

Meeting of:	<b>Shared Regulatory Services Joint Committee</b>
Date of Meeting:	<b>Tuesday, 28 June 2022</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 2022-23
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 2022/23 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 2022/23.
2. That the Head of the Shared Regulatory Service is authorised to make administrative amendments to the 2022/23 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 that once approved, it is 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 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 Business 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** In 2019, The Wales Audit Office recommended that the SRS Business Plan should contain a clear distinction between statutory and non-statutory services to ensure that statutory responsibilities and powers are weighed and prioritised appropriately alongside discretionary services. Schedule 4 to the Joint working Agreement contains the following text:

*Some of the functions the Shared Regulatory Service will provide are legally mandated, statutory requirements: the role of the Weights and Measures authority, the duties under the Health and Safety at Work Act etc. Others are optional, non-statutory, but have been adopted to support the core Regulatory function and to support the corporate objectives of each partner Council: examples include, consumer advice, accreditation of landlords.*

*The collaborative arrangement defines a Core Service in terms of ensuring public health, helping customers to access information and knowledge and in securing a safe, healthy, fair, environment. This requires the use of both statutory and non-statutory legislation to achieve service and corporate goals. For example, Consumer Advice and safeguarding initiatives are non-statutory, but are an essential set of tools in protecting the vulnerable and vital in the achievement of other corporate goals.*

- 1.4** To meet the WAO recommendation additional commentary has been included in the plan, however achieving effective outcomes involves the use of many “tools” and often non-statutory functions are more potent in resolving challenges.

This year, the Business Plan reflects the achievements of the Shared Service and the demands placed on it during 2021-22 as a result, both directly and indirectly, of its COVID response. Looking to the future, the Plan sets out the vision for 2022-23 as the Service recovers its ‘business as usual’ rhythm. The draft Plan has been the subject of limited consultation with SRS officers, senior managers at the partner Councils and a range of stakeholders.

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

- 2.1** The draft 2022/23 Business Plan has been developed through the SRS business planning process to reflect the input of Officers and Team Managers, while at the same time acknowledging at a strategic level, the need for our work to respond to local, regional, and national agendas; as well as to global events as and when required. The draft Plan presents a realistic acknowledgement of the challenges and resource limitations within which SRS will deliver essential services. There is broad support for continued use of the existing four strategic themes 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 2022/23 draft Plan, like those previously approved by the Joint Committee, sets out the services provided by SRS, providing an indication of the activities planned for the 2022/23 period, the financial projections for the year, and a review of performance for 2021/22.
- 2.3** The Plan contains proposed service improvement targets aligned with the Wellbeing Objectives and Corporate Health priorities. Proposed targets are set out, together with all relevant performance indicators that will enable the partner Councils to demonstrate progress against achieving their Corporate Plan Wellbeing Objectives. Consultation with stakeholders generated some minor changes to the Plan which have been incorporated into the document placed before the Joint Committee. Members are asked to approve the draft 2022/23 SRS Business Plan.

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

- 3.1** The Wellbeing of Future Generations Act requires the SRS to underpin decision making by contributing to the seven wellbeing 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 wellbeing 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 Environmental Health, Trading Standards, 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 wellbeing; 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.
- 3.3** Aligning the Wellbeing Goals of the Act enables us to evidence our contribution to the National Wellbeing 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 can 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 budget preparation for 2022/23. The programmes of work identified in the plan can be delivered within budget.

### **Employment**

- 4.2** There are no employment matters associated with the plan. The SRS budget reductions in previous years 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 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.



# Draft Shared Regulatory Services

## Business Plan

2022/23



Gwasanaethau  
Rheoliadol  
a Rennir



# Foreword

The creation of this 2022-23 Business Plan marks the start of the eighth year of the Shared Regulatory Service. In delivering the Environmental Health, Trading Standards and Licensing functions on behalf of the three partner authorities since 2015, we have never shied away from change. Indeed, our very ability to embrace change and to evolve, right from the outset, has made SRS the responsive, adaptable organisation it is today.

Nevertheless, the last two years have seen unprecedented levels of change for the Service on a number of different levels, most notably in playing our role, front and centre, in the Public Health response to the COVID 19 pandemic. This involved multiple staff being seconded from their substantive roles to lead on the various areas of our response, including supporting the Test, Trace Protect (TTP) service with cases needing escalation; supporting high risk settings such as care homes to minimise the potential spread of the disease; enforcing the Health Protection (Coronavirus Restrictions) (Wales) Regulations to ensure businesses complied with the relevant limitations on their trading and had all the necessary safety measures in place; and carrying out checks to ensure individuals complied with self-isolation requirements. All of these activities played an essential part in minimising the risk of disease transmission, and it will be important for the Service to retain these skill sets in the event of a new coronavirus variant of concern appearing in the coming winter.

The last 2 years, however, have not just been about COVID-19, although sometimes it may have felt that way, and throughout this time SRS Officers not directly involved in the 'COVID effort' worked tirelessly to continue to provide regulatory services across the three authorities; all this in a challenging environment of covid restrictions, and fewer staff resources caused by colleague secondments and recruitment pressures.

As we enter 2022-23, our main vision for the coming year is one where the Service continues its transition from the unique challenges of the pandemic towards much more of a 'business as usual' rhythm where we attempt to recover from the challenges of the last two years. We will focus on the recovery of traditional inspection programmes, chief among these of course will be our alignment with the Food Standards Agency Recovery Plan for food hygiene and food standards. We also look forward to re-focusing on our role

in supporting legitimate businesses through tailored packages of advice and guidance, while taking firm action against rogue traders and others who act recklessly or who flout the law. Our Business Plan reflects this and sets out a number of key challenges facing the Service, not least the need for our work to respond to the impact of global events such as the Cost of Living crisis, the Climate Change agenda, EU Exit and of course the war in Ukraine.

Capturing the views of staff on our post-pandemic ways of working and in defining our hybrid model will be crucial in the months ahead, as will finding solutions to the difficulties we currently face in filling certain vacancies, and the latter will be picked up in a dedicated SRS recruitment and retention workstream.

In presenting my first Business Plan as Head of Shared Regulatory Services, I reflect on the words, this time last year, of my predecessor, when he said

*'We remain an organisation that is performing well; an organisation that is vibrant and ready to do things differently; an organisation that is doing all it can to keep people safe'*

How well these words have stood the test of time; they remain just as relevant now as they were then. I couldn't be prouder of our staff in all that they are doing, have done, and will do in the future to deliver first class services. It is all thanks to them that SRS has been able to rise so effectively to the challenges of the pandemic, as well as to the challenges and opportunities facing us as we emerge from it and embark on the next chapter for the Service.

**Helen Picton**  
Head of Shared Regulatory Services



# 1. Shared Regulatory Services

**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. SRS delivers a fully integrated service under a single management structure for trading standards, environmental health and licensing functions with shared governance arrangements ensuring full elected member involvement.**

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

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

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

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

Details of 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.

## Key services offered

The service delivers a diverse and comprehensive range of functions 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 spectrum of services that deal with issues that can have a huge impact upon people when things go wrong or have not been enforced properly /or when there is poor compliance.



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 throughout the food chain. 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 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 enforcement 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. Officers ensure that Houses in Multiple Occupation are licensed through Mandatory and Additional Licensing Schemes, inspect HMO's and improve 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 also addressed.





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 involving 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 improves 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.



Animal Health and Welfare

**Animal Health and Warden Services** ensure 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 4 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 to 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 and reviewing training offerings to meet business needs;
- Identifying new funding sources;
- Exploring potential income generating services and developing paid for services.

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

**Covid-19** - The unprecedented challenges of the Covid-19 outbreak has seen SRS adapt and work in partnership to reduce the transmission of the virus across the region. This continues to be achieved through our significant commitment to the Test Trace and Protect regime, the investigation of clusters and incidents, the provision of advice to business to operate safely, and ensure compliance with regulations and self-isolation requirements.

The SRS delivers a range of statutory duties for the partner Councils and also functions where the Council has been given powers in legislation to safeguard and protect local communities. Determining the relative importance and value of council services when deciding on where to make savings or service reductions is not easy. Often the debate starts with a focus on determining whether a service is 'statutory' or 'discretionary'. Defining services as 'statutory' or 'discretionary' is perhaps unhelpful. Services that keep people healthy, well and safe; support businesses to flourish and thrive; protect and enhance our environment are essential. In this plan we have sought to clarify the legal basis for a service or how it contributes to wider council responsibilities, but many SRS functions cannot be easily defined in this way; some are extensions of 'statutory' activity whilst other services have developed over time to become longstanding, highly valued and central to the work of each council.

# Area Profile

**Shared Regulatory Services covers the Council areas of Bridgend, Cardiff and the Vale of Glamorgan and serves over 650,000 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 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 nearly 370,000. 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 and Cardiff International Airport.



# 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. Commercial Services Officers are professionally qualified officers in environmental health and trading standards who focus on more complex issues while Technical Officers, with appropriate levels of qualification and competence, 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.

**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.

**Enterprise and Specialist Services (ESS)** is the most diverse of the services and incorporates discrete specialisms such as air quality, 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 SRS; 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 and strategic priorities

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 suite 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. 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

## Corporate priorities and outcomes of partner local authorities

### Bridgend County Borough Council

#### Priorities

#### Outcomes/Aims



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

- Support local people develop skills and take advantage of opportunities to succeed.
- Create conditions for growth and enterprise
- Create town centre and communities that improve the quality of life for citizens
- Give people more choice and control over what support they receive ...
- Reduce demand through more targeted early help and intervention programmes
- Develop more active, healthy and resilient communities...
- Ensure the Council is financially sustainable over the longer term.
- Improve efficiency and access to services...
- Work collaboratively to make the most of natural and physical assets
- Develop the culture and skills required to meet the needs of a changing organisation

### City of Cardiff Council

#### Priorities

#### Outcomes/Aims



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

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- A Capital City that works for Wales
- Cardiff grows in a resilient way
- Modernising and integrating our public services

### Vale of Glamorgan Council

#### Priorities

#### Outcomes/Aims



- 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

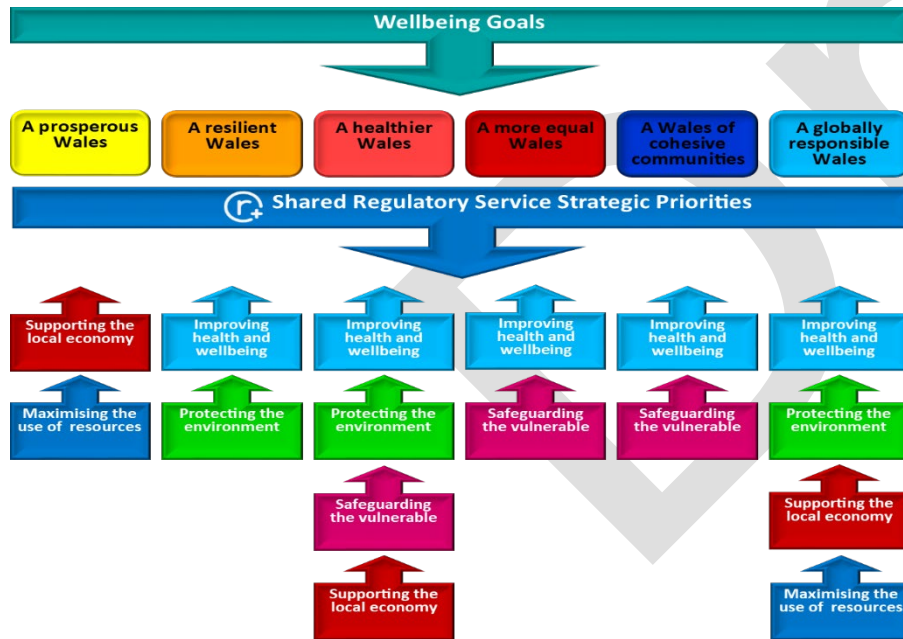
A Vale that is:

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

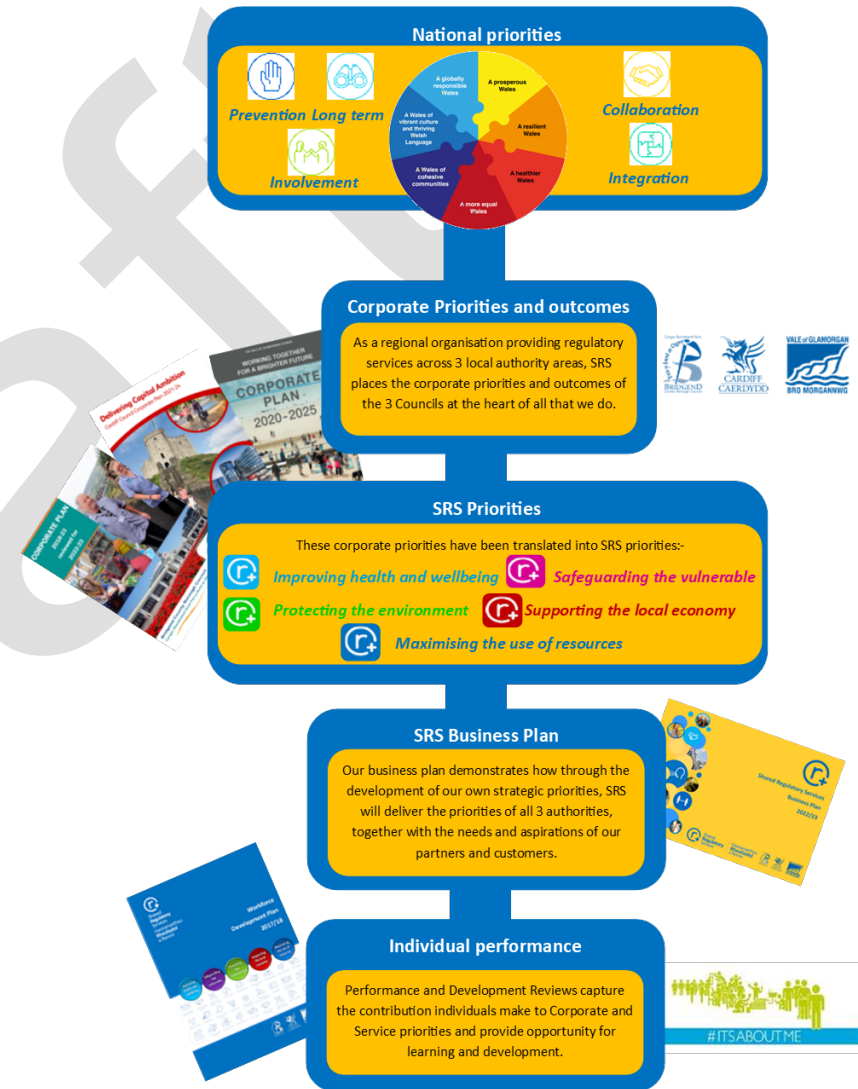
Nationally the service also contributes to the National Enforcement Priorities for Wales for local regulatory delivery which highlight the positive contribution that regulatory services, together with local and national partners, can make in delivering better outcomes, i.e.

- 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.



## 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 seven 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 2022/23, 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 budget cuts may affect the service ability to maintain performance at existing levels. We will however seek to measure activities and outcomes to ensure performance is managed effectively and in a meaningful way. (RR1)

**COVID-19** - The unprecedented challenges posed by COVID-19 saw officers adjust to altered work and personal routines.—At a service level, priorities had to be redrawn quickly to focus regulatory efforts on the most urgent issues facing the region and the public as a result of the pandemic. As COVID restrictions reduce in line with the transition from pandemic to endemic, so too has the SRS resource needed to support the Test Trace and Protect (TTP) contact tracing service and compliance with COVID rules. Moving into 2022-23, the role of SRS in respect of COVID-19 transitions to one of supporting high risk settings, such as care homes, to prevent the spread of the disease among the most vulnerable. This respite is welcome in enabling the return of further staff to their substantive posts and for ‘business as usual’ priorities, such as the food hygiene and food standards inspection programmes to recover. At the same time, we are very aware of the likelihood of further COVID-19 variants of concern emerging as we approach the winter months, and the very real possibility of having to allocate significant resources once again to supporting TTP and business compliance work. For this reason, it will be crucial for staff skill sets in these contexts to be maintained. (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. (RR3)

**ICT** – The success of Shared Regulatory Services is in part due to embracing the opportunities presented by technical and mobile working solutions. Agile working has become the norm for the service yet, through staff consultation sessions, our officers tell us that the technology currently deployed is becoming outdated. Research indicates that better facilities now exist and the SRS will work with officers and ICT to understand the benefits of exploiting these newer technologies to ensure that our officers can continue to operate as efficiently as possible within financial constraints. (RR4)

**Recruitment and retention** – We have always committed to the resourcing of training to develop people within the organisation to ensure competency within their roles. Our focus however has been more toward the immediate needs of officers to enable delivery of our five strategic priorities. It is clear that a longer term strategy for recruitment and retention is needed as SRS, in common with regulatory services across Wales, experiences difficulty in recruiting and retaining staff. The cause of the problem appears to be multi-faceted, with factors such as a limited pool of qualified staff, accessibility of the professional qualifications and an ageing workforce all contributing to something of a perfect storm. SRS has been at the forefront of taking forward the Directors of Public Protection Wales ‘*Building for the Future*’ strategy, and in making the case to Welsh Government for a regulatory apprenticeship in Wales to create a route into regulatory services for young people. The creation of a recruitment strategy and the development of retention “initiatives” will be a key target for the SRS management team during 2022/23. Our goal must be to retain our officers and ensure they achieve the job satisfaction that underpins service excellence. (RR2 and RR5).

