

## Notice of Meeting

### Overview and Scrutiny Commission

Councillor Angell (Chair), Councillor Virgo (Vice-Chair),  
Councillors Mrs Birch, Brossard, Gbadebo, MJ Gibson, Mrs Mattick,  
Mrs McKenzie-Boyle, McLean, Mossom, Porter and Temperton

**Thursday 7 July 2022, 6.30 pm**  
**Online only via Teams**



### Agenda

Item	Description	Page
1.	<b>Apologies for Absence</b>	
	To receive apologies for absence and to note the attendance of any substitute Members.	
2.	<b>Minutes of previous meeting</b>	3 - 10
	To approve as a correct record the minutes of the meeting of the Overview and Scrutiny Commission held on 9 June 2022.	
3.	<b>Declarations of Interest and Party Whip</b>	
	<p>Members are asked to declare any disclosable pecuniary or affected interests and the nature of that interest, including the existence and nature of the party whip, in respect of any matter to be considered at this meeting.</p> <p>Any Member with a Disclosable Pecuniary Interest in a matter should withdraw from the meeting when the matter is under consideration and should notify the Democratic Services Officer in attendance that they are withdrawing as they have such an interest. If the Disclosable Pecuniary Interest is not entered on the register of Members interests the Monitoring Officer must be notified of the interest within 28 days.</p> <p>Any Member with an Affected Interest in a matter must disclose the interest to the meeting. There is no requirement to withdraw from the meeting when the interest is only an affected interest, but the Monitoring Officer should be notified of the interest, if not previously notified of it, within 28 days of the meeting.</p>	
4.	<b>Urgent Items of Business</b>	
	Any other items which, pursuant to Section 100B(4)(b) of the Local Government Act 1972, the Chairman decides are urgent.	
5.	<b>Public Participation</b>	
	To receive submissions from members of the public which have been submitted in advance in accordance with the Council's Public Participation Scheme for Overview and Scrutiny.	

### **EMERGENCY EVACUATION INSTRUCTIONS**

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6.	<b>Environment and Communities Overview and Scrutiny Panel Report: Integrated Enforcement</b>	11 - 28
	To consider the draft Integrated Enforcement review report prepared by the Environment and Communities Overview and Scrutiny Panel for submission to the Executive on 20 September 2022.	
7.	<b>Work Programme Update</b>	29 - 30
	Overview and Scrutiny Panel Chairs to provide verbal updates on the work programme and highlight any proposed changes such as scope, scheduling or duration.  The Commission to consider the scope for the Enforcement Strategy review from the Environment and Communities Overview & Scrutiny Panel.	

### **Date of next meeting**

The next Overview and Scrutiny Commission meeting is scheduled for 4 August 2022.

### **Forward plan and decisions taken**

Commission members are able to view upcoming decisions by looking at [Browse forward plans | Bracknell Forest Council \(bracknell-forest.gov.uk\)](#) and consider decisions taken since the last Commission meeting by using this link [What's newly published | Bracknell Forest Council \(bracknell-forest.gov.uk\)](#) and altering the date range.

Sound recording, photographing, filming and use of social media is permitted. Please contact Kirsty Hunt, 01344 353108, [kirsty.hunt@bracknell-forest.gov.uk](mailto:kirsty.hunt@bracknell-forest.gov.uk), so that any special arrangements can be made.

Published: 29 June 2022

### **EMERGENCY EVACUATION INSTRUCTIONS**

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**OVERVIEW AND SCRUTINY COMMISSION  
9 JUNE 2022  
6.30 - 8.20 PM**

**Present:**

Councillors Angell (Chair), Virgo (Vice-Chair), Mrs Birch, Brossard, MJ Gibson, Mrs Mattick, Porter, Temperton and Ms Gaw (Substitute)

**Present Virtually:**

Councillor Ms Merry

**Also Present:**

Ann Moore, Assistant Director: Democratic and Registration Services

**Also Present Virtually:**

Councillor Birch, Executive Member for Adult Social Care, Health and Housing

**Apologies for absence were received from:**

Councillors Gbadebo, Mrs McKenzie-Boyle and Mossom

**4. Declarations of Interest and Party Whip**

There were no declarations of interest made.

