

Meeting of:	<b>Shared Regulatory Services Joint Committee</b>
Date of Meeting:	<b>Tuesday, 29 September 2020</b>
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:	Head of Shared Regulatory Services
Responsible Officer:	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"> <li>• The report sets out the process by which the draft SRS Business Plan for 2020/21 has been developed</li> <li>• 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.</li> </ul>	

## **Recommendations**

1. That the Joint Committee notes the content of this report and approves the SRS Business Plan for 2020/21.
2. That the Head of the Shared Regulatory Service is authorised to make administrative amendments to the 2020 /21 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 Shared 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.
3. Authorising the Head of Shared Regulatory Services to make administrative amendments to the Business Plan will enable minor changes to be made, as and when needed during the course of the year, without the need to bring the matter back to the Joint Committee. As well as reducing the burden on the Joint Committee this approach means that minor changes can be made promptly in response to any issues that arise

## **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 seeks to ensure 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. In previous years the Business Plan has been subject to Scrutiny committee assessment, however this year, the Covid outbreak has hindered the process and interaction on the plan has been remote.

## **2. Key Issues for Consideration**

- 2.1** The 2020/21 draft plan presents a realistic acknowledgement of the challenges and resource limitations within which SRS is trying to deliver essential services; not least the Covid outbreak. 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 resources*

- 2.2** The 2020/21 draft Plan, like those previously approved by the Joint Committee, sets out the full range of services provided by SRS providing an indication of the activities planned for the 20/21 period, the financial projections for the year, and a review of performance for 2019/20.

- 2.3** 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 2020/21 where appropriate to do so.

- 2.4** Consultation with stakeholders generated the following feedback which resulted in some minor changes being made to the Plan:-

*The plan is well laid out, comprehensive, easy to read and provides clarity of the vision, priorities, and outcomes. It is great to see the alignment to the Future Generations (Wales) Act, and the local authority plans. It is also positive to recognise the opportunities that the use of ICT will bring.*

*We note that there are resource restrictions, and that the Covid-19 pandemic has created some difficulties, for example to inspections, creating a backlog. We have particular concerns about the risk to the out-of-hours service, which will impact on the delivery to outbreak management.*

*Generally, the risks of limited resources and reduced ability of the service to deliver on the stated plan is a concern, particularly at a time when it is important to reduce the burden of illness on health and health services. How will priorities for delivery be identified if resources are reduced?*

**2.5** Members are asked to approve the draft 2020/21 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 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.



# Shared Regulatory Services

## Business Plan

2020/21



Shared  
Regulatory  
Services

Gwasanaethau  
Rheoliadol  
a Rennir



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# Introduction



The 2020/21 SRS Business Plan represents our sixth programme of work. 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, at the time of writing this introduction, perhaps I can assert that they have never been more important.

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

Covid-19 is posing a growing threat to the health and well-being of our societies. The unfolding health and economic crises means that Government is forced to balance policy choices, minimizing the death toll while reducing the negative economic impact which might leave many households without subsistence income. So what does that mean for the SRS, an organisation that asserts it safeguards the health, safety and economy of the region?

The call upon our resources by the three Councils, our partner agencies in public health, and other stakeholders has, in a world of lockdown, increased significantly. This is perhaps the greatest test of our assertion that through collaboration we have created a more robust resilient service. For a service like ours which is involved in so many different ‘businesses’ across three different Councils, one cannot understate that undertaking.

Consequently, this SRS Business plan depicts an organisation that has had to become more reactive to the challenges emerging locally and nationally. Our normally challenging range of proactive activities are less visible in this plan, but we remain an organisation that is performing well; an organisation that is vibrant and ready to do things differently; an organisation that is challenging unlawful practices and doing all it can to keep people safe.

The impact of COVID-19 will eventually be minimised in one way or another; we will learn to live with it but may pay a high cost as a society. While we are only just approaching the eye of the storm, the acknowledgement of our contributions by elected members and others provides me the stamina for the long haul. And I cannot be alone in that. We will return to “a new normal” having learned lessons, but with new opportunities to explore. If the last 5 years have shown me anything, it is that SRS thrives when opportunities present themselves. Our talent, our commitment and the “Can do Want to” approach means we will come out the other side of this pandemic prepared to face future challenges, whatever they may be.


**Dave Holland**  
**Head of Shared Regulatory Services**





# SRS vision, priorities and outcomes


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


## Improving health and wellbeing


 The food chain is safe and free from risks


 Risks in the workplace are managed properly

 Noise and air emissions are controlled


 A safe trading environment is maintained


 Licensed premises operate responsibly


 The quality of private rented property is improved


 Infectious disease is controlled and prevented

## Protecting the environment


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


 People will use energy efficient buildings and products


 Communities are protected from nuisance and are safer


 Animals are treated humanely


## Safeguarding the vulnerable

 Children are protected from harmful substances and products


 Older and vulnerable people are protected from rogue traders and scams


 Illegal money lending activities are prevented


 Taxi provision is safe and fair


 Vulnerable people are not subject to exploitation, slavery or trafficking

## Supporting the local economy


 A fair trading environment is maintained


 Informed and confident consumers


 Improved business practices and operation


 Accessible services responsive to business needs

## Maximising the use of resources

 SRS operates effectively and efficiently across all 3 areas

 Public and stakeholders can access our services

 Income generation underpins sustainable service delivery

 Staff are effective in their roles

## Delivering our priorities

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

# 1. Overview of Services

## 1.1 Background

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

SRS operates under a Joint Working Agreement (JWA) whereby the Head of SRS reports on service provision to a Joint Committee of elected members drawn from across the three parent Councils. An officer management board has 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 Quality Management and regulates emissions from industrial processes.



Air Pollution



### Port Health

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



### Contaminated Land

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



### Health and Safety at Work

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



### Communicable Disease

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

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



### Animal Health and Welfare

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



### Licensing

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



### Wales Illegal Money Lending Unit

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



### Working with Business

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

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

accreditation levels to attract additional business;

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

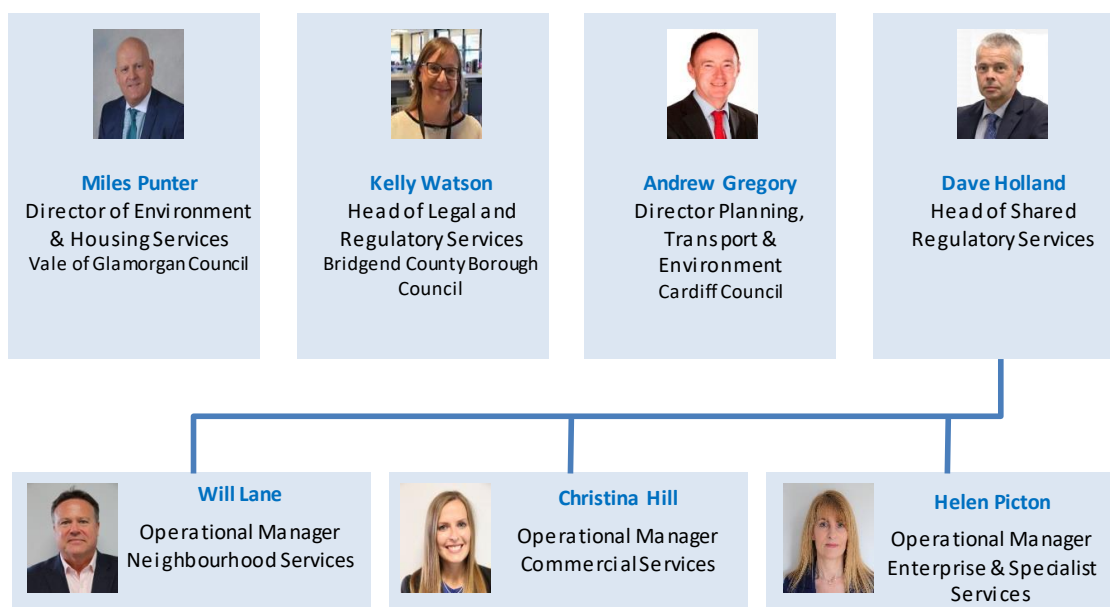
Our new model of delivery sees all these services delivered across three service delivery sectors known as Neighbourhood Services which deals with activities relating to residential premises or having an impact on the local community, Commercial Services which deals with activities relating to business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

# 1.3 Management and Governance Arrangements

## Joint Committee

 <b>Councillor Michael Michael</b> Cardiff Council	 <b>Councillor Dhanisha Patel</b> Bridgend County Borough Council	 <b>Councillor Eddie Williams</b> Vale of Glamorgan Council	 <b>Councillor Norma Mackie</b> Cardiff Council	 <b>Councillor David Lewis</b> Bridgend County Borough Council	 <b>Councillor John Thomas</b> Vale of Glamorgan Council
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## 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

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Civic Offices  
Angel Street  
Bridgend  
CF31 4WB

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

#### Cardiff

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Level 1  
County Hall  
Cardiff  
CF10 4UW

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

City Hall  
Cardiff  
CF10 3ND

#### Vale of Glamorgan

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Civic Offices  
Holton Road  
Barry  
CF63 4RU

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



## 1.6 Staff resources

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

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

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

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

# 2. Service aims & Strategic Priorities

## 2.1 Vision, strategic priorities and aims

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

Our vision:-

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

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



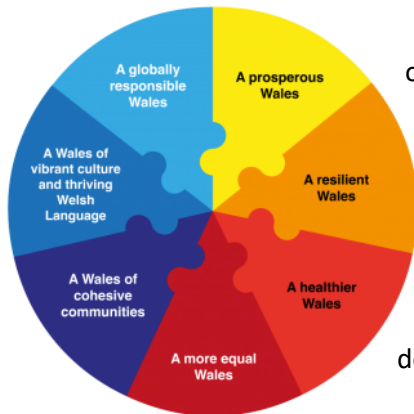
Supporting these strategic priorities, are a number of outcomes that the Service aims to deliver and which are evidenced throughout this Business Plan. Our vision and outcomes will be achieved through the following primary aims:

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

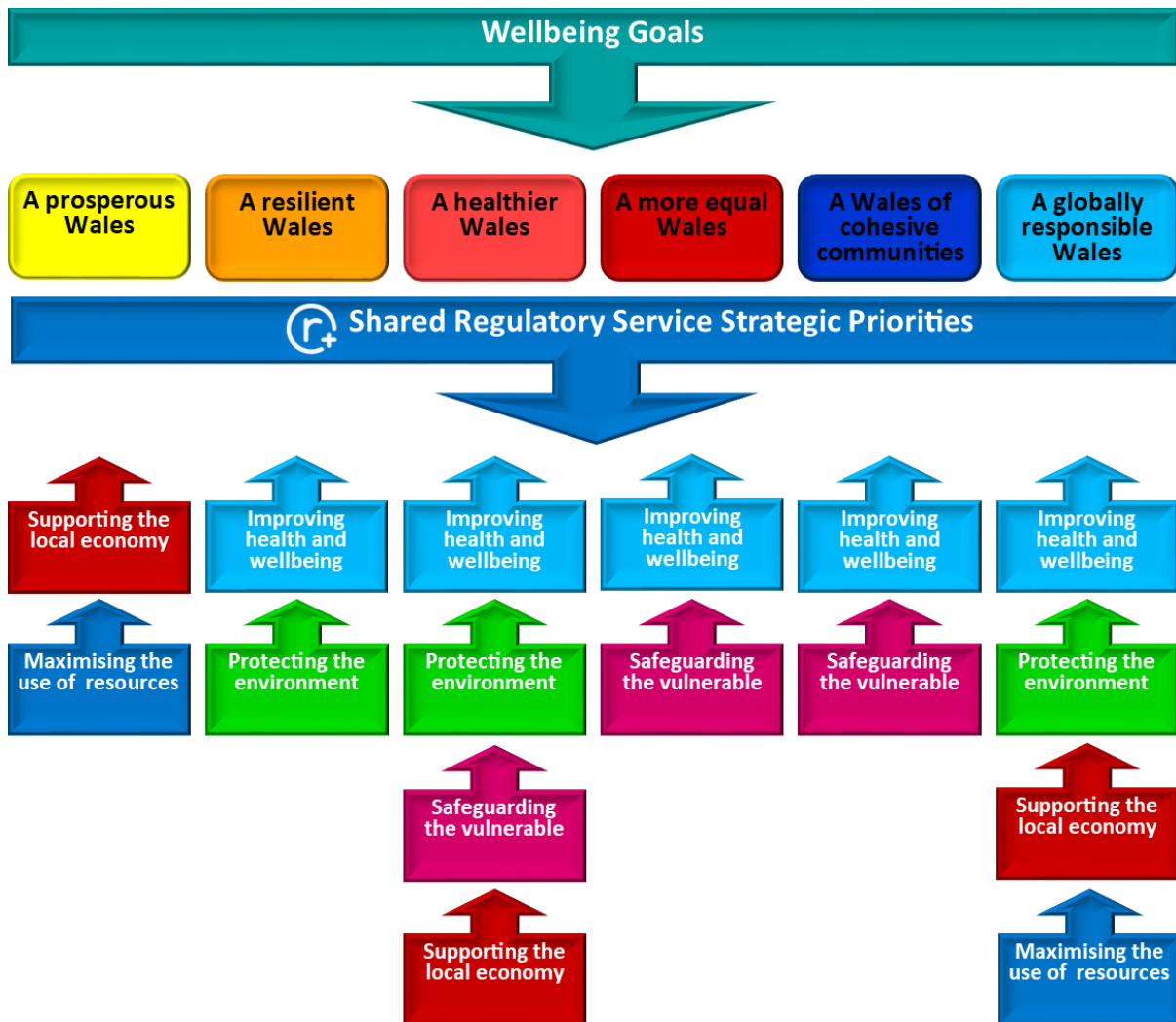
Nationally the service also contributes to the **National Enforcement Priorities for Wales** for local regulatory delivery which highlight the positive contribution that regulatory services, together with local and national partners, can make in delivering better outcomes, i.e.

- Protecting individuals from harm and promoting health improvement;

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



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

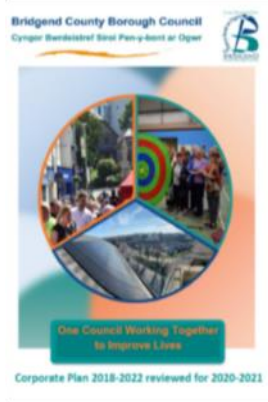


## 2.2 Corporate priorities and outcomes of partner local authorities

### Bridgend County Borough Council

#### Priorities

#### Aims



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

- Improve learner outcomes
- Support growth and prosperity
- Develop and enhance community support and services
- Build resilient communities
- Support better health and well-being
- Transform the Council's estate
- Support areas of corporate change
- Support environmental sustainability

### City of Cardiff Council

#### Priorities

#### Outcomes

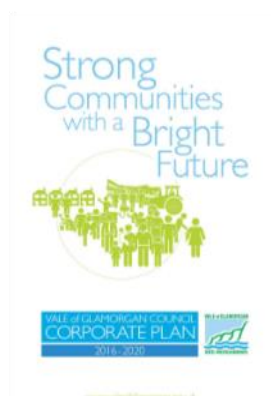


- Working for Cardiff
- Working for Wales
- Working for the future
- Working for public services

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

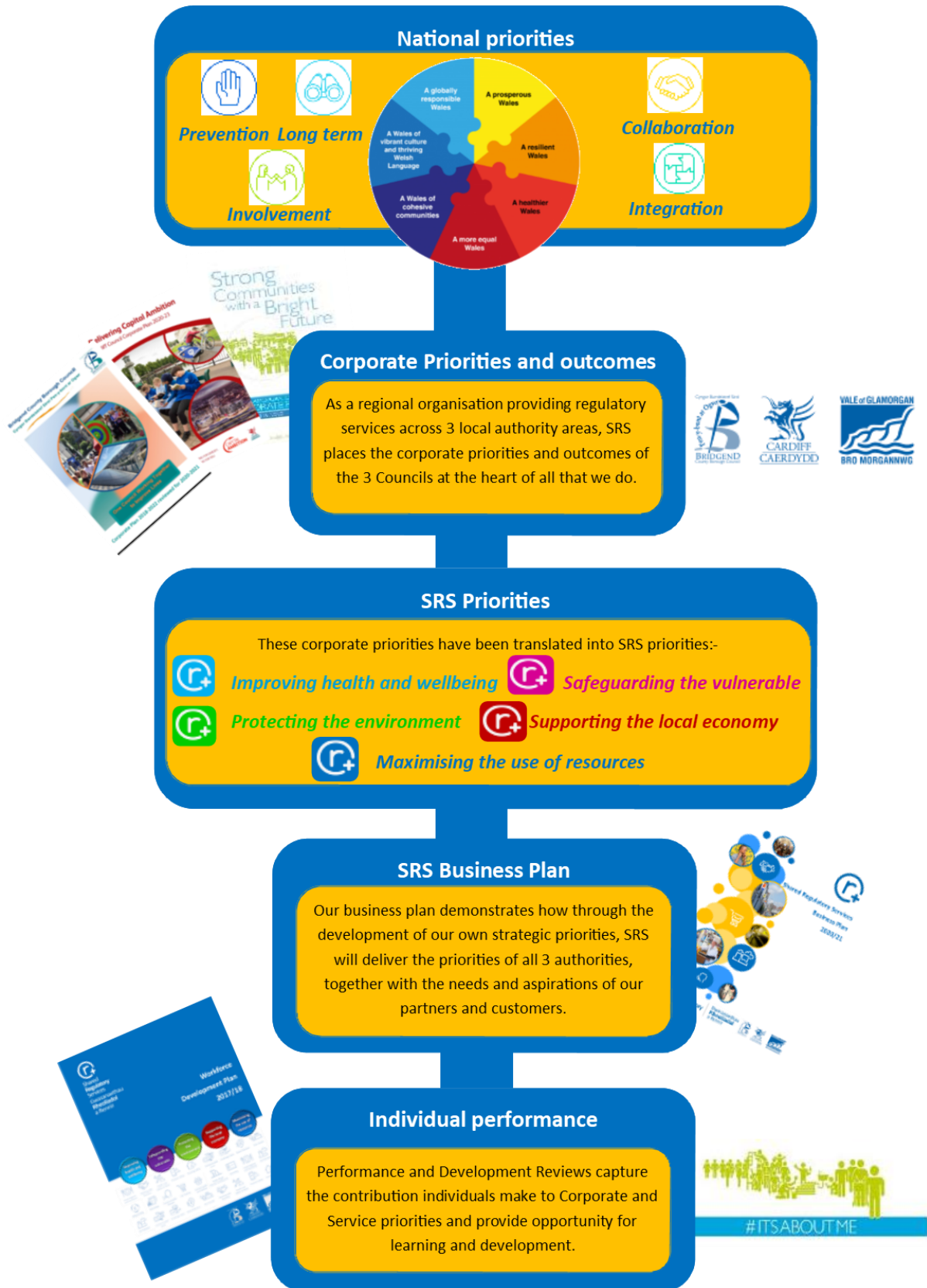
### Vale of Glamorgan Council

#### Priorities



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

## 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 five 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 2020/21, and our risk management approach (Appendix 1).