**Remaining relevant to the three Councils** – The creation of SRS delivering services across three local authority areas resulted in the transfer of the administration of services and staff to the Vale of Glamorgan Council who act as the host authority for the Service. The Service, although jointly funded by the participant authorities, also has a single consistent identity and branding which is not associated with any one Council. Notwithstanding this, the Covid-19 pandemic and the key involvement of SRS in TTP and the enforcement of Coronavirus Regulations has put the service in the spotlight but we will still need to actively promote the Shared Regulatory Service and the important services we provide across the three Councils to ensure their continuing support for the venture. (RR8)

**New legislation** – The implementation of new legislation and any requirements imposed by such legislation can place additional burdens on the Service. It requires new processes to be developed, awareness raising to be undertaken with stakeholders, staff training and additional inspections etc. Generally new requirements can be planned for and effectively resourced, for example the Public Health (Wales) Act and the Public Health (Minimum Price for Alcohol) (Minimum Unit Price) (Wales) Regulations, however, it is not always easy to predict the impact that new legislation may have on resources, as the last 2 years has shown. We are prepared to adapt the Service accordingly to ensure businesses can continue to function and consumers are not disadvantaged. The great uncertainty is the quantum of change and the unknown time scales within which that change must take place. (RR6)

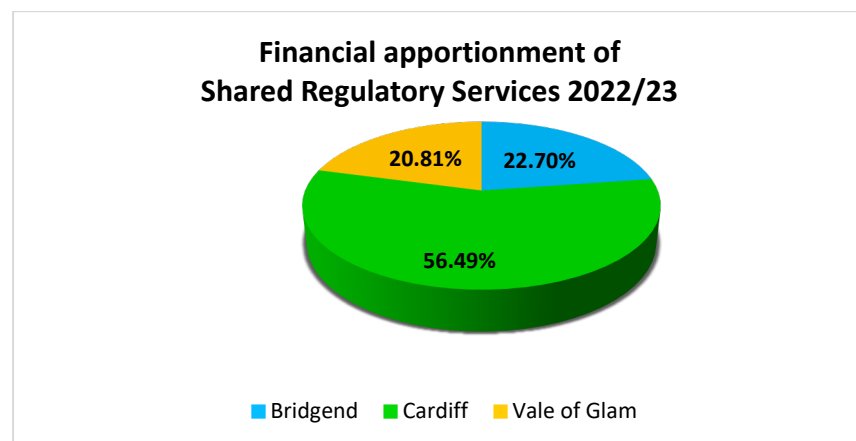
**Out of Hours** - SRS operates an “out of hours” duty rota to enable the service to respond to incidents that arise outside normal office hours. These responses include responding to nuisance calls relating to burglar alarms, food incidents, etc. To date, officers have operated the rota on a voluntary basis across the service. However, the number of officers willing to participate in the rota is reducing to the extent that the service delivery is becoming uncertain. Coupled with this has been the success of the Joint Enforcement Teams which has raised stakeholder expectation. The SRS management team needs to understand the consequences of that success and review this position and put forward options for these aspects of the service. (RR7)

**The cost of living crisis** – The full extent of the cost of living crisis has yet to be seen, but it is certain to impact SRS in two broad respects. Firstly, in our role as regulator, at a time when residents are struggling to make ends meet and rogue traders will waste no time in exploiting the situation. When times are hard financially, even normally legitimate traders may feel under pressure to cut corners, for example through the passing-off of inferior products or ingredients for the genuine article. Likewise, this is a time when already struggling residents are at risk of falling into the hands of loan sharks and all the misery that illegal money lending can bring. The other respect in which the cost of living crisis could have a devastating effect is on the wellbeing of our staff, and there is a real need for managers and colleagues to spot warning signs among team mates so that all available support can be provided. (RR1).

## 4. Budget

### Financial allocation

Bridgend, Cardiff and the Vale of Glamorgan Councils fund Shared Regulatory Services jointly through an agreed formula. 2022-23 represents Year 8 of the SRS. The Joint Committee approved the proposed Shared Regulatory Services budget for 2022-23 at its December 2021 meeting. The aggregate budget for the service remained at £8.331m as a result of £134k of savings offset by £134k salary costs attributable to the national pay award. Budget discussions will now begin with the partner Councils for the next three year period. The methods of apportionment for operating the core service and the cost contribution percentages are set out in the Joint Working Agreement and based upon the population of each Council. This will not revise the bottom line position of the budget. There are also arrangements in place to deliver "authority specific" services to individual partner Councils.



### Resource Implications (Financial and Employment)

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

SRS Gross expenditure budget 2022/23			
Area	Core £'000	AS £'000	Total £'000
Bridgend	1,343	434	1,777
Cardiff	3,343	1,468	4,811
Vale of Glam	1,231	512	1,743
<b>Total</b>	<b>5,917</b>	<b>2,414</b>	<b>8,331</b>

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 Public health burials
Cardiff	Licensing Additional HMO Licensing at Cathays & Plasnewydd Empty Homes Night time Noise Port Health Student Liaison
Vale	Licensing Kennelling & Vets Pest Control Public health burials Port Health

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.



## 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.

As highlighted throughout this Business Plan, since March 2020, the COVID pandemic has impacted service delivery in many ways. One such area was that of income generation where the secondment of key members of staff into the COVID response has limited the provision of certain paid-for services. In addition, COVID restrictions since that time meant that the provision of face to face training courses was not permitted and remote teaching solutions had to be developed. As we move into 2022-23 and the greater potential for income generation the year will bring, we will be able to enhance service delivery and ensure resilience within SRS moving forward.

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.

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.

# 4. 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. A number of employees have been supported to undertake post graduate training gaining Masters degrees in areas such as environmental health and leadership and management. 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.

In terms of recruitment and retention, SRS has led on the introduction of a Regulatory Compliance Officer type apprenticeship within Wales and promoted the DPPW 'Building for the future' report seeking increased investment in terms of funded public protection workforce development programmes to address capacity and resilience issues in the environmental health and trading standards professions. SRS looks forward to benefitting from these approaches in the future.

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.



## 5. Turning actions into outcomes

We continue to work to integrate our vision, priorities, outcomes 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 take forward in 2022/23 to deliver on the strategic priorities. This framework will be continually reviewed to ensure it remains relevant and meaningful to stakeholders.

Draft

## Priority

# Improving health and wellbeing

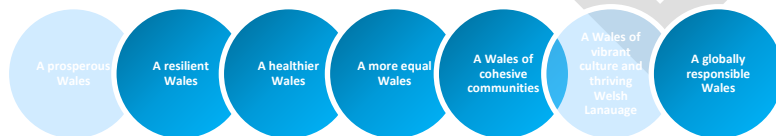
## Outcomes



## Outputs



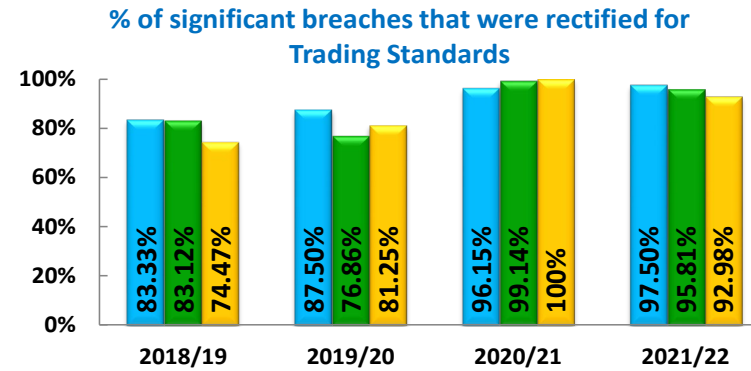
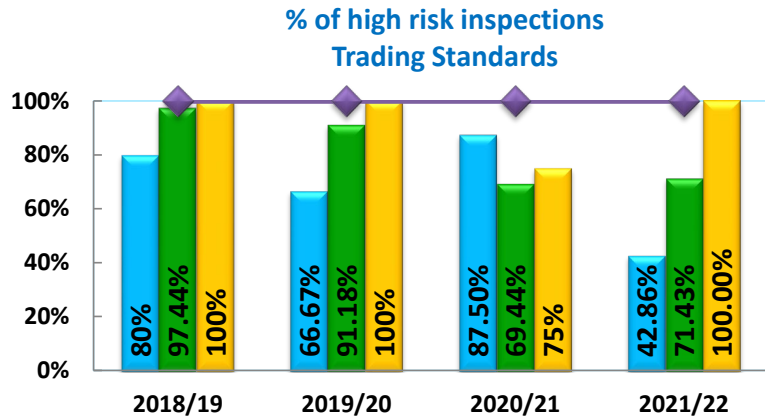
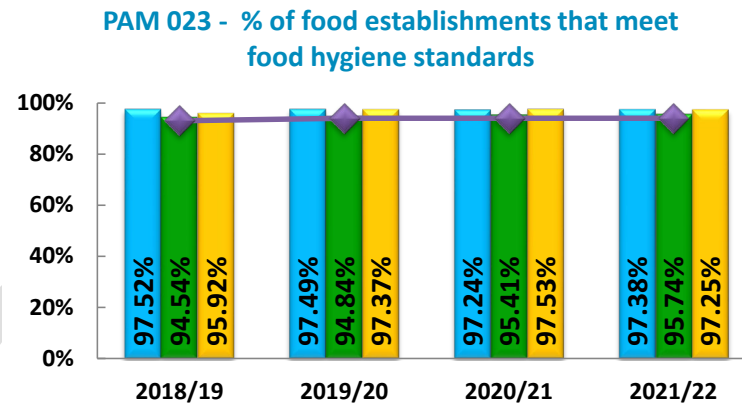
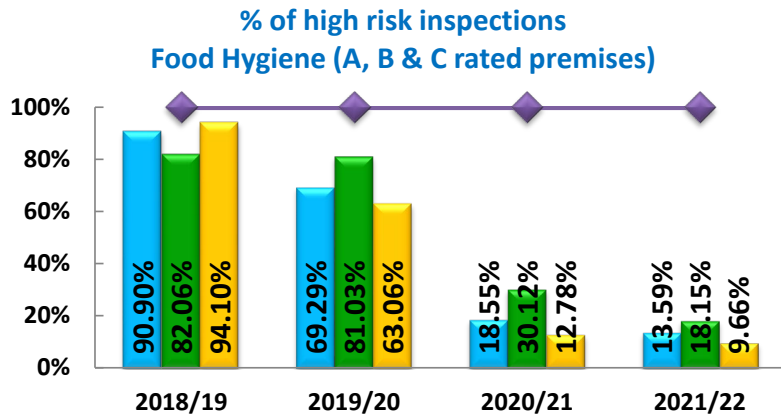
In addition, our outcomes also contribute to the following wellbeing goals:-



**Improving health and wellbeing** is a key priority for SRS. 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

■ Bridgend   
 ■ Cardiff   
 ■ Vale of Glamorgan



% of private rented properties and HMOs improved through the removal of category 1 hazards 2020/21			
	Bridgend	Cardiff	Vale of Glam
Total no. of assessments which contain category 1 hazards	10	72	7
No. of HMOs and non HMOs where all category 1 hazards have been resolved as a result of local authority action.	7	22	11
% Total resolved	70%	30.5%	157%

# What we have achieved

## The Food chain is safe and free from risks

**Businesses that are broadly compliant** - The number of food businesses with a food hygiene rating of more than 3 continues to remain at a high level with 97.38% in Bridgend, 95.74% in Cardiff and 97.25% in the Vale of food businesses being broadly compliant. The results show a positive upward trend, year on year, exceeding targets and highlighting the growing number of businesses that are improving their standards, which can be attributed to the success of the intervention programme for food businesses. That programme ensures that any food safety issues identified are followed up by either enforcement, advice or training and subsequently revisits to ensure compliance with food safety law.

**Prosecutions** – SRS is committed to enforcing the laws we regulate, instigating legal proceedings against those businesses or individuals that flout the law. During 2021/22, despite the COVID-related backlogs in the court process, the service concluded a number of successful prosecutions against individuals/businesses in relation to food offences. The following examples showcase the impact and value of this work

7  
Successful prosecutions of food businesses concluded

- **Company/owner of Cardiff convenience store fined £20,000 for a string of food hygiene offences** – In this case, officers found dreadful conditions on the premises including a dead mouse, cockroach infestation, unwrapped raw meat being stored next to fresh herbs and vegetables and out of day and mouldy foods. The defendant had been prosecuted previously for food hygiene matters and also for the supply of illegal tobacco, so knew the serious nature of the offences. The company of which the store owner was the director was given a total fine of £20,000, and the owner sentenced to a total of 13 months imprisonment and issued with a Hygiene Prohibition Order preventing him from participating in the management of any food business.
- **Bridgend takeaway fined for 8 food hygiene offences** – In another case, an inspection of a take-away in Bridgend discovered a number of food hygiene offences including a failure to ensure the premises were kept clean, failure to implement and maintain procedures based on HACCP principles, failure to provide sufficient washbasins and failure to ensure that food, cooking utensils and raw materials were kept clean to avoid cross contamination. In view of the serious incidents, the defendant was fined a total of £1760, ordered to pay costs of £1100 and a victim surcharge of £176.

**Port Health and infectious disease** – During 2021/22 significant engagement took place with the relevant stakeholders at the seaports of Cardiff and Barry and at Cardiff International Airport to ensure that enhanced measures and controls were implemented to minimise the risk of importation of Covid-19 and its onward spread. This included the need to secure procedures to address the notification of any illness in passengers or crew, the display of relevant informative posters, announcements to passengers and the monitoring of vessel and aircraft movements. Representation was made at many meetings with other organisations such as the Association of British Port Health Authorities, All Wales Expert Panel, Cruise Start, Welsh Government, Maritime Port and Welfare Group and Test Trace Protect, to ensure that officers were following up to date guidance and best practice.

With the gradual opening of international travel, the number of flights steadily increased into Cardiff Airport during the year. A total of 1598 flights entered Cardiff Airport between 1st April 2021 and 31st March 2022. Until 22nd December 2021 there was a requirement for all flights to submit a General Aircraft Declaration confirming that no passengers and/or crew on board were showing symptoms of Covid prior to being permitted to disembark. The monitoring of 1177 flights was completed to ensure compliance with this requirement. In addition, 243 flights entering Cardiff were identified as having a positive passenger travelling on the plane during their infectious period which required further investigation to identify relevant contacts and to provide the relevant advice about isolation requirements.

Vessels (other than those departing from the Common Travel Area) up to 22nd December 2021 were required to submit a medical declaration of health declaring that there was no one symptomatic on board with Covid prior to being granted free pratique to disembark by the Port Health Service at the seaports of Cardiff or Barry. The port operators were advised of the granting or refusal of free pratique to ensure that the risks of infection to their staff were suitably managed. In addition, the Covid procedure for the port operator was reviewed to ensure that suitable controls were in place to minimise the spread of infection.

In July 2021 a detailed review of Covid policies, procedures and an outbreak plan were undertaken for a small cruise ship prior to its arrival in port to ensure that suitable controls had been identified to minimise the risk of spread of infection. This identified a number of improvements that were required to be exercised prior to its arrival.

For many seafarers', issues were experienced in obtaining vaccines against Covid due to the transient nature of their work. The Port Health Team, with the assistance of the Cardiff and Vale Health Board managed to overcome such difficulties and arrange suitable vaccine for crew arriving at Cardiff and Barry where requested. This vaccination model has since been used by other ports within Wales

**Food Hygiene Inspection Exercise** – As hospitality began to re-open from lockdown, an exercise was initiated to target areas with high concentrations of food businesses. These included City Road in Cardiff, Holton Road in Barry and Nolton Road in Bridgend. All food officers from across the different teams worked together in each area to make targeted unannounced inspections of food businesses. In total over 110 inspections were made across the 3 areas resulting in 4 voluntary closures of businesses, 2 voluntary surrender of

food and the issue of a fixed penalty notice for the non display of food hygiene rating sticker. These exercises brought benefits in terms of maximising the number of inspections carried out through targeted enforcement, and provided greater integration of disparate teams who were able to support one another, develop new relationships and get an appreciation of the restraints and demands in each other's areas.

**Online unregistered food businesses** – Sometimes referred to as 'Cloud' kitchens, these businesses often prepare food at separate premises rather than a restaurant. This is a relatively new practice, 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 there is a danger that meals could be sold without clear information on ingredients and allergy information. These businesses are generally promoted via social media platforms such as Facebook and Instagram and as a consequence are difficult to reach. During the year, SRS conducted a project whereby 10 food business operators that had not registered their food business were identified. These businesses were contacted and six of these have been brought into compliance by either 'taking down' the social media platform/posts used to promote the sale of food or as a result of the food business operator registering their business.

## Risks in the workplace are managed properly

**Legionella management in care homes** - Legionnaires' disease is a potentially fatal type of pneumonia, contracted by inhaling airborne water droplets containing viable Legionella bacteria. Created by hot and cold water outlets; atomisers; wet air conditioning plant and whirlpool or hydrotherapy baths, health and social care providers are required to carry out full risk assessments of their hot and cold water systems and ensure adequate safety measures are in place. Due to concerns raised by care homes, about allowing entry to contractors due to the risk of introducing Covid-19 or other infections into the homes, SRS undertook an exercise looking at legionella management in care homes. As a result, 31 desk top reviews seeking evidence of monitoring were undertaken with care homes across the region. Where concerns were identified as a result of these assessments, face to face assessments were carried out at a number of premises.

**Visits to open farms** – Zoonotic diseases, i.e., those that can pass from animals to humans, may be acquired from animal contact at visitor attractions. As families ventured out in the summer of 2021, the Health and Safety Executive relaunched its guidance on the spread of cryptosporidium, campylobacter and e.coli, and SRS officers undertook health and safety visits to open farms in the region. Assessments were carried out during these visits to ensure effective control measures were in place to minimise the risk of infection from contact with animals.

## Infectious Disease is controlled and prevented

**Test, Trace and Protect** – The commitment made by SRS during the last 2 years to support the Test, Trace and Protect Scheme (TTP) has been hugely significant. Senior officers have been at the heart of the TTP initiative from the outset working across the two health boards while 30+ officers have been redeployed at various times to work on the scheme. This has involved the tracing of people who have tested positive for Covid-19 and linking with health professionals to identify trends and incidents in order to restrict the spread of the disease. During the year incidence rates were closely monitored so that the SRS input into TTP could be tailored accordingly. This allowed demand to be met during spikes in the number of cases, while at the same time allowing the flexibility for staff made available to TTP to devote time to their substantive roles during quieter times.

**Communicable Disease** – The Communicable Disease Team has been at the heart of the Covid-19 pandemic during the last two years, acting as the Regional Response team. Tasked with protecting public health by controlling and preventing cases and outbreaks of infectious disease, the focus of the team has almost entirely shifted to tackling Covid-19. During the last year alone, 135,828 confirmed and suspected cases of communicable disease were reported to the service, 134,048 of which were reported as Covid-19. To provide some context to this figure, in 2019, 2149 cases were reported, then in 2020/21 this figure rose to 44,739, meaning that there was a tripling of that number during 2021-22.