There were no indications that members would be participating while under the party whip.

**5. Urgent Items of Business**

There were no items of urgent business.

**6. Public Participation**

No submissions had been made by members of the public under the Council's Public Participation Scheme for Overview and Scrutiny.

**7. Minutes of previous meetings**

**RESOLVED** that the minutes of the meeting of the Commission held on 7 April and 18 May 2022 be approved as a correct record, and signed by the Chair.

**8. Work Programme Update**

Environment and Communities

The final meeting of integrated enforcement review was on 14 June where the Panel would present its findings and recommendations. The review report was due to be considered by the Commission at its July meeting. Scoping had begun for the next review which would focus on enforcement strategies and policies. In Q4 the Panel would review the implementation of the recommendations from the Registered Social Landlords review.

## Education, Skills and Growth

The review on SEND was at the stage of developing recommendations. It had taken longer than anticipated as the Panel had interviewed more witnesses than originally planned. Representatives from Croydon Council had presented their SEND approach to members of the Panel and council officers. Scoping had begun on the next review which would focus on county lines and child exploitation. In Q4 the Panel would review the implementation of the recommendations from the Community Infrastructure review.

## Health and Care

The final stage of the mental health review had been taking to the report to the Health and Wellbeing Board which completed recommendation 5. The Chair thanked Councillor Birch, Chair of the Health and Wellbeing Board for facilitating this. A Panel meeting was being scheduled to discuss the next review. The Chair reported he was attending the Disability Access Forum on 15 June to discuss with the forum members the Panel's blue badge review.

### 9. **Understanding the issues facing residents accessing GP surgeries**

Sitting as the Strategic Health Scrutiny Committee the Commission invited Tess Scott from Healthwatch Bracknell Forest, and Fiona Slevin-Brown and Dr Annabel Buxton from the Clinical Commissioning Group (CCG), to address the meeting in order to provide an overview on how well current health provisions meet existing and emerging needs.

The Healthwatch Bracknell Forest's presentation relating to the review of access to GP services noted:

- Healthwatch's access to GP-led services project would provide high level feedback of primary care in Southeast England. 347 patients in Bracknell Forest responded to the survey as part of the project.
- Main findings of the survey included patient frustration with lengthy telephone queues as they tried to contact their surgery and the availability of consultations. Telephone and online consultations had mixed feedback as some patients preferred this approach.
- The findings also found that there was varied understanding among patients on the pressures of primary care and the way the triage system worked. There was positive feedback in terms of staff ability to demonstrate empathy when dealing with patient enquiries. A main theme of the responses was a concern that lack of face-to-face consultations could lead to an inferior service.
- A website and telephone review was carried out in December 2021 which focused on all GPs in the Bracknell Forest area. The top three changes that Healthwatch recommended were removing lengthy Covid messages from the automated telephone welcome, designing a standardise template for local GP's website homepage and explaining the triage access. Some GP surgeries had already adopted the website template and it had received positive feedback from patients.
- The final report would be published in June 2022.

The Clinical Commissioning Group's presentation advised:

- General practice has adapted to new models of access rapidly to deal with the demands and consequences of the Covid-19 pandemic. NHS Digital

data shows that general practice appointment levels have increased when compared to pre-pandemic levels. Despite this increase in capacity, patients continue to report difficulties in access in many areas.

