up to £200 plus costs. Receipts arising from the issue of penalty notices may be retained by the enforcing authority to cover the reasonable costs of enforcement, administration and legal advice with any surplus being paid into the Welsh Consolidated Fund.

The new Animal Health and Welfare Framework is an updated version of the existing framework that forms a partnership agreement aimed at helping local authorities in Wales carry out their statutory duties under animal health and welfare legislation in a consistent and co-ordinated way. It was recognised that the existing framework had become outdated and failed to support local authorities so the new framework was developed to reflect the altered financial, policy, regulatory, political and economic position within which local authorities, government and businesses now work.

Lucy's Law is a campaign to ban third party puppy sales and end the suffering caused by puppy farms. Named after a Cavalier King Charles Spaniel rescued following years trapped as a breeding bitch, the campaign has already resulted in the Westminster Government declaring that the sale of puppies by pet shops, online dealers and other third party traders will be banned in England in due course. Animal welfare is a devolved power, so the ban in England will not apply in Wales, however Welsh Government have launched a consultation into introducing Lucy's Law in Wales this year. The SRS will lead the response from the three Councils who have already indicated their support for such a ban. Last year, the service successfully prosecuted an illegal puppy farming operation under the Fraud Act 2006 and the Consumer Protection from Unfair Trading Regulations 2008. Other investigations are still in progress and the proposed change in law while welcome by SRS has uncertain resource implications.

Illegal Dog Breeding –Recent investigations into illegal dog breeding have highlighted a hidden industry. SRS Officers will therefore continue to investigate unlicensed dog breeding. A particular area of concern relates to 'backyard' breeding as this is also linked to other criminal activity and possible organised crime. Officers will work with partner agencies, SWP, HMRC, RSCPA to investigate reports on any breeding activities which are in breach of Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014 -.

Flygrazing of horses – Flygrazing of horses is not something that can be readily controlled or predicted, and a large incident could occur without prior warning, which could have significant resource and cost implications for the service. Careful planning and managing of such incidents needs to be fully considered, especially given the cost risks that can be associated with undertaking such operations. Due to the number of departments and cross authority issues SRS has not yet finalised a harmonised procedure. This will however be completed in 2019/20.

Feed Law Enforcement - A series of Food and Veterinary Office (FVO) audit reports of Official Feed Controls in the UK (2009, 2011 and 2012) identified a catalogue of serious and persistent failings in

some Councils in Wales. In April 2013, the Councils and the Food Standards Agency recognised that the changes considered necessary to improve feed law enforcement could not be made with the existing funding mechanism. Following extensive discussion between these parties, the problem was resolved by WG removing the funding for Official Controls on Feed from the RSG and making that available to be reallocated to the Welsh Councils (according to their workload) via the FSA Wales. The Regional Delivery Model proposed that each LA's work programme would be specified by FSA Wales and that LA's would invoice FSA Wales so that they could be remunerated for the work they carried out. This process has been in place for some years and the FSA have announced their intention to undertake an audit of the scheme to ensure it functions as intended and provides value for money.

What we plan to do next

Protecting the environment

Lead
Responsibility

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

Provide technical support to Cardiff Council in undertaking Feasibility Study to achieve compliance with legal limit for Nitrogen Dioxide.

H Picton

Submit annual progress reports for LAQM Duties for Bridgend, Cardiff and Vale.

H Picton

Finalise Clean Air Strategy and Action Plan for Cardiff

H Picton

Review air quality data and Air Quality Management Areas (AQMA) across the region and consider and formally action the implementation and revocation of Air Quality Management Areas where appropriate across the region.

H Picton

People will use energy efficient buildings and products

Build on the proactive work undertaken in relation to empty homes in order to increase the number of empty homes brought back into reuse in Cardiff and Bridgend

W Lane

Work in conjunction with Cardiff and Bridgend Council's Housing Strategy Team to maximise opportunities to reduce the number of empty homes.

W Lane

Animals are treated humanely

Finalise the fly grazing and stray horse procedure and develop a procedure for straying livestock and animals.

H Picton

Work with partner agencies in investigating reports of any dog breeding activities that are in breach of the Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014 and engage with Welsh Government consultation on the introduction of Lucy's Law in Wales.

H Picton

Produce Guidance for owners and keepers of horses on the new Equine Identification (Wales) Regulations 2019, and hold a series of micro-chipping and passport events to assist owners in complying with the new Regulations.

H Picton

Review and harmonise where appropriate, inspections and fees and charges in relation to the licensing of animal health and welfare related premises across the region.

H Picton

Review fees and charges for Pest Control services in Vale of Glamorgan	H Picton
Respond to consultation on Lucy's Law on behalf of the 3 local authorities	H Picton
Prepare for the FSA audit of the Feed law enforcement programme operated within the SRS region.	H Picton

Communities are protected from nuisance and are safer

Engage with students and residents during Freshers Week in Cardiff providing community advice on housing, environmental and social issues.	W Lane
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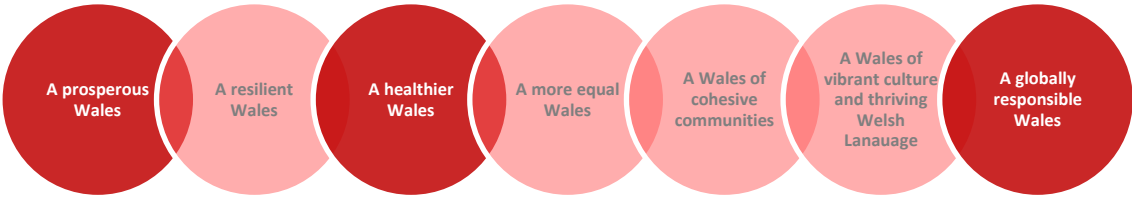
What we will measure during 2019/20

Performance Measures 2019/20	Target
<ul style="list-style-type: none"> For noise complaints requiring attendance on site, the average time between receipt and the officer attending on site. 	Under consideration
<ul style="list-style-type: none"> % of domestic noise and air complaints responded to within 3 working days 	90%
<ul style="list-style-type: none"> % of commercial and industrial noise and air complaints responded to within one working day 	75%
<ul style="list-style-type: none"> % of alarm complaints responded to within one day. 	90%
<ul style="list-style-type: none"> % of stray dogs returned to owner or rehomed. 	90%
<ul style="list-style-type: none"> % of empty private sector properties brought back into use during the year through direct action by the local authority (Cardiff and Bridgend only) 	TBC
<ul style="list-style-type: none"> Number of additional dwellings created as a result of bringing empty properties back into use (Cardiff and Bridgend only) 	TBC
<ul style="list-style-type: none"> Nitrogen Dioxide (NO₂) concentrations within Air Quality Management Areas. 	Annual mean ratified concentrations of (NO ₂) not to exceed 35µg/m ³