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

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

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

**ICT** – The success of Shared Regulatory Services is in part due to embracing the opportunities presented by technical and mobile working solutions. Agile working has become the norm for the service yet, through staff consultation sessions, our officers tell us that the technology currently deployed is becoming outdated. Research indicates that better facilities now exist and the SRS will work with officers and ICT to 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 during 2020/21. (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 and the Public Health (Minimum Price for Alcohol) (Minimum Unit Price) (Wales) Regulations, however, it is not always easy to predict the impact that new legislation may have on resources. 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)

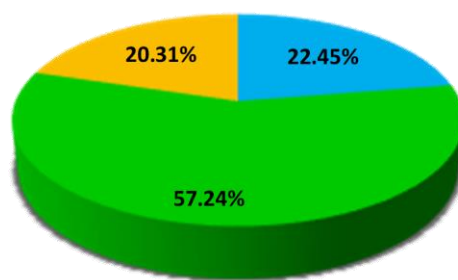
**Out of Hours** - The SRS operates an “out of hours” duty rota to enable the service to respond to incidents that arise outside normal office hours. These responses include responding to nuisance calls relating to burglar alarms, food incidents, etc. To date, officers have operated the rota on a voluntary 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)

# 4. Budget

## 4.1 Financial allocation

Bridgend, Cardiff and the Vale of Glamorgan Councils fund Shared Regulatory Services jointly through an agreed formula. 2020/21 represents Year 6 of the SRS and the final year of the agreed budget reduction process of 5% year upon year. In this financial year, we will reflect upon the budget reductions over the last three years and begin discussions with the partner Councils for the next three year period. The methods of apportionment for operating the core service and the cost contribution percentages are set out in the Joint working Agreement and based upon the population of each Council. There are also arrangements in place to deliver “authority specific” services to individual partner Councils.

**Financial apportionment of Shared Regulatory Services 2020/21**



■ Bridgend ■ Cardiff ■ Vale of Glam

## 4.2 Resource Implications (Financial and Employment)

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

SRS Gross expenditure budget 2020/21			
Area	Core £'000	AS £'000	Total £'000
Bridgend	1,310	428	1,738
Cardiff	3,338	1,444	4,782
Vale of Glam	1,184	505	1,689
Total	5,832	2,377	8,209



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 provides a framework to blend:-

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

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

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

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

## 6. Turning actions into outcomes

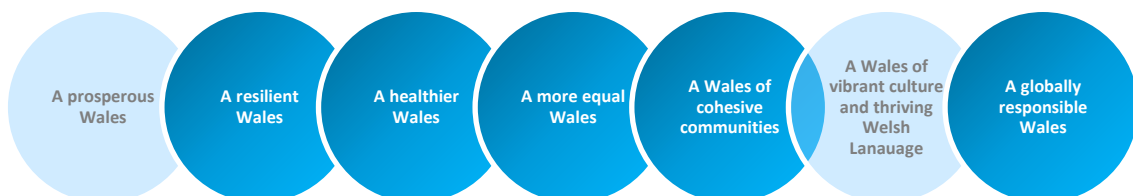
We continue to work to integrate our vision, priorities, outcomes and our primary aims and our performance to provide a comprehensive picture of the work the service undertakes and the positive impact it makes.

The following section of this Business Plan brings all these different elements together in order to highlight our achievements and performance during the last year together with the actions we aim to undertake in 2020/21 to deliver our priorities. This framework will be continually reviewed to ensure it remains relevant and meaningful to stakeholders.

# Improving health and wellbeing



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

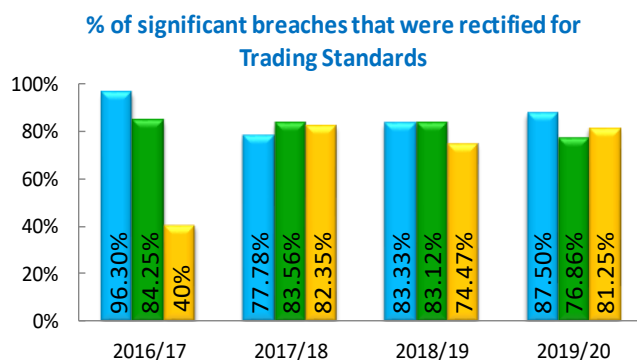
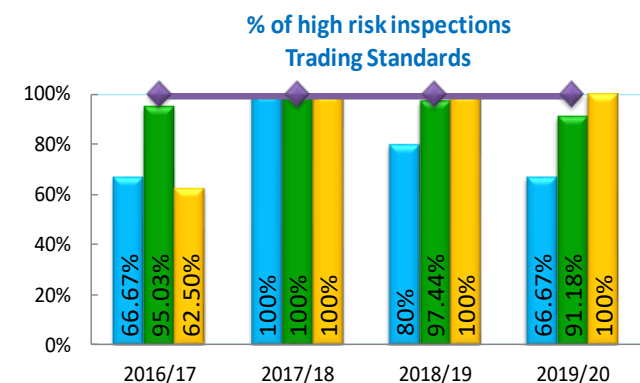
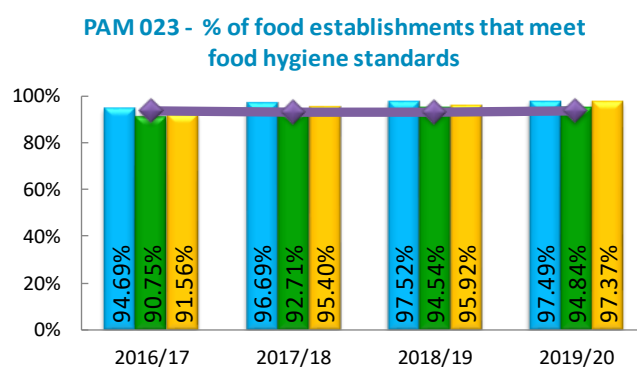
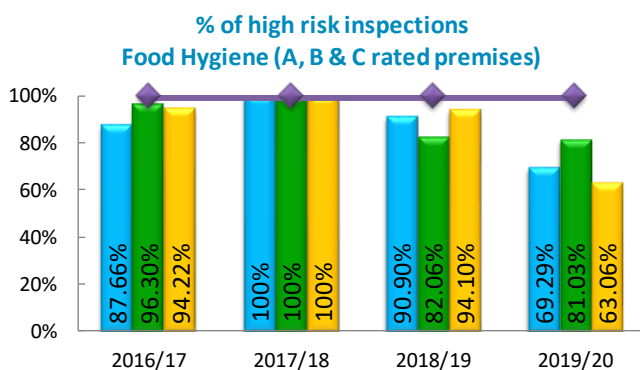


# 6.1 Improving health & wellbeing

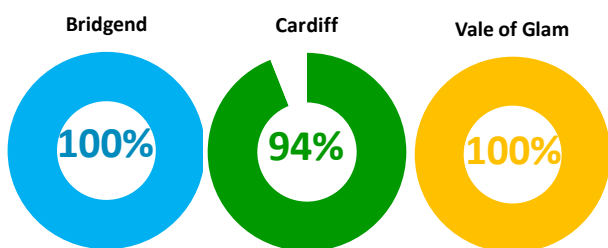
## Introduction

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.

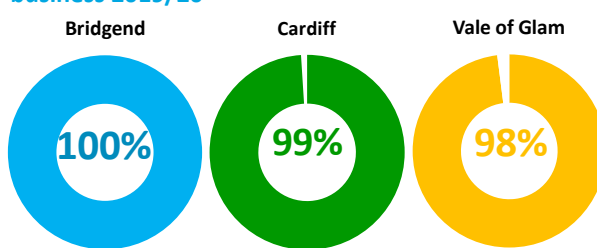
## How we performed



**Businesses who felt inspection helped them improve standards of compliance in their business 2019/20**



**Training delegates who felt the training received will help them improve standards of compliance in their business 2019/20**



## Comments received from survey respondents 2019/20

*Unannounced food hygiene inspections are a little daunting but I found the officer to have a friendly yet professional demeanour which helped settle the nerves. He's clearly very competent and explained things in a practical and easy to understand manner. His application of the regulations to our specific premises was down to earth and made sense.*

*In a business that can be quite chaotic and stressful, it was excellent to see that the inspector was very patient and understanding. We try to uphold high standards and were pleased.*

*The officer who visited us was extremely professional and well mannered. She was approachable and informative. She allowed us to feel at ease. The visit as a result went smoothly. We were very impressed.*



## % of private rented properties and HMOs improved through the removal of category 1 hazards 2018/19

<b>Bridgend</b>	Total no of assessments which contain category 1 hazards	47
	No. of HMOs and non HMOs where all category 1 hazards have been resolved as a result of local authority action	11
	<b>% total resolved</b>	<b>23.40%</b>
<b>Cardiff</b>	Total no of assessments which contain category 1 hazards	371
	No. of HMOs and non HMOs where all category 1 hazards have been resolved as a result of local authority action	76
	<b>% total resolved</b>	<b>20.49%</b>
<b>Vale</b>	Total no of assessments which contain category 1 hazards	23
	No. of HMOs and non HMOs where all category 1 hazards have been resolved as a result of local authority action	16
	<b>% total resolved</b>	<b>69.57%</b>

# What we have achieved



## The Food chain is safe and free from risks

**Increase in businesses that are broadly compliant** - The number of food businesses with a food hygiene rating of more than 3 increased once again in Cardiff and the Vale of Glamorgan, while Bridgend stayed at a similar high level to the previous year. (Bridgend 97.49% Cardiff 94.84 % and Vale of Glamorgan 97.37%). The results show a positive upward trend, year on year, exceeding targets and highlighting the growing number of businesses that are improving their standards, which can be attributed to the success of the intervention programme for food businesses. That programme ensures that any food safety issues identified are followed up by either enforcement, advice or training and subsequently revisits to ensure compliance with food safety law.

**Food Hygiene Rating Sticker Survey** – 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. One example of such a survey was the Food Hygiene Rating Sticker Survey. The Food Hygiene Rating (Wales) Act 2013 and Food Hygiene Rating (Wales) Regulations 2013 makes the display of food hygiene rating stickers by businesses mandatory. Premises must display a valid food hygiene rating sticker at or near each entrance to the food business establishment in accordance with the Food Hygiene Rating (Wales) Act 2013. An operation was carried out with 2 Environmental Health students from Cardiff Metropolitan University where the students carried out checks on premises rated 0 to 2 in Cardiff to establish if valid food hygiene rating stickers were being displayed in the location and manner prescribed. Of the 106 businesses checked, 19 were identified as failing to comply with the Regulations. 12 premises failed to display a food hygiene rating sticker, 3 premises failed to display the correct score and 4 premises failed to display conspicuously in the location and manner prescribed. The above failures subsequently received follow up action.

**Prosecutions** – SRS is committed to enforcing the laws we regulate, instigating legal proceedings against those businesses or individuals that flout the law. During 2019/20, the service successfully prosecuted a number of individuals/businesses in relation to food offences and the following cases showcase a few selected examples.

- **Cardiff takeaway owner ordered to pay over £7,000 for food hygiene offences** – During a routine inspection of a takeaway, officers discovered a significant amount of rat and mouse droppings that had not been controlled for at least 6 months and accumulations of food debris and fat that led to the successful prosecution of the owner in July 2019. Following a guilty plea to 4 offences, the owner was fined £4,800, ordered to pay £2,217 in costs as well as a victim surcharge of £120. Remedial work was carried out by the owner, and following a re-visit by officers the business was given a food hygiene rating of 4.





- **Cowbridge restaurant received hefty fines for breaching food hygiene laws** – Officers identified a number of food safety violations at a restaurant in Cowbridge including dirty equipment, cross contamination of raw and cooked food and insufficient training of staff, resulting in a food hygiene rating of 2 being awarded. Despite being aware of the improvements required, further visits revealed that although the issue of staff training was in hand, the other violations remained. As a result 2 directors of the restaurant were prosecuted and each fined £2766, ordered to pay costs of £500 and a victim surcharge of £138. In addition, their company was fined a total of £10,000, ordered to pay costs of £1173 and a victim surcharge of £170.
- **Former owner of Cardiff restaurant fined for food hygiene offences** – During an inspection of a well-known restaurant in Cardiff, officers found evidence of ‘wide-spread’ mouse droppings throughout the food storage and food preparation areas and piles of rubbish in the back yard which led the investigating officer to conclude that there was a “real risk of contamination of food to satisfy the health risk condition”. The owner voluntarily closed the restaurant and was given advice on the work that was required to be done and a further inspection showed that structural work had been carried out as well as a deep clean. The restaurant re-opened shortly after. A further inspection, however, revealed more widespread droppings throughout the food storage and preparation areas and a food hygiene rating of 2 being displayed, instead of the true rating of one. The restaurant was voluntarily closed again. When officers inspected the business again in February 2019, they were satisfied that improvements had been carried out. The owner of the business was fined £1,100 and ordered to pay £400 in costs and a victim surcharge of £30 but was advised by the Court that the fine would have been significantly higher in the tens of thousands if the owner was not now unemployed.
- **Bridgend shop owner found guilty of selling more than 20 food items found for sale beyond expiry dates** - Officers visited a store in Maesteg and discovered a number of food items, including ‘all day breakfast’ sandwiches and chicken tikka wraps, that had been placed for sale which were unsafe. They had passed their use by dates and were not of the nature, substance or quality which would be demanded by the purchaser. A pack of Balti curry slices was visibly mouldy. As a consequence, proceedings were instigated against the owner of the business who pleaded guilty to 12 offences under the General Food Regulations 2004 and one offence under the Food Safety Act 1990. He was subsequently fined £50 for each offence and ordered to pay costs of £400 and a victim surcharge of £30.

**Port Health and infectious disease** - In May 2019 a review was completed with relevant stakeholders, including Public Health Wales and the Ambulance Service, of the facilities available at Cardiff International Airport in comparison with the World Health Organisation’s standard to ensure adequate passenger management in the event of a public health emergency of international concern. The exercise identified improvements required including more appropriate accommodation for the detention of patients with symptoms of a serious communicable disease and changes to procedures.

This was a timely exercise as on 12 January 2020, the World Health Organisation announced that a novel coronavirus was the cause of an outbreak in Wuhan City, Hubei Province, China which was more recently named as Covid-19 and declared a pandemic. Global travel presented a significant risk to the rate of spread of infection from affected countries into the UK and air travel was of particular concern due to the short timeframe in which people can travel from country to country. Whilst Cardiff International Airport received no direct flights from China, long haul connectivity existed via direct flights to international airports at Amsterdam, Paris and Doha so regular communication links between the Port Health Team and suitable stakeholders at Cardiff International Airport were put in place to ensure the national advice on Covid-19 was being followed and queries addressed. Furthermore a previously scheduled mock exercise at Cardiff Airport was rewritten to implicate Covid-19 and executed with all relevant stakeholders.

Steps were also taken to ensure that all relevant stakeholders at the seaports of Barry and Cardiff were implementing the national advice on Covid-19. This required the need for port health officers to review all maritime declarations of health for all vessels arriving at seaports other than tugs and workboats to ensure fitness of crew and passengers prior to permitting free pratique to disembark. This has included the need for the provision of an out of hours service.



## Risks in the workplace are managed properly

### Cardiff businesses failed to prevent smoking in smoke-free places

– Since the advent of the ban on smoking in enclosed public places and workplaces, Cardiff has seen an increasing number of shisha lounges operating in the student areas of the City. Historically, compliance with smoke-free legislative requirements has been poor and prosecution fines have been low. In an attempt to improve the level of compliance in shisha lounges, the SRS Officers worked collaboratively with South Wales Fire and Rescue Service to produce collective guidance and undertake joint, unannounced enforcement visits. As a result of these measures, SRS successfully prosecuted four Cardiff based businesses for failing to prevent smoking in a smoke-free place in accordance with The Health Act 2006 and Smoke-Free Premises etc. (Wales) Regulations 2007. During unannounced visits by officers in February and June 2019, the businesses were found to be permitting the smoking of charcoal lit shisha pipes and/or cigarettes in either fully, or substantially, enclosed areas. The Smoke-free Premises etc. (Wales) Regulations 2007 prohibit smoking in enclosed public places, work places and work vehicles. Failure to display No Smoking signs is also an offence. The operators, companies and directors of the businesses were given a range of fines, costs and victim surcharges amounting to a total of £9,620 in fines, costs totalling £1390 and victim surcharges of £363. The smoking ban applies to anything that can be smoked, including cigarettes, pipes (including shisha and hookah pipes), cigars and herbal cigarettes.