135,828

Communicable  
disease cases  
notified to SRS.

During the last year, 428 outbreaks of communicable disease in care homes, schools, nurseries, and domiciliary care establishments were investigated and managed. 368 of these were Covid-19 outbreaks. In 2019 this figure was 85. Furthermore 4596 confirmed cases of Covid 19 in care and educational settings were escalated to the regional response team from Test, Trace and Protect.

130

Statutory notices  
issued for non-  
compliance with  
Coronavirus  
Regs

**Covid Enforcement Teams** - When the UK was first put into lockdown in March 2020 it became the responsibility of SRS to enforce the Health Protection (Coronavirus Restrictions) (Wales) Regulations across the region. As a consequence, SRS officers have throughout the pandemic undertaken a range of work to ensure businesses comply with regulations, through visits and the provision of advice and guidance. As regulations and Welsh Government guidance changed, and case numbers increased, SRS put in place a reciprocal commitment with South Wales Police to form three Joint Enforcement Teams (JET) undertaking coordinated enforcement activity in a range of sectors across each of the three local authority areas. These teams made up of SRS officers focused upon engaging with

business, encouraging compliance and more recently upon ensuring that returning travellers and positive cases observe the isolation requirements.

These visits included checks to ensure those businesses that were required to close, were closed, that adequate social distancing measures and signage were in place and that hand sanitiser was made available. If it was found that businesses were failing to meet the regulations, statutory notices were issued compelling businesses to comply. In total SRS officers issued 529 such notices for non-compliance across the region since 2020, 130 during the last year. These included Closure Notices, Improvement Notices, Prohibition Notices, Compliance Notices and Fixed Penalty Notices depending upon the current regulations in place at the time.

Covid enforcement has been challenging, not least because of the changing regulations throughout the year, which officers, and businesses, were required to be conversant with. In addition, as restrictions continued, public support for restrictions began to wane resulting in a shift in attitude towards officers by some individuals.

**South Wales Police Awards 2021** – Such was the success of the Joint Enforcement Teams, mentioned above, the teams consisting of SRS Officers and South Wales Police were recognised at the South Wales Police Awards Ceremony where they were awarded the Special Recognition Award. This award recognised the partnership between local authority and Police colleagues throughout the force area as Joint Enforcement Teams (JETs) undertaking Covid enforcement work from September 2020 onwards. The close working between local authority and Police colleagues through the Force area was commended and held up as a model for future partnership working.



## Noise and Air Emissions are controlled

**Noise Pollution and Anti-Social Behaviour** - In investigating cases of noise nuisance, officers routinely work with external stakeholders such as the Police and local authority anti-social behaviour Teams. Often this is because creating noise disturbance is just one aspect of anti-social behaviour that needs to be addressed to provide solutions to the community issues raised. One example of a case dealt with by SRS in conjunction with the Police concerned residents of a block of flats. SRS received a number of complaints about loud music which resulted in an abatement notice being served. This notice was subsequently

breached when the tenants held a house party during a tier 3 lockdown and South Wales Police were called due to covid breaches. These officers were then assaulted by the tenant's guests. In another case, jointly investigated by SRS and South Wales Police, two neighbours were in dispute, with one neighbour blasting music for long periods of time to annoy the other. In this case SRS were able to catch the offender blasting loud music on 3 occasions.

## A safe trading environment is maintained

**Disposable e-cigarettes** – In January 2022, SRS officers worked with BBC's X-Ray programme on a feature about the work conducted by SRS in relation to disposable e-cigarettes. E-cigarettes are a regulated product that should comply with the Tobacco and Related Products Regulations 2016. These restrictions include a limit on the capacity of the refillable tank of the cigarette device which must not be more than 2 ml; that there is a nicotine limit of 20 mg per ml in nicotine-containing liquids or containers; that products should contain prominent health warnings; and that all e-cigarettes and e-liquids are required to be notified to the Medicines and Healthcare Products Regulatory Agency before they can be sold. 28 inspections were conducted in response to intelligence and complaints received, which resulted in 19 seizures of approximately 3200 non-compliant, disposable e-cigarettes with an estimated value of over £19,000.

## Licensed premises operate responsibly

**The Public Health (Minimum Price for Alcohol) (Minimum Unit Price) (Wales) Regulations** came into force on 2 March 2020. The purpose of the legislation is to protect the health of harmful and hazardous drinkers by using price as the means to minimise their access to very low cost / high alcohol products (for example some strong ciders). Under this 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 matter proceeds to court. In order that the trade is fully aware of the requirements of the law, Welsh Government funded SRS officers to visit the 650+ off-licensed premises across the region.

A programme of visits to these premises began in March 2020, however the impact of the Covid-19 pandemic resulted in further visits being delayed to later that year and throughout 2021/22. During the last year SRS conducted 166 initial inspections at alcohol retail premises across the SRS region to assess whether the businesses were complying with the minimum unit price requirement. Of these, 26 were found to be non-compliant and were issued with a warning and guidance on future compliance. 37 re-visits were then conducted at those businesses that had previously been found to be non-compliant, and this resulted in 6 fixed penalty notices being issued in cases where it was found the businesses continued to sell alcohol below the MUP.





**Firework storage Inspections** - Retailers of fireworks are required to register with the local authority in order to ensure safe storage. All premises registered for the storage of fireworks are inspected by officers of the service to ensure that the conditions imposed by the registration are complied with and that the storage is safe and the business operates in a safe manner. In the run up to 'bonfire night' in 2021, 24 registered premises were inspected by SRS officers to

ensure the safety of firework sale and storage. Only minor non-compliances were identified as a result of these visits, all of which were rectified by the business concerned at the time of inspection.

## The quality of private rented property is improved



**HMO Licensing** - HMOs often present the worst physical and management standards, as well as having a detrimental impact on the neighbourhoods in which they are situated particularly in relation to street scene. Despite the significant impact of the Coronavirus pandemic on the work of the service, the Cardiff Team took 3 successful prosecutions during 2021/22 comprising 17 separate offences including non-compliance with Housing Act notices and a variety of management offences in dangerous houses in multiple occupation, with total fines and costs being £9,977.

In addition, the team dealt with 1,891 service requests of which just under 500 related to hazards in private rented housing and approximately 600 in relation to housing related advice and

guidance. Of particular concern and possibly linked to issues around lockdown restrictions were the number of complaints about potential nuisance or filthy and verminous properties (88 complaints) which resulted in a number of particularly challenging works in default cases. Furthermore there were 82 complaints about the condition of problem empty homes and a further 26 requests for information on such properties.

It remained the case for much of the year that fewer site visits could be undertaken, with evidence being obtained remotely because of Covid, limiting officer options for enforcement action. However, where visits were undertaken, 142 Housing Act 2004 notices were served, of which 37 were formal actions, and 7 Prohibition orders were served. There was a return to dealing with HMO licensing during the year and 358 HMO licences were issued, almost doubling the total for the previous year where Covid restrictions were more severe. The

team continued joint working with Rent Smart Wales (RSW) to address problem landlords with a total of 9 landlord fit and proper person reviews and significant input into 3 letting agent audits. RSW have also continued to make investigation referrals with 108 cases received including one Renting Homes Fee investigation case. Significant work has also been completed to robustly defend multiple HMO licensing appeals at Residential Property Tribunal.

**Cathays Additional Licensing Scheme** – The statutory consultation in relation to the re-declaration of the Cathays Additional Licensing Scheme was completed in March. Landlords, letting agents, tenants and residents living in Cathays were consulted together with other people/organisations with an interest in the Cathays area and/or the Scheme. An analysis of the responses received is currently taking place with a view to reporting results to Cardiff Council's Cabinet in Summer 2022.

**Cardiff landlord fined following complaints about property condition** – This case concerned a complaint about disrepair from a tenant of a property in Cardiff. A check on the property revealed that it was a 3 storey property occupied by 5 unrelated people sharing kitchen and bathroom facilities and was not licensed as a HMO as required. Furthermore a visit made by SRS officers revealed that the property lacked an adequate fire alarm system, had a defective electrical installation and an insecure carpet to the first floor. The defendant subsequently failed to provide electrical reports when requested to do so and was found to be operating a licensable house in multiple occupation without a licence. The landlord was fined £834, ordered to pay costs of £350 and a victim surcharge of £83.

**Illegal Evictions and pre-occupancy checks** - In Bridgend and the Vale of Glamorgan SRS investigated and gave advice regarding 10 cases of illegal eviction which allowed us to prevent the households from becoming homeless in the majority of cases. We also provided a valuable service to the Housing Solutions Departments by conducting pre-occupancy inspections of 13 properties.

## Emerging issues

**COVID-19** - The unprecedented challenges posed by COVID-19 has seen officers adjusting to altered work and personal routines, not to mention coping with the uncertainty and anxiety we all face for our own health. SRS has, and continues to play a key role in tackling the Covid crisis through its involvement in Test, Trace, Protect, which has required the service to adapt and re-prioritise the services delivered throughout the last two years. As we look to the future, the position is still uncertain but looking more optimistic, but as we know from the last two years the situation can change rapidly. This will require the service to continue to monitor the situation and adjust resources as circumstances change, which is likely to impact on our ability to deliver 'business as usual'.

**Recruitment and retention**— Recruiting to vacancies, particularly to those roles that require professionally qualified officers continues to be challenging, particularly as we are seeing a number of our officers leaving the service to secure positions elsewhere. 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 and a reduced investment in sponsorship of students by Councils, have to be addressed if we are to deliver effective regulatory services. Across Wales, the Directors of Public Protection Wales (DPPW) has sought to co-ordinate a consistent approach to identify immediate issues of capacity and resilience along with other challenges for the future as demands and expectations on regulatory services continue to grow and has produced a report detailing the key issues facing local government regulatory services. The report highlights the challenges faced in terms of workforce pressures, the need for better coordination and oversight and how to achieve greater resilience in the medium term through a number of recommendations.

**Backlog of programmed inspections** - Government restrictions on social distancing, non-essential travel and the closure of certain businesses to reduce the spread of Covid-19, resulted in routine inspections being suspended several times during the last two years which inevitably created a backlog across a number of SRS services. Furthermore, the deployment of staff to Test, Trace, Protect, covid enforcement teams and other covid related activities has impacted on the resource available within teams to carry out “business as usual” activities creating a significant backlog of inspections, that is further exacerbated by recruitment and retention issues evident in some areas of the service. Inspections of food businesses, for example, are normally programmed each year to ensure all businesses are inspected at regular intervals at a frequency relevant to the risk category of the business. The inability to inspect these premises has inevitably led to a backlog of programmed inspections, particularly in relation to ‘C’ rated and new business inspections where a backlog already existed pre-pandemic. Similarly the Private Sector Housing team have been unable to visit rental properties to carry out inspections as part of the HMO Licensing regime, only undertaking inspections where significant risks to the tenant are identified. While inspections have now resumed, it is envisaged that clearing the backlog of inspections will take a significant resource and take some time to complete.

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

**Cost of living crisis** – The cost of living crisis in the UK is currently dominating the headlines. With inflation at its highest level in 30 years, the UK is seeing petrol and grocery prices increasing, together with tax increases and exponential rises in energy costs. Disruption of global supply chains due to Covid-19 and global shipping costs has also

resulted in increased prices and shortages of certain products. There are now reports of further shortages as a consequence of the war in Ukraine, most notably sunflower oil and wheat. Most of the sunflower oil used in the UK is imported from Ukraine and is used extensively in cooking, and ingredients in many food products, including crisps, chips, ready meals, biscuits and mayonnaise. Shortages and price hikes have resulted in food manufacturers looking for alternatives to minimise disruption in availability with several already switching to refined rapeseed oils. The Food Standards Agency have indicated that this change has been done so quickly that manufacturers have been unable to update food labels. While the FSA deem this to be of very low risk to consumers, it does highlight potential issues arising from the cost of living increases and product shortages. Food businesses, for example, already struggling following the pandemic, may see a reduction in customers who can no longer afford to eat out. They, faced with rising prices may be tempted to substitute food items for cheaper alternatives and cut corners in their food hygiene processes to save money, placing even greater demands on SRS at a time when the service itself is attempting to recover from the effects of the pandemic and staff shortages.

**New Food Businesses** – New food businesses are required to register with the service if a new business is planned, the nature of an existing business changes or if there is a change of ownership following the creation of new legal entities such as a new limited company, sole trader and partnership. All new businesses are required to be inspected and the Food Law Code of Practice requires that where possible, they be inspected within 28 days of opening. This requirement places a significant impact on the resources of the Food Safety and Trading Standards functions due to the large number of applications received. During 2021/22 900 applications were received, 529 in Cardiff, 166 in Bridgend and a further 205 in the Vale of Glamorgan all of which are required to be inspected alongside the planned programme of inspections. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention. This requirement coupled with the resource issues currently experienced due to Covid and recruitment and retention issues, will severely impact our ability to complete these interventions.

**Inspection of food imports – Brexit** – A recent announcement by the UK Government to scrap plans to introduce physical checks on fresh food imported from the European Union, that was planned this summer, has caused the Chartered Institute of Environmental Health to express concern about the severe consequences this could have for UK consumers and for the public health of the country. The plan to introduce checks on animal and plant products entering the UK from the EU came about in the wake of the UK’s exit from the European Union and would have impacted a wide-range of food sold in supermarkets. However, warnings that such checks could make food more expensive and exacerbate the cost of living crisis, resulted in the Government scrapping all inspections for imports from the EU. The CIEH believe that such a move heightens the danger of food fraud and crime where food of unknown origin and questionable quality could end up on supermarket shelves and in our homes. If such concerns are realised, this will inevitably impact on the work of SRS.

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

**Core Capacities Assessment at Cardiff International Airport** - Cardiff International Airport is a designated point of entry which is required to meet certain core capacities. These are annually reported to the World Health Organisation by completing an assessment toolkit, "WHO Assessment tool for core capacity requirements at designated airports, ports and ground crossings".

In relation to comparison of the core capacities required for designated airports there have been some improvements at Cardiff Airport due to the provision of an isolation room which has direct tarmac access for emergency vehicles and an improvement to cleaning programmes as a result of audit by the Port Health Authority. However, a small number of number of actions have been identified as requiring action to meet the core capacity requirements including the inspection programme of facilities, water quality and vector surveillance which have been impacted by the redirection of staff resource to the Covid response. Currently there is no vector surveillance programme being undertaken. Training is required for staff on dealing with potential chemical and radiological incidents, a procedure is required for dealing with human remains and a further review in relation to the responding to events that may constitute PHEIC (Emergencies) is needed.

**Implementation of infection control measures directed by Public Health Wales at points of entry** – The impact of Covid-19 on travel has seen various restrictions imposed during the last two years,. While it appears that such restrictions are gradually being lifted as the Covid-19 outbreak comes under control within the UK, the 'variants of concern' originating in other countries means that it is possible 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.

**Public Health (Wales) Act** – This new legislation brings together a range of practical actions for improving and protecting health by way of a number of new requirements that effect several areas of the SRS. Although not fully enacted, the legislation has already introduced a prohibition of intimate piercing of under 18s and now enables food authorities to retain fixed penalty notice receipts resulting from offences under the Food Hygiene Rating (Wales) Act. Over the coming years, different elements of the legislation will be introduced including a licensing scheme for special procedures such as acupuncture, body piercing, electrolysis and tattooing, and the restriction of smoking in areas such as school playgrounds and hospital grounds. In time, it will create a national register of retailers of tobacco and nicotine products and create a prohibition of handing over tobacco and/or

nicotine products to a person under the age of 18 years. It is unclear when these additional elements will come into force due to delays as a result of the Covid 19 pandemic but it is anticipated that there will be a resource implication associated with this. The scheme aims to strengthen existing registration requirements and as such will place additional responsibilities in administering and enforcing the new requirements including the delivery of training, undertaking professional interviews of applicants and the management of a new database.

**Renting Homes (Wales) Act** – The Renting Homes Act will be implemented on 1 December 2022, requiring 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 will include additional provisions that relate to 'no fault evictions' where the minimum notice period that must be given is 6 months subject to certain conditions. 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.

**Caravan Parks** – During the Covid outbreak holiday caravan parks were instructed to close by the Welsh Government and SRS as the enforcing authority ensured that this was the case. It did however become apparent that some people were using holiday homes as their main residential address with some caravan owners advising that if they were forced to leave the site they would effectively be made homeless. Welsh Government at the time made it clear that they did not wish to see an increase in homelessness during the pandemic and these owners were permitted to stay. However now that covid restrictions have been lifted, and the issue of residency highlighted, it will be necessary for SRS officers to work with the caravan sites to ensure that they are compliant with their licence conditions.

**Outdoor hospitality** – The covid pandemic saw many hospitality venues investing in outdoor seating areas to enable them to operate in a safe way and to recoup losses following closure and lockdown restrictions. This has inevitably resulted in an increase in outdoor hospitality that is likely to continue, but is an area that has several implications for SRS as a regulatory body. Large numbers of people seated in outside areas does have the potential to create noise nuisance to neighbouring residents, resulting in complaints to our noise service. Furthermore the safety of structures, in terms of electrical installations for lighting and heating will be a key concern in terms of health and safety. SRS recognises the significant impact that the pandemic had on the hospitality industry, but will be mindful of the need to balance the needs of the business with those of the residents and patrons.

**Homes for Ukraine** is a scheme that allows people in the UK to sponsor someone from the Ukraine to come and live in the UK. Hosts record their interest in offering a home as part of the scheme offering accommodation for at least 6 months. A number of checks are required

to be completed as part of the scheme and SRS have been asked to undertake property inspections in Bridgend, Cardiff and Vale. As part of this process, officers need to ensure that the accommodation provided by the hosts fulfils necessary health and safety requirements and is in line with Welsh Government guidance.

**Building Safety Joint Inspection Team** – Following the publication of the Building Safety White Paper a Welsh Government priority remains the establishment of the Joint Inspection Team (JIT), hosted by the WLGA. This remains a work in progress and SRS continue to have a presence on the Steering Group which has been charged with appointing the members of the JIT. It is anticipated that this will take place this year to enable a work programme to be drawn up in consultation with all Welsh local authorities and Welsh Government. We will work with the JIT to understand the scale of the issues in high rise buildings in the Authorities that we serve and working in conjunction with WG prioritise any remediation work to ensure the health and safety of the occupants.