Supporting the local economy



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

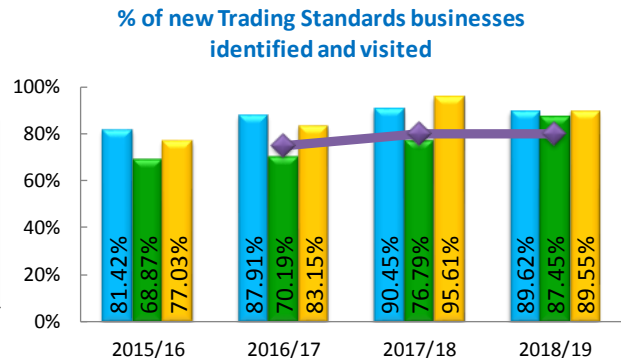
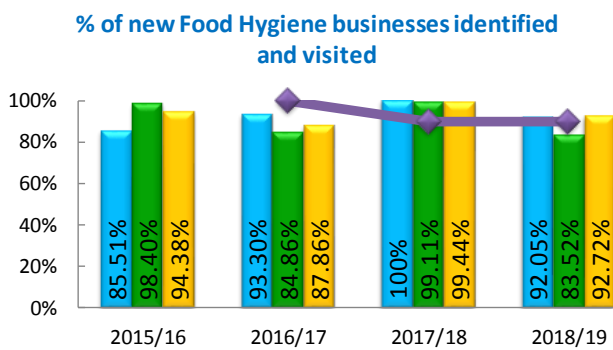


6.4 Supporting the local economy

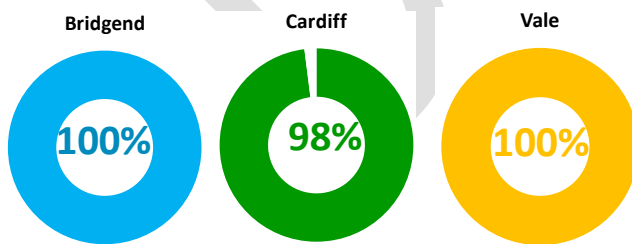
Introduction

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.

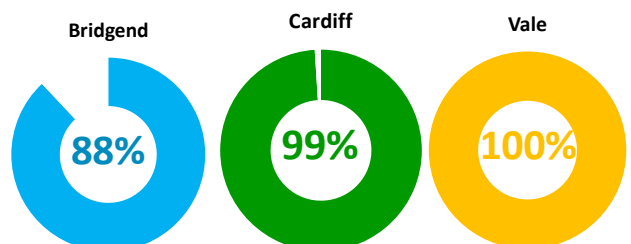
How we performed



Training delegates who felt the training they received will benefit their business 2018/19



Training delegates who would recommend the training to an employee, colleague or friend 2018/19



Source – Respondents to training evaluation questionnaire



What we have achieved

A fair trading environment is maintained

Weights and Measures Survey – In December, SRS officers carried out a survey of a cross-section of 35 pubs and clubs across the SRS region to determine the level of compliance against consumer protection, trade mark and weights and measure legislation. At each visit 3 drinks were ordered including a measure of whiskey, gin, rum or vodka, a cocktail that contained a branded spirit and a small glass of wine. The spirits were dip tested using authenticity indicators provided by the brand holder. The cocktails were observed being served to ensure ingredients were as described and the wine was checked to ensure it was served in a 125ml glass. Full bar inspections were also carried out to check measuring equipment was compliant with the legislation. Four premises were found to have non-compliant measuring equipment and 40 unstamped capacity serving measures were seized. All the non-compliant premises were given a written warning and the products signed over for destruction. A further 29 licensed premises were visited in March in Cardiff where three written warnings were issued by officers to those premises in breach of weights and measures legislation.

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. This includes a joint operation with HMRC. In one instance, officers removed illegal products from a property on Friday, only to return the following Monday to find that the retailer had re-stocked. The profits associated with this illegal activity are significant and those involved in the supply chain are well organised. During 2018/19 SRS seized 3053 packets of illicit cigarettes, 140 pouches of illicit hand-rolling tobacco and 104 packets of illicit shisha

products. Furthermore the service successfully prosecuted 3 individuals and one company for selling counterfeit tobacco in 3 businesses in Cardiff under the Trade Marks Act 1994 and the Tobacco and Related Products Regulations 2016. The total amount of fines awarded was £2610, costs of £1350 and £245 in victim surcharges. One defendant was also given a 12 month community order and ordered to undertake 120 hours of community service. Forfeiture orders were also granted.

Jeweller prosecuted- Following the receipt of complaints from customers, who had purchased items for substantial amounts of money and requested repair work where the quality and value were not of the standard expected or paid for, SRS undertook a significant investigation into a Cardiff jewellers. Breaches were found in relation to claims of membership



and approval of trade associations and the valuer, identified as such by the business, was found to be not registered and failed to carry out valuations in accordance with industry practice. In addition, during inspection, a number of items of jewellery that were precious metal containing diamonds were found to breach registered trade marks and were seized by officers. A mixture of hallmarking, trade marks and consumer protection from unfair trading regulations offences were found to have taken place. The company was fined £1500, a victim surcharge of £150 and ordered to pay compensation of £400 to a complainant. A further individual was fined £800, a victim surcharge of £80 and ordered to pay costs of £350. A forfeiture and destruction order was made in relation to all seized jewellery which was estimated to be of a retail value of £25,000.

Counterfeit merchandise and products – SRS has supported a number of major concerts including the Rolling Stones, Ed Sheeran, Anthony Joshua, Stereophonics and Beyoncé by seizing over 450 counterfeit clothing garments and posters with an equivalent genuine retail value of over £10k. SRS also carried out test purchasing of 20 household products manufactured by Proctor and Gamble including washing powders and shampoo. Using a kit provided by the company, officers were able to determine the authenticity of the products. 14 products were tested and found to be genuine.



Informed and confident consumers

As part of its Safeguarding role, the Service provides assistance to residents identified as being vulnerable in resolving difficulties encountered as a result of marketing scams and also more straightforward 'shopping' problems. In providing this service, the aim is not only to resolve the immediate difficulty facing a resident but to equip them as well as their families and carers with the knowledge and awareness to avoid similar issues arising in the future. In one recent case, a consumer employed a roofer to undertake some home improvements at her address and paid £6,930 in total via a bank transfer. The roofer carried out a small amount of work at the address and then started making excuses to not return and complete the work. The consumer chased the roofer for several months to complete the work. Bad weather had resulted in the roof leaking as it had not been made watertight and despite continuing to contact the roofer, sending numerous photos of the damage, he didn't return. On contacting SRS and providing a statement, the consumer was

advised by officers to make a claim via the Small Claims Court which resulted in an out of court settlement for £6,000 which the consumer has confirmed receipt of.

This is just one example from over the course of the year where SRS has been able to make a huge difference to the lives of residents needing assistance to resolve problems of this type. With the investment of officer time to provide tips on avoiding similar problems in the future, the legacy of these interventions is one where even our more vulnerable residents and their families are far better equipped to make informed decisions.

Improved business practices and operation

Open for Business - Across the region, the SRS licensed over 900 licensed premises in both the day and night time economy and issued over 600 personal licences allowing people to sell alcohol. These licences were issued in accordance with the statement of licensing policies and were subject to a robust assessment to ensure all the premises and individuals were fit and proper to undertake the roles required by the legislation. All the licences were issued well within the statutory time limit as we seek to ensure that legitimate business enterprises are able to open promptly and with all regulatory requirements in place and approved.