### Company behind the Coyote Ugly Saloon in Cardiff fined £66,000 for 3 health and safety offences -

Following a referral from South Wales Police concerning the number of incidents occurring at the premises, where employees were sustaining injuries after falling whilst dancing on the bar, SRS officers made an unannounced visit to the bar to investigate the concerns in October 2017. It became apparent during the visit that there were serious deficiencies in the health and safety management arrangements at the business and no proper risk assessments in place at that time. The court heard how one employee had sustained deep lacerations to her right shoulder and breast area after misplacing her footing whilst dancing on the bar and landing on a customer's wine glass and another had sustained a fracture to her back after slipping on the bar while dancing. The Defence Counsel accepted that the risk assessment wasn't sufficient or specific enough and apologised on behalf of the company, making clear to the court that the incidents occurred when the business was in its infancy and there had been no repeat offences since the incidents had occurred. The company were fined £66,000 ordered to pay £3,315 in costs as well as a victim surcharge of £170.

**Nail Bar survey** - Health and safety concerns in nail salons have risen recently as Local Authorities across the UK report investigating an increasing number in relation to post-treatment infections and poor management of hazardous substances commonly associated with this industry. As a

consequence SRS officers undertook a project to determine if employers were effectively managing health and safety risks to both employees and members of the public. A total of 19 visits were completed across the region and the project identified that general standards of compliance were better than anticipated. They did however identify that the areas of greatest non-compliance centred around the maintenance and thorough examination of local exhaust ventilation (LEV), the carrying out of detailed client consultations before each treatment to identify any potential contraindications, and the lack of health surveillance of employees to facilitate the early detection of health conditions associated with work activities (e.g. occupational asthma; dermatitis) and the monitoring of the effectiveness of existing control measures. As a result of these observations, an educative approach will be adopted to raise awareness of the specific issues via the productions of leaflets promoted via the SRS website and social media links.

**Hand Arm Vibration (HAVS) and Noise Project** - Following the investigation of 4 cases of Hand Arm Vibration (HAVS) and Carpel Tunnel Syndrome (CTS) by SRS and Torfaen Council, together with a pilot study undertaken by Torfaen/Blaenau Gwent Council, a lack of awareness and understanding about HAVS and noise at work was identified, together with confusion about how to assess employee exposure and effectively evaluate the risk of injury. These cases also coincided with a number of successful prosecutions by the Health and Safety Executive (HSE) after a number of large organisations exposed employees to the risk of HAVS. These factors and information received via an SRS project at golf courses that identified these issues as a weak area of compliance led to the initiation of a project targeting golf clubs, main car dealerships and tyre and exhaust businesses. Key topics for inclusion in the project were HAVS and noise risk assessments, health surveillance and general health and safety management and a total of 59 premises across the Bridgend, Cardiff and the Vale of Glamorgan were selected for inclusion in the project. This phased project intervention successfully achieved its aims enabling officers to ensure duty holders in golf clubs were suitably assessing their HAVS and noise exposures, and implementing appropriate control measures as necessary. Furthermore it enabled officers to assess the management of HAVs and noise within main car dealerships and tyre and exhaust businesses. Overall the project achieved positive outcomes which will stimulate behavioural change throughout the 3 sectors involved. It was evident that SMEs have shown that they want to engage with the local authority and are committed to improving their health and safety standards and appreciate the support provided by SRS.



## Infectious Disease is controlled and prevented

**Increase in communicable disease cases** – During the last year, the service experienced a cluster of confirmed legionella cases in the Barry area which exceeded the expected number of cases for the time of year. In addition, the number of confirmed TB cases across the region and particularly in Cardiff increased. This culminated in SRS Officers carrying out a series of interventions which included assisting Public Health Wales in undertaking TB screening of 1900 prisoners and officers at HMP Parc in Bridgend; investigating the cluster of confirmed Legionella cases in the Barry area in conjunction with PHW and the HSE; preparing 3 successful Part 2A Orders for cases of Tuberculosis and assisting PHW with the on-going treatment regime of 'Patient B'; assisting PHW in investigating and managing a Hepatitis A outbreak in the Vale of Glamorgan; and preparing and disseminating a 'warn and inform' guidance sheet for homeowners about how to manage the risk of Legionella in a domestic setting.

**Communicable Disease** - SRS received reports of 2149 cases of communicable disease during 2019, of which 1786 were laboratory confirmed. The most common causative pathogen, Campylobacter makes up 53% of confirmed lab reports notified. Other notable pathogens include Cryptosporidium, Giardia, Salmonella including paratyphoid, Shigella, E. coli O157, Legionella and Hepatitis A and E.

Of the 146 (13%) who returned their customer feedback forms:

- 60% reported changing their behaviour as a result of the interview.
- 99% cases interviewed were very satisfied or satisfied with the service.

85 communicable disease outbreaks were investigated. The 2 most common settings were schools and care homes. 48% associated with schools and 28% associated with care homes.

In the last quarter of 2019/20 the implications of the coronavirus outbreak now present significant, but yet to be quantified, challenges for the service.



## Noise and Air Emissions are controlled

### Owners of crowing cockerels and a noisy dog both fined for failing to deal with noise disturbance issues –

Following complaints from residents, 2 individuals from Bridgend were successfully prosecuted for breaching noise abatement notices. In one case a noise abatement notice was served following long standing complaints from nearby residents about cockerels crowing. Despite this, complaints continued and when enforcement officers visited the property to undertake a noise survey they found cockerels crowing every few seconds between 4.40am and 5.10 am, and on another occasion crowing 13 times between 6.15am and 6.20am and a further 104 times between 6.45am and 7.20am with each crow lasting a few seconds. This led to a prosecution where the owner pleaded guilty to breaching the notice and was fined £600 by magistrates, and ordered to pay £300 legal costs, £250 investigation costs and a £60 victim's surcharge.



In a different case heard on the same day a dog owner taken to court after breaching a noise abatement notice issued as a result of his dog barking excessively. In this case, a noise abatement notice was also served after the dog was heard barking for prolonged periods, mainly during the day, but despite this the noise continued. When officers witnessed the noise, they recorded "almost continuous" barking over a 20 minute period in the early evening and on one occasion a total of 565 barks over a 30 minute period and on another occasion at around 11am.

**Community Concerns** - Throughout the year Officers have continue to respond 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.



## A safe trading environment is maintained

**Penarth man prosecuted for incorrectly storing fireworks** – An inspection of a Penarth business selling fireworks revealed a number of safety issues that posed a significant risk to members of the public, resulting in a Penarth man being prosecuted. Despite advice being given on how to store fireworks safely a year earlier, officers found that no measures were in place to prevent the spread of fire, emergency exits were not maintained, fireworks were stored in corroded cabinets with flammable papers and there was open boxes of fireworks, one of which contained a knife, presenting a risk of piercing. The defendant, a holder of an Explosives Licence to store fireworks was found guilty at Cardiff Magistrates Court and ordered to pay a fine of £1516, costs of £650 and a victim surcharge of £151.



**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. They are usually coloured, patterned or novelty lenses used for purposes such as enhancing people's appearance for fashion, special effects in films, fancy dress or to mask the

eye. There are also a number of serious risks of infection associated with these contact lenses. Earlier this year a Cardiff health and beauty business was prosecuted for selling contact lenses which should have only been supplied by a registered optometrist. In this case, the business was found to be selling "zero powered halloween contact lenses" during a test purchase exercise in October 2018 not long after written advice was sent to the business. Despite this advice, the lenses were supplied to the officers during the test purchase. A director of the company that owned the business pleaded guilty to one offence under the General Product Safety Regulations 2005 for the company and one offence as director. In mitigation, the defendant claimed he had not received the advice letter due to confusion with his address which was taken into account along with his early guilty plea and previous clean character. Both the company and the director were fined £183 each, ordered to pay costs of £220 and a victim surcharge of £30.





## Licensed premises operate responsibly

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

A programme of visits to these premises began in March, and in that short space of time, non-compliance was evident in a small number of retailers. The impact of the COVID 19 pandemic has however resulted in the remainder of visits being delayed until later in the year. This is partially due to priority during this phase needing to be given to enforcement of the COVID 19 restrictions, and crucially the pressure being felt on the retail premises requiring a visit at this time. With the majority of these outlets being small shops, it is recognised that enforcement visits at this time can cause real difficulty in terms of social distancing requirements, with some small businesses for example having to limit footfall to only two persons in the store at any one time. As the Welsh Government's intended approach with this new legislation has always been one of engagement with the trade supported by advice, 'virtual' visits are not being considered as a solution; rather, face to face visits will be resumed as and when this is practicable.

Moving forward from the initial round of MUP visits, use will be made of intelligence received to target those outlets failing to comply in the future or where advisory support is required.



## The quality of private rented property is improved

**HMO Licensing** - HMOs often present the worst physical and management standards, as well as having a detrimental impact on the neighbourhoods in which they are situated particularly in relation to street scene. The Cardiff Housing Enforcement Team took 7 successful prosecutions in Cardiff during 2019/20 comprising 45 separate offences at 8 properties for a range of offences. These included failure to obtain a HMO Licence, non-compliance with Housing Act notices, statutory nuisance issues and a variety of management offences in dangerous houses in multiple occupation. In addition to this enforcement work, the Housing Enforcement Team dealt with over 1200 service requests of which 740 related to



hazards in private rented housing, served 332 Housing Act 2004 notices of which 124 were formal actions and served 19 Prohibition orders, effectively closing or restricting the use of hazardous premises. 414 HMO licences were issued with 80% of these including improvement works to comply with the licence conditions. The team continued joint working with Rent Smart Wales (RSW) to address problem landlords with a total of 55 landlord fit and proper person reviews completed and 6 letting agent audits completed and improvement action plans issued. Significant work has also been completed to robustly defend multiple HMO licensing appeals at Residential Property Tribunal made by a large portfolio landlord captured by the Plasnewydd additional licensing scheme. Six cases have been successfully defended in the Council's favour with 4 of his cases dismissed with cost awarded to the Council. No cases have been found in the landlord's favour.

A review of the Plasnewydd additional licensing scheme for Houses in Multiple Occupation (HMO) was also completed. A wide ranging stakeholder and public consultation was carried out on re-declaration of the scheme and cabinet report drafted in readiness for re-declaration on return to normal business following Covid restrictions.

**Cardiff Landlord fined for poor condition of rental property** - In this case, following receipt of a complaint from a tenant, SRS officers inspected a property in the Grangetown area of Cardiff and found a large number of breaches to Housing legislation in respect of fire safety and housing matters. As well as pursuing prosecutions against the landlord, a Prohibition Order was made on the property prohibiting the use of it for human habitation, due to the significant risks to the health and safety of the occupiers. These included, undersized rooms, penetrating damp, unsafe steps to the first floor, unsafe electrics and fire safety offences such as failure to provide a fire alarm system, adequate structural fire protection and to maintain a means of escape from fire. After pleading guilty, the defendant was fined a total of £5533.24, ordered to pay costs of £5826.00 and a victim surcharge of £66.66. In giving his decision the District Judge stated that he considered the fire safety offences to be very serious and he gave a greater penalty for those offences within the fine awarded. He stated that an aggravating factor was the defendant's 'cost cutting at the expense of safety'. The defendant had earned income from renting out the property for over a decade without HMRC being aware of this income and she had also saved money by not putting the house in order.

**Illegal Evictions and pre-occupancy checks** - In Bridgend and the Vale of Glamorgan we investigated and gave advice regarding 9 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 64 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.

## Emerging issues

**Suspension of routine inspections due to Covid-19** – Following Government restrictions on social distancing, non-essential travel and the closure of certain businesses to reduce the spread of Covid-19, routine inspections were suspended during March. Inspections of businesses are normally programmed each year to ensure all businesses are inspected at regular intervals at a frequency relevant to the risk category of the business. With regard to food premises; the Food Standards Agency provided an instruction in April to begin to inspect A and B rated premises where possible and in line with the coronavirus restrictions. Whilst the service continues to provide advice and information in relation to diversifying businesses as well as responding to significant matters, a backlog of inspections will be generated until restrictions are lifted. This will inevitably impact on resources in both clearing the backlog and completing the planned programme for 2020/21.

**End of transition period for UK leaving the EU** – As the UK prepares to leave the EU, SRS is keeping abreast with the potential changes as they occur in order to 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 and any higher risk products not of animal origin to be imported through a Border Control Post. Currently neither the ports nor airport in the SRS region possess this status in relation to food, but it is anticipated that trade patterns may change in the future and potentially require an enhanced monitoring role for the SRS.

**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 555 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 of the nature of business changes.

**Implementation of infection control measures directed by Public Health Wales at points of entry -** It is hoped that the current restrictions on travel will be gradually lifted as the Covid-19 outbreak comes under control within the UK. However, during this recovery phase with the disease potentially continuing to affect other countries it is inevitable that additional control measures will be required to be implemented at Cardiff International Airport and Cardiff and Barry seaports which will be the responsibility of the port health officers to ensure are adhered to.

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

**Allergen Control and Management** – Food interventions completed by food safety and food standards officers continue to identify the failure of food businesses to understand their legal duties in controlling and managing allergens. Safe Sustainable Authentic Food Wales, has formed a working group to develop a toolkit to ensure a consistent approach amongst local authorities to address the enforcement of allergens. Representatives of SRS actively participate in this area of work and it is hoped that once complete all officers will be trained to ensure its effective implementation. Created by the Directors of Public Protection Wales, SSAFW is a collaboration between the Food Standards Agency, Welsh Government and local authorities in Wales with representation from the food industry and consumer bodies.

**Public Health (Wales) Act** – This new legislation brings together a range of practical actions for improving and protecting health by way of a number of new requirements that effect several areas of the SRS. Although not 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. 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 at the end of 2020 and it is anticipated that there will be a resource implication associated with this. The scheme aims to strengthen existing registration requirements and as such will place additional responsibilities in



administering and enforcing the new requirements including the delivery of training, undertaking professional interviews of applicants and the management of a new database.

**Trampolines** – In 2018, the SRS began an investigation into the safety of trampoline parks. In 2019/20 SRS investigated a further number of serious injuries at 2 indoor trampoline parks and one indoor ninja warrior in Cardiff. These indoor activity areas have become increasingly popular attracting significant numbers of children and the safety of such activities is emerging as an area of concern. During the next year SRS will continue scrutinising compliance with the PAS 5000 standard for indoor trampoline park settings and effective management of risk in leisure settings such as ninja warrior / indoor soft play facilities.

**Grenfell Fire** - The implications of the tragic fire and loss of life in Grenfell Tower continue to unfold. Recommendations from the enquiry, updated guidance, are informing the way in which local authorities respond to the issues presented. Within Cardiff in the last 12 months, SRS has worked with SWFRS, Building Control and WG to map out the affected buildings and begun to determine how best to resolve the matters identified. In some instances, the building owners/developers have taken positive steps toward remediating action; in others the responsibility and accountability is disputed and some regulatory action has been necessary to progress and improve safety in the affected buildings.

Enforcement under the Housing Act uses the Housing Health and Safety Rating System (HHSRS) system, which evaluates potential risks to health and safety from any deficiencies identified in dwellings. The regime considers fire risks; the threats from exposure to uncontrolled fire and associated smoke at a dwelling. The assessment should include both the likelihood of a fire starting and how likely it is that the fire will go undetected and spread. Should the assessment determine that there is a risk, this will be identified as a category 1 or category 2 hazard. Any significant building defects are likely to place an onus upon the constituent Council to take some form of action under the Housing Act. In the worst case scenario, the Council may have to consider the service of a prohibition order, requiring the occupants to leave the property until the matters are resolved. More likely is the service of improvement notices, but these may need to be served upon the occupants leaving them with significant bills.

SRS Officers have been clear with the developers and the management agents that the Council's role in these circumstances is one of enforcement as the Housing Authority. It is the legal duty of the owner / developer to have undertaken all works in full compliance with the Building Regulations and subsequently for those in control of the building to meet the requirements of the FSO and Housing Act. Most recently, SRS officers have been working with the WLGA on the creation of an expert team drawing expertise from the Local Authorities and the Fire Service to undertake a comprehensive programme of inspection of all high rise buildings (18m+) in Wales. The expertise assembled and experience gained, would have the benefit of supporting the national position across the rest of Wales, where there are less buildings to assess.

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

**The Renting Homes (Fee etc.) Act 2019**, implemented on the 1 September 2019, prohibited certain fees often charged by landlords and agents. This Act and subsequent regulations will potentially increase the number of referrals about this matter as new contracts are issued to tenants, and particularly students, for the 2020/21 Academic year.

**HMO licensing** – Delays in re-declaring the Additional Licensing Scheme in Plasnewydd and the suspension of inspections during the coronavirus outbreak will lead to a significant backlog of work. HMO Mandatory licence in Wales for the time being will stay as existing for properties of 3 or more storeys with 5 or more persons sharing amenities, unlike England where the number of storeys element has been removed. Following re-declaration of Plasnewydd, a review of the Additional Licensing Scheme in Cathays will again be required as this scheme will expire in January 2021 and consideration will need to be given on whether further extension of additional licensing is required if the Mandatory licensing definition remains unchanged in Wales.