In addition to the above, SRS is represented on the Leaseholder Task and Finish Group which is examining options to help support leaseholders who find themselves in financial hardship. Welsh Government plans to introduce a scheme which will target provision where it is most needed in buildings with identified defects where individual leaseholders cannot sell their properties on the open market and find themselves in significant financial difficulty due to escalating costs.

**Smoke free compliance in hospital grounds** – The Smoke-free Premises etc. (Wales) Regulations 2007 were introduced to protect employees and the public from the harmful effects of second-hand smoke. This legislation prevented smoking in 'enclosed' or 'substantially enclosed' public places, including workplaces and vehicles. In March 2021 further changes were made to the legislation which extended the smoke-free requirements to more places such as hospital grounds, schools grounds and public playgrounds, as well as outdoor day care and child-minding settings to be smoke-free. SRS is responsible for enforcing these regulations and in doing so recognises that the requirement for all hospital sites to be smoke-free promotes healthier care environments and supports smokers using hospital services, visiting or working in hospitals to quit. The service will therefore undertake a programme of engagement with smokers at these sites to reduce the incidence of smoking and promote improved health and wellbeing.

# What we plan to do next

\*\* - Cardiff Corporate Plan \*\*\* Vale Service 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 2022/23 and undertake interventions in accordance with the plan and the arrangements in place to discharge food safety duties. \*\*\*

C Hill

Deliver the FSA Recovery Plan and adopt processes to prioritise and tackle the backlog of new business and broadly compliant C rated inspections.

C Hill

Deliver a programme of inspections targeting retail butcher premises to establish compliance with food standards and weights and measures legislation.

C Hill

Develop and adopt the Port Health Plan 2022/23.

C Hill

Undertake necessary actions to enable Cardiff International Airport to meet the requirements of the World Health Organisation Assessment tool for core capacity requirements at designed airports, ports and ground crossings.

C Hill

### Risks in the workplace are managed properly

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

C Hill

Engage with smokers using, visiting or working at hospital sites to promote smoke free compliance in hospital grounds.

C Hill

### Noise and air emissions are controlled

Develop a Noise policy including service standards.

W Lane

Work with partner authorities to reinvigorate the Responsible Authority Meetings to ensure joined up working and balanced enforcement across regulatory activities.

W Lane

Review and explore options for future proofing the Out of Hours Noise Service.

W Lane

## A safe trading environment is maintained

Continue intelligence led operations to investigate and disrupt businesses selling non-compliant e-cigarette products.

C Hill

Conduct firework inspections of licensed premises to ensure those holding a licence sell fireworks that meet the relevant safety standards, have adequate policies in relation to age restricted sales and stored safety in retail premises.

C Hill

## Licensed premises operate responsibly

Complete the programme of inspections, re-visits and enforcement action, where appropriate, to ensure retailers are complying with the Minimum Unit Pricing (MUP) controls for alcohol.

C Hill

Review site licensing conditions in place to manage caravan sites and holiday parks to ensure they are suitable and sufficient to protect the health and safety of the public.\*\*\*

W Lane

## The quality of private rented property is improved

Drive up standards in the private rented sector by:  
-Undertaking robust enforcement action to deal with rogue agents and landlords letting and managing properties. \*\*

W Lane

Evaluate the consultation responses carried out in Cathays on the re-declaration of the Cathays Additional Licensing Scheme and submit a report to Cardiff Council's Cabinet.

W Lane

Conduct proactive, area based exercises to identify and target unlicensed Houses in Multiple Occupation in Cathays and Plasnewydd.

W Lane

Review the fire safety standard, known as the Quick Reference Guide in conjunction with the South Wales Enforcement Group and Fire and Rescue Service and seek adoption by Cardiff Council's Cabinet.

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

Work in partnership to respond to the Covid-19 pandemic by leading on the Test, Trace, Protect service, supporting businesses and high risk care settings to operate safely and enforcing regulations and self isolation requirements. \*\* &\*\*\*

C Hill

Prepare businesses and internal procedures in readiness for the implementation of the new special procedures licensing regime and through the delivery of RSPH Level 2 Infection Control Training course for Special Procedures.

C Hill/J Bale

## What we will measure during 2022/23

Performance Measures 2022/23	Target
% of food businesses meeting food hygiene standards (broadly compliant).	94%
% of high risk businesses (category A & B) that were liable to a programmed inspection that were inspected for food hygiene.	100%
% of high risk businesses (category C) that were liable to a programmed inspection that were inspected for food hygiene.	90%
% of high risk businesses that were liable to a programmed inspection that were inspected for trading standards.	100%
% of significant breaches rectified by intervention during the year for trading standards.	N/A
No. of private rented properties and HMOs improved through the removal of category 1 hazards.	100

## Priority

# Safeguarding the vulnerable

## Outcomes



## Outputs



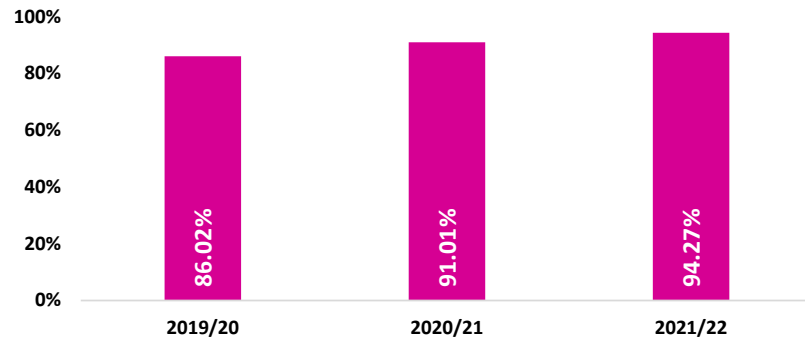
In addition, our outcomes also contribute to the following wellbeing goals:-



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

**% of reported scams and doorstep crime incidents prevented or resolved through intervention**



**693**

Cases, enquiries and referrals received or dealt with by SRS Safeguarding Team.



**19**

Victims of doorstep crime and scams identified. This work included 37 visits to consumers and 1 rapid response made.



**£13,000+**

Achieved in redress for consumers.

## What we achieved

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

**Cardiff fraudster jailed for pest control scam** – A predatory fraudster who targeted 2 elderly and vulnerable women in an elaborate pest control scam was sentenced to an additional 12 months in prison following investigations by SRS officers. In the first case, the fraudster targeted a 71 year old woman who lives alone by knocking on her door and offering to repair a roof tile at the property. What followed was an 8 day fraud where the victim had her life savings of £11,400 taken from her. While working on the broken roof tile, the fraudster claimed to uncover a rat infestation in the victim's loft which he could treat by 'spraying the loft' at a cost of £2600. After 'spraying the loft', he then continued to visit the victim each day to claim further work was required to fix the rat infestation, including further resprays of the loft, repairs to roof felt, and for sealant to repair damage caused by rats. Payments were demanded separately and the victim followed to the bank each time a payment was made. After the work was supposedly finished, the roof started leaking and the victim contacted the fraudster who wanted further payment to finish the work. At this point the pensioner refused. A subsequent assessment by a housing surveyor confirmed that no work had been carried out at the property, and Cardiff's Pest Control service confirmed that a Cardiff resident would only be charged £48 to deal with a rat problem. Between 16 January and 6 February 2019, the fraudster called the victim 65 times and sent her 44 text messages and no details, contract or paperwork were provided.

In the second case, a 69 year old pensioner was cold called at her home by a person called 'Adam' claiming to be an environmental health officer. The resident was told she had a rat infestation in her back garden, and let 'Adam' and a workman into the garden. The worker shouted 'I have got one', waving a rat in the air, inferring that it had been taken from the drain. The fraudster explained he would return the following day to carry out the work but didn't provide a quotation. On arriving at the property the next day with a worker, he stayed for an hour and half in the back garden. The following day the victim began receiving calls from 9am and told that someone would be collecting the £2000 she owed. Over a three month period, this happened on 8 different occasions and the resident parted with a total of £10,400 during this time. No work was carried out and no contract or paperwork provided. Weeks later the resident received a further phone call claiming that the work had taken place but at the wrong address and she would receive a bankers draft of £15,000 plus compensation. To receive this money however, she would have to pay an additional £1500 up front, but she explained that she had no more



money to give.

By the time the matter came to court, the fraudster was already serving a four and a half year sentence for burglary. He pleaded guilty to 2 offences, and had his jail term extended by a further year.

**Safeguarding Week** - The 2021 National Safeguarding Week for Wales took place between 15<sup>th</sup> and 21<sup>st</sup> November with the purpose of raising awareness around the importance of safeguarding children and vulnerable adults and ensuring that they are protected from neglect, harm and other forms of abuse. To coincide with Safeguarding Week, SRS produced a podcast on doorstep crime for Bro Radio and held a public facing information stand in Barry town library alongside SWP Community Safety and the Stop Loan Sharks Wales team.

**Safeguarding/Scams** – A series of proactive operations and initiatives were carried out through the year to highlight scams and improve awareness. These included training to Police cadets; the creation of 4 new informal 'mini' street cold calling control zones by providing window stickers and information leaflets to over 130 houses; and over the course of the year, GP surgeries and pharmacies across the region were supplied with new awareness raising material on scams and frauds to be displayed in practices and in front windows, delivering key preventative advice.

**Doorstep crime and Scams** – SRS respond to instances of doorstep crime and scams, supporting the victims and families where possible. Often individuals are elderly and vulnerable and these crimes can have a devastating effect on the emotional as well as the financial wellbeing of residents. The following examples given an indication of the types of interventions undertaken over the course of the year.

During 2021-22, the service dealt with 67 Doorstep Crime and 73 Scams cases. A total of 19 residents were identified through the year as having suffered a doorstep crime incident or as having been on the receiving end of a scam. Some £13,000 in redress was achieved for residents. In one case, a consumer's card details were being used fraudulently (to access online services) which appeared to have started after they were conned by a white goods insurance/warranty company. What began as a relatively low level scam involving £80, led to further losses of over £8000.

A number of significant cases against rogue traders and doorstep criminals concluded in court. Sitting behind each of these cases is a story of residents being defrauded of large sums of money, often life savings, for little or no work; or where work has been carried out it will have been to a very poor standard. The legacy of COVID related delays in the court process meant that fewer cases of this type than normal finally concluded in court. Nevertheless, the impact of the 6 concluded cases is significant, i.e.

- A combined total of nearly 10 years in custodial sentences
- A 12 month Community Order
- Compensation of £3080 awarded to those affected.

**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 further call blockers during the last year in residents' homes helping to reduce nuisance and scam calls. Since 2014 SRS has installed a total of 61 call blockers to protect older and vulnerable people and each of these is estimated to block up to 5 nuisance or scam calls a day.

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

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

## Children are protected from harmful substances and products

**Underage sales operations** – During 2021-22, with the assistance of a young volunteer, 48 attempts were made to purchase a range of age restricted products, including alcohol, tobacco, knives, e-cigarettes and e-liquids. Seven of these attempts to purchase resulted in a sale (15%) of either alcohol or e-liquids, and the circumstances of each case (1 outlet in Bridgend, 1 in Cardiff and 5 in the Vale) were investigated. In one case, the retailer was issued with a fixed penalty notice in respect of the underage sale of an e-liquid, while another resulted in the prosecution of a Cardiff retailer and Premises Licence holder for selling alcohol to a person under the age of 18. The prosecution resulted in the licence

holder being fined £420 and ordered to pay £220 in costs together with a victim surcharge of £40.

## Taxi provision is safe and fair

**Taxi Licensing** – The Driver and Vehicle Standards Agency (DVSA) is a government agency that approves people to be driving instructors and MOT testers and monitors the recall of vehicles. It also carries out tests that ensure buses and lorries are safe to be driven and undertake roadside checks on both vehicles and drivers. The DVSA joined forces with SRS officers in February in a joint operation in Cardiff to carry out checks relating to the mechanical standards and compliance checks of vehicles. The exercise carried, out over 2 days, resulted in checks of 41 vehicles. The overall compliance rate was poor, with only 30% of the vehicles checked being completely clear of defects. A total of 29 'Stop Notices' were issued by Licensing Officers due to a range of mechanical defects and faults with disability access systems, seatbelt fittings and vehicle trim damage. DVSA officers identified 10 defects that resulted in immediate prohibition action (to be fixed before driving away), 31 defects that resulted in delayed prohibition action (grace period given for repairs), 26 defects that resulted in advice being issued, and one vehicle was noted to have expired road tax which was taxed at the roadside. The range of mechanical defects found included suspension faults, steering faults, brake faults, air bag faults, defective tyres, fuel leaks and corrosion. One driver even obstructed an examiner by refusing an inspection and driving away which resulted in the issue of a £300 fixed penalty notice. The poor compliance rate illustrates the continued need for regulatory enforcement in relation to vehicle standards and the importance of joint inspections with the DVSA.

## 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 2021/22, 13 pieces of intelligence were received, resulting in 7 operations being carried out, and 8 illegal lenders being identified. The total value of all loans given out by these illegal lenders was approximately £64,000. 9 victims have been identified and supported as part of the team's investigations; and approximately £30,000 of debt has been 'written off' via intervention.

**Illegal Money Lending Education and Training** - The Wales Illegal Money Lending Unit (WIMLU) is small team covering the whole of Wales. As a result, it is reliant on other public agencies, housing providers and third sector organisations to be its eyes and ears. These are the 'front line' people who will encounter the victims of loan sharks through their daily activities and provide the richest vein of intelligence available. To exploit this

and encourage reporting, WIMLU proactively seeks opportunities to present to these organisations on our work. The restrictions imposed as a result of the Covid-19 pandemic led to the indefinite postponement of Client Liaison training programmes, however, new forms of engagement emerged very quickly. These new forms of engagement have evolved into useful tools to raise awareness of loan sharks, not least because the harsh economic consequences of lockdown have underlined concerns that loan sharks will exploit the financially vulnerable. Training sessions have continued to be delivered virtually since the onset of the pandemic, and the team still receives frequent requests for information and training of frontline staff and community based public facing support services. In 2021/22, training was delivered to 22 different organisations from all over Wales, reaching 319 participants. This included Flintshire Citizens Advice Service; Ceredigion Family Support Service and the Vale of Glamorgan Council Tenancy Support Team.

**Awareness raising activities** – In addition, WIMLU undertook a number of other awareness raising activities and this included the Principality Building Society inviting the team to run an awareness raising session during their financial crime awareness week. This was attended by a high number of customer facing staff. During National Safeguarding Week WIMLU was invited to speak to over 20 people within the statutory and voluntary supporting people sectors. The theme was 'Debt, Mental Health and Loan Sharks' and presented an excellent opportunity to explore this challenging theme. Training for Citizen's Advice staff and volunteers continued, with Torfaen and Flintshire colleagues attending virtual awareness raising sessions. The Vale of Glamorgan's Homes and Safe Communities Scrutiny Committee requested an update on the unit's work. The committee was well attended, and WIMLU's input was widely reported in local and national Welsh media. The Council's Housing and Tenant Liaison departments subsequently requested and received training. During the course of the year, the West Wales Financial Capability Forum resumed its activities and WIMLU had an opportunity to promote its work, and finally, Ceredigion Council's Family support team attended a virtual training and workshop session.

Within the charitable sector, Kinship Carers made contact with WIMLU and a valuable engagement session took place as a result. The session explored the likelihood of illegal money lenders attempting to exploit vulnerabilities arising from the problems experienced by people caring for children in difficult circumstances. Melin Community Trust, based in Neath Port Talbot also took up the training offer.

**Near Miss Scheme/POCA Community Based initiatives** - Monies obtained from loan sharks under the Proceeds of Crime Act is used by WIMLU on initiatives that raise awareness of the problems caused by illegal lending in our communities, and how those affected, and the wider public, can report concerns. In 2020/21 a fixed amount of proceeds of crime funds were set aside for a year-long pilot of a new initiative known as the 'Near Miss Scheme', encouraging responsible borrowing from Credit Unions.

Working with the Cambrian Credit Union in North Wales, a pilot exercise in which individuals who have narrowly missed out on satisfying the Credit Union borrowing criteria, benefited from having small loans underwritten by proceeds of crime funds. The pilot has been very successful, resulting in 28 loans being issued with only 2 defaults, and the Credit Union concluding that the project “enabled staff to think differently about loan decisions... and take a more calculated risk”. In addition, their rejection rate decreased by 10%. Crucially, all the ‘near miss’ borrowers started savings accounts as a result of their inclusion, and some were able to go onto borrow further additional monies. Such was the success of the scheme, that in the course of regular meetings with Welsh Government, the Scheme was discussed and on the basis of it’s success, Welsh Government is considering a national scheme underwriting similar marginal loans.

**WIMLU/Credit Union – Paid for ads** – Another POCA funded project undertaken by the WIMLU team was aimed at promoting affordable credit to users of Facebook and Google. This project funded the sponsoring of adverts for the Credit Unions of Wales which boosted the social media profile and visibility of the Credit Unions so that the adverts were targeted at those searching for small loans utilising the algorithms of these platforms and appearing in searches. The project took place between July and November 2021 and resulted in an 148% increase in traffic to loan pages compared to the previous 6 months and 54% of traffic to the Credit Union of Wales website was via these paid for adverts.

## Emerging issues

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

**Cost of living crisis** - The cost of living crisis in the UK has the potential to impact a number of services within SRS. With rising prices on energy, fuel and other products coupled with national insurance increases and interest rises, people will have less disposable income. This plan has already highlighted some of the possible issues in terms of improving health and wellbeing, but this theme also runs through our safeguarding work. As people have less disposable income, they may be tempted to take on cheaper rogue traders to undertake work in their homes, which could lead to an increase in complaints and enforcement action. Similarly, people could be tempted by unregulated forms of credit and fall prey to loan sharks and scammers.