Food for Thought - Businesses given help complying with food safety regulations - SRS hosted a forum for food businesses at the Principality Stadium in March to give businesses advice on how best to meet standards. Over 170 delegates booked onto the event, representing a diverse range of organisations, including cafés, health boards, nurseries and hotel chains. Environmental Health and Trading Standards professionals from SRS advised delegates about health and safety in catering and how the food hygiene rating system works in practice and how to improve and maintain a food hygiene rating. Furthermore advice was given on preventing the spread of norovirus and the topic of food allergens which gave attendees the chance to understand their responsibilities in law whilst ensuring the safety of their customers. The event also highlighted the tailored advice services available as a paid-for service, or through Primary Authority partnerships which can include staff training, auditing of terms, conditions, policies and procedures and mock food hygiene inspections to better prepare businesses for the real thing. The event was very well received by all attendees, in fact, following the event, a food inspection was undertaken at a delegate's food business where he had implemented improvements as a result of the event and received an improved food hygiene rating score. A number of comments were also received via Twitter from attendees saying 'Very informative event, great to talk to the Environmental Health team', 'Gaining valuable knowledge in food safety' and 'Great event, informative info sharing!'



Tacking poor food hygiene ratings - A successful bid to the Food Standards Agency resulted in funding being awarded to SRS to tackle poor food hygiene rating scores across the region (scores of 0 – 2). The FHRS intervention grant enabled officers to target those businesses most in need of support in improving their score, and what followed was a programme of intensive 1 to 1 assistance provided to some 14 food businesses. The impact of the interventions has been evaluated by

reference to the FHRs scores of each of the businesses both before and after the training and support was provided. The results are quite remarkable. Most notably:-

- The average FHRs score across the fourteen businesses before the intervention was 1.5
- The average FHRs score across the fourteen businesses after the interventions was 4
- The greatest improvement was shown by a business achieving a FHRs rating of 4 having previously been zero rated
- Three premises achieved a 5 rating after the intervention, two having been on a rating of 2 previously and the other on a rating of 1.

As an added benefit of this work, officers were able to pilot the newly developed SRS HACCP training for businesses which is now available to book. It is hoped that given the huge success of the project in driving up low FHRs scores, similar interventions will be possible in the coming year, ideally with further FSA funding.

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 27 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. 2019/20 is likely to see a consolidation of this work.

Food and Safety News – The Service’s commitment to advising and supporting food businesses to achieve legal compliance and the highest possible standards continues with our twice yearly newsletter aimed at food businesses to inform, educate and advise on responsible food safety and health and safety across Bridgend, Cardiff and the Vale of Glamorgan.



Training Offerings – SRS has provided accredited training to 169 individuals through its Level 2 and 3 Food Safety and Level 2 Health and Safety Courses. Furthermore the service has also delivered bespoke training in areas such as infection control, labelling and compositional requirements of honey, HACCP, allergens, labelling and consumer rights to at least a further 70 delegates. Satisfaction with the training provided is very positive with 100% of attendees saying that the training they received will help improve standards of compliance in their business.

Major events liaison - Major events liaison - During 2018/19, SRS has attended numerous Event Liaison Panels (ELP) and Event Safety Advisory Groups (ESAG) across the region and assessed over 65 paper submissions in addition to any that required site visits. Regular annual events held across the region such as the Cardiff Food Festival, Bridgend Show, the Vale Show, along with Volvo Ocean Race, Urdd Eisteddfod, Jurassic Kingdom and many others have received advice, comments or visit support on food safety, health and safety, trading standards, pollution, licensing and specialist areas such as water usage.

Emerging issues

Increase in new food businesses in Cardiff - The prosperity and increasing popularity of the City of Cardiff means that the number of new food businesses attracted to the City is constantly increasing. During the last year a total of 540 new businesses were identified. This places a significant impact on resources of the Food Safety and Trading Standards functions, particularly as the Food Law Code of Practice requires new food businesses to be inspected, where possible, within 28 days of opening. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention. Businesses are deemed to be new businesses following the creation of new legal entities such as new limited companies, sole traders and partnerships and if the nature of business changes.

Minimum Unit Pricing of Alcohol - The Welsh Government's Substance Misuse Strategy for 2008-18, *Working Together to Reduce Harm*, sets out a number of action areas to address the harm caused by alcohol and other abused substances, including a commitment to tackling availability and protecting individuals and communities via enforcement activity. The Public Health (Minimum Price for Alcohol) (Wales) Act 2018 builds upon this commitment, is based on strong evidence that varying the affordability of alcohol is a legitimate means to address alcohol related harm. The legislation received royal assent earlier in the year and will take 12 months to take effect so will become effective during 2019/20.

Under the new law, it will be an offence to supply alcohol below the applicable minimum price, and this is calculated by reference to the alcoholic strength of a product and the volume in which it is sold. It is anticipated that the minimum unit price will be set at 50p and the purpose of the legislation is to protect the health of harmful and hazardous drinkers who tend to consume greater amounts of low-cost/ high-alcohol content products. Research has shown that on implementation, high strength white ciders and similar will double in price. While supermarket sales of alcohol will be largely unaffected, the minimum Unit Price requirement will impact multi-buy and similar deals and situations where alcohol is supplied together with goods or services.

This is a novel piece of legislation for the trade and those failing to comply will face a £200 fixed penalty notice, or should the matter proceed to court, a maximum fine of £1000. In order that the trade is fully aware of the requirements of the law, Welsh Government will require all off-licensed premises to be visited and advised by the local authority ahead of and after implementation. Across the SRS region, there are some 635 off-licensed premises, and Welsh Government is funding visits to each of these premises.

Brexit and changes in legislation - The key issues of Brexit are coming into focus, yet the outcome remains uncertain. If a new free trade deal with the EU is put into place, the UK may end up with a nearly identical trading situation; Brexit may feel like a non-event. However, at the other end of the spectrum is the UK leaving with no deal and defaulting to World Trade Organisation rules. In that scenario, the implications for businesses in the SRS region who import or export goods are significant. The effects of the change are uncertain and will take time to unfold; whatever they may be, they will have major implications for the SRS and the businesses in the region.

Major events - SRS plays an important role in the successful staging of major events across the three local authority areas. In addition to any 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 trade marked goods and safeguard against the supply of counterfeits. 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 have been 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. There is also a discernible increase year on year in the other two local authority areas, with figures for the Vale of Glamorgan area suggesting a 25% increase in events this year. Some examples of events recently staged include the Volvo Ocean Race, Oktoberfest, Welshfest and the various agricultural shows across the region. All of this has an impact on the Shared Service in terms of meeting demand from other areas of responsibility, and at a time of our diminishing staffing resource, and in covering weekend and evening work. Discussions are underway with the respective partner councils to ensure that event work can be appropriately prioritised, for example through service level agreements, and measures put in place to recover cost where necessary.

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. It expands the size of the market they operate in and therefore gives them 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.