**Empty Homes** - Cardiff Council has taken the decision to remove Council tax 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 an impact on the number of long term vacant houses in Cardiff by reducing their numbers. The additional Council Tax revenue generated must be used for empty homes work, so it will be important to continue dialogue with the Council Tax team to determine what level of funding can be achieved and reallocated to Housing Enforcement to support the work of the Housing Enforcement Team in Cardiff.

## What we plan to do next

Improving health and wellbeing	Lead Responsibility
<b>The food chain is safe and free from risks</b>	
Develop and adopt the Food and Feed Law Enforcement Plan 2020/21 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 2020/21	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 and comply with public health requirements at ports of entry for control measures to be adopted in relation to the control of Covid-19.	C Hill
Utilise social media to identify 'dark kitchens' to regulate compliance across the industry.	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, continue the undertaking of designated food standards inspections by food safety officers by training up new officers to the service.	C Hill

## Risks in the workplace are managed properly

Develop and adopt the Section 18 Health and Safety Service Plan 2020/21 and undertake interventions in accordance with the plan and the arrangements in place to discharge health and safety duties.	C Hill
Implement the provisions of the Public Health (Wales) Act 2017, including preparing businesses and internal procedures in readiness for the implementation of the new special procedures licensing regime.	C Hill
Undertake a project to identify how risk of CO associated with the use of indoor BBQs/charcoal tandoor ovens/charcoal grills is being managed	C Hill
Continue scrutinising compliance with the PAS 5000 standard in indoor trampoline park settings; effective management of risk in leisure settings such as ninja warrior / indoor soft play facilities.	C Hill

## Noise and air emissions are controlled

Consult and implement 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
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## A safe trading environment is maintained

Undertake an exercise over the Christmas period inspecting seasonal pop ups and markets offering a variety of products to check compliance with legislation.	C Hill
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## Licensed premises operate responsibly

Undertake actions to support the provisions of the Public Health (Minimum Price for Alcohol) (Wales) Act 2019.	C Hill/H Picton
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## The quality of private rented property is improved

Drive up the standards in the private rented sector and in the city's high-rise buildings by taking enforcement action against rogue agents and landlords letting and managing properties.	W Lane
Continue the process of re-declaring the Additional Licensing Scheme in Plasnewydd	W Lane
Review HMO licensing Fees Structure and process to maximise resources available and implement split fees in line with the Provision of Services Regulations 2009	W Lane
Investigate additional sources of income through Council Tax premium on empty homes and allocate this to improve empty homes performance.	W Lane
Implement service request/enforcement policy to allow for targeted and intelligence lead enforcement for unsafe properties and rogue landlords	W Lane
Review Cathays Additional Licensing scheme in preparation for consultation and re-declaration.	W Lane
Continue investigations into HMOs in the Bridgend and Vale areas, not registered with Rent Smart Wales in order to ensure compliance.	W Lane

## Infectious disease is controlled and prevented

Secure approval and deliver the Communicable Disease Service Plan 2020/21 and undertake interventions in accordance with the plan and the arrangements in place to discharge these duties.	C Hill
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Manage the risk of legionella associated with cooling towers (in Cardiff) and the display of hot tubs/spas.	<b>C Hill</b>
Use powers granted under the Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020, to help improve the health and wellbeing of the public by ensuring the businesses are compliant with these provisions.	<b>All OMs</b>

## What we will measure during 2020/21

<b>Performance Measures 2020/21</b>	<b>Target</b>
% 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.	Baseline being set

# Safeguarding the vulnerable



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



## 6.2 Safeguarding the vulnerable

### Introduction

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

### How we performed





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

**Cardiff rogue trader jailed** – A Cardiff fraudster who engaged in ‘disgraceful behaviour’ in targeting 3 elderly and vulnerable people’ despite being warned and given advice by Trading Standards was imprisoned for 24 months following investigations by SRS Officers. The court heard how an elderly clergyman in his late eighties and suffering from mobility issues was cold called by the defendant and advised that there were cracked tiles on the roof at his property. He quoted £4000 to do the work which he later reduced to £3500 if the consumer had the work done before Christmas. The consumer was not provided with appropriate paperwork, nor advised of his cancellation rights. An expert surveyor confirmed that it was unlikely that the work was necessary and would have only cost £700.

Another consumer aged 70 years was approached by the defendant on a street near his home. The defendant offered him a lift home where stickers and a warning poster were on the front door stating no cold callers. This gentleman had been a repeat victim of doorstep crime and an inheritance of £28,000 had been depleted previously by rogue traders. The defendant convinced the consumer to have £6400 worth of work in his back garden done. The consumer felt pressurised so he agreed even though he didn’t have the money for it but hoped to get an overdraft, pay in instalments or sell his gold coin collection. Fortunately no payment was made to the defendant after SRS officers became involved.

On another occasion, the defendant cold called an elderly lady purporting to be a roofer who had been instructed to carry out building works on the roof of a block of flats where she resided. He obtained £12,700 from her as payment although he did try to obtain even more money. After taking £9000 from her he had returned and requested even more money which he claimed was VAT on the work even though he was not VAT registered. The trader was sentenced to 2 years in prison and later a Criminal Behaviour Order was granted preventing him from, or from instructing others to do so, cold calling customers, leaflet dropping and working for any firm in the UK that carried out building/repair work without permission from Cardiff Council. Furthermore an order for compensation was made of £2500 each for 2 of the victims

**Rogue Trader sent to prison** - Following the receipt and investigation of two complaints received by SRS, the service successfully prosecuted a rogue trader from Caerphilly for 13 offences under consumer protection legislation. In the first case, the trader who used a false name agreed a contract to build a one storey extension for a consumer. A fee of £33,750 was agreed to do the work, with a deposit of £16,875. When carrying out the work the trader damaged a sewer pipe and following his inability to fix the problem, Welsh Water became involved where it unfolded that the work undertaken was not being carried out correctly. An independent surveyor who examined the work concluded that it amounted to a few hundred pounds and that the consumer had been overcharged by at least £16,000. The second complaint related to the defendant over charging a pensioner from Newport for a water tank repair. In this case, the pensioner was charged £240 for the call out and quoted a further £700 to repair the tank. As the job was being carried out he claimed that further work was required to the internal chimney breasts at a cost of £16,088. A subsequent surveyors report indicated that it was extremely unlikely that the work would have been necessary. The court heard how the defendant had used false names and addresses so that customers would not find out about his previous offending and operated under a number of different trading names. The defendant even lied during the trial making elaborate claims that he had memory loss after being shot in the back of the head when serving as a Royal Marine in Bosnia



which turned out to be untrue. The defendant was subsequently sent to prison for 10 months, half to be served in prison, and half on licence.

**Safeguarding Week** - The 2019 National Safeguarding Week for Wales took place between 11th – 15th November with the purpose of raising awareness around the importance of safeguarding children and vulnerable adults and to ensure that they are protected from neglect, harm and other forms of abuse. On Tuesday 12th November, SRS staged a Financial Abuse Safeguarding Conference at Cardiff City Hall to highlight the problem of financial abuse which can take many forms and so can be hard to recognise. The event was a first for the region, and invited staff, partners and stakeholders to attend to hear a variety of speakers discuss the implications and current issues of financial crime, most notably that relating to mass marketing frauds, doorstep crime and fraud. Over 100 delegates attended the event to hear speakers including the Police, the National Trading Standards Economic Crime team, the Office of the Public Guardian, Royal Mail and the Wales Illegal Money Lending Unit. The conference brought together professionals and partners from across this area of crime prevention and safeguarding to share information, raise awareness of initiatives and reinforce the tell-tale signs of financial abuse.

Later in the week, officers attended the Welsh Assembly to deliver a Friends against Scams training session for Vaughan Gething AM, Minister for Health and Social Services and his team. Friends against Scams is a national initiative aimed to protect and prevent people from becoming victims of scams by empowering people to take a stand against scams. Scams cost the UK economy £5-£10 billion a year; 53% of people over 65 have been targeted by scams; only 5% of scams are reported and our statistics indicate that the average scam victim has lost over £3000.



**Safeguarding/Scams** – A series of proactive operations and initiatives were carried out through the year to highlight scams and improve awareness throughout the year. A total of 26 events were conducted, engaging at least 324 people on the issue of safeguarding and scams. These included joint events in collaboration with South Wales Police and high street banks and stores and 2 police training events and community group awareness sessions. All these events provide an opportunity to improve awareness and distribute grab cards and no calling stickers to participants.

**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 investigation completed is that of a vulnerable consumer who parted with a substantial amount of money for a single storey extension that she wanted to back onto her garden. The lady parted with a total of £26,000 that included specific payments for a sky lantern and bi-fold doors. Over the course of approximately 9 months, only a small amount of work was completed; including removing the garage and building 2 structural walls. All the rubbish, debris and asbestos garage roof was left at the property. The trader made continuous promises to return and complete the work but this never happened. Neither of the items ordered were delivered or installed. Officers intervened to try to



assist the completion of the contract or obtain a refund, but no satisfactory result was obtained. As a result, the trader was investigated and is being reported for formal action. Very sadly, the poor consumer has since passed away and will not see any resolution of this issue. She had to live with her garden being a complete mess and suffered significant financial loss and emotional distress as a result of the traders actions.

During the year, the service participated in 8 rogue trader operations where traders were stopped, checked 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 13 Rapid Response visits made in relation to doorstep crime activity. Furthermore training was also provided to 2 neighbourhood police teams on doorstep crime incidents; how to recognise these crimes and what actions to take for prevention and investigation.

**Call blockers** can put an end to nuisance or malicious calls. They can be installed at the homes of residents being repeatedly targeted by scams and once fitted, prevent all calls coming through other than those from recognised friends and family numbers. SRS installed 8 call blockers during the last year in residents' homes helping to reduce nuisance and scam calls. Since 2014, SRS has installed 51 call blockers to protect older and vulnerable people across Bridgend, Cardiff and the Vale of Glamorgan and so far 25,375 nuisance and scam phone calls have been blocked. It is estimated that 29 scams have been prevented. Comments made by those protected by call blockers include *"This made a huge difference and enable my mother to live in her own home for longer"*, *"My mother no longer gets anxious and agitated. I cannot impress on you the positive impact this has made"* and *"Thanks for making my phone my friend again!"*

**Memocams** are motion sensed devices that record activity in short bursts and SRS have purchased a number of the devices to install and fit in a consumer's home if necessary. While only a small number have been installed, so far in the homes of repeat victims as a support measure, one of our consumers in particular has now gained more confidence in saying no to doorstep callers and does so regularly. Officers review the footage after an incident is reported to us; and if necessary, we can use any footage for intelligence purposes.



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

**Raising awareness** - During the last year, SRS officers continued to promote their role in assisting key agencies tackle exploitation, slavery or trafficking during the course of their duties. Recent warrant executions have included the attendance of officers from the Gangmasters Authority and other agencies; those investigations have revealed both regulatory breaches and the exploitation of workers.

Safeguarding was a key issue for all three Councils following the findings of the Wales Audit Office inspections in 2019. SRS managers have played a key role in raising awareness the Council of the SRS role and how it can integrate with the wider Council agendas. The WAO report for the safeguarding of children recognised the excellent work undertaken by the SRS highlighting that the Council could consider ways in which it could extend its safeguarding training offer, for example building on the Child Sexual Exploitation awareness training given to taxi drivers and the safeguarding training for those working in the night time economy.

**Child exploitation** – In order to build upon and strengthen improvements in relation to the

safeguarding of children, the hackney carriage/private hire driver's written knowledge test in Bridgend was updated to include a section on CSE. 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

**Operation to address the supply of nitrous oxide (NOS) to consumers** - Nitrous oxide (NOS), also known as 'laughing gas', is a substance with several legitimate uses in medicine and catering; it is also a popular recreational drug amongst young people. When inhaled, this substance can make users feel euphoric and relaxed, with some reporting hallucinations. However, inhaling nitrous oxide can be dangerous, and can lead to loss of blood pressure, fainting and even heart attack. Prolonged exposure to nitrous oxide may also result in bone marrow suppression and poisoning of the central nervous system. These risks are likely to be exacerbated if the exposure to the gas is combined with alcohol or other drugs. Nitrous oxide is now being used recreationally in several settings such as clubs, private residences and parks, and is particularly prevalent at festivals. It is commonly sold in small metal canisters containing the gas which is then either transferred into a balloon for inhalation using a bottle opener or a 'cracker'. These small metal canisters are sold in bulk online and may be presented for use as a whipped cream propellant. Following receipt of numerous complaints from members of the public and safeguarding partners, SRS officers carried out several inspections and planned operations to address the supply of nitrous oxide (NOS) to consumers including school children. 18 premises were inspected and 4,687 canisters of NOS seized. Paraphernalia including balloons and bottle openers have also been seized from premises where NOS has been offered for sale. An information poster has also been developed and distributed to retailers across the SRS region as part of an educational campaign.



## Taxi provision is safe and fair

**Fit and proper taxi drivers** - In November 2019 new suitability guidance (based on the Institute of Licensing policy) was introduced to determine whether licence holders in the taxi and private hire trades are 'fit and proper'. This tightened up the criteria required to be a licence holder. The SRS were at the forefront of introducing the new guidance in Wales, ensuring that all Councils served by the SRS are applying the new criteria. This change has already seen a higher test applied to applicants and has been supported by the courts where appeals have been taken. In the same vein, the SRS now 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

**Taxi driver prosecuted for refusing to take an assistance dog** – In this case, a disabled person had placed a booking for a taxi stating at the time that they had a guide dog, however when the driver turned up, he refused to take the passenger and dog alleging that he had an allergy to dogs. This was despite being a taxi driver for many years and never declaring on any documentation that he had allergies or obtained an exemption certificate or received medication from a doctor for the condition. In mitigation the driver accepted full responsibility for his actions and apologised to the court and the complainants, however he was given a conditional discharge for 6 months, ordered to pay costs of £150 and a victim surcharge of £20.

**Enforcement action against taxi drivers** – In addition, a number of other prosecutions took place against drivers during the year, for offences such as plying for hire without a licence, failing to produce insurance and failing to return taxi plates when requested to do so. These generated a variety of penalties for the drivers, with fines starting at £140 up to £440, prosecution costs of between £100 and £150 and victims surcharges of £30 to £44.

**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 6 immediate revocations of drivers licences for inappropriate behaviour and 12 revocations, 18 suspensions and 21 warnings issued by the Committees of the partner Councils.

**Welsh Government Consultation on Taxi Legislation** - The Welsh Government consulted on the matter of improving public transport in Wales in December 2018. Following evidence submitted by a range of interested parties, including the SRS, the Welsh Government has stated that it will not be pursuing legislation in relation to taxi and private hire vehicles in this current term. The WG continue to see addressing the outdated taxi and private hire vehicle legislation as a key priority. However, it has become very clear that there is a considerable amount of work still required before legislation can be introduced that addresses the improvements needed. SRS and some other Councils are assisting the WG to develop a package of short-term measures, to respond to some of the immediate concerns raised. In the longer term, an officer from the SRS has been seconded to assist the Welsh Government deliver the requisite changes in law.



## Illegal money lending activities are prevented

**Wales Illegal Money Lending Unit** - Dealing with the personal and 'social' fallout linked to the criminality of illegal money lending is difficult to quantify. Reporting rates are often low and victims are sometimes unwilling to name the lender for fear of repercussion. In 2019/20, 32 pieces of intelligence were received and 12 investigations commenced as a result, where there was sufficient detail to proceed. Approximately £72,000 of loans were identified across all cases. 27 victims across Wales were identified, 24 of which received direct support and 8 victims had approximately £30,000 of debt 'written off' via intervention. A number of victims were of Thai origin and officers had to gain trust and overcome language barriers to provide support to these individuals. 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 2019/20, Client Liaison Officers provided training to 800 frontline members of staff, Government groups, charities and the private sector and attended a number of community events. These included attendance at the Wrexham Council Fun Day for the first time where intelligence was received about an active loan shark; the Ceredigion Council Fun Day in Aberystwyth which gave particularly good networking opportunities leading to future training engagements; Step Change, the debt advice charity at their launch event for their report 'Wales in the Red'; a Money management advice day organised by Chris Elmore MP in Rhondda Cynon Taff; training sessions with DWP partnership managers, who support vulnerable customers in West Wales; and the delivery of four training sessions for Welsh Water frontline staff who deal with debt recovery and vulnerable customers.

**POCA Community Based initiatives** - A total of £37,000 was awarded to eight community based initiatives under the first Stop Loan Sharks Awards for Wales at the end of 2018. 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. During 2019 the team spent time liaising with the fund winners to assist in delivering their projects. These included the Afan Tawe Nedd Crime Prevention events which took place over two days, the sponsoring of an attraction at the Philipstown Carnival, an area of known loan shark activity and the Idris Davies School in Caerphilly who took on a substantial creative project involving many pupils. The children created an awareness raising song highlighting the dangers of illegal lending and created a video to accompany it. The project was launched with a good level of publicity and attendance by local politicians. Applications have now been received for the next round of the Proceeds of Crime Community Awards initiative.