**Buy now pay later** deals have increased dramatically during the pandemic. This unregulated form of credit allows consumers to delay payment for goods, without interest and has gained a foothold among the under 30s and those with tight finances. Companies such as Clearpay, Laybuy and industry leader Klarna give online shoppers options to pay for products via instalments at the checkout and there are concerns that people are signing up for credit without fully understanding that this is the case and that it is being made easier for consumers to buy more than they can afford. While the UK Government has consulted on the future of the buy now, pay later sector, it will be some time before any regulation will take-effect.

**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 creates a duty of care to protect persons at risk from financial abuse; with partnership working and cooperation at the heart of this approach.

Preventing crime, and supporting safe, confident, resilient communities, is a key aspiration that SRS shares with the South Wales Police and Crime Commissioner. Shared areas of work might include scams and cyber crime, night time economy and licensing, victim support and safeguarding, general intelligence sharing and substance misuse together with underage sales, including knife crime. 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 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. The cost of living crisis will see a reduction in disposable income for many consumers which could result in these fraudsters exploiting similar opportunities to take advantage of those seeking more affordable options. There is now a greater need to try and protect more vulnerable residents in the face of the likely increase in reporting during the coming year.

Awareness raising activities are crucial to crime prevention, but they invariably increase the demand for the service. We will support South Wales Police as it delivers the Police and Crime Plan and will endeavour to enhance the protection available to the most vulnerable in our communities.

**HMRC Conditionality checks** – From April 2022, the renewal of licences for drivers of taxis and private hire vehicles and also for scrap metal dealers and collectors, will only be possible if the person applying can show they have completed a tax check with HMRC. This is in addition to the requirements already in place by licensing authorities. The process requires that typically once every 3 years an online tax check will be made on renewal to confirm that applicants are registered for tax if they need to be. Applicants will need a tax check reference number which they get by submitting their details into the online service. The licensing authority will use this to confirm with HMRC that the applicant has completed a taxi check. First time applicants will not have to complete the check but instead, licensing authorities will make sure they have access to HMRC guidance, showing them what they need to do in order to be properly registered for taxi in the future.

Draft

# What we plan to do next

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

## Safeguarding the vulnerable

Lead Responsibility

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

All OMs

## Children are protected from harmful substances and products

Contribute to the safeguarding agenda by working with partners to safeguard the vulnerable to ensure that children are protected from harmful substances and products, older people are protected from rogue traders and scams and vulnerable people are not subject to exploitation, slavery and exploitation. \*\*\*

All OMs

Conduct intelligence led underage sales exercises in relation to the sale of tobacco, alcohol, nicotine inhaling products, knives and other age restricted products.

C Hill

## Illegal money lending activities are prevented

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

J Bale

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

J Bale

## 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

# What we will measure during 2022/23

## Performance Measures 2022/23

## Target

- % of reported scams/doorstep crime incidents prevented /resolved through intervention.
- % of licence holders receiving disciplinary action following receipt of notifications of safeguarding concerns.
- No. of people reached through education or training on scams and doorstep crime.

80%

Not applicable

500

## Priority

# Protecting the environment

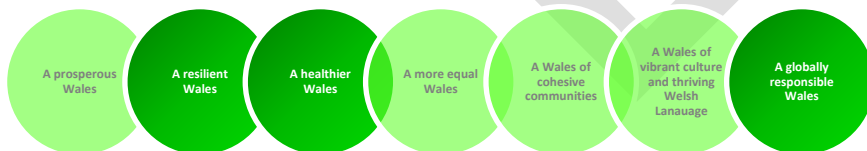
## Outcomes



## Outputs



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

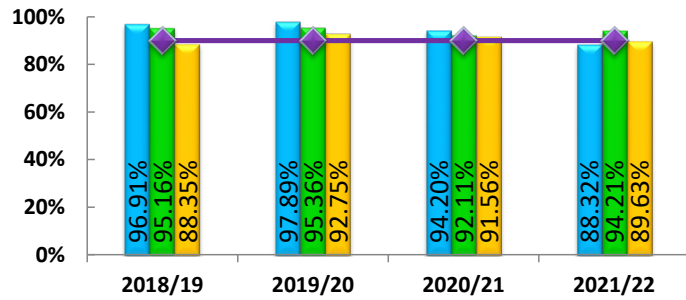


Protecting the environment is a core strategic priority of SRS. Many of the activities listed here such as water sampling, monitoring air quality, and remediating contaminated land contribute toward promoting a better environment which in turn means better long term prospects for the health and wellbeing 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.

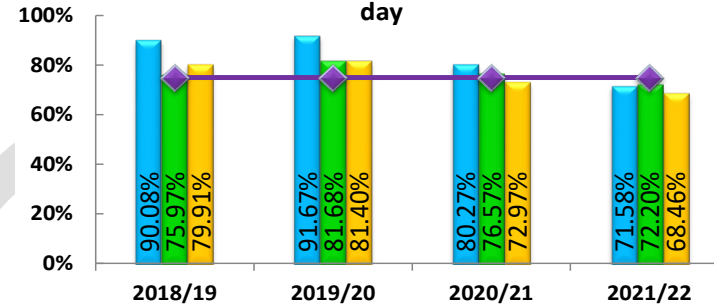
# How we performed

■ Bridgend   
 ■ Cardiff   
 ■ Vale of Glamorgan

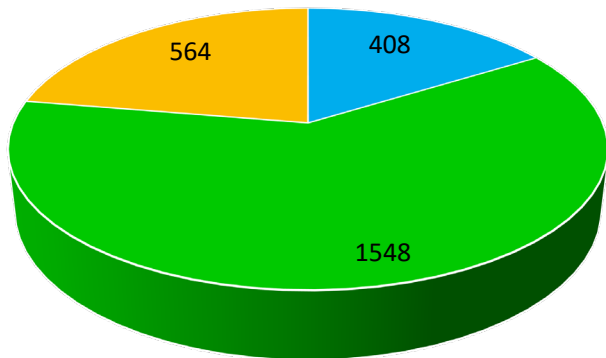
**% domestic noise and air complaints responded to within 3 working days**



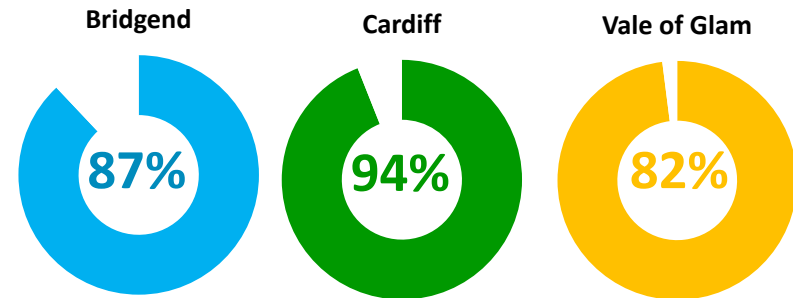
**% commercial and industrial noise and air complaints responded to within one working day**



**No. of Air Quality Samples taken during 2021/22**



**% of alarm complaints responded to within one day 2021/22**



# What we have achieved

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

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

SRS continues to deliver the statutory local air quality duties for Bridgend, Cardiff and the Vale of Glamorgan Councils, ensuring the Annual Progress Reports are submitted and approved by each respected Cabinet. These reports provide vital information on the local air quality in each area, and provide relevant updates on statutory work such as the Park Street Air Quality Action Plan for Bridgend, and the delivery for the Clean Air Plan for Cardiff. Work to improve and enhance monitoring capabilities across all 3 local authorities also remains a priority for SRS.

In **Bridgend**, the 2021 APR highlighted continued non-compliance of the annual average air quality objective for NO<sub>2</sub> at number of locations within the Park Street AQMA, even when accounting for the impacts from COVID in terms of reduced travel demand. Work has continued in terms of assessing measures outlined in the Draft Air Quality Action Plan (AQAP) to pursue mitigation options that will manage and improve traffic flows through the Park Street AQMA in order to reduce NO<sub>2</sub> concentrations in line with air quality objectives. In March 2022, cabinet received the preliminary results of the assessment of the key options for Park Street. The modelling results indicate that NO<sub>2</sub> concentrations at the majority of locations will achieve compliance with the annual average air quality objective for NO<sub>2</sub> of 40 µg/m<sup>3</sup> by the end of 2023, including all currently monitored locations within the AQMA. Two modelled locations do still show a slight exceedance of the objective. Cabinet has agreed for a public consultation on these options to be undertaken following the local government elections. Following completion of the public consultation a final AQAP will be reported to Cabinet for approval prior to submission to Welsh Government by the end of September 2022.

In **Cardiff**, the 2021 APR highlighted that no monitoring sites recorded concentrations in exceedance of the annual average objective set for NO<sub>2</sub> of 40 µg/m<sup>3</sup>. The results were indicative of the impacts of the COVID lockdowns and restrictions on pollution levels in Cardiff, which was likely owing to traffic volumes having decreased. SRS continues to support delivery of the Cardiff Council Clean Air Plan in line with the additional Legal Direction it received. Work in 2021-22 has ensured delivery of a number of key measures in the Plan, namely implementation of 36 Electric Buses, Retro fit programme of 49 buses, and a taxi lease scheme in conjunction with a 30 day try before you buy scheme with Cardiff Capital Region. In November 2021, Cabinet implemented an interim transportation scheme on Castle Street following approval in June 2021. Work is ongoing to assess the implementation of a permanent scheme on Castle St to ensure long-term NO<sub>2</sub> compliance post COVID recovery.

In the **Vale of Glamorgan**, the 2021 APR demonstrated that no monitoring sites recorded concentrations in exceedance of the annual average objective set for NO<sub>2</sub> of 40 µg/m<sup>3</sup>. Monitoring within the previously declared Windsor Road Air Quality Management Area (AQMA) showed continued compliance concerning the applicable air quality objectives for NO<sub>2</sub>.

**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 49 visits across the region to take water samples at private water supplies. 46 environmental samples were also taken at beaches and lakes across the region. Furthermore SRS took 2520 air quality samples across the region.

**Lease Scheme for electric wheelchair accessible vehicles** – Welsh Government has set a target of de-carbonising the taxi fleet by 2028 and to facilitate this have in conjunction with Day's Rental introduced an Electric Taxi Scheme. This Scheme gives licensed taxi drivers the chance to trial a fully electric, wheelchair-accessible vehicle for 30 days and review the financial and environmental benefits of zero-emission vehicles. Cardiff Licensing Team have assisted with the introduction of this lease scheme, enabling 16 new electric hackney carriages vehicles to be rented out to existing vehicle owners.

## Animals are treated humanely

**Illegal dog breeder jailed for illegal dog breeding, animal mutilation, causing unnecessary suffering to an animal and illegal importation of dogs** – This case was brought to light via an anonymous email to the service from a member of the public claiming that a Cardiff man was breeding dogs illegally. It was alleged that he was selling American Bully puppies through Facebook without a dog breeders licence under the name 'Bulletproof Bullies'. Following investigations, a search warrant was carried out at



the offender's property where 5 breeding bitches and 3 male-dogs were discovered, as well as 8 puppies. The offender was unable to provide any passports for three of his adult dogs at that point, and 6 out of the 8 puppies had recently had their ears cropped, a form of animal mutilation prohibited by the Animal Welfare Act 2006. These 3 dogs together with the 8 puppies were subsequently seized. Further investigations carried out with veterinary practices, identified the scale of the offender's illegal trading with the finding that he had registered 67 dogs at one local veterinary practice alone. He was sentenced to a total of 16 weeks in custody with immediate effect, fined £1200 and ordered to pay costs of £9775. He was also banned from keeping animals for a period of 8 years, with no right to apply for this ban to be revoked for a period of 5 years. In addition, an order was made to deprive the offender of the 8 puppies that were seized, as well as the 8 adult dogs and a victim surcharge of £120



**Puppy Breeders prosecuted and ordered to pay more than £450,000** – In this further case of illegal dog breeding, a Vale of Glamorgan couple were ordered to pay more than £450,000 following a successful prosecution brought by SRS. The couple were convicted of breeding bulldogs without a licence and on animal welfare counts relating to the number of litters produced within a short period. Officers found that breeding dogs were not given enough time to recover, often being artificially inseminated soon after

delivering a previous litter. A warrant executed at the couple's home found 28 dogs in an outbuilding, a laboratory with equipment including a multipurpose centrifuge machine, microscopes, equipment for storing and collecting semen, and for taking blood. A further 30 dogs were discovered at two other properties. Investigations found that the couple bred at least 67 litters between 2014 and 2020 with information on known C-sections indicating 43 litters had been delivered between 2018 and 2019. One dog had delivered 6 litters within a 4 year period while numerous others were forced to deliver 2 litters in less than a 12 month period. The dogs were registered with 5 different veterinary practices and litters given different names and addresses to avoid detection by both the local authority and the kennel club. The couple were fined a total of £19,000 each, ordered to pay prosecution costs of £43,775.50 and a victim surcharge of £175 each. They were also told to repay a total of £372,531.54 within 3 months in a Proceeds of Crime Hearing or face a 2 year prison sentence.

### South Wales Police and Crime Commissioner Partnership Award 2021

recognised our hard work in the seizure of 240 horses in appalling conditions in January 2020, and the subsequent prosecution and disqualification of the owner under the Animal Welfare Act. As a result of the very best in partnership working, SRS Officers had worked alongside the RSPCA and equine charities to seize the horses from three different locations, supported by colleagues from South Wales Police. In addition a further partner, South Wales Fire and Rescue Service, came to the rescue with emergency lighting when darkness began to fall, enabling the teams to work into the night to complete the task.



## People will use energy efficient buildings and products

**Empty Homes** – In **Bridgend**, SRS has responded to 245 new service requests from members of the public, empty property owners and internal staff requesting advice and support in relation to empty properties. Work has continued in Bridgend in relation to empty properties which has resulted in considerable progress, with 17 longer-term empty properties. The owners of these properties have received help and assistance mainly using the 5-stage letter process and on occasions may have been subject to the service of an Enforcement Notice. This has resulted in properties being marketed for sale, in change of ownership, and in renovation works commencing. A total of 115 properties have now been risk assessed and action has been targeted in relation to the 'top 20' properties. Of these, planning permission for renovation work has been obtained in respect of two, six properties are subject to formal enforcement action and a grant application has been submitted in respect of one.

In **Cardiff**, SRS presented a new Private Sector Empty Homes Policy 2021-2024 to Cardiff Council's Cabinet, which was agreed. The Policy underpins the work undertaken against two Public Accountability Measures (PAMs) relating to homes brought back into use and new units of accommodation. The increased profile of this work due to the adoption of the Policy has secured an extension of funding from Cardiff Council enabling the service to employ 2 empty homes officers for a further 2 years. Key to ensuring effective corporate working on the issue of empty homes has been the establishment of an empty homes working group which met on several occasions during the year and is useful in shaping corporate working to maximise performance. An action plan has also

been submitted to Welsh Government which has had formal approval. This will enable the drawing down of funding to underwrite losses made in any subsequent activity taken against the worst, derelict, long term empty City Centre properties. In total 84 properties were returned to use or new units created as a result of empty homes work during the last year.

## Communities are protected from nuisance and are safer

**Straying horses and dogs** - Our Animal Health and Welfare team has continued to work proactively across the area to reduce the instances of straying horses and associated welfare issues. Regular patrols have been carried out and stray dogs and other animals picked up, while at the same time, officers have taken every opportunity to work with residents across the region to improve responsible ownership.

**Vale resident prosecuted for excessive bird feeding** – This case arose as a result of anti-social behaviour caused to neighbours by a resident feeding wild birds. The resident left large quantities of bird food outside her house causing those living nearby to be subjected to noise nuisance, the threat of injury from swooping seagulls, excessive bird mess on houses and gardens, and the presence of rats and other vermin, attracted by the feed, which caused damage to properties in the street. Initially the defendant was served with a Community Protection Notice, requiring her to stop all feeding of birds on the land, however a few months later she was found to be feeding the birds again. The resident was charged with offences under the Prevention of Damage by Pests Act 1949, and the Anti-social Behaviour Crime and Policing Act 2014 for failing to comply with the Community Protection Order. The resident was fined £1000 and ordered to pay costs of £3583 together with a victim surcharge of £100.

**Student Liaison** – The Student Liaison Officer (SLO) is a role that sits in the Cardiff Student Community Partnership (CSCP) and is jointly funded by the universities in Cardiff and Cardiff Council. The role focuses on facilitating work between Higher Education Institutions, the Local Authority, Police and Health Board including initiatives to address student-community issues and to collaborate with members on strategic ambitions for the city.

Over the course of the last year, the SLO has focused on the redevelopment of the governance structure and work programme of the Partnership. The successful collaboration between SRS, Cardiff Council, South Wales Police, CAVUHB and the Universities to support students and address issues during the pandemic demonstrated the need to further embed joint-working practices in other areas. To reflect this shared approach, the CSCP's membership has been expanded to formally include SWP and

CAVUHB, and a new governance structure has strengthened links across the organisations to improve the decision-making process and the delivery of the partnership's work programme. The priority areas have also been redeveloped and now include: 1) Community Life, 2) Student Health & Wellbeing, 3) Economic Development and 4) Net Zero, and the SLO is working with the members to establish a new work programme to reflect those priority areas.

Communications have also been a key focus of the SLO. The CSCP's public brand - Cardiff Digs - now has Instagram and Facebook pages to reflect the channel preferences of students. The Cardiff Digs channels (social media and website) host annual advice campaign content such as housing and waste management advice as well as a wide range of relevant content from partners such as SRS's food allergy awareness campaign or Cardiff Council's voter registration campaign. With the return of in-person events, the SLO supported by members from SRS's Pollution and Housing Enforcement teams as well as Cardiff Council's Waste, Sustainable Transport and Electoral Services Teams attended engagement and training events aimed at students and staff. The SLO also supported the development of new resources such as guidance tools for students to help manage waste and recycling at their properties and supported outreach activities including Community Days at the universities and door-knocking campaigns by the Waste Strategy Team, South Wales Police and University Advice Teams. The SLO will be working with the partnership on a new communications strategy and campaign plan for the next year.

The SLO has also contributed strategic input into a range of groups, meetings, plans and consultations including the Cathays and Plasnewydd Operations Board, the U.K. Town and Gown Association, WRAP Cymru, Keep Wales Tidy/Caru Cymru, the consultation for the redeclaration of the additional HMO licensing scheme in Cathays and Cardiff's Local Development Plan as well as helped facilitate links between the University/Students' Unions and Local Authority Teams on specific case work.