What we plan to do next

Supporting the local economy	Lead Responsibility
A fair trading environment is maintained	
Following a national project undertaken in 2018, undertake a series of Weights and Measures exercises targeting post offices, doctors surgeries, hospitals, airports and textile retailers and supermarkets.	C Hill
Undertake actions to support the provisions of the Public Health (Minimum Price for Alcohol) (Wales) Act 2018.	H Picton
Undertake operations to disrupt the business of those selling illegal tobacco products	C Hill/H Picton
Undertake exercises targeted on second hand car sales in areas receiving the highest levels of complaint.	C Hill

Develop strategic assessment and control strategy in line with the Intelligence Operating Model.	H Picton
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Informed and confident consumers

Launch a 'Buy with Confidence' (responsible trader) scheme across the region to provide residents with peace of mind when shopping or choosing a tradesperson whilst supporting reputable businesses with a 'Trading Standards approved' endorsement.	H Picton
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Improved business practices and operation

Extend training provision to business by developing and offering training for Personal Licence holders.	H Picton
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Develop and promote advisory guidance for food businesses including the development of 'talking heads' on the SRS website.	H Picton
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Accessible services responsive to business needs

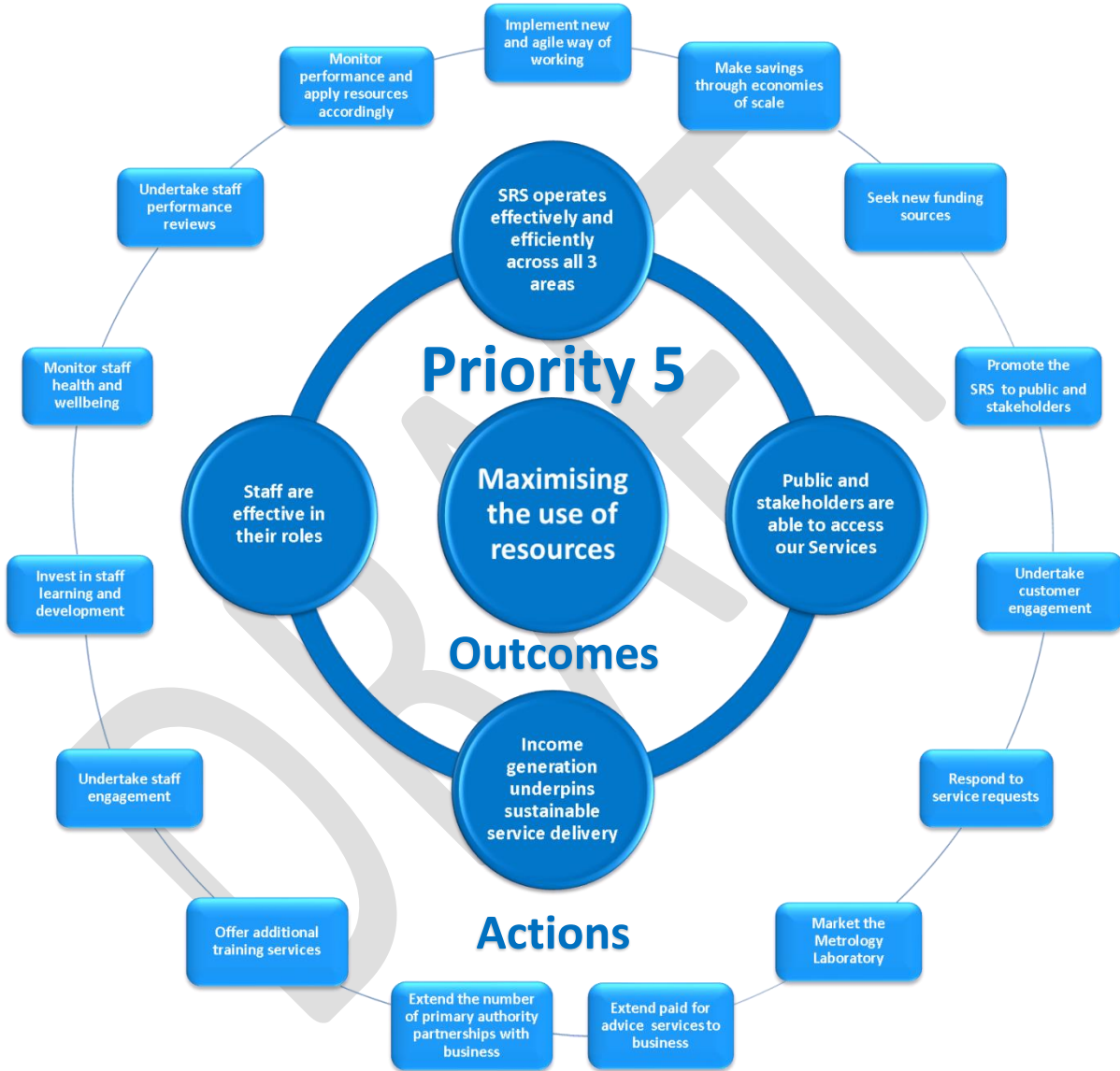
Consolidate existing Primary Authority Partnerships to improve level of service provided.	H Picton
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Review outputs of the quarterly Taxi Fora that facilitates engagement with drivers, operators and vehicle owners and consider any proposals for changes to the taxi licensing regime in Cardiff and the fora as a mechanism for effective engagement.	W Lane
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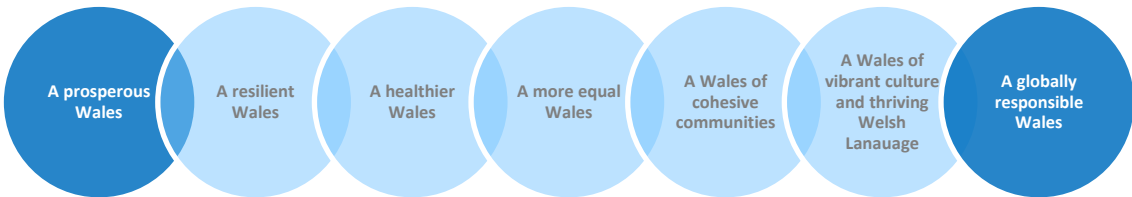
What we will measure during 2019/20

Performance Measures 2019/20	Target
<ul style="list-style-type: none"> % of new businesses identified which were subject to risk assessment visit or returned a self-assessment questionnaire during the year for food hygiene. 	90%
<ul style="list-style-type: none"> % of new businesses identified which were subject to risk assessment visit or returned a self-assessment questionnaire during the year for Trading Standards 	90%
<ul style="list-style-type: none"> % of businesses who felt that interaction with SRS has helped them improve standards of compliance in their business. 	85%
<ul style="list-style-type: none"> % of businesses satisfied with our paid for business advice services. 	Establish baseline
<ul style="list-style-type: none"> % of individuals who feel that the training they received through SRS will benefit their business. 	95%

Maximising the use of resources



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



6.5 Maximising the use of resources

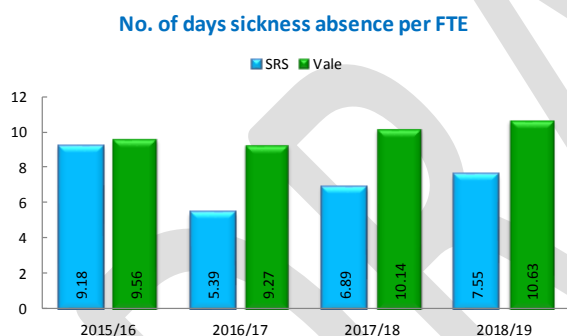
Introduction

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.