**Illegal money lending prosecutions** –Two investigations were brought to a conclusion last year. The first involved a jewellers in Tenby, Pembrokeshire, who was given a departmental caution for minor breaches of Pawnbroker legislation with regards to the pawning of jewellery and the buying back of the items. The investigation was carried out in conjunction with Pembrokeshire Trading Standards. The second, Operation Orinoco, involved a single defendant who appeared at Cwmbran Magistrates Court on 16th March 2020 for 2 counts of illegal money lending (Consumer Credit Act and Financial and Services Markets Act). They pleaded not guilty and the case was originally adjourned for trial at Newport Magistrates Court on 14th May 2020 but has now been stood out until 9th July 2020 for a directions hearing. Investigators from the unit also went to the Croydon area of South London in October 2019 and assisted their colleagues from the England Illegal Money Lending Team with the execution of a number of warrants and enquiries regarding Operation Bush Hill, which resulted in their largest ever financial case.

## Emerging issues

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

Preventing crime, and supporting safe, confident, resilient communities, is a key aspiration that we share with South Wales Police. This is putting further strain on already stretched resources as the

potential number of victims to scams and doorstep crime increases and expectations of successful interventions rise.

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

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

## What we plan to do next

### Safeguarding the vulnerable

Lead  
Responsibility

#### Children are protected from harmful substances and products

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

C Hill

#### Older and vulnerable people are protected from rogue traders and scams

Target key audiences through channels not previously used by undertaking a targeted education drive to GP surgeries and Pharmacy delivery services on scams and rogue traders and increasing stock of promotional materials to provide key safeguarding messages.

H Picton

Undertake a targeted drive to reuse currently inactive call blockers and to offer more out to those who need them.

H Picton

#### Illegal money lending activities are prevented

Promote 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

Raise awareness of the dangers of illegal lending within rural communities and provide training where opportunities arise.

H Picton

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

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

W Lane

#### Taxi provision is safe and fair

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

## What we will measure during 2020/21

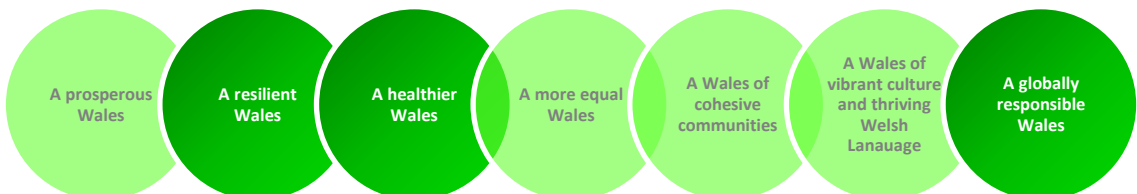
Performance Measures 2020/21	Target
<ul style="list-style-type: none"> <li>% of reported scams/doorstep crime incidents prevented /resolved through intervention.</li> </ul>	80%
<ul style="list-style-type: none"> <li>% of licence holders receiving disciplinary action following receipt of notifications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



# Protecting the environment



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

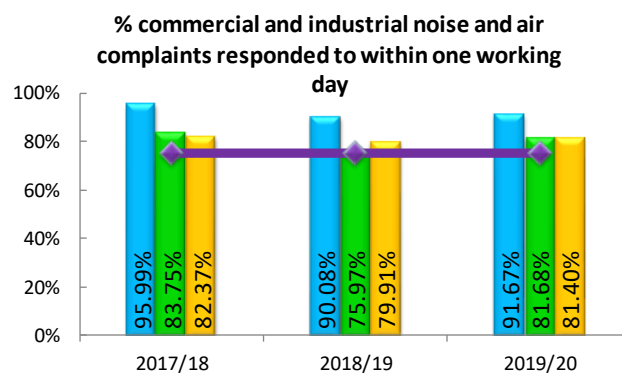
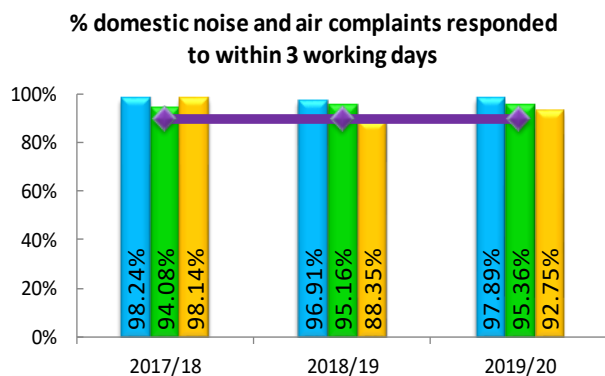


# 6.3 Protecting the environment

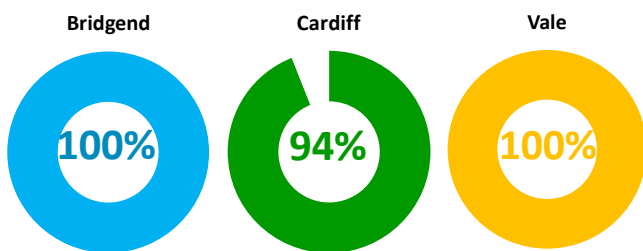
## Introduction

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

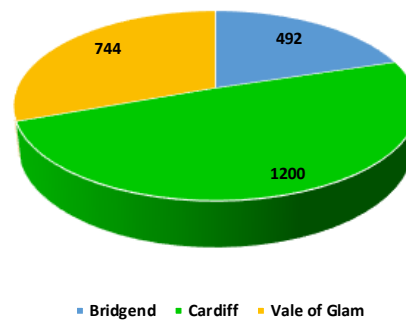
## How we performed



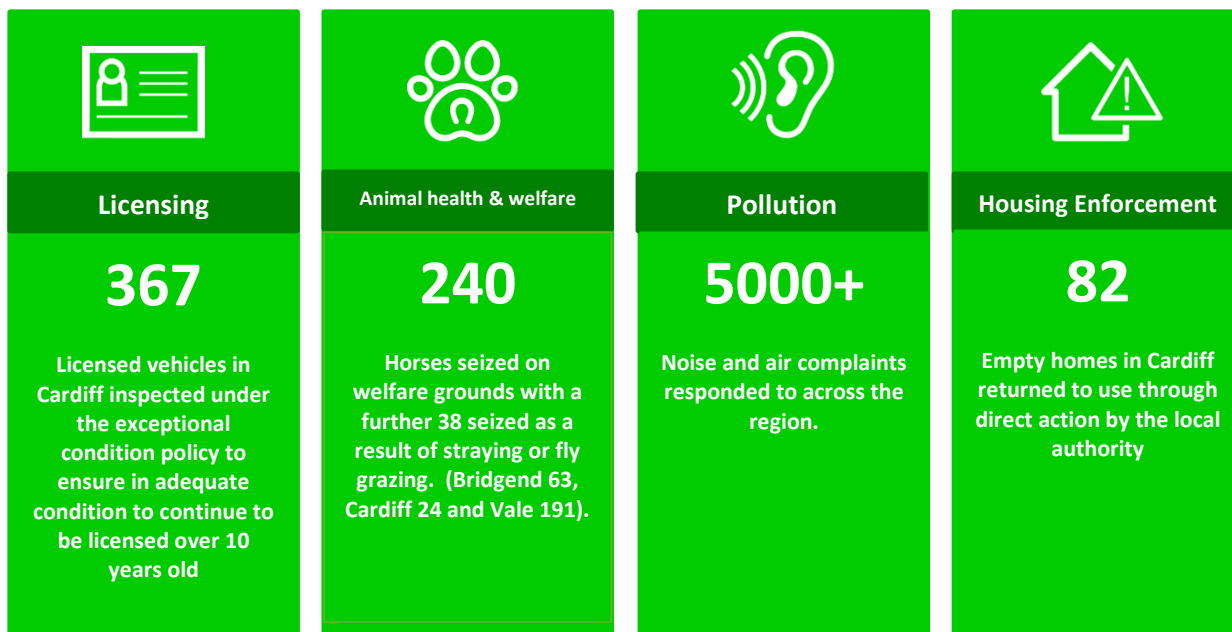
**% of alarm complaints responded to within one day 2019/20**



**No. of Air Quality Samples taken during 2019/20**







## 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 2019/20, 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 these reports and submit to Welsh Government on time could have led to the issue of a 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 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 and as a result an Air Quality

Management Area (AQMA) was designated in Park Street to take effect in January 2019. More recently, drop-in sessions were set up in December 2019 to give residents and other interested parties the opportunity to discuss options for improving air quality in the area. The work of the cross departmental group has resulted in a list of mitigation measures for consideration. These will now be subject to cost benefit analysis enabling BCBC Cabinet to consider and give approval to a draft action plan. This in turn will be the subject of formal consultation prior to adoption of a finalised action plan by the end of 2020.

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. A series of drop-in sessions took place in Penarth to enable residents to speak with staff and find out more about the sustained improvement in air quality in recent years which has made possible the revocation of the Windsor Road Air Quality Management Area (AQMA). During the formal consultation exercise that followed, participants expressed concern for air quality in the area after revocation, and it is important to note that air quality will continue to be monitored at in this location with the only change in practice being the fact that it will no longer be a designated AQMA. Should there be concerns as to compliance in the future then this position will of course be reviewed.

**Licensing Standards** - Throughout the year the SRS Licensing teams were engaged with Members and the Taxi Trade to review the licensing standards applied to vehicles licensed across the three Authorities. In Cardiff this involved input to the Local Air Quality review due to non-compliance with air quality standards in the city centre. This involved a significant trade consultation involving drop in centres and online surveys. Proposals have been put forward to transition taxis from petrol and diesel to ULEV with a stepping stone of compliance with Euro 6 emission standard in the first instance. The Covid-19 outbreak has put these plans on hold but they will be revisited in the following year. In the Vale and Bridgend we have reviewed the age policy guidelines for new 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. This involved 58 visits across the region to take samples, an additional 13 at temporary events and 90 from Knap Lake in the Vale. Furthermore SRS took 2436 air quality samples across the region .



## Animals are treated humanely

**Dog owner prosecuted and disqualified from keeping dogs** – In 2018 SRS served a Community Protection Notice on an individual requiring him to keep control of his husky dog, however, in 2019, the owner breached the notice. He allowed his dog to stray off lead causing distress to a tethered horse and used threatening behaviour towards a neighbour who challenged the dog's behaviour. The day after this incident, the man was witnessed causing unnecessary suffering to the dog and another husky he owned by repeatedly beating them in a public place. Finally, in May 2019, when the first dog was again off lead and out of control, she caused fear to anglers. After initially pleading not guilty, the man changed his plea and admitted 2 offences under the Anti-Social Behaviour Crime and Policing Act 2014, one offence under the Animal Welfare Act 2006 and one offence under the Public Order Act 1986. As a result, the defendant was ordered to carry out 100 hours of unpaid work, given a 14 day Rehabilitation Requirement, requiring him to undertake courses on victim awareness and managing aggression. Given the defendant's low income the CPS were granted £85

in legal costs and the local authority £200 towards their legal costs with a further £200 towards kennelling costs and a victim surcharge of £85. In addition a Disqualification Order was imposed which prevents the defendant owning dogs, keeping and participating in the keeping of dogs and from being a party to any arrangements under which he is entitled to control or influence the way in which animals are kept. A Deprivation Order was also imposed in respect of both husky dogs ensuring that they are not returned to the defendant's care. The 2 dogs have since been released by the Service and have been re-homed by a canine charity.

**Horse micro-chipping and passport clinics** - As part of its promotional activity to raise awareness of the new Equine Identification (Wales) Regulations 2019 which came into force in February, SRS has hosted a number of horse micro-chipping and passport clinics in the region. These clinics aimed to ensure high levels of compliance and were well attended by local horse owners. Staged with the support of the RSPCA, local vets and equine charities on a voluntary basis, the micro-chipping and passport service was made available at the discounted rate of £35 per horse. The Equine Identification (Wales) Regulations 2019 replace the earlier 2009 regulations and prohibit the keeping of a horse unless it has been properly identified through an identification issuing body. As with the earlier regulations, foals must be micro-chipped by a veterinary surgeon within six months of birth, or by 31 December in the year of birth, whichever is the later. However, for the first time retrospective micro-chipping will be required for older horses which were previously only required to be passported. A transition phase exists until February 2021 for completion of the retrospective microchipping for older horses and SRS will continue to engage with horse owners.



**Seizure of neglected sheep** - In August, a planned visit to a keeper of sheep identified the suffering of a flock of nearly 50 animals as well as the presence of several complete and part carcasses. Despite the time of year and associated heat, the animals had not been shorn and still had their heavy winter coats. On examining the animals closely, it became apparent that beneath their wool, the sheep were suffering from severe flystrike, with some so badly affected that they had open wounds exposing muscle and soft tissue. Unfortunately, a number of these had to be put to sleep. The sheep were seized under the Animal Welfare Act (AWA) and a section 20 AWA application sought in the Magistrates Court. The order was granted in October, giving the authority ownership of the sheep which have since been rehomed and are doing well. A prosecution in this case is pending but has had to be postponed as a result of Covid-19.

In another incident, in the run up to Christmas, SRS seized 6 further sheep that were continually straying onto the highway. The sheep were unclaimed so became the property of the local authority after 7 days.

**RSPCA Awards** – SRS were once again recognised at the RSPCA Cymru Paw Prints awards in 2019 in the Dog Warden service, Animal Licensing and Kennelling 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 for animal licensing and gold award for our dog warden services, but achieving a bronze standard for the first time in respect of dog kennelling services. 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 is the only awards programme recognising good practice from public bodies in relation to animal welfare. Winners picked up their trophies at the ceremony in the Pierhead in Cardiff Bay in September with speeches given by the Minister for Environment, Energy and Rural Affairs Lesley Griffiths AM and RSPCA chief executive Chris Sherwood.

**Multi-agency raid on 3 separate but linked properties for dog breeding without a licence** - In December 2019, SRS led on the entry by warrant into a number of properties as part of a multi-agency investigation into illegal dog breeding. The case has highlighted illegal breeding on a significant scale with puppies being sold to unsuspecting purchasers for thousands of pounds. A case file has been compiled to consider animal welfare and other concerns, and consideration is being given as to the appropriate course of action.



## **People will use energy efficient buildings and products**

**Empty Homes** – In Bridgend, we have continued to progress with our role of bringing Empty properties back into use through the additional funding provided to finance an Empty Property Coordinator role for 3 days a week in the area. Properties were risk assessed for action, which resulted in a top 20 being identified. The Empty Property Officer attended a number of training sessions and also had an opportunity to discuss with a representative from Welsh Government, some of the issues that we have experienced with the empty properties in Bridgend, and to take them on a tour so they could see some of our priority properties first hand. The Empty Property Working Group for officers is now well established, and through discussions and joint working this has led to greater enforcement action regarding the service of section 215 notices under the Town and Country Planning Act, with the Empty Property Officer providing support to Planning in relation to carrying out the work in default. The current situation with regard to the top 20 properties identified is that 12 have been brought back into use, 4 are currently subject to section 215 notices, and we will continue to pursue options with regard to the remaining 4 properties.

This year the overall target in Cardiff of 81 properties returned to use or new units created as a result of empty homes work was exceeded (82 properties). This is a result of a combination of both proactive and reactive work involving informal negotiation and formal enforcement in order to assist owners in bringing their properties back into use or to require improvements to eradicate associated nuisances. Due to the problematic nature of the work and the many reasons properties become and remain empty, casework is fairly bespoke depending how receptive an owner is. That said, the work does follow a general process in order to open a dialogue with owners and where that fails, formal enforcement in the form of statutory notices, as mentioned above, in addition to such measures as compulsory purchase and enforced sale are available. During 2019/20 the Council made three Compulsory Purchase Orders on long term empty houses. One was held in abeyance while the owner agreed to renovate and occupy which has happened; a second has been confirmed and will be vested in the Council's ownership; a third is subject to appeal by the owner to the High Court. Another property, in Grangetown, has had works of repair carried out by a contractor engaged by the team in order to deal with its negative impact on visual amenity. This property will be subject to enforced sale upon non-payment of the debt incurred completing the works. Many of the properties returned to use have been the target of routine enforcement action by the team to deal with nuisances but the majority have been returned to use through informal means of advice and persuasion. The team has established an Empty Homes Working Group drawing together all those with expertise across the Council with the aim of maximising effectiveness in returning empty homes to use.



## 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** – Recruitment to the post of Student Liaison Officer was completed after being vacant for some time, enabling attendance at all four student fresher fairs and Cardiff Met Housing Fair. Such direct engagement provides an opportunity to provide advice and information to students on matters of housing, safety, welfare and neighbourliness and 632 students were reached during these exercises.

## Emerging issues

**Animal Welfare and Pest Control during the Covid-19 Pandemic** – The emergence of the Covid-19 pandemic in the latter part of the year has changed the way we live our lives potentially creating issues in relation to animal welfare and pest control. There are concerns that the economic fallout from the pandemic will result in a spike of straying and abandoned dogs which owners are no longer able to feed and look after; current restrictions on vets being able to vaccinate puppies has the potential for causing an explosion in potentially life threatening canine disease; lack of socialisation of young dogs as a result of the lockdown has the potential for aggressive behaviour to become more common in future; concerns over farmer's ability to care for and feed livestock and the potential for illegal slaughter; fewer pest control treatments being carried out in domestic properties, as a result of residents being anxious about having caller, and also in schools while they are shut, has the potential for infestations to become more common place. Furthermore the service will need to make up 'lost ground' in respect of animal health and animal feed inspections not completed for the duration of the pandemic.

**Illegal dog breeding** – Investigations into illegal dog breeding have highlighted a hidden industry with a particular area of concern being that of 'backyard' breeding. The high value of certain breeds has resulted in a surge of illegal dog breeding across the region, often with links to serious organised crime, and there appears to be an increasing incidence in unlicensed home boarding and breeding which requires further investigation. Officers will continue to work with partner agencies to investigate such reports and the SRS will watch with interest as Welsh Government is set to unveil proposals for dealing with dog breeding/puppy farming in Wales.