- A sustained significant increase in demand for all appointments since April 2021. Peaked in March 2022 at nearly 20,000.
- Across the system there is an increasing demand across all channels. Significantly increased demand for appointments, with more patients considering their condition to be urgent. Particular increase in the working age, generally well population accessing general practice and an increase in “health anxiety” and mental health consultations. Clinical capacity stretched across routine, urgent, long term condition management and preventative services
- General practice workforce and premise pressures experienced in Bracknell Forest include increased staff turnover, workforce capacity being stretched across all services, absence of staff for both Covid and non-Covid related reasons and longstanding premises pressures across surgeries.
- Over the last 6 months the CCG has carried out wide ranging engagement to better understand the views of local people about access to health care services. These activities include surveys, focus groups, working with partners, listening across social media channels and a continued commitment to supporting local health and wellbeing charity projects.
- Current priorities in Bracknell Forest include developing a consistent offer for people to access general practices services, utilising opportunities through face to face, digital and telephony innovation. A CCG’s objective for 2022-2023 is to use a population health management-based approach to the delivery of general practice to reduce demand and improve access. Over the next year the CCG strives to provide a better patient experience by improving telephony, increasing self-serve options and navigating more patients to the right care first time. It shall also maintain continuity of care for the patients who need it most while making the best use of resources support minor illness and routine care for the generally well population, as well as developing at scale Personalisation and Anticipatory Care Team workforce to support clinical staff with patients with LTCs and complex needs. The CCG also aims to strengthen the population health management approach through an established programme.
- The themes that were common across all of the feedback the CCG received include confusion among patients on the multiple entry points to care and on the variation in services. The majority of patients said that they want to access urgent care through their own practice, however their current experience of primary care was mixed. Patients also reported that access to primary care was worse during the pandemic. Digital access is welcomed by the majority of users, although some find it too confusing. Patients believe the NHS is a trusted source of information but there is less awareness of localised sources of information and more work is required locally to reach people including designing accessible materials and making time to have a presence in local communities. Communities want to help themselves but often don't have the time, money or knowledge to get started.
- In response to the recent findings the CCG is increasing capacity, increasing workforce capacity and skillsets, improving premises and releasing capacity, utilising digital to support people, continuing to engage and communicate with residents, population health management, maturing PCN development and improving self-care and alternatives to general practice.

- A range of communications materials, both internal and external, are continuing to be produced for GPs and partners across the whole system in order to tell one consistent story to patients. A new series of short animations have been created and will be launched in June. A communications escalation plan has been developed to ensure consistent messaging across partners at various levels of demand/system pressure. A Communications Resource Centre has been set up on the Frimley Health and Care website containing downloadable assets for each campaign to encourage sharing via social media channels, websites and newsletters.
- Staff recruitment and staff retention is key to both recovery and to having a sustainable professional workforce. If staff are invested in, then they tend to be more engaged. A six-month engagement programme for primary care network directors and managers is now underway with support from the communications and engagement team. The programme is supporting with both patient and community involvement theory alongside practical support. Frimley Training Hub staff survey run by The Picker Institute. Over 350 responses so far from staff across Frimley. Specific focus on satisfaction linked to responsibility, skills and organisational value of individual work. Reports now available on request that will allow individual primary care networks to drill down into the data.

The following questions were asked:

- In response to queries on why only 347 out of 117530 residents in Bracknell participated in the survey, and how are patients engaged with when Healthwatch carry out their projects, Tess Scott from Healthwatch, explained that they send out surveys to all the stakeholder as well as post on website, in their newsletter and across all social media platforms to promote participation in the survey. Healthwatch also attend various focus and voluntary group meetings when possible. The survey was carried out during Covid lockdown, so it was difficult to engage with the hard-to-reach communities.
- A query was raised on how issues on triage that were highlighted should be tackled to which Tess Scott from Healthwatch explained the final report will have recommendations on how to tackle the challenges associated with triage as well as other concerns highlighted in the findings. The final report will be published on the website, newsletter and social media and sent to key stakeholders to cascade.
- In response to a query on whether Healthwatch looked at the possibility of an automated message to tell the patient where they are in the queue when contacting a practice Tess Scott Healthwatch stated this will be recommended in the final report.
- In response to a question on whether Healthwatch monitor social media for feedback (including positive feedback) Tess Scott from Healthwatch explained that all feedback is welcome and encouraged Bracknell Councillors to engage with Healthwatch.
- A query was raised on whether the waiting time for blood test results would be reduced to which Tess Scott from Healthwatch explained they are unable to comment.
- A query was raised on whether Bracknell Forest Council Scrutiny Officers would be able to have a copy of the report once it was published, and when would the publication date be Tess Scott from Healthwatch agreed to provide copies to relevant officers and explained it would likely be published during week 3 in June 2022.