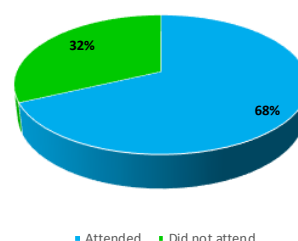
We are generating income, where possible, to underpin service delivery; activities like marketing our metrology laboratory, offering paid for advice services, building Primary Authority partnerships and extending our training provision to business are examples of our move to a more “commercial” culture.

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.

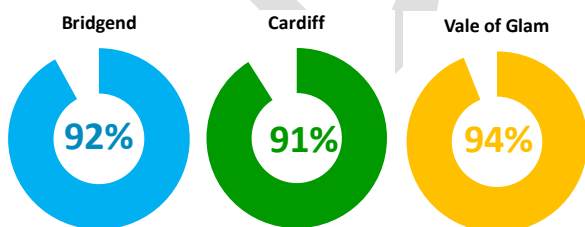
How we performed



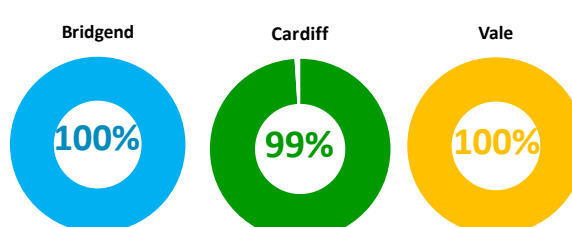
SRS Employees who attended the Vale Big Conversation



% of food businesses satisfied with overall level of service 2018/19



% training delegates who rated the training they received as good to excellent.



Source - Respondents to customer satisfaction survey and training evaluation questionnaire



What we have achieved

SRS operates effectively and efficiently across all 3 areas

Multi disciplined teams and sharing resources – The concept of more generic working and the development of multi-disciplined officers has been a key strategy for SRS during the last year. Our Pollution and Housing Teams have gone through the process of cross training to support one another during peaks in demand which has resulted in Officers specialised in Pollution Control matters undertaking Housing Health and Safety Rating System training and assisting officers with housing enforcement work during the winter. Similarly Housing Enforcement Officers have been able to assist their colleagues in the Pollution Team during the summer. The concept of generic working has also been applied in the Food Safety Teams where officers have been trained to develop their confidence and competence in food standards with the aim of maximising resources, enabling food safety officers to complete the food standards intervention at the same time as a food safety inspection of low risk food standards businesses. Both these initiatives provides benefits to the service by building a more cohesive and resilient service with more flexibility whilst introducing some variety of work for team members together with career development opportunities.

Noise app – SRS have been trialling a Noise app for customers who have contacted the service to make complaints about domestic noise problems they are experiencing. This innovative app enables customers with smart phones to record their noise problem in short bursts and send them to the noise team enabling them to listen and establish if a noise nuisance is occurring and streamlining the complaint process for both the customer and SRS. For example, it would remove the need for complainants to keep a paper diary of noise problems and enable SRS to filter and prioritise complaints while also preventing vexatious complaints being made.

SRS highly commended by British Hallmarking Council - Shared Regulatory Services (SRS) was highly commended in the British Hallmarking Council's 2018 Touchstone Awards, following a successful compliancy drive involving local jewellery outlets. The award recognised the work undertaken by SRS at the end of 2017 and 2018 when they undertook an exercise targeting new businesses, Christmas stalls and businesses that had been the subject of customer complaint. Officers made unannounced inspections of the businesses concerned, and were accompanied by an Assay Office

representative, to provide support and expertise in new and second-hand jewellery, gemstones and silverware. A range of jewellery items were examined to determine their authenticity and the accuracy of descriptions, and as a result, 77 items were removed from sale, 10 verbal warnings were issued and one jeweller was prosecuted.



SRS awarded for anti-counterfeiting drive



SRS were successful last year, in scooping the UK Anti-Counterfeiting Group (ACG) Departmental Award for Excellence in recognition of work carried out during 2017. The award particularly recognised the efforts made by SRS at numerous major events, preventing the sale of dangerous and unsafe fake goods from being sold to consumers. This included events such as concerts by Robbie Williams, Justin Beiber and Coldplay, as well as events like the British Grand Prix Speedway, World Championship Boxing, WWE Wrestling, Disney on Ice and the UEFA Champions League finals.

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. To aid the service in achieving this, we have during the last year:-

- **Improved the 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. The number of users of our website has increased from 2303 in April 2018 to 4003 in March 2019. In March the website had 11303 page views, with our Noise and Air Pollution web pages consistently receiving the most page views.
- **Equalities** – During the year, the service commenced 2 new processes to collect feedback from our customers on how inspections were carried out and the way service requests have been handled. A key part of this process has been the inclusion of questions to enable equality monitoring of our customers and to identify any issues or concerns, particularly around the ability to access our services.
- **Twitter account** – Since launching our own Twitter account @SRS_Wales in 2017, the SRS has almost doubled the number of followers from 156 to 292. This means of communicating with our customers enables the service to be promoted whilst conveying key messages to residents and businesses alike.

Income generation underpins sustainable service delivery

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. During the last year the service has extended the number of Primary Authority partnerships to 27. Furthermore,

the Service has provided accredited Food Safety training at levels, 2, 3 and level 2 Health and Safety to 169 individuals and delivered bespoke training in areas such as infection control, labelling and compositional requirements of honey, HACCP, allergens, labelling and consumer rights to at least a further 70 delegates.

Nest Inspections – During the last year, Housing Enforcement teams have worked with British Gas to deliver the Warm Home Nest Scheme by undertaking inspections of private rented properties in accordance with the Housing Health and Safety Rating Scheme. The service receives payment for these inspections and this has generated over £10,000 in income.

Just over £3000 in Bridgend in relation to pre-app planning advice and planning appeals.

Empty Homes – Bridgend - In October 2018 Bridgend Council provided additional funding to SRS in order to finance an Empty Property Coordinator role 3 days a week. Since taking up the role, SRS has revised the Empty Property Information Pack, produced draft procedures in relation to enforcement such as Compulsory Purchase and Enforced Sale and produced a suite of letters which are sent to owners of empty properties. If the owners fail to engage and take action in relation to their property then contact with the owners escalates. SRS also coordinates the empty property working group within the Council which brings together departments to engage in a corporate response to tackle the problem of empty properties. A departmental referral form has been developed which enables information to be collated across the council to assist in risk assessing properties for action.

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. During the last year, the service has invested in a number of learning and development activities to support the business including the following:-

- SRS sought applications from employees interested in developing themselves by offering to match fund suitable applications for external study. This resulted in a number of employees pursuing academic qualifications through the year such as M.Sc. qualifications in Environmental Health and Leadership and Public Service Management.
- Furthermore, the service expanded its financial investigative capability by supporting the training of 2 employees in financial investigation.
- The service has also provided legal competence training for officers together with a range of other professional development activities, which included a wide variety of training to support specific projects including product safety training, intellectual property training, fair trading – criminal, intelligence and investigative principles and the Metrology qualification.
- In house training sessions were arranged during the year in relation to HHSRS and HMO Licensing. By arranging the training in house it can be delivered at a lower cost, and is accessible to a greater number of officers. Officers across Neighbourhood Services attended the training assisting in the vision of developing generic working and helping to increase consistency across the teams. The training also provides valuable refresher training for the more experienced officers and assist in preparations for any potential review of this legislation in the coming year, which will mirror what is happening currently in England.