**The Domestic Minimum Energy Efficiency Standard (MEES) Regulations** set a minimum energy efficiency level for domestic private rented properties requiring properties which require an energy performance certificate (EPC) to have a minimum 'E' rating on their EPC assessment, or have a valid exemption registered. The deadline for compliance of all new or existing tenancies is the 1 April 2020. This may result in an increasing number of referrals to the service where a landlord has failed to improve properties or applied for an exemption. Further clarity over the enforcement responsibility of these provisions within the Service as a whole maybe necessary.

# What we plan to do next

## Protecting the environment

Lead  
Responsibility

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

Complete the revocation of the Windsor Road, Penarth AQMA (delayed as a result of COVID-19), and progress the Action Plan for the Park Street, Bridgend AQMA

H Picton

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

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

H Picton

Work with the taxi trade to develop a phased transition for Cardiff licensing conditions by:

- Requiring vehicles to have a minimum Euro 6 emission standards by December 2021;
- Developing a medium-term strategy to ensure the Cardiff taxi fleet are all Ultra Low Emission Vehicles.

W Lane

### People will use energy efficient buildings and products

Investigate and monitor the implications of the Domestic Minimum Energy Efficiency Standard (MEEES) Regulations on housing enforcement.

W Lane

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

W Lane

### Animals are treated humanely

Explore the feasibility of applying to APHA to get one or more of the Animal Warden vehicles authorised to transport potential rabies dogs (if they are able to comply).

H Picton

Work with licensing authority and applicants in publicising/promoting a register for all breeders, home boarders etc. that have a licence.

H Picton

Set up a campaign to encourage those wanting to buy a puppy, to purchase from reputable licensed breeders.

H Picton

Carry out investigations into illegal dog breeding/home boarding.

H Picton

### Communities are protected from nuisance and are safer

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

H Picton

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

W Lane

## What we will measure during 2020/21

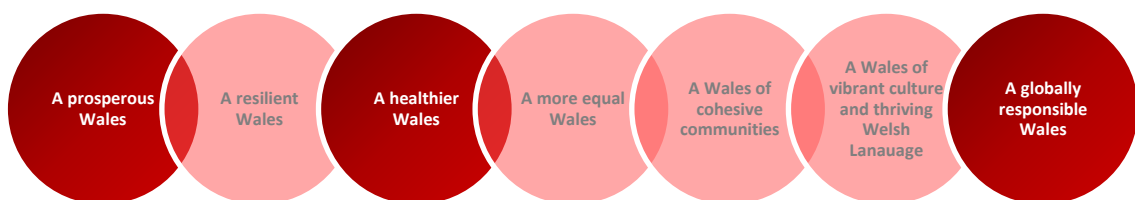
Performance Measures 2020/21	Target
<ul style="list-style-type: none"> <li>For noise complaints requiring attendance on site, the average time between receipt and the officer attending on site.</li> </ul>	Under consideration
<ul style="list-style-type: none"> <li>% of domestic noise and air complaints responded to within 3 working days</li> </ul>	90%
<ul style="list-style-type: none"> <li>% of commercial and industrial noise and air complaints responded to within one working day</li> </ul>	75%
<ul style="list-style-type: none"> <li>% of alarm complaints responded to within one day.</li> </ul>	90%
<ul style="list-style-type: none"> <li>% of stray dogs returned to owner or rehomed.</li> </ul>	90%
<ul style="list-style-type: none"> <li>% of empty private sector properties brought back into use during the year through direct action by the local authority (Cardiff and Bridgend only)</li> </ul>	TBC
<ul style="list-style-type: none"> <li>Number of additional dwellings created as a result of bringing empty properties back into use (Cardiff and Bridgend only)</li> </ul>	TBC
<ul style="list-style-type: none"> <li>Nitrogen Dioxide (NO<sub>2</sub>) concentrations within Air Quality Management Areas.</li> </ul>	Annual mean ratified concentrations of (NO <sub>2</sub> ) not to exceed 35µg/m <sup>3</sup>



# Supporting the local economy



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



# 6.4 Supporting the local economy

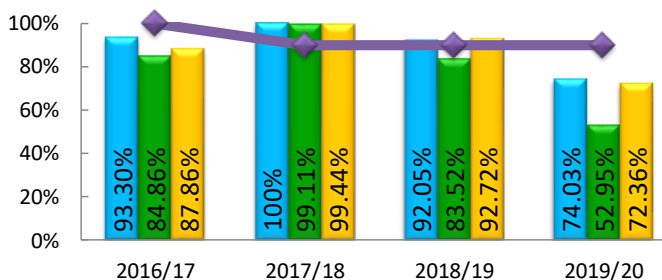
## Introduction

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

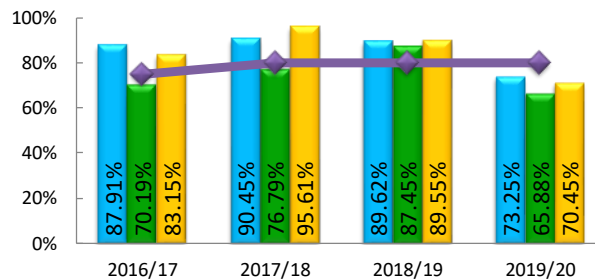
## How we performed



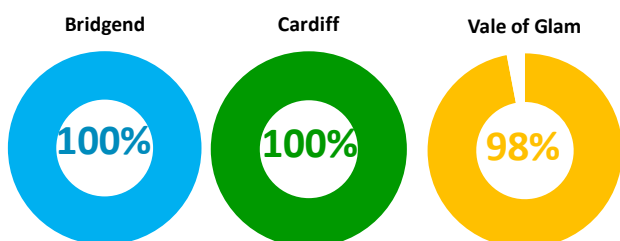
% of new Food Hygiene businesses identified and visited



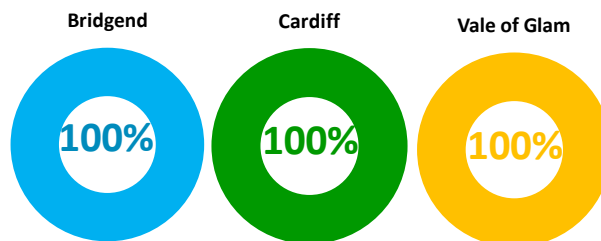
% of new Trading Standards businesses identified and visited



Training delegates who felt the training they received will benefit their business 2019/20



Training delegates who would recommend the training to an employee, colleague or friend 2019/20



Source – Respondents to training evaluation questionnaire



## What we have achieved



### A fair trading environment is maintained

**Fraudster jailed for conning people out of deposits for gardening work that he never intended to do** – A Cardiff man who peddled his gardening business through Facebook taking money from his victims with no intention of doing the work was jailed by Cardiff Crown Court following investigations by SRS officers.

The case involved four complaints, three of which involved victims contacting the defendants company through Facebook to have work carried out to their gardens and the fourth victim was the defendant’s own landlord who paid £5,980 for two minibuses which were never purchased. On all four occasions, the defendant took money from his victims up front in the guise of buying goods and supplies for work to be carried out but this was all a lie. When interviewed by officers, he admitted that he never bought any goods or supplies, never intended to do any of the work or buy the minibuses, as he spent all of the money to feed his gambling addiction. Furthermore the contract sent to his customers used incorrect company details, a false name and contained no cancellation rights. The defendant admitted seven counts of fraud, and four offences under the Consumer Protection for Unfair Trading Regulations and re-paid the victims and was sent to prison for 16 months and ordered to pay £149 victim surcharge.

**Shoddy roofing work results in Bridgend business reimbursing customer** - The owner of a roofing business in Bridgend was fined and made to refund a customer he left out of pocket and with a leaking roof, after an investigation by SRS Officers. In this case, the roofing company had provided the consumer with a quote of £1500 to repair a porch roof but later advised the complainant that work was needed to the main roof too which would cost £3000. No cancellation rights were provided and, when the porch roof subsequently leaked, the business failed to return to resolve the problems despite providing a 15 year guarantee. The business owner pleaded guilty to 5 offences under the Consumer Protection from Unfair Trading Regulations 2008. The business had advertised on Yell.com as being a member of Rated People and that it had traded for 23 years, which were both untrue. They carried out poor quality work which contravened the requirements of professional diligence. The owner admitted failing to check work done to the property by his employees and accepted that his paperwork was inadequate after he failed to issue the customer with required cancellation rights. He was subsequently fined a total of £750, ordered to pay legal costs of £250 and investigation costs of £460.50 together with a victim surcharge of £30. He was also ordered to pay compensation to the complainant of £900 which was the amount incurred to pay another roofer to rectify the problems caused.

**Jewellery and cosmetic trader prosecuted** - Following information received from the Assay Office, an investigation was made into jewellery being sold via Ebay. Officers set about making test purchases from the business and observed that alongside the jewellery items offered for sale were cosmetic products and items that were potentially infringing trademarks. Both jewellery and cosmetics were sent off for analysis to the respective



test houses which revealed that the jewellery was mis-described, the cosmetics were unsafe and the trademark holders confirmed that the goods infringed the trademark. A warrant was therefore executed at the home of the offender where officers seized items of jewellery, cosmetics and trademarked items along with items used in the distribution of goods such as various sizes of padded envelopes and in addition £12,845 in cash. The investigation showed that the defendants had been trading for a number of years and had at one point had their own website. In sentencing the Judge stated that in her opinion this was a large scale, sophisticated business with issues of goods being supplied that were unsafe, being used by individuals who will have no idea that they are using an unsafe product. Both defendants in the case pled guilty to offences in relation to hallmarking, cosmetics, trademark and consumer protection regulations and in summary received a 14 month prison sentence suspended for 18 months with a victim surcharge of £140 each. One defendant is also subject to a Confiscation investigation under the Proceeds of Crime Act 2002 which has yet to be concluded.



**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. Two recent cases arising from these inspections resulted in two Cardiff shop owners being successfully prosecuted. In one case a shop owner pleaded guilty to 8 offences under the Trade Marks Act 1994 and one offence under the Tobacco and Related Products Regulations 2016 after officers seized tobacco products which were counterfeit and did not carry the required health warnings. He was fined £580, ordered to pay costs of £260 and a victim surcharge of £30. Another shop owner

was prosecuted after officers found a large stash of tobacco and cash at his shop including 117 packets of twenty cigarettes and 17 pouches of snuff and £7200 cash which were all seized. In this case the magistrates took into account the shop owners early plea and low income and was fined £80, ordered to pay costs of £400 and a victim surcharge of £30, however at a later hearing and Order was made for the forfeiture of the £7,200 under the Proceeds of Crime Act 2002.

**Supply of counterfeit goods** –SRS officers were alerted by South Wales Police of the potential sale of counterfeit goods via Facebook which prompted an investigation. On the execution of warrants, large quantities of counterfeit goods were discovered, together with price lists for the goods and cash totalling £5295. The goods were subsequently confirmed to be counterfeit and some of the makeup seized was later discovered to exceed permitted levels of lead. The investigation showed that the goods were obtained from Manchester and sold via Facebook and the value of the conspiracy was in the region of £90,000. In sentencing the Judge stated that these were ‘extremely serious’ crimes and that those who sell counterfeit goods ‘are a threat to commerce’. He accepted that it was not a sophisticated operation but hard work had been put into the enterprise with a number of trips to Manchester to obtain the goods with one of the defendants making 9000 texts over 9 weeks. Four of the five defendants pleaded guilty and were sentenced to imprisonment. This ranged from 8 months imprisonment to a 12 month community order. Furthermore a confiscation hearing regarding the main defendant culminated in the confiscation being agreed at £49,119.39, which the defendant has 3 months to pay this amount, including the sale or re-mortgage of the property. In addition the forfeiture and destruction of the counterfeit goods was ordered.



## Informed and confident consumers

**Businesses and consumers benefit from Buy with Confidence Scheme** - SRS became the latest regulator to join the Buy with Confidence scheme, which tells consumers which local businesses have given their commitment to trading fairly. Businesses across Bridgend, Cardiff and the Vale of Glamorgan can now apply to join the scheme, which is run by local Trading Standards Services in over 50 Local Authorities across the UK. In order to successfully join, businesses are audited by officers from SRS and undergo a series of detailed checks before being approved as a member. Membership of the scheme is not given lightly, as each applicant undergoes financial checks, has their complaints history reviewed and good references are required from previous customers.



Businesses must agree to abide by the scheme’s code of conduct, which requires them to follow the letter and spirit of the law. The scheme gives consumers within the region and beyond the confidence to choose a reliable and trustworthy trader who is committed to trading fairly while member businesses have the potential to increase customer numbers.



## Improved business practices and operation

**Training provision** - The Service has continued to consolidate its excellent reputation as a training provider and over the last 12 months has provided accredited training to 243 individuals over the course of the year. Training included Level 2 and 3 Food Safety and Level 2 Health and Safety courses and the HACCP (Hazard Analysis and Critical Control Point) Level 2 qualification. Our courses on allergens were particularly popular during the year, assisting food business operators and their staff in complying with the law on allergens and the significant risks that can be involved if not managed properly. The Service also positioned itself to be an accredited centre for the provision of the Level 2 Award in Infection Control for Special Procedures Practitioners, piloting the course with a number of practitioners. Attendance at such a course will be a mandatory requirement for individuals seeking entry onto the Wales Special Procedures Register under the Public Health (Wales) Act.

**Open for Business** - Across the region, the SRS licensed over 750 licensed premises in both the day and night time economy and issued over 450 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.

**Providing additional advice and support to food businesses** - Helping businesses improve their food hygiene rating score was the drive behind a successful bid to the Food Standards Agency for project funding during 2019/20. The funding enabled SRS to target those businesses most in need of support in improving their score, and officers worked with food businesses across the region having poor scores of between 0 and 2. The funding was used to cover the cost of completion of the visits and the provision of materials so the service was free of charge to the businesses participating. What followed was a programme of intensive 1 to 1 assistance provided to some 15 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. Unfortunately, however, due to the Covid-19 outbreak several of the businesses could not be re-inspected so we were unable to fully assess the impact. Notwithstanding this 7 of the premises were inspected before the end of the year and for those premises the average FHRs score increased by over 2.7.

In addition to these businesses, a further 14 businesses approached the service seeking advice and support under the paid for advice service that we offer. These included food business operators who were considering starting a business and wanted advice on structure through to businesses already trading with a FHRs score of 5 who wanted some additional guidance or a mock inspection. Where a rating inspection followed in the last year the FHRs score increased by an average of +1.4 although this is probably not a true reflection of the added value provided by the advice visit.





## Accessible services responsive to business needs

**Primary Authority** - The Primary Authority scheme enables a business to enter into a statutory partnership with a local authority through which it can receive assured advice. Provided this advice is followed, the Primary Authority (PA) is able to challenge intended enforcement action by other local authorities. SRS now has some 28 Primary Authority partnerships in place with both local and national businesses and is able to charge for the work done as part of these arrangements on the basis of full cost recovery. 2020/21 is likely to see further consolidation of this work.

A recently secured partnership is one with the Cardiff and Vale University Health Board (C&VUHB) which is currently focussed on two main areas of work. This includes SRS providing all Level 2 and Level 3 food safety training for catering staff at both the University Hospital of Wales and Llandough Hospital sites and officers working closely with the Catering Managers to review and update the food safety management system for the central food processing kitchen. Once completed it is anticipated that reviews of policies and procedures for food production elsewhere within the C&VUHB estate will take place.

**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 243 individuals over the course of the year. Of these 125 delegates sat Level 2 and 3 Food Safety and Level 2 Health and Safety courses while a further 3 were successful in gaining the HACCP Level 2 qualification. Our courses on allergens attracted some 99 delegates, and the launch of Infection Control training for Special Procedures practitioners attracted 16 delegates.

In February 2020, SRS was the first in Wales to provide the Allergy Awareness training course devised by the Allergy UK charity. In addition to the training course we are promoting the Allergy Aware scheme which allows business to demonstrate their commitment to providing safe food for consumers with food allergies. The scheme will be administered by Allergy UK but SRS officers will carry out audits to food premises on behalf of the charity.

During the year, the Service also began working with the Huggard Centre to deliver Level 2 Food Hygiene training. The Huggard Centre is a Cardiff based charity supporting the homeless with the aim of tackling homelessness and helping those who are often excluded from other services to overcome the problems that force them to sleep rough on the streets. Through its Skill Share programme funded by the Active Inclusion Fund and the Wales Council for Voluntary Action, the Huggard Centre arranges for individuals to receive training that will improve their prospects of employment and in turn enable those who have been homeless to rebuild their lives

**Major events liaison** - During 2019/20, SRS attended numerous Event Liaison Panels (ELP) and Event Safety Advisory Groups (ESAG) across the region and assessed over 127 events in addition to any that required site visits (34 Bridgend, 51 Cardiff and 42 Vale). Such events included the Elvis Festival held in Porthcawl, the Homeless World Cup, Mardi Gras and Winter Wonderland events in Cardiff and Vale Agricultural Show and Cowbridge Food and Drink Festival. These along with many others



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 555 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.