**Cardiff street prohibited for street trading** – Following complaints from local residents about a burger van trading next to a busy junction in the Whitchurch area of Cardiff, SRS Licensing officers worked with colleagues in Cardiff Council and local residents to prohibit nearby streets for street trading purposes. In this case, residents were concerned that a burger van permanently parked in a newly created residents parking bay was creating a nuisance and potential safety risk due to an extension cable running from an adjacent property to the van across an adopted footway, and customers illegally parking and causing obstruction on a busy junction used by school children. Following consideration of these complaints, 4 streets in Whitchurch were declared as prohibited, making it an offence to street trade.

## Emerging issues

The **Domestic Minimum Energy Efficiency Standard (MEEES) 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. If a property has an F or G rating, owners are required to improve the property's rating to E or better, or register an exemption before entering into a new tenancy. The cost of making improvements is capped at £3500 (including VAT), so if owners cannot improve their property to an EPC E for this amount or less, they are required to make all the improvements they can make up to that amount, then register an 'all improvements made' exemption. Although these regulations have been in place for some time, they now apply to all private rental contracts, not just those that are new. Delivering on this area of work now has even greater urgency, given the need to improve energy efficiency and reduce carbon emissions, and also as a result of the recent energy price rises, which are already impacting tenants of such properties.

**Avian Influenza** is an infectious disease of birds caused by the influenza A virus. Birds are the hosts for most avian influenza viruses and domestic poultry are especially vulnerable and the virus can rapidly cause epidemics in flocks. Human infections with avian influenza are rare, however, some viruses, have been associated with human disease. Following a number of detections of avian influenza (bird flu) in wild birds across Great Britain, the Chief Veterinary Officers from Wales, England and Scotland declared an Avian Influenza Prevention Zone (AIPZ) across the whole of Great Britain to mitigate the risk of the disease spreading amongst poultry and captive birds. When such a zone is declared, owners must put in place a range of disease control measures to prevent the disease spreading to poultry and other domestic birds. While these controls are effective in domestic and commercial settings, it can become particularly challenging when the influenza is present in the wild bird population where traditional controls used in these situations are ineffective and difficult to manage. An example of this is the recent cases of Avian influenza affecting swans at Cold Knap in Barry and Roath Park in Cardiff which were found to be unwell or to have died from Avian influenza and there were reports of the public handling the animals and carcasses.

**Pets from Ukraine** – Any pet travelling to the UK must meet strict health requirements. to ensure they are not bringing diseases which do not exist here that could be very serious. These include, but are not limited to, rabies. Whilst Welsh Government understand how important pets are to their owners, they, unlike the UK Government have made a decision to uphold quarantine requirements on pets arriving from Ukraine. Therefore cats, dogs and ferrets traveling to the UK from an unlisted third country, such as Ukraine, are considered compliant and can enter and move freely across the UK only if they meet a number of requirements, including a 3 month quarantine. These

requirements will form part of the Homes for Ukraine suitability checks to ensure that homes are suitable for pets.

**Dog ownership** – During the covid pandemic of the last 2 years, the UK saw a significant rise in dog ownership as individuals and families who found themselves spending more time at home, sought the companionship of a dog. There were concerns during this time, that as people returned to work, this could lead to issues with separation anxiety, and that the economic fallout from the pandemic would result in a spike of straying and abandoned dogs which owners are no longer able to look after. Currently, the cost of living crisis is giving further cause for concern and we are seeing a rise in the number of dogs being housed in rescue centres, some finding their way there as 'fake strays'. While the service has yet to see a significant rise in noise complaints regarding dogs barking as a result of separation anxiety, there is potential for this to increase as restrictions end and more and more people will be required to return to the office/workplace.

**Increase in Illegal dog breeding** – As demonstrated by the successful prosecutions carried out by SRS, the high value of certain dog breeds together with the increase in consumer demand for puppies has led to an increase in complaints to the Service. On-going investigations show that a number of these cases are complex, with multi agency involvement and links to organised crime. The largest illegal dog breeding case during the last year uncovered evidence of unlicensed breeding, the over-breeding of dogs, illegal importation and mutilation. Investigations into illegal dog breeding have highlighted a hidden industry with a particular area of concern being that of 'backyard' breeding. As a result, there appears to be an increasing incidence of unlicensed breeding and sick puppies. Officers will continue to work with partner agencies to investigate such reports and take appropriate enforcement action.

**Seeking effective controls on activities linked to dog breeding** – Current Welsh Government legislation requires that a person holds a dog breeding licence if they breed 3 or more litters of puppies on their premises in any 12 month period, and those puppies are supplied to customers. During the course of our investigations into illegal dog breeding, it has become apparent that a number of practices allied to breeding can legitimately take place without the need for a dog breeding licence. For example, no licence is needed for the supply of stud services or the sale of semen, nor for the advertisement of puppies produced as a result of those stud services. Similarly, no licence is needed where bitches are acquired when already pregnant. It is clear that these 'linked' practices can be hugely lucrative, serve to fuel the illegal dog breeding market and associated animal welfare concerns, and yet they are completely unregulated.

# What we plan to do next

## Protecting the environment

Lead Responsibility

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

Undertake local air quality assessments and review the data to ensure that national air quality objectives continue to be achieved.\*\*\*

J Bale

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

J Bale

Contribute to good air quality in Cardiff by:

- Updating the Clean Air Strategy and Action Plan and implementing further measures to improve air quality;
- Reviewing real-time air quality data to assess and identify trends in pollution to assess further interventions that will further reduce air pollution;

J Bale

### People will use energy efficient buildings and products

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

W Lane

Review advice and support given to owners of long term empty homes and work with Welsh Government to establish the most effective enforcement route to deal with the worst long term, derelict empty homes and draw down funding to underwrite such action.

W Lane

Work with landlords and letting agents to raise the energy efficiency ratings of private rental properties in line with the requirements of the Domestic Minimum Energy Efficiency Standard (MEES) Regulations.

W Lane

Support the 3 partner Councils in fulfilling their climate change responsibilities through the delivery of regulatory activities that contribute to the reduction of carbon emissions. \*\*\*

All OMs

## Animals are treated humanely

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

J Bale

Carry out investigations into illegal dog breeding.

J Bale

Review the impact of the implementation of the Animal Welfare (Licensing of activities involving animals) (Wales) Regulations 2021.

J Bale

Engage with Welsh Government regarding the welfare of stud and imported dogs and wider animal welfare issues related to dog breeding and sales.

J Bale

Work with partners to make the case for practices allied to dog breeding to be brought within the licensing regime and subject to the necessary enforcement controls.

J Bale

## Communities are protected from nuisance and are safer

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

W Lane

## What we will measure during 2022/23

Performance Measures 2022/23	Target
• % of domestic noise and air complaints responded to within 3 working days	90%
• % of commercial and industrial noise and air complaints responded to within one working day	75%
• % of alarm complaints responded to within one day.	90%
• % of stray dogs returned to owner or rehomed.	90%
• % of empty private sector properties brought back into use during the year through direct action by the local authority (Cardiff and Bridgend only)	TBC
• Number of additional dwellings created as a result of bringing empty properties back into use (Cardiff and Bridgend only)	TBC

## Priority

# Supporting the local economy

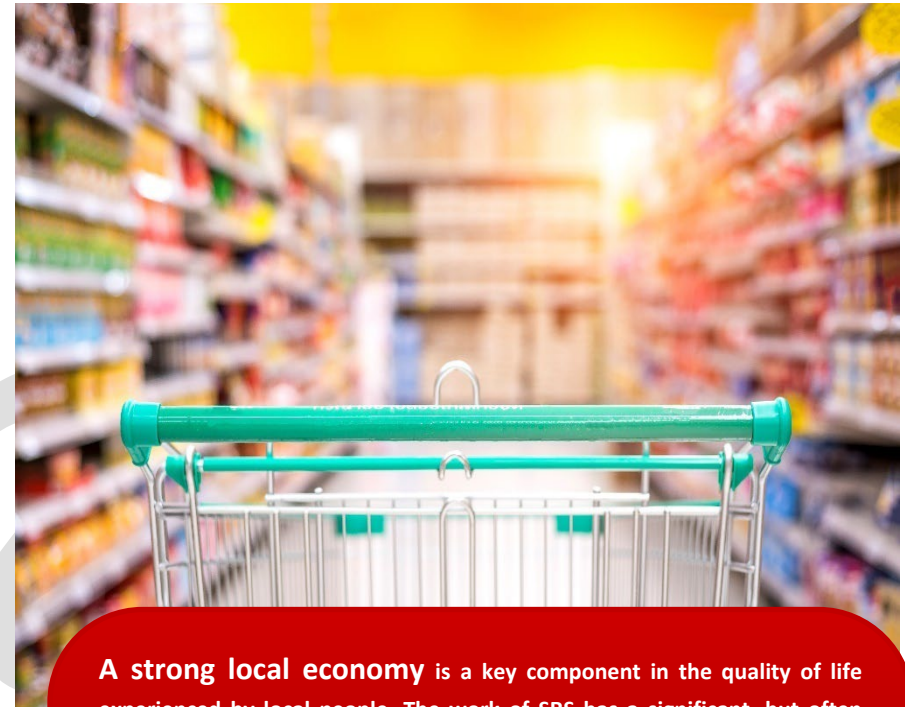
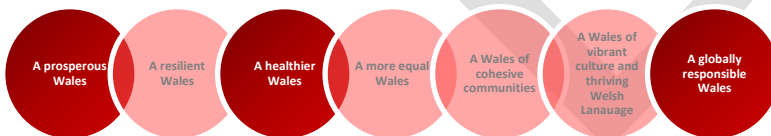
## Outcomes



## Outputs



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

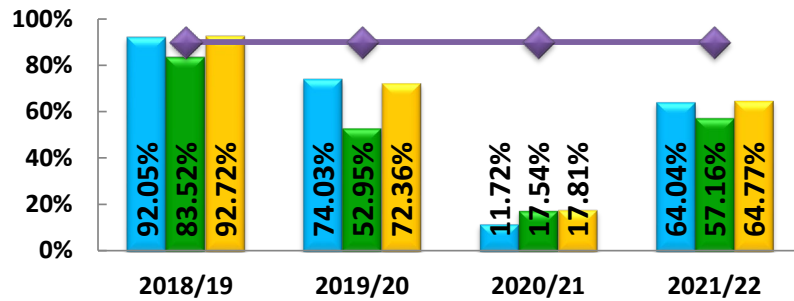


**A strong local economy** is a key component in the quality of life experienced by local people. The work of SRS has a significant, but often unseen, impact upon the local economy. The provision of timely advice and guidance on regulation can benefit the economic viability of businesses resulting in 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.

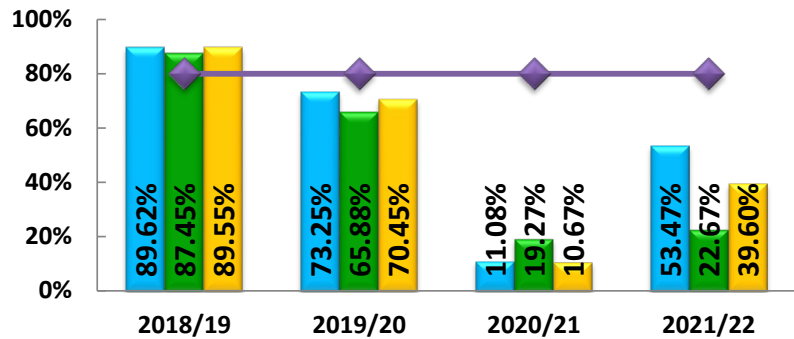
## How we performed

■ Bridgend   
 ■ Cardiff   
 ■ Vale of Glamorgan

**% of new Food Hygiene businesses identified and visited**



**% of new Trading Standards businesses identified and visited**



## What we have achieved

### A fair trading environment is maintained

**Cardiff cowboy builders who ruined dozens of homes jailed** – In this case two builders defrauded 24 consumers out of £565,000 by targeting victims claiming thousands of pounds for work which was not needed, scaring consumers into thinking that their roofs were unsafe. The builders employed unskilled labourers who carried out poor quality work leaving consumers' roofs in worse condition, requiring significant sums of money to rectify. They used aggressive tactics against vulnerable victims with initial quotes being plucked out of thin air and escalating the price when the property had been partially or fully stripped of its roof and the property owners were in a vulnerable position. Consumers felt intimidated, bullied and robbed with one consumer losing over £86,000. Much of this fraud took place when one of the builders was awaiting sentence for a previous prosecution brought for similar offences and, whilst under a suspended sentence. The driving force behind the scam was sentenced to a total of 6 years and 10 months imprisonment, and his accomplice was sentenced to 3 years and 4 months imprisonment. A Proceeds of Crime application was made by the prosecution and a timetable set for April 2022, at which time compensation and costs will be dealt with as part of the application.

**Bridgend rogue trader jailed** – A rogue builder from Bridgend was prosecuted after leaving several people out of pocket. The trader defrauded a total of 20 people across South Wales including single mothers, NHS workers and a widow, causing a loss of approximately £50,000. In this case, the trader would demand customers pay an upfront deposit to 'secure a slot' for the work to be done then didn't return to complete the work or attend site and complete a nominal amount of work, often leaving to get more materials or due to a 'family emergency' and then never return. The trader pleaded guilty to 11 charges under the Fraud Act and 10 further charges under the Consumer Protection from Unfair Trading Regulations 2008. He was jailed for 16 months and an investigation under the Proceeds of Crime Act continues.

**Sales blocking at Caravan Site** – In this case, the owner of a caravan site in the Vale of Glamorgan was found guilty of offences relating to 'sales blocking'. SRS initially received a complaint from the owner of a residential mobile home located at the site, who on inheriting the mobile home had advertised it for sale and secured a purchaser who then completed the obligatory Proposed Sale Form which was submitted to the owner of the caravan site. The purchaser had indicated that he intended to park a Mitsubishi car on the site. The site owner however, applied to the Residential Property Tribunal for a Refusal Order in an attempt to stop the sale, claiming that the purchaser wanted to park

a camper van on the site, which site rules precluded. This was vehemently denied by the purchaser who confirmed that he did not and had never owned a campervan and had not made any calls to the site suggesting that he wanted to park a campervan. The Refusal Order was not granted by the Tribunal and the sale was eventually completed, but at a substantially lower price as the complainant had felt the need to reduce the sale price given the delays caused to the purchaser. SRS subsequently prosecuted the site owner who was charged with one offence under the Mobile Homes (Wales) Act 2013 for knowingly or recklessly providing information which was false and which could cause a potential purchaser of a residential mobile home to decide not to do so. It became clear in evidence presented during the court case, that the defendant had submitted a number of applications for Refusal Orders in other cases to the Tribunal in an attempt to frustrate the sale of homes. As a result of this prosecution the defendant was fined £1400, ordered to pay costs of £600 and a compensation order of £10,000 was made for the complainant to compensate him for the loss in sale price, which he was ordered to pay within 28 days. This case was subsequently highlighted on the BBC X Ray consumer programme.

**Illicit tobacco** – Illegal tobacco continues to present a problem in our communities, and the most recent market research available indicates that at least 15% of all tobacco and tobacco products supplied are illegal (either counterfeit or non-duty paid). Many smokers appear to be comfortable in purchasing illegal tobacco, presumably under the misapprehension that the only impact of its widespread use is the loss of revenue to HM Treasury. This thinking ignores the most serious harms caused by illegal tobacco. At around half the cost of legitimate product, illegal tobacco removes the price incentive for smokers to quit the otherwise expensive habit. In addition, the way in which illegal tobacco is supplied means that mainstream tobacco control measures such as minimum age of purchase and the tobacco display ban are undermined. Finally, supply chains for illegal tobacco are sufficiently profitable to appeal to organised crime groups (OCGs). Part of this attraction has been the much lower penalty associated with the selling of illegal tobacco when compared to other supply chains such as those for drugs, weapons, etc. 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 products that often require specialist skills to detect and open. During the year 29 seizures of illegal tobacco were made from vehicles, residential and retail premises. 53,682 packets of cigarettes and 152.5kg of hand rolling tobacco was seized during these operations with a total retail value estimated to be £697,942.

**Counterfeiting** - Counterfeit products are fake replicas of the real product and are often produced with the intent to take advantage of the superior value of the imitated product.

29  
Seizures of  
illegal tobacco

The word counterfeit frequently describes the imitations of goods such as clothing, handbags, shoes, pharmaceutical, watches, electronics, software, toys and films. Counterfeit products tend to have fake company logos and brands, and have a reputation for being low quality, unsafe and may even include toxic chemicals. Counterfeit goods are sometimes considered ‘victimless’ crimes, but this is far from the truth as fake products can endanger the local economy and can potentially cause injury. Furthermore the huge profits can be used to fund other serious organised crimes such as people smuggling, drugs, guns, child pornography and even terrorism. In August 2021, SRS officers supported by an officer from South Wales Police attended Splott Market in Cardiff following intelligence received that counterfeit goods were being openly sold at the market. As a result, 602 counterfeit items of clothing were seized with an estimated retail value of £4,900 from three stallholders. All received a written warning and the seized clothing was either signed over for destruction or was forfeited in the courts.

## Improved business practices and operation

**Training provision** - The Service has continued to consolidate its excellent reputation as a training provider and despite many covid restrictions being in place during the last year, impacting the delivery of face to face training, the service trained 98 delegates on accredited courses in Level 1 and 2 in Food Safety and Level 2 Food Allergens. The last year saw the service focus upon existing workplaces to reduce risks and build stronger relationships rather than offering publicly available training, mainly in departments within the Vale of Glamorgan Council. Furthermore, the service developed online training as an alternative to face to face training. Despite there being less demand for this type of training, the one online course held was very successful and we will look to continue to offer this type of training going forward. In addition to the accredited training, SRS trained over 65 businesses on the new changes brought in as a result of Natasha’s Law on allergens which came into force last year, in addition to 37 SRS Officers on the same topic. Bespoke training on intellectual property matters when setting up an online marketplace was also carried out, resulting in over 300 delegates being trained in total.