- In response to a question on whether Healthwatch is mostly patient focused Tess Scott from Healthwatch explained they aim to listen to the views of all the people who access the service, but they also have regular meetings with the CCG and ICS
- In response to the question on whether Healthwatch could be more proactive in working with local practices Tess Scott from Healthwatch explained they are as proactive as resources allow and they try to reach as many people as possible but are limited in that they only have one officer in Bracknell.
- In response to a query on what powers Healthwatch has it was explained by Tess Scott from Healthwatch that their role is to listen to the needs and experiences of services users and feedback to the relevant people.
- In response to a question on whether the new ICS system was too complicated Tess Scott from Healthwatch explained they were not placed to comment.
- Executive Member for Adult Services, Health and Housing suggested that the Commission schedule a briefing with Healthwatch to find out more information on their role.
- In response to a query on whether there would be similar projects aimed at dentist patients Tess Scott stated a survey designed for dentist users will be taking place in the summer and a report will be published soon after.
- In response to a query on how the situation can improve Dr Annabel Buxton from the CCG explained nationally there is not currently an increasing GP workforce which in addition to a rapidly increasing population and increasing demand on the existing workforce is a challenge. To tackle this the primary care network must take lessons from the Covid pandemic and move away from the old model while assuring the health needs of the local population are being met. The traditional model is transforming to incorporate the newer members of the primary care workforce. Telephony hubs and care navigators that are being set up will ensure that patient queries are dealt with in a timely fashion and sign posted so that the patient is aware which health care professional will be tasked with it.
- It was queried whether the current system consisted of too much paperwork and not enough time spent with patients and so is reform an option to which Dr Annabel Buxton stated in response that it was likely beyond the remit of the meeting before adding that paperwork isn't usually detrimental to that amount of time spent with patients as it is usually completed in evenings.
- In response to what is the preferable ratio for doctors to patients Dr Annabel Buxton from the CCG explained as there are many new and additional roles within the primary care network the traditional ratio is not as relevant as it used to be. Fiona Slevin-Brown from the CCG added the Fuller report explains how the primary care team doesn't consist of just GPs anymore but a whole multidisciplinary team consisting of GPs, nurses, physiotherapists, pharmacists now exist to ensure the health needs of the communities are met and, patients tend to be very positive to this change.
- When responding to a question on how Councillors can assist the CCG Fiona Slevin-Brown stated they would really appreciate the support of scrutiny colleagues, particularly when engaging with residents to ensure they understand what they are trying to achieve in pursuit of addressing the concerns and issues they are raising with Councillors.

- In response to the question on how the Council can work with the CCG to encourage residents to attend their appointments (or make practices aware when they are unable to attend), the CCG stated joint working would be appreciated and communications to residents is key. It is apparent there is a lack of understanding among residents on what services are available including the community pharmacist and the online version of 111 and so it is important to promote both services.
- In response to a query on whether Saturday openings was an option for local practices it was explained that there have been some Saturday and Sunday appointments available for a number of years now and there is an appetite to expand the service provision in order to reach harder to reach populations/working age population and to expand from offering not just GP appointments but to also offer screening, blood tests, health care assistance and nursing.
- When asked what the process for recruiting new GPs is it was explained that GP practices operate as independent entities, and the practice manager will be tasked with the recruitment. They will have to advertise the vacancy through the various options available to them.
- In response to a question on how provisions can be accelerated for the elderly and those who struggle with technology Dr Annabel Buxton explained they are aware there is one size doesn't fit all approach and there won't be a wholly digital solution. There will always be a role for telephone and will always be a role for the primary care network to be alert to the fact that some individuals need a different offering.
- A query was asked on what are the CCG's plans to make up for the shortfall in GPs or are the current plans over ambitious to which it was explained the CCG intends to ensure the workforce is well looked after. Many practices in the local area are training practices and generally tend to be very successful in retaining this population of these GPs within the area. It is important to create the conditions where communities can be part of the solution and can work in conjunction with the primary care network to make Bracknell an attractive place to work. Overall the CCG have been quite successful in recruiting for local vacancies. However, it is an increasing challenge as there are fewer GPs than there are jobs.
- In response to a query on whether GPs do blood tests it was explained that it will vary from practice to practice and the query will need to be taken away in order to provide an accurate response.
- In response to a query on whether all the local health services are joined up it was recommended to contact Patient Advice and Liaison Service as CCG unable to comment on that concern.
- Responding to a question asking if there were statistics currently available on the number of patients dealt with successfully over the telephone and therefore not requiring a face-to-face appointment, it was stated there are no figures available at this point but if primary care staff felt a face-to-face visit was necessary after a telephone appointment, then they would arrange one.
- It was queried whether a model where telephone consultations would be offered instead of face-to-face appointments would continue to which it was explained at present there are a variety of consultations provided including face to face and over the telephone. Currently there are more than 50% appointments offered that are face-to-face. Ultimately, quality care is at the forefront of the primary care network's ambition.
- When responding to a case where a resident had walked into their local practice and was refused an appointment Fiona Slevin-Brown asked for