Health and Safety for staff - Employers are responsible for the health, safety and welfare at work of all their workers, as are the employees themselves, who must take reasonable care of themselves and other people affected by work activities. Earlier in the year, SRS began working with the Trade Unions to ensure that everything possible is being done to protect the health, safety and wellbeing

of frontline, peripatetic staff and particularly those working alone. This resulted in a number of actions. Firstly, all non-office based staff were provided with Conflict Management and Lone Worker training from an external provider, Safety Training Solutions Ltd. The training was tailored to the particular needs of SRS, through the use of relevant case studies and making reference to relevant risk assessments. The day long training was extremely well received and prompted a number of suggestions from attendees on additional measures to protect staff safety. In addition, a number of SRS staff are piloting the use of the 'Solo Protect ID' device that pinpoints the location of the user, and should they encounter violent or aggressive behaviour or suffer injury while working alone, a call handler is able to intervene to get the necessary assistance to the person concerned. Feedback to date has been very positive and the device will be made available to other identified SRS staff. Finally, the system put in place to record warning alarms in respect of premises or individuals linked to violent or aggressive behaviour is working well on the SRS Tascomi database. It is vital that this process now extends to enable the two way sharing of such information across the three partner authorities, albeit this remains more of a challenge from the data governance perspective

Emerging issues

Delivery of the Duty Officer regime - The SRS Duty Officer regime operates on a 24/7 basis over 365 days of the year and provides a single point of contact out of office hours for dealing with SRS emergencies and witnessing specific pre-determined cases that have an impact upon residents in our communities. The types of emergencies that the duty officer may be required to respond to include the notification of an outbreak of infectious disease, such as food poisoning, death or major injury accidents, the presence of hazardous chemical on insecure land, usually notified by South Wales Fire and Rescue Service, certain noise nuisance that may be deemed to be a public nuisance notified by the Police and incidents of doorstep crime. In addition, officers may need to respond to major emergencies reported to SRS by key stakeholders, eg. Police, Health and Safety Executive, Natural Resource Wales, Food Standards Agency, Fire Authority, Public Health Wales and Welsh Government. Cover is currently provided by officers on a voluntary basis whereby they provide cover as the Duty Officer on a rota basis and are paid to cover these responsibilities. In recent months, it has become increasingly difficult to recruit officers to cover the Duty Officer role resulting in a shortage of cover which has on occasion required managers to step in at short notice. There is significant concern that the delivery of the current regime lacks the resilience it needs to operate effectively and there is a need to address this by exploring alternative options.

Ensuring competency/Food Law Code of Practice –As anticipated the Food Law Code of Practice Wales (August 2018) has increased the required continual professional development from 10 to 20 hours for all food officers. This will require relevant adjustments to be made to the staff appraisal system “#its about me” and internal monitoring to ensure its effective implementation. Challenges will be posed by the ability to identify suitable courses for more experienced officers to participate in to further their personal development. It is hoped that annual membership of an online training provider for all officers charged with the delivery of the food service will meet this need. In addition the amended Food Law Code of practice details competencies that Lead Food Officers, Authorised Officers and Regulatory Support Officers must meet in order to fulfil the role for the Food Authority. The Food Standards Agency intend to issue guidance on how these should be met which is awaited prior to a review of authorisations for each individual being undertaken.

Retention of staff – The SRS is undergoing another significant period of change; the functions we deliver for our partner councils such as Air Quality, Food Hygiene, and Housing enforcement are attracting new demands. Recruitment and retention of good officers remains a challenge; we need

to ensure the SRS meets existing targets but is nimble enough to meet future agendas for public protection.

The shortage of applicants with the right skills, abilities and experience in the different professions, Environmental Health, Trading Standards, 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. We know that the majority of our officers are content with their employment within the SRS, yet the SRS delivery model is at significant risk due to the inability to attract, recruit and retain a high calibre.

In 2019, the SRS will build upon the its' Workforce Plan by implementing a strategy that seeks to sustain and motivate the workforce. Reflecting observations from stakeholders and the recommendations put forward by audits, e.g. FSA, WAO. The intended outcomes of this strategy are:

- The SRS will be able to recruit high calibre individuals and experienced professionals to ensure the provision of high quality regulatory services across the region.
- The SRS will manage talent effectively to be able to respond speedily and effectively to necessary changes.
- SRS officers will be able to work effectively in their roles and find their working life to be an enjoyable and rewarding experience.

Mobile Working Solutions – An essential component of the 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 the service is finding the technology deployed is becoming outdated after only 2/3 years. As technology improves, better facilities now exist which could further enhance the work of SRS and its remote working capabilities. SRS will work with ICT to explore options for improving equipment and systems to ensure that we deliver services both efficiently and effectively.

Intelligence Operating Model – In response to the reducing budget base officers have been examining new ways of working by introducing an intelligence-led approach to compliance rather than relying on an inspection driven approach. Making this shift allows service demand to be managed through a tactical tasking process to ensure the effective targeting of resources that better focusses activity on those individuals causing the greatest harm to consumers and reputable traders. Based on the Police National Intelligence Model, the National Trading Standards Intelligence Operating Model (IOM) is the first framework available to mainstream this approach into regulatory services. The IOM was developed with the aims of :-

- Being a flexible tool to assist in the frontline delivery of Trading Standards
- Being used by all local authority Trading Standards Services regardless of size and resources
- Helping to co-ordinate enforcement locally, regionally and nationally to avoid any potential enforcement gaps
- Enabling informed decisions to be made in order to deal with the highest risks and the greatest threats
- Helping to identify current and emerging issues or problems
- Enabling effective allocation of resources

As part of a realignment of resources flowing from last year's budget savings work and a successful business case for enhanced funding for the Wales Illegal Money Lending Unit, the Service was able to create two specialist Intelligence posts. Recruitment into these posts, an Intelligence Analyst and an Intelligence Support Officer has been completed, and as a result, intelligence handling and

analysis is now being embedded into the Service to drive this new way of working. Following the IOM and an agreed set of criteria for the prioritisation of demands, intelligence packages are prepared from various sources. This includes complaint data from the Citizens Advice Consumer Service, open source information from the internet, public records and media reports, and closed source information from within the local authorities and that shared by partners. Working initially across the Trading Standards, Major Investigations, Safeguarding and Wales Illegal Money Lending Unit sectors of the Service, our Intelligence capacity will enable more efficient tasking of professional officers on priority areas of work, and enhance the investigations that result. In time, the intention is to roll out this intelligence led approach to other areas of work within SRS.