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

**On-line retailing** - The Internet is undeniably driving change, and large retailers have responded by embracing multi-channel sales strategies and while the high street has not, as yet, been put out of business, their traditional physical stores are beginning to become a secondary outlet. It would seem inevitable that, in the longer term, the size and composition of the high street will be significantly impacted, as on-line shopping becomes a far more mainstream activity. Information technology and the fast developing digital environment are also causing a change in the way people interact, including in the way they interact commercially. Modern consumers increasingly access goods and services across the world through the tap of a phone screen or the click of a mouse. The Internet presents an enormous opportunity for consumers. 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.

**New homes** – The purchase of a home is probably the biggest purchase of a lifetime and the buying of a new build is a popular choice made by many. Recently, however, SRS has seen an increase in complaints surrounding new homes across the region in connection with service charges imposed and leasehold/freehold arrangements on properties. In light of this, the service will undertake a survey during the year to establish the breadth of issues and to offer advice and education.

## What we plan to do next

### Supporting the local economy Lead Responsibility

#### A fair trading environment is maintained

Continue operations to investigate and disrupt the business of those selling illicit and counterfeit tobacco products	C Hill/H Picton
Carry out survey of new builds across the region to establish Consumer Protection Regulation breaches and to offer advice and education.	C Hill
Incorporate regular surveillance of on line selling into trading standards work due to the volume of goods being sold on line.	C Hill
Develop strategic assessment and control strategy in line with the Intelligence Operating Model.	H Picton

#### Informed and confident consumers

Continue to promote the ‘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

Continue to promote and provide training to business across a variety of areas	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

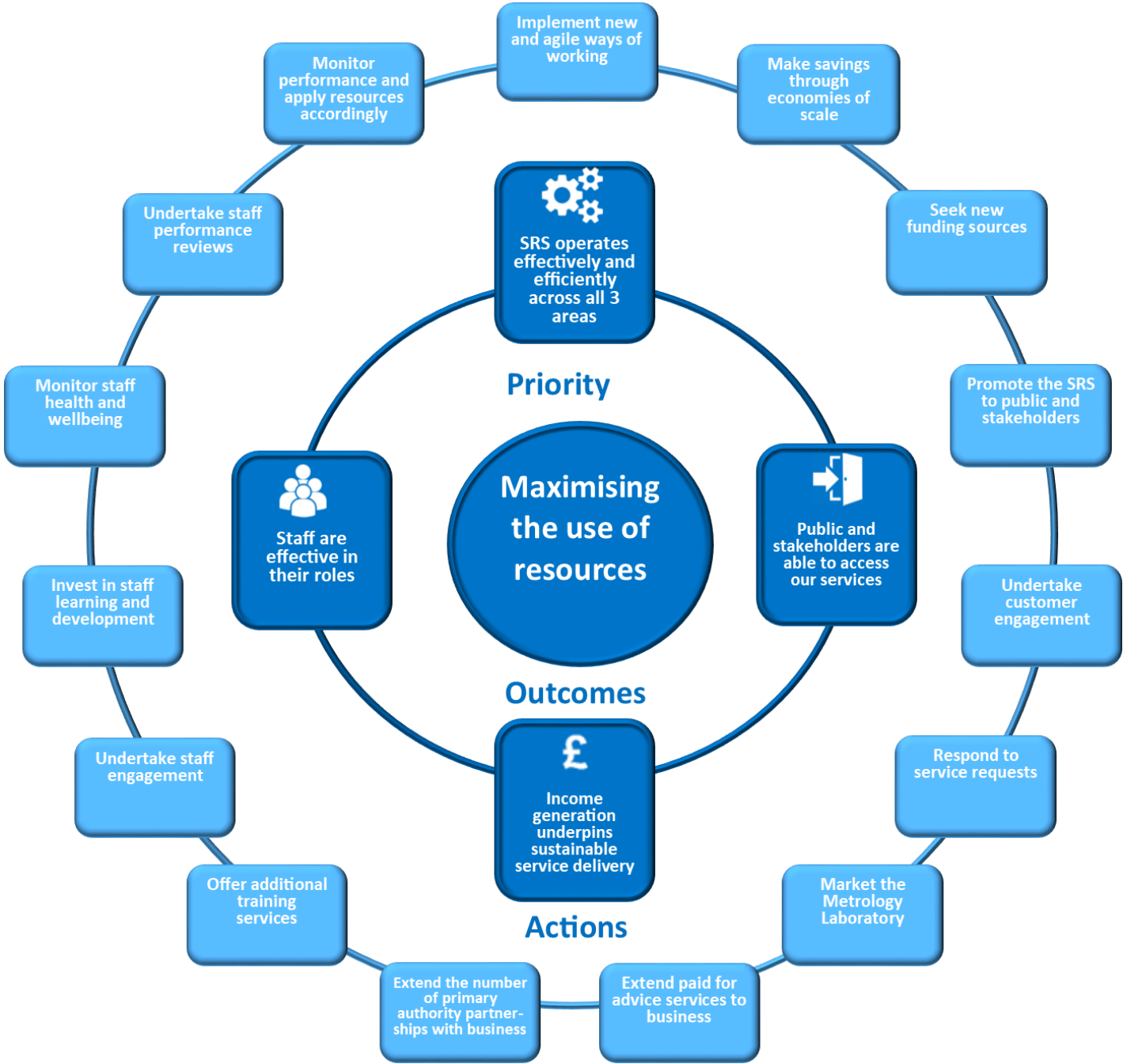
Consolidate the advice and support requirements for our current Primary Authority partners	H Picton
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## What we will measure during 2020/21

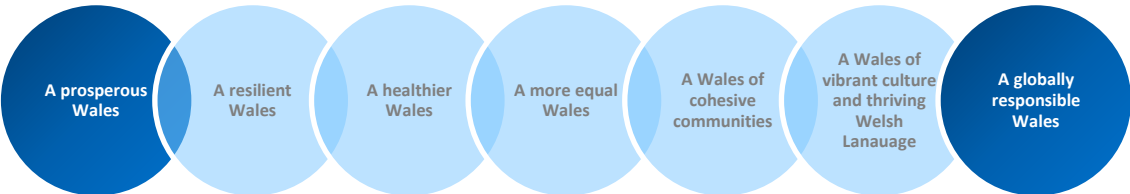
Performance Measures 2020/21	Target
<ul style="list-style-type: none"> <li>% of new businesses identified which were subject to risk assessment visit or returned a self-assessment questionnaire during the year for food hygiene.</li> </ul>	90%
<ul style="list-style-type: none"> <li>% of new businesses identified which were subject to risk assessment visit or returned a self-assessment questionnaire during the year for Trading Standards</li> </ul>	80%

<ul style="list-style-type: none"> <li>• % of businesses who felt that interaction with SRS has helped them improve standards of compliance in their business.</li> </ul>	85%
<ul style="list-style-type: none"> <li>• % of businesses satisfied with our paid for business advice services.</li> </ul>	Baseline being set
<ul style="list-style-type: none"> <li>• % of individuals who feel that the training they received through SRS will benefit their business.</li> </ul>	95%

# Maximising the use of resources



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



# 6.5 Maximising the use of resources

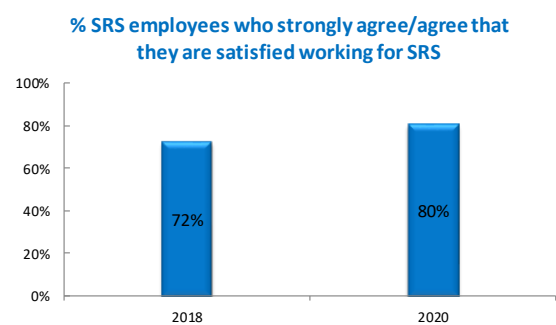
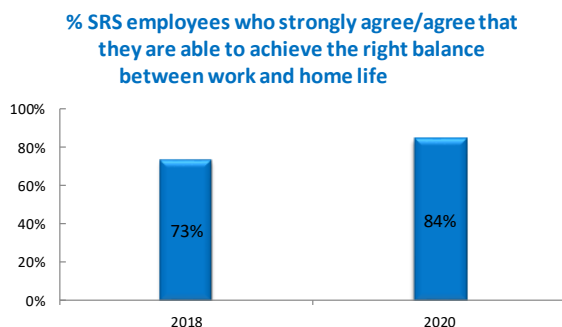
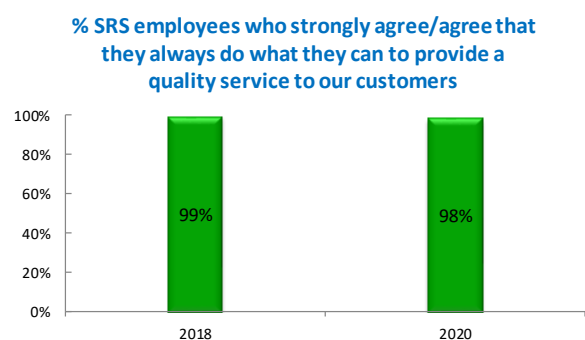
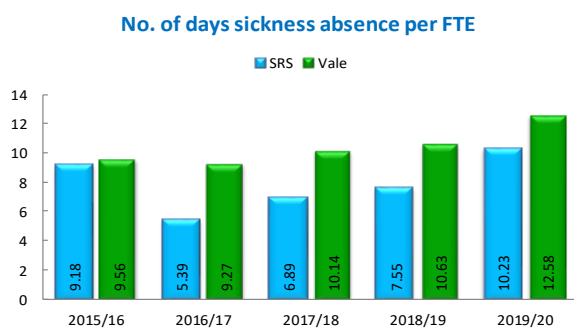
## Introduction

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.

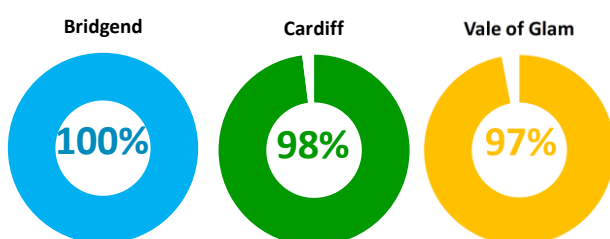
We are generating income, where possible, to underpin service delivery; activities like marketing our metrology laboratory, offering paid for advice services, building Primary Authority partnerships and extending our training provision to business are examples of our move to a more “commercial” culture.

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.

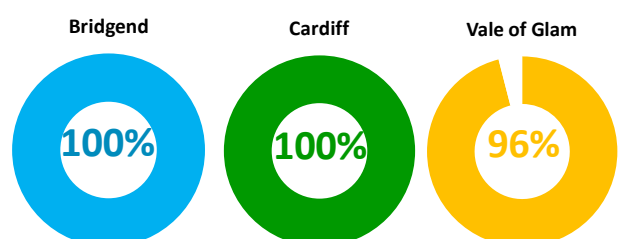
## How we performed



**% of businesses inspected that are satisfied with overall level of service 2019/20**



**% training delegates who rated the training they received as good to excellent 2019/20**





## What we have achieved



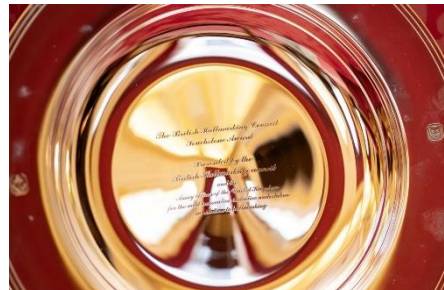
**SRS operates effectively and efficiently across all 3 areas**

**SRS receives Touchstone Award from the British Hallmarking Council** - The prestigious Touchstone



Award presented by the British Hallmarking Council and funded by the four UK Assay Offices and National Association of Jewellers recognises and rewards the most effective trading standards initiative each year for increasing awareness and enforcement of the hallmarking legislation. SRS received the award in recognition of a programme of work, which included proactive visits to jewellers across the region, and a major investigation of a local

on-line trader. In the first case, the business was fined a total of £1500 and compensation of £400 awarded to one of the complainants; a Director of the company received a fine of £800, and ordered to pay costs of £350. A forfeiture and destruction order was made in relation to the seized jewellery. In the second case, the online business, the traders each received a prison sentence of 14 months for early guilty pleas, suspended for 18 months.



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

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

*"It's so very good to know that you have tenaciously pursued... and brought him to justice. Initially we had some trouble in getting anywhere with our complaint... I wonder how many more people he has duped where they've not bothered to come forward? It's as well that people like him are brought to justice by an organisation such as yours with professional people like yourselves".* Victim of a rogue trader.

*"This is excellent news. I really feel justice has been served and I hope that no one has to go under the stress again dealing with someone like... Thanks for keeping me updated and hope with time I will learn to trust 'true' trades people again".* Victim of a rogue trader.

*"Just wanted to express our thanks for sorting the issue out of the barking dog, it has been such a relief to get this sorted, we cannot thank you enough".* Noise Pollution complainant.

*"Thank you to the Night time Noise Team who came out just before 1 am to tell my neighbours 4 houses away to turn down their music".* Noise Pollution complainant.

*"I would like to express my appreciation for the help my husband and I received from your colleague".* Animal health and welfare complainant.

**FSA Feed Audit** – In February this year, the Food Standards Agency conducted an audit of our delivery of feed controls across the three local authority areas. Authorities are audited against the Feed and Food Law Enforcement Standard which sets out the minimum standards of performance expected from local authorities. Such audits provide the service with recommendations for improvement and recognise good practice and the service looks forward to receiving the FSA report in due course. The last year has seen significant work undertaken within the Service in consolidating procedures, the recording of information and making improvements with regard to the Feed and Food register, and any recommendations contained within the report will build upon this work to further improve the delivery of feed controls.

**ICT Review** – In recognition of advancements in technology that could enhance the way we work across SRS, the service set up a working group of officers to explore opportunities for improving ICT to enable officers to work more efficiently and effectively, particularly in respect of mobile and remote working. The initial meeting of officers held in the latter part of the year, was very positive, successfully bringing employees together to identify issues and suggestions for future improvement and also providing a forum for officers to share experiences and knowledge to enhance the use of existing technology. Work has already commenced in addressing a number of issues and examining new technology and this will continue during the year.

**Intelligence Operating Model** - The Intelligence function within SRS was established towards the end of 2018 and in the new year of 2019 with the aim of providing a specialist resource to implement the widely used and accepted Intelligence Operating Model to inform and lead service delivery of SRS and the WIMLU. 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 team proactively identify and monitor emerging issues, referrals and intelligence received by the Service. This can be used to identify work priorities and present recommendations for future action. The team also assist other SRS teams and officers, providing intelligence and analytical support to progress investigations. This can include producing target and problem profiles; and tactical assessments, providing a snap shot of recent work activity. For example, illicit tobacco makes up more than a third of the intelligence which informs operations undertaken within the service and intelligence on scams and doorstep crime helps identify repeat offenders and trends. We have established close links with key intelligence partners, and regular two-way dissemination of intelligence occurs. 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 where appropriate.

**Delivering with less**– During October 2014, the WAO produced a national report the provision of environmental health services in Wales. 'Delivering with Less- The impact on environmental health services and citizens'. At that time the partner councils received reports indicating that, to varying degrees, the continued delivery of environmental health services was uncertain. A common observation was that the Councils would find it difficult to take on new statutory duties that protect the public and the environment. The report further commented: "With the exception of the planned shared regulatory service between Bridgend, Cardiff and Vale of Glamorgan Councils, we found little evidence of councils developing a comprehensive regional-based solution to address the financial challenges they face".

Since September 2015, Bridgend, Cardiff and the Vale of Glamorgan Councils have provided most of their environmental health services through the SRS. This shared service model was established to secure the effective use of council resources whilst continuing to maintain high quality service delivery.

In 2019, the WAO revisited their findings undertaking a follow up review of environmental health services in the partner Councils. Their audit had two aspects. Firstly, they sought to determine whether the Councils were still delivering its statutory Environmental Health functions given the financial challenges? And secondly whether the Council was effectively managing performance and had acted upon the recommendations made in their previous review.

Overall, the report findings are positive, and it concludes that 'The Shared Regulatory Services (SRS) model is enabling all three partner Councils to sustain its delivery of environmental health services in a context of reducing resources and additional responsibilities placed on it by ongoing changes in legislation'.

The review identified that there is scope for the Councils to strengthen its independent oversight and assurance arrangements of the SRS and those matters are being progressed by the Scrutiny Heads. The review also concluded that any future changes to environmental health services must be subject to a more rigorous analysis of costs, benefits and impacts as resources become more constrained.



## 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 fluctuates throughout the year but at its highest, 4974 users were recorded in July together with 14,205 page views. Our Noise and Air Pollution web pages consistently receive the most page views.
- **Equalities** – Following the inclusion of equalities information in our customer satisfaction surveys, we are now able to carry out equality monitoring of our customers in order to

identify any issues or concerns and more specifically access to our services. During 2019/20, 97% of businesses who responded to our customer satisfaction survey said they were able to access the services and facilities they needed from SRS.

- **Twitter account** – Since launching our own Twitter account @SRS\_Wales in 2017, the SRS continues to increase the number of followers which now stands at 399. 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

**UKAS Accredited Metrology Laboratory** - The Metrology laboratory based in Cardiff undergoes an annual audit by the United Kingdom Accreditation Service (UKAS) to maintain its accreditation. The 2019 audit was particularly significant as it marked the transition from the 2005 iteration of the standard to the new 2017 version. Preparing for the audit required a great deal of work including a complete overhaul of the laboratory's quality manual. The auditors commented that for an organisation transitioning in this way, the number of recommendations resulting from the audit was exceptionally low. The metrology laboratory was first established in 1995, but since the creation of SRS there has been a drive to enhance the income generating capacity of the laboratory. In the last four years, calibration work has been undertaken for over 70 different businesses, the majority of whom are regular and returning customers. These businesses represent a broad range of sectors including avionics, food, pharmaceutical and medical where accuracy and confidence in their weighing equipment is fundamental to their operations. Stemming from this successful transition is the possibility of now widening the scope of the accreditation to include volume as well as mass, and feasibility studies are now being undertaken to scope this work and customer base.