the details to be passed onto them as the facility for patients to walk into any local practice and book an appointment should be offered.

- In response to a query on how the CCG deal with unspecified and last-minute closures of pharmacists it was stated that recent instances have been due to pharmacists finding themselves short staffed at very short notice. NHS England are currently commissioning pharmacists for the core contract but from July Integrated Care Boards will be accountable for commissioning local community pharmacists' services. Whereas the CCG commissions enhanced services from community pharmacists. Under the current set up CCG would contact NHS England if and when issues with pharmacists arise.
- It was queried if there was a way of tackling frequent visitors to surgery who may not necessarily need the care to which Dr Annabel Buxton detailed how a RAG rating system is used to segment the local population and then prioritise GP access accordingly. 65% of population is considered well, younger and working age and so through this RAG system they can ensure that this population can seek an alternative primary care avenue and then escalated to a GP appointment if necessary. This will be achieved through the telephony and digital services in addition to the reception team. It was also noted that some practices have their own paramedics which can help with this.

**CHAIRMAN**

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To: **Overview and Scrutiny Commission**  
**7 July 2022**

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## **Overview and Scrutiny Review of Integrated Enforcement Report** **Statutory Scrutiny Officer**

### **1 Purpose of Report**

- 1.1 To present the Environment and Communities Overview and Scrutiny Panel's report to the Commission following the Panel's review into enforcement services.
- 1.2 To provide the advice of the Statutory Scrutiny Officer (SSO) to inform the Commission's decision whether to endorse the Panel's recommendations to the Executive.

### **2 Recommendation**

- 2.1 **That the Overview and Scrutiny Commission considers whether to endorse the Environment and Communities Overview and Scrutiny Panel's recommendations to the Executive, as set out in the Panel report (attached as Appendix A) and paragraph 5.5 of this report, taking into account the comments of the Statutory Scrutiny Officer.**

### **3 Reasons for Recommendation**

- 3.1 It is the role of the SSO to advise the Council on any issues or concerns that may arise about the operation of the scrutiny function and the SSO may on occasion be required to make a determination about what the law says and how this should be applied to any particular situation. In carrying out this statutory role, there is a need to have a nuanced and meaningful understanding of the scrutiny function in order to accurately make judgments about its operation when disagreements or other issues arise.
- 3.2 The SSO is responsible for ensuring that the scrutiny function is adequately resourced and that service departments and partners are contributing sufficiently to reviews to ensure that they are effective.
- 3.3 The SSO is also responsible for providing advice to the Commission on whether the recommendations within review reports are robust, taking account of resource, legal, climate change, equalities, health and wellbeing and strategic risk implications.

### **4 Alternative Options**

- 4.1 The Commission could decide:
  - to endorse the recommendations to the Executive (and others) as set out in the Panel's report
  - to endorse the recommendations in part
  - to ask for further work to be undertaken before the report is submitted to the Executive recognising that this would delay the Panel's next piece of work

- to note the Panel report and not make any recommendations to the Executive (or others)