Delivering with less – Environmental Health Services Follow up Review – As part of his ‘delivering with less’ series of Local Government Improvement Studies, the Auditor General published his report – Delivering with less – the impact on environmental health services and citizens, in October 2014 which contained a number of recommendations for local authorities. In January 2018, the Auditor General set out his intention to follow up on this report to determine the extent these recommendations have been addressed. SRS has a role to play in these assessments across all three partner councils and are currently assisting auditors in preparation for such a review across the three councils. It is anticipated that despite challenging financial pressures, SRS will be able to demonstrate a successful change programme and strong links to national and corporate priorities.

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.	H Picton
Review Licensing fees and charges across the service.	W Lane
Explore new ways of working within the Noise and Air Pollution Team to address loss of resources.	W Lane
Improve equality monitoring data to enable more informed decisions about service delivery.	H Picton
Ensure service delivery complies with Welsh Language Standards.	H Picton
Review duty officer regime across the SRS region to explore alternative forms of delivery.	W Lane
Review the food registration process with a view to streamlining new business procedures and making the process more robust whilst also exploring the feasibility of promoting on-line food registration via the government website.	C Hill
Review the SRS operating procedures for the collection and retention of data to ensure compliance with the GDPR	H Picton
Engage with Wales Audit Office in undertaking the Delivering with Less – Environmental Health Services follow-up review.	D Holland

Develop a recruitment strategy together with retention initiatives to address skill gaps within the service	D Holland
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Public and stakeholders are able to access our services

Review the effectiveness of current mechanisms used by stakeholders to access SRS services particularly in relation to telephone and email contact.	H Picton
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Income generation underpins sustainable service delivery

Review the role of SRS in providing support to major events including the determination of the true cost to the Service in providing support across the three local authority areas.	H Picton
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Staff are effective in their roles

Rationalise and harmonise Health and Safety and Communicable Disease procedures	C Hill
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Improve the delivery of administration and support to operational teams	H Picton
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Address the workload imbalance between the 3 hubs by transferring calls in Cardiff to C1V.	H Picton
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Complete the PDR process with all SRS employees.	All OMs /TMs
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Review Workforce Development Plan.	C Hill
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Complete actions identified in the SRS Staff Survey Action Plan 2018	D Holland
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Consider alternative options to replace the SRS staff survey	H Picton
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What we will measure during 2019/20

Performance Measures 2019/20	Target
Average days sickness per FTE.	5.00
% 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

DIRECTION OF TRAVEL

Risk level forecast to increase
Risk level forecast to decrease
Risk level forecast to remain unchanged

RISK MATRIX

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

Risk Description	Inherent Risk Score (April 2018)		Risk	Comments (to support risk scoring)	Forecast Direction of travel
	Likelihood	Impact			
RR1: Insufficient resources, and capacity to deliver planned services will result in loss of service provision and reduction in performance.	4	3	High 12	The Service is examining new ways of prioritising services and using risk based approaches to activities in line with reduced resources including a move to an Intelligence Operating Model. However whilst these efforts help reduce the impact of reduced funding, the cuts will likely impact on service delivery and performance.	Increase
RR2: The complexities of resource allocation may result in a lack of	3	3	Medium/High 9	Dedicated accountant appointed for the Service. Governance arrangements in place to address lack of	Remain unchanged

Risk Description	Inherent Risk Score (April 2018)		Risk	Comments (to support risk scoring)	Forecast Direction of travel
	Likelihood	Impact			
understanding and misalignment of resources.				understanding. Review and standardisation of financial processes ongoing.	
RR3: 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 in 2017 facilitates remote access. Laptops and mobile devices rolled out to staff to allow for more agile working. This technology however has become outdated in only 2/3 years. In order to improve remote working capabilities and deliver services efficiently and effectively, the service will need to work with ICT to explore better facilities.	Remain unchanged
RR4: 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. The creation of a recruitment strategy and the development of retention initiatives will be a key target for SRS during 2019/20.	Remain unchanged
RR5: Implementation of new legislation may create additional demands on service delivery.	3	3	Medium/High 9	Workloads reviewed and monitored and process in place for Head of Service to regularly report to partner authorities. It is not always easy however, to predict the impact that new legislation may have on resources and with the uncertainty over EU membership this could exacerbate such matters.	Remain unchanged
RR6: 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 it is	Remain unchanged.

Risk Description	Inherent Risk Score (April 2018)		Risk	Comments (to support risk scoring)	Forecast Direction of travel
	Likelihood	Impact			
				becoming increasingly difficult to recruit officers resulting in shortage of cover which has required managers to step in a short notice. The current process lacks resilience and there is a need to explore alternative options.	
RR7: 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. Furthermore opportunities to promote successes of the new service are taken.	Remain unchanged

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 2019/20 and undertake interventions in accordance with the plan and the arrangements in place to discharge food safety duties.

C Hill

Develop and adopt the Port Health Plan 2019/20.

C Hill

Engage with changes to the Food Law Code of Practice and ensure appropriate staff are trained and competent to deliver the required assessments against the framework.

C Hill

Undertake a survey of FHRS sticker displays at premises and on takeaway menus.

C Hill

Review public health requirements for Cardiff Airport as a point of entry and consider implications on resources.

C Hill

Implement recommendations made in the Food Hygiene Rating Scheme Audit conducted by the FSA.

C Hill

Review the food registration process with a view to streamlining new business procedures and making the process more robust whilst also exploring the feasibility of promoting on-line food registration via the government website.

C Hill

Building upon the food standards training received, commence the undertaking of food standards inspections by food safety officers.

C Hill

Risks in the workplace are managed properly

Develop and adopt the Section 18 Health and Safety Service Plan 2019/20 and undertake interventions in accordance with the plan and the arrangements in place to discharge health and safety duties.

C Hill

Undertake an all-wales agreed inspection programme in relation to Hand Arm Vibration (HAVS).

C Hill

Engage with Welsh Government on the implementation of the Public Health (Wales) Act 2017, undertaking actions to support the provisions of the legislation including preparing businesses and internal procedures in readiness for the implementation of the new special procedures licensing regime.

C Hill

Noise and air emissions are controlled

Undertake consultation with the public, taxi trade and stakeholders on proposed policy changes to the age, emission and testing standards of vehicles in order to deal with the air quality challenges faced by Cardiff Council.

W Lane

A safe trading environment is maintained

Following on from investigations undertaken in 2018, carry out a joint enforcement exercise of trampoline parks across the region.

C Hill

Licensed premises operate responsibly

Undertake a review of the Statement of Licensing Act Policy (SLP) and Cumulative Impact Zone in line with the revised Section 182 Guidance in Cardiff and Bridgend and publish, following consultation with stakeholders and obtaining Council approval.

W Lane

Undertake a study/survey to understand the gambling patterns of the young to determine any discernible impact on public health.

W Lane

The quality of private rented property is improved

Build upon the work undertaken in Bridgend in 2018/19 to identify HMOs and landlords not registered with Rent Smart Wales in preparation for changes identified in the Renting of Homes Act.

W Lane

Agree an enforcement approach with partner Councils and Rent Smart Wales in relation to the Renting of Homes Act.

W Lane

Where appropriate take forward prosecutions for offences relating to housing standards, HMO Licensing and Rent Smart Wales.