100%  
Of delegates  
felt training  
will benefit  
their business

**Supporting businesses through the pandemic** – Since the UK was put into lockdown on 23 March 2020, the government put into place a limited number of reasons for people to be allowed to leave their homes and imposed various restrictions on the opening of businesses. As a consequence, many businesses had to close or implement safeguards to prevent the spread of the virus, and it became the responsibility of SRS to enforce the Health Protection (Coronavirus Restrictions) (Wales) Regulations across the region. During the following 2 years these regulations were updated as we moved from various



tiers according to the current risks, and throughout this SRS have been at the forefront of not only enforcing these regulations but providing guidance to businesses in order that they can operate safely. This period has been a challenging and unsettling time for all concerned but the unique position of SRS in regulating a diverse range of businesses has enabled us to provide targeted guidance and advice to different business sectors by way of mailshots, the SRS website, through Primary Authority partnerships, regular visits to businesses and responding to service requests.

## Accessible services responsive to business needs

**Primary Authority** - The Primary Authority scheme enables a business to enter into a statutory partnership with a local authority through which it can receive assured advice. Provided this advice is followed, the Primary Authority (PA) is able to challenge intended enforcement action by other local authorities. SRS now has some 28 Primary Authority partnerships in place with both local and national businesses and is able to charge for the work done as part of these arrangements on the basis of full cost recovery. 2022/23 is likely to see further consolidation of this work.

28  
Primary  
Authority  
partnerships

**Allergens Project** – On 1 October 2021 the law on allergens and ingredients lists changed. Known as Natasha’s Law, food businesses are now required to provide full ingredient lists and allergen labelling on foods pre-packaged for direct sale on the premises. In order to prepare businesses for the changes SRS undertook a project to raise awareness of the changes, improve the knowledge of food businesses across the SRS region and across the service to provide greater support to businesses. Four free online workshops were run via MS Teams for businesses based in Bridgend, Cardiff and the Vale of Glamorgan which took place between August and September 2021. Scheduled on various days and times to accommodate as many businesses as possible, 65 delegates were trained. Feedback received was very positive with several businesses indicating that they would share the information with their colleagues.

**‘Ask the regulator’ podcasts** – In order to make information and advice on regulatory matters as easy as possible to access, SRS launched a new podcast service in August 2021. The aim of these podcasts is to hold dialogues and discussions between regulators, businesses and members of the public on matters concerning environmental health, trading standards and licensing with a view to providing useful advice and guidance on things that matter to businesses across the SRS region. Produced by Bro Radio, the local community radio station focussed on the Vale of Glamorgan, SRS have so far produced 5 podcasts on subjects such as allergens, Halloween, Safeguarding, Food and Christmas, and health and nutrition and aim to produce further episodes through 2022/23 on other environmental health, trading standards and licensing regulatory matters. These podcasts can be accessed via the SRS website and are also available on Spotify.



## Informed and confident consumers

As part of its Safeguarding role, the Service provides assistance to residents identified as being vulnerable in resolving difficulties encountered as a result of marketing scams and also more straightforward ‘shopping’ problems. In providing this service, the aim is not only to resolve the immediate difficulty facing a resident but to equip them as well as their families and carers with the knowledge and awareness to avoid similar issues arising in the future. This Plan has highlighted several prosecutions undertaken by SRS against rogue traders that have scammed individuals of money for work not completed and these examples demonstrate where SRS has been able to make a huge difference to the lives of residents needing assistance to resolve problems of this type. With the investment of officer time to provide tips on avoiding similar problems in the future, the legacy of these interventions is one where even our more vulnerable residents and their families are far better equipped to make informed decisions.

## Emerging issues

**New Food Businesses** – Food businesses are required to register with the service if a new business is planned, the nature of an existing business changes or if there is a change of ownership following the creation of new legal entities such as a new limited company, sole trader and partnership. All new businesses are required to be inspected and the Food Law Code of Practice requires that where possible, they be inspected within 28 days of opening. This requirement places a significant impact on the resources of the Food Safety and Trading Standards functions due to the large number of applications

received. During 2021/22 900 food business registration applications were received, 529 in Cardiff, 166 in Bridgend and a further 205 in the Vale of Glamorgan all of which are required to be inspected alongside the planned programme of inspections. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention.

**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 essential role in ensuring that food sold at these 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, the summer of 2021 was exceptionally busy. 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 and also to a degree of event organisers and promoters making up for the time lost during the various spells of lock down. All of this has an impact on the 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.

**Cardiff Music City** – Cardiff Council’s ambition of becoming a world leader in the music cities movement aims to create vibrant, exciting communities and increase the social and economic value of music in the City. Cardiff wants to become the first city in the UK to incorporate music into its city structure, from planning to licensing to social wellbeing and tourism. SRS will contribute significantly to these ambitions through its licensing policies and noise pollution functions and its important role in the successful staging of events. In supporting these ambitions it will be essential to consider the wider implications on communities and how these ambitions interact with regulatory services that protect residents and the public in general.

**On-line retailing** - The internet is undeniably driving change, and large retailers have responded by embracing multi-channel sales strategies. While the high street has not, as yet, been put out of business, there is a danger that traditional, physical stores will increasingly become secondary outlets to this strong online presence. It would seem inevitable that, in the longer term, the size and composition of the high street will be significantly impacted, as on-line shopping becomes a far more mainstream activity. Information technology and the fast developing digital environment are also causing a change in the way people interact, including in the way they interact commercially. Modern consumers increasingly access goods and services across the world through the

tap of a phone screen or the click of a mouse. The internet presents an enormous opportunity for consumers and this became even more evident during the last 2 years, as shops were required to close, and customers relied heavily upon the ability to shop online, whether it be to order groceries, or other consumer products. The Office of National Statistics report that the proportion spent online soared to 35.2% in January 2021 from 19.5% in January 2020. The internet expands the size of the market and therefore gives access to more providers and more choice. It also makes it possible to compare products, suppliers and prices on an unprecedented scale. The internet is the most empowering tool consumers have ever had. A consequence of this for the law enforcement agencies like the SRS is that the “visible” high street has moved to an activity undertaken behind closed doors. Monitoring the market place through traditional market surveillance methods thus needs to change else the SRS will only be able react to incidents and not prevent them.

# What we plan to do next

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

## Supporting the local economy Lead Responsibility

### A fair trading environment is maintained

Conduct intelligence led operations to investigate and disrupt businesses selling illegal tobacco products and raise public awareness of how to report it. C Hill

Incorporate regular surveillance and review of on line sales platforms into trading standards work due to the volume of goods being sold on line. C Hill

### Informed and confident consumers

Continue to promote the 'Buy with Confidence' (responsible trader) scheme across the region J Bale

### Improved business practices and operation

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

### Accessible services responsive to business needs

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

Develop online training for businesses on Food Safety and other regulatory areas. H Picton

Extend the scope of the 'Ask the regulator' podcasts to encompass other regulatory activities undertaken by SRS. J Bale

# What we will measure during 2022/23

## Performance Measures 2022/23 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%

## Priority

# Maximising the use of resources

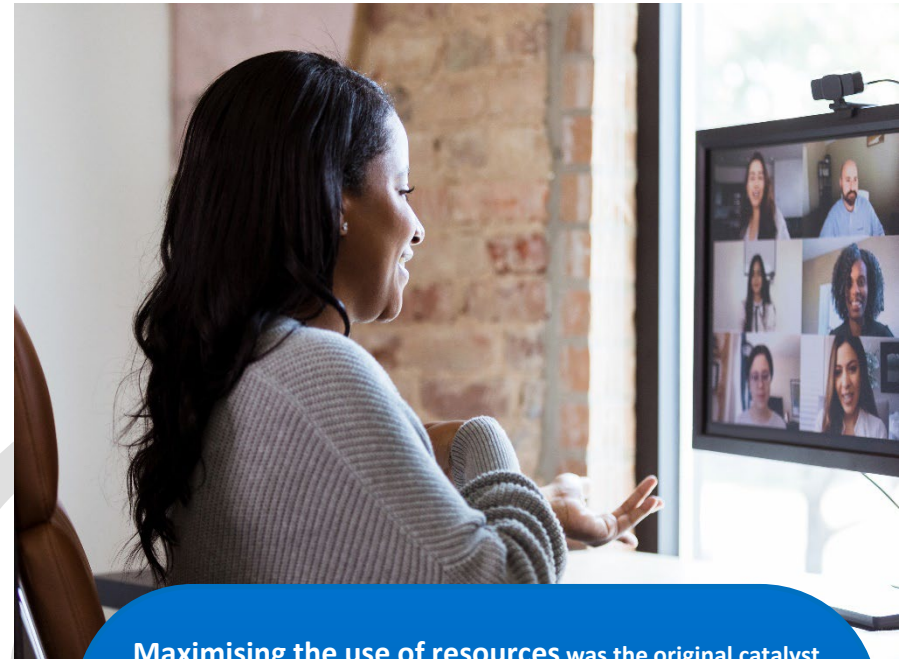
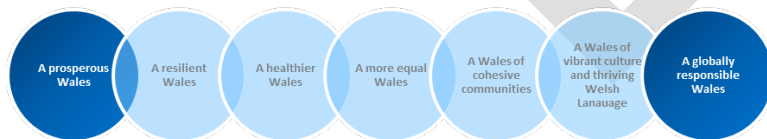
## Outcomes



## Outputs



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

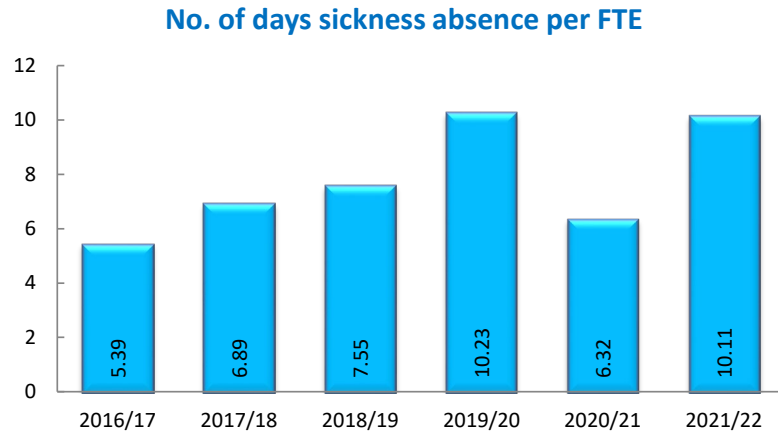


**Maximising the use of resources** was the original catalyst for creating SRS, and our work in this area continues. Reducing “triplication” of effort, introducing better processes, making our systems work without constant intervention, improving access into the service will all benefit our business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



### How training participants rated the training provided by SRS.



## What we have achieved

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

**Staff Commitment during the Covid-19 pandemic** – The Covid-19 threat to the health and wellbeing of our societies has been at the forefront of everyone’s minds during the last 2 years, and the significant role SRS has played in reducing the transmission of the virus has been well documented and recognised. Officers have been deployed to roles in the Test Trace Protect regime and enforcement teams while their colleagues picked up the additional demands placed on them due to the reduction in resource to deal with ‘business as usual’. This has required the highest level of commitment and flexibility from all officers during this time, to meet the unprecedented demands placed on them, at a stressful time both professionally and personally and SRS Officers should be celebrated for their achievements.

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

- All staff were provided with the equipment needed to work from home such as laptops and mobile phones.
- Business Support and Licensing teams moved to working from home keeping a minimal presence in the office .
- Where attendance is required at the office for cover, this is done on a strict rota basis to minimise the numbers in the office.
- Committee meetings, internal and external meetings moved online via MS Teams. This method of communication is also used to keep in contact with colleagues.

- During the suspension of visits to premises, virtual inspections were undertaken where appropriate.
- The printing of correspondence was moved online, enabling letters to be emailed to a hybrid mail provider who would print and send correspondence, removing the need for employees to attend the office.
- Taxi driver and vehicle applications and licence payments were moved online. This has had several benefits for applicants as they are no longer restricted to applying for a licence during office hours and can now apply at any time of the day. They also no longer need to travel, park and wait in queues to be served.
- Hackney Carriage and Private Hire vehicle licences were extended for 6mths in line with government safety guidelines to support the taxi trade during the early part of the pandemic.
- The Noise app introduced prior to the pandemic, has been a really effective tool in dealing with noise complaints, negating the need for officers to monitor noise nuisance themselves.
- In order to support food businesses that changed their operations to take-away during the pandemic, SRS Officers provided telephone support and advice.
- Service requests made about activities that SRS regulate were triaged to ensure that those requiring urgent attention were prioritised.

**Customer Satisfaction** – SRS delivers a diverse range of regulatory services on behalf of Bridgend, Cardiff and the Vale of Glamorgan Councils and we place great importance on receiving customer feedback which enables us to understand what we are doing well and what can be improved. As well as monitoring customer satisfaction through surveys, the results of which can be found throughout this plan, we also receive specific feedback from individuals or groups that we have helped expressing their gratitude for our intervention. During the last year, we received a number of such compliments, a selection of which can be found below-

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

*“I am writing to say thank you for your hard work dealing with our " Burger Van " problem. The van has closed since you posted your notice and has made life a bit more normal for everyone in the street. I am in admiration of your perseverance and diligence plus your stamina in dealing with this problem as I know it gave you stress and anxiety !. If*

*you ever go into politics you have my vote !! ...So once again thanks from me and the residents for you hard work...PS .please pass this email to your boss. It may get you a pay deserved rise !”.* Noise Pollution complainant

*“Thank you for the update on the Public Protection Committee report. I look forward to seeing how they respond to the public consultation. I am copying this email to your Chief Executive as I judge that you should receive commendation for the very efficient and sensitive manner in which you handled this matter of public concern. I appraise... how time consuming such work can be, particularly during the challenge of the pandemic”.* Street Trading complainant.

*“Just a quick note to you all at your covid team to say just a massive thank you to you for your support and dedication this year. It’s been a rough tough year due to covid restrictions but we all got through it. Your support loyalty means so much...”* Business who was assisted to meet covid restrictions.

**Review of HMO Licensing fee structure** – A thorough review of the licensee fee structure for Houses in Multiple Occupation was implemented in Cardiff during the year. The new fees better reflect the significant administrative costs and in particular the officer costs incurred in enforcing the scheme and raising standards. The additional income projected from this, together with the empty homes funding, derived from a Council Tax premium in Cardiff has allowed the team to strengthen by recruiting at administrative, technical and managerial levels.

## Public and stakeholders are able to access our services

**Access to SRS services** –The ease with which the public and stakeholders are able to access SRS services has been particularly important in 2021/22 as in 2020/21 as buildings were less accessible and many staff worked from home.

The following examples show how SRS ensures access to services.

- **SRS website** – The improvement of the SRS website is an ongoing process which sees web pages being added or updated to provide valuable up to date information for SRS customers. This has been particularly true during the last 2 years where we have provided regular guidance for businesses on how to comply with the Coronavirus Regulations and operate safely while highlighting the notices issued to businesses under the regulations. During the last year, the website had 64,914 users and 177,919 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 2021/22, despite the response rate being very poor, 100% of responses to our customer satisfaction survey said they were able to access the services and facilities they needed from SRS.
- **Twitter account** – Since launching our own Twitter account @SRS\_Wales in 2017, the SRS continues to increase the number of followers which stood at 643 on 1 April 2022. This means of communicating with our customers enables the service to be promoted whilst conveying key messages to residents and businesses alike and shared with the legacy authorities.
- **Noise app** – This app can be downloaded by customers making a complaint about noise enabling them to record short bursts of the disturbance and submit to the service to determine if a nuisance has occurred. This app has come into its own during the last 2 years during a time when noise nuisance complaints increased as more people stayed at home, enabling complaints to be triaged, and reducing the need for officers to visit homes to monitor disturbances.

providing income generation. We do this by developing Primary Authority partnerships with businesses of which we currently have 28 in place. Furthermore, the Service provides accredited training in areas such as food safety, Health and Safety and allergens and officers within the Industry Team have recommenced delivery of these course through a mixture of online and where possibly face to face. As we emerge from the pandemic it is hoped that the range and frequency of courses provided will increase.. Income is also generated via our Metrology Lab services and Air Quality Monitoring Services/Local Site Operator Licences. During 2021/22 the income generated was £63,407.22

## Staff are effective in their roles

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

- SRS regularly offers opportunities to employees who are interested in developing themselves by offering to match fund suitable applications for external study. This has resulted in a number of employees pursuing academic qualifications such as M.Sc. qualifications in Environmental Health and Public Service Management, several of whom have now successfully completed their studies and are able to apply their learning in the workplace.
- Secondments provide development opportunities for both the employee who is seconded and the employee who fills the empty position and during the last year the number of secondments within the service increased significantly. Within SRS we now have four team managers seconded to different stakeholders which has enabled their roles to be filled on a temporary basis by existing employees. Furthermore recent changes to the senior management team have provided an Operational Manager secondment opportunity. The creation of our JET teams enforcing Coronavirus Regulations also provided opportunities for 3 employees to be seconded to Team Manager roles. And finally, two of our officers have been seconded to TTP to take on a co-ordinating role across the wider public health network. The ability to 'act up' provides valuable development opportunities and experience for officers, whilst also contributing to the effective management of the service.
- Training in food standards work continued amongst our food safety officers to enable them to undertake food standards interventions at the same time as a food safety inspection of low risk food standards. This training and the concept of generic working not only provides team members with learning and career

## Income generation underpins sustainable service delivery

**UKAS Accredited Metrology Laboratory** - The Metrology laboratory based in Cardiff undergoes an annual audit by the United Kingdom Accreditation Service (UKAS) to maintain its accreditation. The metrology laboratory was first established in 1995, but since the creation of SRS there has been a drive to enhance the income generating capacity of the laboratory. Calibration work has been undertaken for a significant number of businesses, the majority of whom are regular and returning customers. These businesses represent a broad range of sectors including avionics, food, pharmaceutical and medical where accuracy and confidence in their weighing equipment is fundamental to their operations. The aim for this this year will be to continue with the UKAS Accreditation following the scheduled audit in August 2022 and supporting local businesses to meet their needs as they emerge from the pandemic.

**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

£63,000+

Income generated

development opportunities but benefits the service by building a more cohesive and resilient approach to inspections.