**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 28. Furthermore, the Service has provided accredited training to 243 individuals over the course of the year. Of these 125 delegates sat Level 2 and 3 Food Safety and Level 2 Health and Safety courses while a further 3 were successful in gaining the HACCP Level 2 qualification. Our courses on allergens were particularly popular during the year, attracting some 99 delegates, and the launch of Infection Control training for Special Procedures practitioners attracted 16 delegates.

**Nest Inspections** – During the last year, Housing Enforcement teams have worked with British Gas to deliver the Warm Home Nest Scheme by undertaking 89 inspections of private rented properties across the region in accordance with the Housing Health and Safety Rating Scheme. The service receives payment for these inspections and this has generated over £13,000 in income.



## 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 examples:-

- SRS regularly offers opportunities to employees who are interested in developing themselves by offering to match fund suitable applications for external study. This has resulted in a number of employees pursuing academic qualifications such as M.Sc. qualifications in Environmental Health and Public Service Management, several of whom have now successfully completed their studies and are able to apply their learning in the workplace.
- Several SRS Team Managers have been seconded to Welsh Government leaving vacancies within the Service that have been filled on a temporary basis by existing staff. The ability to 'act up' provides valuable development opportunities and experience for officers, whilst also contributing to the effective management of the service.
- Training sessions were arranged during the year in relation to the introduction of the Public Health (Minimum Price for Alcohol) (Minimum Unit Price) (Wales) Regulations 2019. Such training was provided as part of the agreement with Welsh Government and delivered in house. Bringing in training such as this makes it more accessible to a greater number of officers, and on those occasions where a cost is attached, makes it more cost effective for the service. In this particular case officers across Commercial Services and Neighbourhood Services attended the training to ensure consistency across teams.
- To ensure front line staff keep up to date with licensing legislation, members of the Licensing teams in Bridgend and Vale have been working towards gaining the Institute of Licensing Professional Licensing Practitioners Qualification. The qualification focuses on the practical issues that licensing practitioners need to be aware of when working in the licensing field and is of benefit to both new officers or those wishing to refresh their knowledge and expertise. So far eight members of the teams in Bridgend and the Vale have completed one or more of the modules with five receiving the qualification so far.
- Furthermore training in food standards work continued amongst our food safety officers to enable them to undertake food standards interventions at the same time as a food safety inspection of low risk food standards. Such training has involved attendance at training, cross training between teams and an on-line training subscription has now gone live providing additional support. This training and the concept of generic working not only provides team members with learning and career development opportunities but benefits the service by building a more cohesive and resilient approach to inspections.

**Employee Survey** – In early 2020, we carried out our second employee survey aimed specifically at SRS employees. The survey was introduced to improve communication within the service and to explore employee perceptions of various aspects of working for SRS to find out what we were doing well and what needed to be improved. Distributed electronically a response rate of 65% was achieved. The results gathered, provide a positive response from employees with 81.82% of results falling into the excellent to very good category. This was a significant increase on the last survey in 2018 where 68.18% of results fell into the same categories. Some areas require further

improvement and an action plan will be developed to address the key issues raised, together with communication of the results to employees.

## Emerging issues

**Covid-19 pandemic** – The lockdown measures introduced in March 2020 as a result of the Covid-19 pandemic has impacted considerably on the work undertaken within the service and the ability to undertake inspections and visits. This has required the service to modify the way we work and will impact on service delivery as we enter the new financial year. In light of these significant changes, it will be necessary to continue to review service delivery during the lockdown and consider what long term changes need to be made including accessibility of service, risk assessments for officers and collaborative working arrangements with other organisations. One example of the impact of Covid-19 is the impact that government restrictions have had on the Licensing Team, and the individuals/businesses they license. These teams generate income which is used to fund the running of the licensing service and the following illustrates potential effects in relation to just two of the many licence types dealt with.

- **Hackney Carriage/Private Hire Licensing** - In March 2020, the UK Government announced that MOTs due to expire on or after 30 March 2020 will be extended by 6 months. In light of this, and guidance received from the LGA, the Licensing Departments across the SRS extended all vehicle licences over this period by 6 months. This will currently result in a loss of approximately 25% of vehicle income for the 2020/21. Due to the downturn in demand, many Hackney Carriage/Private Hire Driver licence holders may choose not to renew their licence before it expires and wait until the quarantine measures are lifted. Depending on when the quarantine measures are lifted, there may be a large influx of licence holders wishing to renew which we will have to manage through changes to our Licensing processes.
- **Premises Licensing** - It is currently unknown how many licensed premises will cease trading as a result of Covid-19 and the very likely economic downturn this will cause. For each licensed premises that ceases trading and remains vacant, this will result in a loss of income to the Council. We will aim to support businesses whilst ensuring they comply with the law in relation to trading and protection of the vulnerable.

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

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

The strategy sets out how SRS will recruit and retain officers with the requisite skills, experience, behaviours and beliefs to undertake their job roles effectively. Our 2020 staff survey shows that the majority of our officers are content with their employment within the SRS, yet the SRS delivery

model remains at if we are unable to attract, recruit and retain a high calibre workforce. The impact of the new strategy will be monitored over the next two years to determine its efficacy.

## What we plan to do next

### Maximising the use of resources

Lead  
Responsibility

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

To explore the possibility of establishing a digital forensics function within the service, that can improve the effectiveness of seizing and analysing digital media to assist investigations, and further reduce spending on outside forensic services.

H Picton

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

H Picton

Review and update Out Of Hours emergency service procedures and explore alternative forms of delivery.

W Lane

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

H Picton

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

D Holland

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

D Holland

Review Licensing fees and charges across the service.

W Lane

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

Review service delivery during the lockdown and consider what long term changes need to be made including accessibility of service, risk assessments for officers and collaborative working arrangements with other organisations.

All OMs

Improve engagement and consultation with stakeholders including service users and residents and review the effectiveness of current mechanisms used to access Shared Regulatory Services.

All OMs

#### Income generation underpins sustainable service delivery

Extend training provision through the delivery of RSPH Level 2 Infection Control Training course for Special Procedures.

H Picton/C Hill

#### Staff are effective in their roles

Complete the PDR process with all SRS employees.

All OMs /TMs

Review Workforce Development Plan.

C Hill

Examine employee survey results, disseminate across service and develop an action plan for improvement

D Holland

## What we will measure during 2020/21

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

# Appendix 1 – Risk Register

Possible Impact or Magnitude of Risk	Catastrophic	4 <i>MEDIUM</i>	8 MEDIUM/HIGH	12 HIGH	16 VERY HIGH
	High	3 <i>MEDIUM/LOW</i>	6 <i>MEDIUM</i>	9 MEDIUM/HIGH	12 HIGH
	Medium	2 LOW	4 <i>MEDIUM</i>	6 <i>MEDIUM</i>	8 MEDIUM/HIGH
	Low	1 VERY LOW	2 LOW	3 <i>MEDIUM/LOW</i>	4 <i>MEDIUM</i>
<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 (Feb 2020)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
RR1: Insufficient resources, and capacity to deliver planned services will result in loss of service provision and reduction in performance. NB. The risk is exacerbated by the demands placed upon the SRS due to the Covid 19 outbreak.	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. NB. The risk of insufficient resource is exacerbated by the demands placed upon the SRS due to the Covid-19 outbreak.	3	3	Medium/High 9



Risk Description	Inherent Risk Score (Feb 2020)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
RR2: Inability to recruit professional officers to vacant posts.	4	3	High 12	The traditional supply of professional officers from universities has greatly reduced, and it now takes longer to qualify which has resulted in a shortage of applicants for vacancies within the service. SRS however has developed a recruitment strategy, and is exploring several options to address this issue by way of trainee posts and apprenticeships.	3	3	Medium/ High 9
RR3: The complexities of resource allocation may result in a lack of understanding and misalignment of resources.	3	3	Medium/ High 9	Dedicated accountant appointed for the Service. Governance arrangements in place to address lack of understanding. Review and standardisation of financial processes ongoing.	2	2	Medium 4
RR4: The lack of functioning ICT systems could hinder the ability to work as a single service unit and affect the Service's ability to work smarter and more efficiently.	3	3	Medium/ High 9	The web based Tascomi database implemented across all 3 authorities 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, working groups across SRS have been set up to review ICT arrangements. This will in turn require the service to work with ICT to explore better facilities.	2	2	Medium 4
RR5: Failure to identify and resource staff learning and development needs to address changes in roles and immediate needs and	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	1	3	Medium/

Risk Description	Inherent Risk Score (Feb 2020)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
long term goals of the service could result capability issues amongst staff which would affect the Service's ability to deliver services.				in 2015/16. To address this a recruitment strategy was developed and approved by Joint Committee on 10 September 2019.			Low 3
RR6: 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.	2	2	Medium 4
RR7: An inability to recruit officers to the Duty Officer regime may result in inadequate cover and failure to deal with emergencies out of hours.	3	2	Medium 6	The Duty Officer regime operates on a 24/7 basis over 365 days a year providing a single point of contact out of office hours dealing with SRS emergencies. Cover is provided by officers on a voluntary basis however there have been periods where it has become difficult to recruit officers resulting in shortage of cover which has required managers to step in a short notice. Steps have recently been taken to address this lack of resilience following the recruitment of new officers to the service who have subsequently volunteered to work the rota. Therefore, whilst the risk has reduced, there will be a need to keep arrangements under review.	1	2	Low 2
RR8: The positioning of Shared Regulatory Services	2	2		The Service remains relevant to all 3 authorities through links into Corporate Plans of 3 authorities,			

Risk Description	Inherent Risk Score (Feb 2020)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
under a host authority, together with unique branding may result in the Service becoming divorced from its constituent Councils or marginalised.			Medium 4	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.	1	3	Medium/ Low 3

# 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 2020/21 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 2020/21

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 and comply with public health requirements at ports of entry for control measures to be adopted in relation to the control of Covid-19.

C Hill

Utilise social media to identify 'dark kitchens' to regulate compliance across the industry.

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, continue the undertaking of designated food standards inspections by food safety officers by training up new officers to the service.

C Hill

### Risks in the workplace are managed properly

Develop and adopt the Section 18 Health and Safety Service Plan 2020/21 and undertake interventions in accordance with the plan and the arrangements in place to discharge health and safety duties.

C Hill

Implement the provisions of the Public Health (Wales) Act 2017, including preparing businesses and internal procedures in readiness for the implementation of the new special procedures licensing regime.

C Hill

Undertake a project to identify how risk of CO associated with the use of indoor BBQs/charcoal tandoor ovens/charcoal grills is being managed

C Hill

Continue scrutinising compliance with the PAS 5000 standard in indoor trampoline park settings; effective management of risk in leisure settings such as ninja warrior / indoor soft play facilities.	<b>C Hill</b>
<b>Noise and air emissions are controlled</b>	
Consult and implement policy changes to the age, emission and testing standards of vehicles in order to deal with the air quality challenges faced by Cardiff Council.	<b>W Lane</b>
<b>A safe trading environment is maintained</b>	
Undertake an exercise over the Christmas period inspecting seasonal pop ups and markets offering a variety of products to check compliance with legislation.	<b>C Hill</b>
<b>Licensed premises operate responsibly</b>	
Undertake actions to support the provisions of the Public Health (Minimum Price for Alcohol) (Wales) Act 2019.	<b>C Hill/H Picton</b>
<b>The quality of private rented property is improved</b>	
Drive up the standards in the private rented sector and in the city's high-rise buildings by taking enforcement action against rogue agents and landlords letting and managing properties.	<b>W Lane</b>
Continue the process of re-declaring the Additional Licensing Scheme in Plasnewydd	<b>W Lane</b>
Review HMO licensing Fees Structure and process to maximise resources available and implement split fees in line with the Provision of Services Regulations 2009	<b>W Lane</b>
Investigate additional sources of income through Council Tax premium on empty homes and allocate this to improve empty homes performance.	<b>W Lane</b>
Implement service request/enforcement policy to allow for targeted and intelligence lead enforcement for unsafe properties and rogue landlords	<b>W Lane</b>
Review Cathays Additional Licensing scheme in preparation for consultation and re-declaration.	<b>W Lane</b>
Continue investigations into HMOs in the Bridgend and Vale areas, not registered with Rent Smart Wales in order to ensure compliance.	<b>W Lane</b>

## Infectious disease is controlled and prevented

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

C Hill

Manage the risk of legionella associated with cooling towers (in Cardiff) and the display of hot tubs/spas.

C Hill

Use powers granted under the Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020, to help improve the health and wellbeing of the public by ensuring the businesses are compliant with these provisions.

All OMs

## Safeguarding the vulnerable

Lead  
Responsibility

### Children are protected from harmful substances and products

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

C Hill

### Older and vulnerable people are protected from rogue traders and scams

Target key audiences through channels not previously used by undertaking a targeted education drive to GP surgeries and Pharmacy delivery services on scams and rogue traders and increasing stock of promotional materials to provide key safeguarding messages.

H Picton

Undertake a targeted drive to reuse currently inactive call blockers and to offer more out to those who need them.

H Picton

### Illegal money lending activities are prevented

Promote 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

Raise awareness of the dangers of illegal lending within rural communities and provide training where opportunities arise.

H Picton

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

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

W Lane

### Taxi provision is safe and fair

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

W Lane

standards for taxis.	
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

<b>Protecting the environment</b>	<b>Lead Responsibility</b>
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### The environment is protected from harmful emissions to land, air and water

Complete the revocation of the Windsor Road, Penarth AQMA (delayed as a result of COVID-19), and progress the Action Plan for the Park Street, Bridgend AQMA	H Picton
Ensure good air quality in Cardiff by implementing and evaluating the: <ul style="list-style-type: none"> <li>• Clean Air Plan as approved by Welsh Government to ensure compliance with the EU Limit Value for Nitrogen Dioxide (NO2) in the shortest possible time by the end of 2021;</li> <li>• Wider Clean Air Strategy measures to ensure a continued reduction of NO2 concentrations is achieved across the city.</li> </ul>	H Picton
Work with the taxi trade to develop a phased transition for Cardiff licensing conditions by: <ul style="list-style-type: none"> <li>• Requiring vehicles to have a minimum Euro 6 emission standards by December 2021;</li> <li>• Developing a medium-term strategy to ensure the Cardiff taxi fleet are all Ultra Low Emission Vehicles.</li> </ul>	W Lane

### People will use energy efficient buildings and products

Investigate and monitor the implications of the Domestic Minimum Energy Efficiency Standard (MEEES) Regulations on housing enforcement.	W Lane
Work with landlords to return empty properties back into use helping to increase the availability of affordable housing for sale or rent in Bridgend and Cardiff	W Lane

### Animals are treated humanely

Explore the feasibility of applying to APHA to get one or more of the Animal Warden vehicles authorised to transport potential rabies dogs (if they are able to comply).	H Picton
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Work with licensing authority and applicants in publicising/promoting a register for all breeders, home boarders etc. that have a licence.	H Picton
Set up a campaign to encourage those wanting to buy a puppy, to purchase from reputable licensed breeders.	H Picton
Carry out investigations into illegal dog breeding/home boarding.	H Picton

## Communities are protected from nuisance and are safer

Explore the feasibility of extending the number of pest control contracts by engaging with the farming community, schools and commercial sector.	H Picton
Engage with students and residents during Freshers Week in Cardiff providing community advice on housing, environmental and social issues.	W Lane

## Supporting the local economy

Lead Responsibility

### A fair trading environment is maintained

Continue operations to investigate and disrupt the business of those selling illicit and counterfeit tobacco products	C Hill/H Picton
Carry out survey of new builds across the region to establish Consumer Protection Regulation breaches and to offer advice and education.	C Hill
Incorporate regular surveillance of on line selling into trading standards work due to the volume of goods being sold on line.	C Hill
Develop strategic assessment and control strategy in line with the Intelligence Operating Model.	H Picton

### Informed and confident consumers

Continue to promote the '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

Continue to promote and provide training to business across a variety of areas	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 the advice and support requirements for our current Primary Authority partners **H Picton**

## Maximising the use of resources **Lead Responsibility**

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

To explore the possibility of establishing a digital forensics function within the service, that can improve the effectiveness of seizing and analysing digital media to assist investigations, and further reduce spending on outside forensic services. **H Picton**

Maximise mobile working opportunities by reviewing ICT and mobile working needs across the service via the ICT Working Group including evaluating options for virtual communication between staff and other stakeholders to ensure service continuity. **H Picton**

Review and update Out Of Hours emergency service procedures and explore alternative forms of delivery. **W Lane**

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

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

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

Review Licensing fees and charges across the service. **W Lane**

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

Review service delivery during the lockdown and consider what long term changes need to be made including accessibility of service, risk assessments for officers and collaborative working arrangements with other organisations. **All OMs**

Improve engagement and consultation with stakeholders including service users and residents and review the effectiveness of current mechanisms used to access Shared Regulatory Services. **All OMs**

### Income generation underpins sustainable service delivery

Extend training provision through the delivery of RSPH Level 2 Infection Control Training course for Special Procedures. **H Picton/C Hill**

### Staff are effective in their roles

Complete the PDR process with all SRS employees. **All OMs /TMs**

Review Workforce Development Plan.

**C Hill**

Examine employee survey results, disseminate across service and develop an action plan for improvement

**D Holland**