W Lane

Review the effectiveness of the Plasnewydd Additional Licensing scheme and consider consultation on its re-declaration for another 5 years

W Lane

Work with the Fire and Rescue Service and Welsh Government in response to the Grenfell Fire by ensuring the remediation of any buildings under the remit of SRS.

W Lane

Implement a training programme for SRS employees on the implications of the Renting Homes Act.

W Lane

Infectious disease is controlled and prevented

Secure approval and deliver the Communicable Disease Service Plan 2019/20 and undertake interventions in accordance with the plan and the arrangements in place to discharge these duties.

C Hill

Safeguarding the vulnerable

**Lead
Responsibility**

Children are protected from harmful substances and products

Undertake an underage sales exercise in relation to the newly introduced Public Health (Wales) Act 2017 and the arrangement of intimate piercings, taking appropriate action against those practitioners that commit offences.

C Hill

Conduct an underage sales exercise in relation to the sale of e-cigarettes to persons under the age of 18.

C Hill

Older and vulnerable people are protected from rogue traders and scams

Improve access to safeguarding information on SRS website by reviewing and improving information on web pages.

H Picton

Raise awareness of scams, doorstep crime and other safeguarding issues by developing leaflets and guidance and participating in community events.

H Picton

Build relationships with trade federations such as the Federation of Master Builders to scope out current trading practices across the region and inform future priorities for intervention including intelligence, education and enforcement activities.

H Picton

Purchase and roll out 'Memocam' motion detectors as a safeguarding tool to victims of doorstep crime.

H Picton

Illegal money lending activities are prevented

Repeat the Proceeds of Crime funded community projects exercise which invites applicants from across Wales to bid for funding to progress projects and initiatives linked to the prevention and raising awareness of illegal money lending activities.

H Picton

Promote awareness of WIMLU work and practices across the 19 local authorities.

H Picton

Vulnerable people are not subject to exploitation, slavery or trafficking

Build upon work undertaken in 2018/19 to reinforce awareness of child sexual exploitation amongst the taxi trade across the 3 authorities.

W Lane

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

Review taxi policy for vehicle and driver standards.	W Lane
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Undertake taxi demand survey in Cardiff	W Lane
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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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Review and align vehicle age policy guidance for Bridgend and Vale of Glamorgan taxi provision.	W Lane
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Explore options for introducing a knowledge test for taxi drivers in Bridgend and reviewing existing test in Vale of Glamorgan.	W Lane
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Protecting the environment

Lead Responsibility

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

Provide technical support to Cardiff Council in undertaking Feasibility Study to achieve compliance with legal limit for Nitrogen Dioxide.	H Picton
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Submit annual progress reports for LAQM Duties for Bridgend, Cardiff and Vale.	H Picton
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Finalise Clean Air Strategy and Action Plan for Cardiff	H Picton
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Review air quality data and Air Quality Management Areas (AQMA) across the region and consider and formally action the implementation and revocation of Air Quality Management Areas where appropriate across the region.	H Picton
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People will use energy efficient buildings and products

Build on the proactive work undertaken in relation to empty homes in order to increase the number of empty homes brought back into reuse in Cardiff and Bridgend

W Lane

Work in conjunction with Cardiff and Bridgend Council's Housing Strategy Team to maximise opportunities to reduce the number of empty homes.

W Lane

Animals are treated humanely

Finalise the fly grazing and stray horse procedure and develop a procedure for straying livestock and animals.

H Picton

Work with partner agencies in investigating reports of any dog breeding activities that are in breach of the Animal Welfare (Breeding of Dogs) (Wales) Regulations 2014 and engage with Welsh Government consultation on the introduction of Lucy's Law in Wales.

H Picton

Produce Guidance for owners and keepers of horses on the new Equine Identification (Wales) Regulations 2019, and hold a series of micro-chipping and passport events to assist owners in complying with the new Regulations.

H Picton

Review and harmonise where appropriate, inspections and fees and charges in relation to the licensing of animal health and welfare related premises across the region.

H Picton

Review fees and charges for Pest Control services in Vale of Glamorgan

H Picton

Respond to consultation on Lucy's Law on behalf of the 3 local authorities

H Picton

Prepare for the FSA audit of the Feed law enforcement programme operated within the SRS region.

H Picton

Communities are protected from nuisance and are safer

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

Following a national project undertaken in 2018, undertake a series of Weights and Measures exercises targeting post offices, doctors surgeries, hospitals, airports and textile retailers and supermarkets.

C Hill

Undertake actions to support the provisions of the Public Health (Minimum Price for Alcohol) (Wales) Act 2018.

H Picton

Undertake operations to disrupt the business of those selling illegal tobacco products

C Hill/H Picton

Undertake exercises targeted on second hand car sales in areas receiving the highest levels of complaint.

C Hill

Develop strategic assessment and control strategy in line with the Intelligence Operating Model.

H Picton

Informed and confident consumers

Launch a 'Buy with Confidence' (responsible trader) scheme across the region to provide residents with peace of mind when shopping or choosing a tradesperson whilst supporting reputable businesses with a 'Trading Standards approved' endorsement.

H Picton

Improved business practices and operation

Extend training provision to business by developing and offering training for Personal Licence holders.

H Picton

Develop and promote advisory guidance for food businesses including the development of 'talking heads' on the SRS website.

H Picton

Accessible services responsive to business needs

Consolidate existing Primary Authority Partnerships to improve level of service provided.

H Picton

Review outputs of the quarterly Taxi Fora that facilitates engagement with drivers, operators and vehicle owners and consider any proposals for changes to the taxi licensing regime in Cardiff and the fora as a mechanism for effective engagement.

W Lane

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.

H Picton

Review Licensing fees and charges across the service.

W Lane

Explore new ways of working within the Noise and Air Pollution Team to address loss of resources.

W Lane

Improve equality monitoring data to enable more informed decisions about service delivery.

H Picton

Ensure service delivery complies with Welsh Language Standards.

H Picton

Review duty officer regime across the SRS region to explore alternative forms of delivery.

W Lane

Review the food registration process with a view to streamlining new business procedures and making the process more robust whilst also exploring the feasibility of promoting on-line food registration via the government website.

C Hill

Review the SRS operating procedures for the collection and retention of data to ensure compliance with the GDPR

H Picton

Engage with Wales Audit Office in undertaking the Delivering with Less – Environmental Health Services follow-up review.

D Holland

Develop a recruitment strategy together with retention initiatives to address skill gaps within the service

D Holland

Public and stakeholders are able to access our services

Review the effectiveness of current mechanisms used by stakeholders to access SRS services particularly in relation to telephone and email contact.

H Picton

Income generation underpins sustainable service delivery

Review the role of SRS in providing support to major events including the determination of the true cost to the Service in providing support across the three local authority areas.

H Picton

Staff are effective in their roles

Rationalise and harmonise Health and Safety and Communicable Disease procedures

C Hill

Improve the delivery of administration and support services to operational teams.	H Picton
Address the workload imbalance between the 3 hubs by transferring calls in Cardiff to C1V.	H Picton
Complete the PDR process with all SRS employees.	All OMs /TMs
Review Workforce Development Plan.	C Hill
Complete actions identified in the SRS Staff Survey Action Plan 2018	D Holland
Consider alternative options to replace the SRS staff survey	H Picton

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