- The demands on SRS brought upon us by the Covid-19 pandemic required SRS employees to respond by agreeing to be redeployed to other roles. Our commitment to the Track, Trace, Protect Scheme saw 30+ officers be redeployed to act as clinical leads and contact tracers over the last year at various times with 2 officers acting as managers, extending their work experience and personal development.

## Emerging issues

**Recruitment and retention** – Recruiting to 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 as people secure positions elsewhere, and lack of a recognised regulatory apprenticeship, have to be addressed if we are to deliver effective regulatory services. Across Wales, the Directors of Public Protection Wales has identified immediate issues of capacity and resilience along with challenges for the future as the demands and expectations on regulatory services continue to grow. The *Building for the Future* report details the key issues confronting local government regulatory services; the challenges faced in terms of workforce pressures, the need for better coordination and oversight. It presents a case to Welsh Government for increased investment over the medium term, in terms of budget, funded public protection workforce development programmes and the introduction of a Regulatory Compliance Officer type apprenticeship in Wales. SRS fully supports these recommendations, however we also recognise that it will take some time for the effects of such proposals to come into fruition. Given the pressures the service currently faces, it will be essential for SRS to consider other short to long term solutions that make working for SRS an attractive proposition.

**ICT Interface with Legacy Authorities** – Since the inception of SRS, officers have been provided with access to the systems of the 3 legacy authorities of Bridgend, Cardiff and the Vale of Glamorgan. This enables officers to access the essential IT systems they need to fulfil their duties for the relevant authorities. While this has worked well, more recent updates to systems and software have impacted on the continuity of current arrangements affecting connectivity and access. SRS maintains good relationships with the ICT departments of the legacy authorities to deal with issues as they arise in the short term, however it has become evident that there is a need to consolidate the long term

access requirements of SRS to ensure continued access and smooth running of systems in order to provide seamless delivery of essential services.

**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 and ICT to explore options for improving equipment and systems to ensure that we deliver services both efficiently and effectively

**Customer engagement** – Customer engagement is key to understanding the needs and expectations of our customers. It helps us know what we are doing well and what we could do better and informs policy development and procedural changes within the service. Within SRS we engage with customers in a number of ways via public consultations, customer satisfaction surveys, citizens panels and the monitoring of complaints and compliments. While response levels via these various mechanisms has traditionally been low, the last year has seen a huge reduction, particularly via customer satisfaction surveys which is of concern. It is likely that this reduction is as a result of moving surveys online, as opposed to the sending out of hard copy questionnaires which whilst more cost effective for the service, requires a level of effort by customers to navigate their way to the relevant questionnaire. SRS recognises the need to improve customer engagement in this area during the coming year to maximise the important feedback we receive and will take steps to address this.

**Backlog of programmed inspections** - Government restrictions on social distancing, non-essential travel and the closure of certain businesses to reduce the spread of Covid-19, resulted in routine inspections being suspended several times during the last two years which inevitably created a backlog across a number of SRS services. Furthermore, the deployment of staff to Test, Trace, Protect, covid enforcement teams and other covid related activities has impacted on the resource available within teams to carry out “business as usual” activities creating a significant backlog of inspections, that is further exacerbated by recruitment and retention issues evident in some areas of the service.

**Hybrid working** – The changes to working practices brought about as a result of the covid pandemic saw organisations adapt to facilitating employees working from home. Whilst the majority of SRS staff were already accustomed to these arrangements due to our agile/remote working culture, others quickly adjusted. As restrictions have relaxed, there is now a greater call for employees to return to the office and organisations are considering how best to facilitate this whilst meeting the needs of employees in relation



to greater work/life balance. Hybrid working is a relatively new concept that is being seen by many as a way of preserving pre-pandemic office work cultures and office space investments while meeting employee expectations for greater flexibility, striking a balance between employee and employer preferences. Local government is no different and recent developments suggest that partner authorities are considering the implementation of such arrangements with a view to reducing accommodation footprints. SRS occupies office space in Bridgend, Cardiff and the Vale of Glamorgan and it will be necessary to work with these authorities to adjust to new arrangements while ensuring adequate office space is maintained and fit for purpose.

**Public health and adapting to world events** –SRS played a vital role in ensuring public health and public safety through the way in which we responded to the Covid-19 crisis and demonstrated how SRS is central to the public health agenda. It highlighted how, as a service our ability to adapt quickly and respond to emerging world events is key to delivering public health and safety, and how important it is to be able to respond in the same way going forward as issues emerge. Indeed, as we now come out from the pandemic, we are already playing our part in supporting Ukrainian refugees through the undertaking of checks on Homes for Ukraine, and tackling new covid variants. These rising demand pressures, together with ongoing pandemic management support will require effective prioritisation to ensure that the capability of the service is effectively deployed and managed.

# What we plan to do next

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

## Maximising the use of resources

Lead Responsibility

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

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

H Picton

- Consolidating the ICT interface between the legacy authorities to ensure continued access and smooth running of systems.
- The introduction of portable devices to enable use of electronic inspection forms.
- Exploring opportunities to use tools such as 'Yammer' to improve communications, sharing of ideas and innovation.

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

H Picton

Further develop a recruitment strategy together with retention initiatives to address professional skill gaps within the Shared Regulatory Service.\*\*\*

H Picton

Explore the feasibility 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.

J Bale

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

H Picton

Engage with partner authorities on accommodation requirements as a result of hybrid working arrangements.

C Hill

Undertake a review of HMO licensing administrative processes in Cardiff to speed up response times.

W Lane

## Public and stakeholders are able to access our services

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

All OMs

## Staff are effective in their roles

Complete the PDR process with all SRS employees.

All OMs / TMs

Review Workforce Development Plan.

H Picton

Conduct a staff survey of SRS employees .

H Picton

Promote and encourage staff involvement in directorate and corporate staff engagement and well-being initiatives and proactively support staff development in line with the new ways of working. \*\*\*

All OMs

## Income generation underpins sustainable service delivery

Review all available options for cost recovery and income generation.

J Bale

## What we will measure during 2022/23

Performance Measures 2022/23	Target
Average days sickness per FTE.	8.00
% of Staff Performance Development Reviews completed.	100%
% of staff who feel they are able to achieve the right balance between work and home life.	100%
% of staff working in SRS who are satisfied with their job in SRS.	100%
% of customers and Council members satisfied with their ability to access the facilities and services they need from SRS.	90%

# Appendix 1 – Risk Register

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

Risk Description	Inherent Risk Score (April 2022)		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.	4	3	High 12	The Covid 19 pandemic has placed substantial demands on the service in terms of Test, Trace Protect and the enforcement of the Coronavirus Regulations which has seen staff seconded to roles within these functions. This coupled with recruitment and retention issues has significantly impacted performance, The cost of living crisis is also certain to impact SRS in terms of regulatory	4	3	High

Risk Description	Inherent Risk Score (April 2022)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
				activity and on the wellbeing of staff. To mitigate this, the Service is examining new ways of prioritising services and using risk based approaches to activities in line with reduced resources, and through the recruitment of temporary staff and graduates. The service however has yet to fully return to “business as usual” and a backlog of normal planned work remains that requires significant resource to complete.			
RR2: Inability to recruit professional officers to vacant posts.	4	3	High 12	Recruiting to vacancies, particularly to those roles that require professionally qualified officers continues to be challenging, particularly as we are seeing a number of our officers leaving the service to secure positions elsewhere. The shortage of applicants with the right skills, abilities and experience in the different professions has created a more competitive market and is attributable to an aging professional demographic, increasing turnover and a reduced investment in sponsorship of students by Councils, 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. The service has recruited a number of students and apprentices to support the work of the service which has been beneficial as a number of students appointed to deal with the covid work have now joined the service on a permanent basis. While this has enabled some gaps to be filled, training and	3	3	Medium/ High 9

Risk Description	Inherent Risk Score (April 2022)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
				competency requirements mean that it will take some time for these officers to be fully competent to carry out the full range of duties, which will cause shortfalls, particularly in the Food Hygiene and Food Standards disciplines which does present issues for the service. This issue is not unique to SRS and the Directors of Public Protection Wales have produced a report on the issues of capacity together with a number of recommendations. While these proposals are welcomed, it will take some time for the effects to come into fruition. SRS SMT are therefore considering other short to long terms solutions to alleviate some of those pressures.			
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 service utilises a web based database that facilitates remote working and all staff have been issued with laptops and mobile devices which enables more agile working. The technology used, however, has become outdated and there is a need to improve our remote working capabilities and the IT interface between the SRS and the legacy authorities to deliver services efficiently and effectively. We are liaising with ICT on access requirements and on the sourcing of suitable devices, however current demands placed on ICT have resulted in delays in progressing some issues.	2	2	Medium 4

Risk Description	Inherent Risk Score (April 2022)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
RR5: Failure to identify and resource staff learning and development needs to address changes in roles and immediate needs and long term goals of the service could result capability issues amongst staff which would affect the Service's ability to deliver services.	3	3	Medium/ High 9	SRS is committed to the resourcing of training to develop people to ensure competency and the corporate appraisal process <i>#it'saboutme</i> ensures performance reviews are undertaken annually and learning and development opportunities identified. Due to recruitment and retention pressures, however, we now face a skills gap akin to that in 2015/16. A match funding offer to staff for personal development has resulted in a number of officers being supported in further development studies.	1	3	Medium/ Low 3
RR6: Implementation of new legislation may create additional demands on service delivery.	4	3	High 12	Whilst workloads are reviewed and monitored and processes are in place to regularly report to partner authorities, it is not always easy to predict the impact that new legislation may have on resources. This has been particularly evident during the Covid-19 pandemic. SRS became responsible for enforcing the Coronavirus Regulations across the 3 areas which has required a change of focus and placed additional demands on the service. As restrictions have been relaxed, we have seen our commitment reduce, however the impact of the legislation has impacted our planned "business as usual" activities, and the service now has a significant backlog of work. The pressure continues with the new law on food allergens which is an example of increased demand in an area where SRS is struggling to recruit competent professionals.	4	3	High

Risk Description	Inherent Risk Score (April 2022)		Risk	Comments What SRS are doing to mitigate risks	Residual Risk Score		Risk
	Likelihood	Impact			Likelihood	Impact	
RR7: An inability to recruit officers to the Duty Officer regime may result in inadequate cover and failure to deal with emergencies out of hours.	3	2	Medium 6	The Duty Officer regime operates on a 24/7 basis over 365 days a year providing a single point of contact out of office hours dealing with SRS emergencies. Cover is provided by officers on a voluntary basis however there have been periods where it has become difficult to recruit officers resulting in shortage of cover which has required managers to step in a short notice. Steps have recently been taken to address this lack of resilience following the recruitment of new officers to the service who have subsequently volunteered to work the rota. Therefore, whilst the risk has reduced, there will be a need to keep arrangements under review.	1	2	Low 2
RR8: The positioning of Shared Regulatory Services under a host authority, together with unique branding may result in the Service becoming divorced from its constituent Councils or marginalised.	2	2	Medium 4	The Service remains relevant to all 3 authorities through links into Corporate Plans of 3 authorities, attendance at the various Council/Executive meetings and maintaining strong links with members and senior officers within each legacy authority with opportunities to promote successes taken where possible. The Covid-19 pandemic has seen the critical involvement of SRS in the Test, Trace and Protect system and enforcement of Coronavirus regulations which has brought greater attention and recognition from the 3 authorities we serve.	1	2	Low 2



# Appendix 2 – Action Plan



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 2022/23 and undertake interventions in accordance with the plan and the arrangements in place to discharge food safety duties. ***	C Hill
Deliver the FSA Recovery Plan and adopt processes to prioritise and tackle the backlog of new business and broadly compliant C rated inspections.	C Hill
Deliver a programme of inspections targeting retail butcher premises to establish compliance with food standards and weights and measures legislation.	C Hill
Develop and adopt the Port Health Plan 2022/23.	C Hill
Undertake necessary actions to enable Cardiff International Airport to meet the requirements of the World Health Organisation Assessment tool for core capacity requirements at designed airports, ports and ground crossings.	C Hill
<b>Risks in the workplace are managed properly</b>	
Develop and adopt the Section 18 Health and Safety Service Plan 2021/22 and undertake interventions in accordance with the plan and the arrangements in place to discharge health and safety duties. ***	C Hill
Engage with smokers using, visiting or working at hospital sites to promote smoke free compliance in hospital grounds.	C Hill
<b>Noise and air emissions are controlled</b>	
Develop a Noise policy including service standards.	W Lane
Work with partner authorities to reinvigorate the Responsible Authority Meetings to ensure joined up working and balanced enforcement across regulatory activities.	W Lane
Review and explore options for future proofing the Out of Hours Noise Service.	W Lane
<b>A safe trading environment is maintained</b>	
Continue intelligence led operations to investigate and disrupt businesses selling non-compliant e-cigarette products.	C Hill

Conduct firework inspections of licensed premises to ensure those holding a licence sell fireworks that meet the relevant safety standards, have adequate policies in relation to age restricted sales and stored safety in retail premises.

C Hill

## Licensed premises operate responsibly

Complete the programme of inspections, re-visits and enforcement action, where appropriate, to ensure retailers are complying with the Minimum Unit Pricing (MUP) controls for alcohol.

C Hill

Review site licensing conditions in place to manage caravan sites and holiday parks to ensure they are suitable and sufficient to protect the health and safety of the public.\*\*\*

W Lane

## The quality of private rented property is improved

Drive up standards in the private rented sector by:

-Undertaking robust enforcement action to deal with rogue agents and landlords letting and managing properties. \*\*

W Lane

Evaluate the consultation responses carried out in Cathays on the re-declaration of the Cathays Additional Licensing Scheme and submit a report to Cardiff Council's Cabinet.

W Lane

Conduct proactive, area based exercises to identify and target unlicensed Houses in Multiple Occupation in Cathays and Plasnewydd.

W Lane

Review the fire safety standard, known as the Quick Reference Guide in conjunction with the South Wales Enforcement Group and Fire and Rescue Service and seek adoption by Cardiff Council's Cabinet.

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

Work in partnership to respond to the Covid-19 pandemic by leading on the Test, Trace, Protect service, supporting businesses and high risk care settings to operate safely and enforcing regulations and self isolation requirements. \*\* &\*\*\*

C Hill

Prepare businesses and internal procedures in readiness for the implementation of the new special procedures licensing regime and through the delivery of RSPH Level 2 Infection Control Training course for Special Procedures.

C Hill/J Bale

## Safeguarding the vulnerable

Lead Responsibility

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

All OMs

## Children are protected from harmful substances and products

Contribute to the safeguarding agenda by working with partners to safeguard the vulnerable to ensure that children are protected from harmful substances and products, older people are protected from rogue traders and scams and vulnerable people are not subject to exploitation, slavery and exploitation. \*\*\*

All OMs

Conduct intelligence led underage sales exercises in relation to the sale of tobacco, alcohol, nicotine inhaling products, knives and other age restricted products.

C Hill

## Illegal money lending activities are prevented

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

J Bale

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

J Bale

## 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

## Protecting the environment

Lead  
Responsibility

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

Undertake local air quality assessments and review the data to ensure that national air quality objectives continue to be achieved.\*\*\*

J Bale

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

J Bale

Contribute to good air quality in Cardiff by:

- Updating the Clean Air Strategy and Action Plan and implementing further measures to improve air quality;
- Reviewing real-time air quality data to assess and identify trends in pollution to assess further interventions that will further reduce air pollution;

J Bale

### People will use energy efficient buildings and products

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

W Lane

Review advice and support given to owners of long term empty homes and work with Welsh Government to establish the most effective enforcement route to deal with the worst long term, derelict empty homes and draw down funding to underwrite such action.

W Lane

Work with landlords and letting agents to raise the energy efficiency ratings of private rental properties in line with the requirements of the Domestic Minimum Energy Efficiency Standard (MEES) Regulations.

W Lane

Support the 3 partner Councils in fulfilling their climate change responsibilities through the delivery of regulatory activities that contribute to the reduction of carbon emissions. \*\*\*

All OMs

## Animals are treated humanely

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

J Bale

Carry out investigations into illegal dog breeding.

J Bale

Review the impact of the implementation of the Animal Welfare (Licensing of activities involving animals) (Wales) Regulations 2021.

J Bale

Engage with Welsh Government regarding the welfare of stud and imported dogs and wider animal welfare issues related to dog breeding and sales.

J Bale

Work with partners to make the case for practices allied to dog breeding to be brought within the licensing regime and subject to the necessary enforcement controls.

J Bale

## Communities are protected from nuisance and are safer

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

W Lane

## Supporting the local economy

Lead Responsibility

### A fair trading environment is maintained

Conduct intelligence led operations to investigate and disrupt businesses selling illegal tobacco products and raise public awareness of how to report it.

C Hill

Incorporate regular surveillance and review of on line sales platforms into trading standards work due to the volume of goods being sold on line.

C Hill

### Informed and confident consumers

Continue to promote the 'Buy with Confidence' (responsible trader) scheme across the region

J Bale

### Improved business practices and operation

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

J Bale/C Hill

### Accessible services responsive to business needs

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

H Picton

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

H Picton

Extend the scope of the 'Ask the regulator' podcasts to encompass other regulatory activities undertaken by SRS.

J Bale

## Maximising the use of resources

Lead  
Responsibility

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

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

- Consolidating the ICT interface between the legacy authorities to ensure continued access and smooth running of systems.
- The introduction of portable devices to enable use of electronic inspection forms.
- Exploring opportunities to use tools such as 'Yammer' to improve communications, sharing of ideas and innovation.

H Picton

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

H Picton

Further develop a recruitment strategy together with retention initiatives to address professional skill gaps within the Shared Regulatory Service.\*\*\*

H Picton

Explore the feasibility 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.

J Bale

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

H Picton

Engage with partner authorities on accommodation requirements as a result of hybrid working arrangements.

C Hill

Undertake a review of HMO licensing administrative processes in Cardiff to speed up response times.

W Lane

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

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

All OMs

### Staff are effective in their roles

Complete the PDR process with all SRS employees.

All OMs /TMs

Review Workforce Development Plan.

H Picton

Conduct a staff survey of SRS employees .

H Picton

Promote and encourage staff involvement in directorate and corporate staff engagement and well-being initiatives and proactively support staff development in line with the new ways of working. \*\*\*

All OMs

### Income generation underpins sustainable service delivery

Review all available options for cost recovery and income generation.

J Bale