## **5 Supporting Information from the Statutory Scrutiny Officer**

- 5.1 The Overview and Scrutiny Commission commissioned the Environment and Communities Overview and Scrutiny Panel to carry out a review into integrated enforcement as part of the overview and scrutiny four-year work programme, which has been developed to track themes within the new Council Plan.
- 5.2 In support of this review a broad range of witnesses gave evidence putting the Panel in a good position to use this intelligence to frame the review and produce insightful recommendations.
- 5.3 The Panel was supported by Joey Gurney, Governance and Scrutiny Officer who supported the Panel to draw up the scope of the review and prepare an evidence pack of relevant information; to facilitate a number of Panel sessions to interview a range of contributors; to draw out findings from the Panel's investigation, and to prepare a review report. This involved in the region of 300 hours of scrutiny officer time and 12 hours of Panel meetings.
- 5.4 In summary it is the Statutory Scrutiny Officer's view that this review activity had adequate resources and that service departments contributed effectively to the review. The bulk of review activity took place between February 2022 and May 2022 and was slightly delayed due to scheduling challenges. The comments from the relevant officers and partners set out below do not indicate any concerns with the proposed recommendations.
- 5.5 The recommendations are:
1. Introduce the Community Safety Accreditation Scheme (CSAS) as a new standard:
    - Provide appropriate officers with training, ensuring they become accredited.
    - Encourage other appropriate officers to participate in becoming accredited where practical and where resource is available.
 The scheme should be introduced by January 2023.
  2. Introduce an allocation process where a team or officer is assigned as the lead for the duration of an enforcement case. This should be achieved by November 2022.
  3. Develop enforcement strategies encouraging greater collaboration across services and with partners. This will be an ongoing process but an update on its progress will be expected in 12 months' time. It is recognised progress may be impacted by the outcomes of the Panel's upcoming review of the Council's enforcement strategies.
  4. Run regular educational and awareness campaigns on enforcement policies and activities for residents. This includes information campaigns on CSAS as it is introduced. Good enforcement should also be publicised and celebrated, particularly when it involves a joint working approach. This will be an ongoing process but an update on its progress will be expected in 12 months' time.

## **6 Commentary from Environment and Communities Overview and Scrutiny Panel Chair, Councillor John Porter**

- 6.1 During this review it quickly became apparent how vast and complex enforcement can be. By its nature, enforcement in a local authority setting often requires collaboration between teams, services, and/or external partners. Therefore, the Panel wanted to explore whether a development of this collaborative approach, in the form of a more integrated model, could help to improve existing enforcement in the Bracknell Forest area. This was achieved by looking at the current enforcement structures and policies at the Council whilst exploring a range of best practices relating to integrated enforcement at other local authorities.
- 6.2 By using the opportunity to speak to different local authorities about their own approach to enforcement, panel members have deepened their understanding of what good enforcement looks like and how this is reflected in council policy and activity. It was also particularly useful for the Panel to learn more on the Community Safety Accreditation Scheme by speaking with Thames Valley Police, and to learn of the productive partnerships the Council has with other enforcement actors such as the Police and the Royal Berkshire Fire and Rescue Service.
- 6.3 It was encouraging to discover that the Council is working hard to tackle well known issues associated with enforcement and it was pleasing to learn that a joint working approach across services and with external partners is often adopted by officers. The recommendations put forward by the Panel aim to further enhance these efforts to work collaboratively to ensure Bracknell Forest is a safer, cleaner and happier place to live.

## **7 Response from Assistant Director for Contract Services**

- 7.1 There are a number of teams, in different departments across the Council that provide enforcement services and the panel heard evidence from them. As one of those teams we have been engaged throughout the scrutiny review process which has enabled us to share our good practice with the panel.
- 7.2 The opportunity to present evidence of current enforcement work and share potential options for the future has been invaluable so that Councillors appreciate the complexity and breadth of enforcement activity.

## **8 Consultation and Other Considerations**

### Legal Advice

- 8.1 There are no specific legal implications arising from the recommendations in this report.

### Financial Advice

- 8.2 Any actions arising from the recommendations are expected to be delivered within existing budgets.

### Equalities Impact Assessment

- 8.3 The review scope, activities and recommendations were all considered in the initial equalities screening attached at Appendix B.

### Strategic Risk Management Issues

- 8.4 The implications of poor enforcement performance would be reputational damage for the Council as there would be a potential for increased levels of low level and anti-social crime, an inability to protect our highly valued green spaces and appearance of residential communities. At the same time this would undermine the basis of formal application and approvals processes described within the attached report.

#### Climate Change Implications

- 8.5 The recommendations in Section 2 and 5 above are expected to have no impact on emissions of CO2 because there is no suggested increase in activity or travel that would generate a change.

#### Health & Wellbeing Considerations

- 8.6 The Council is committed to actively protecting and enhancing the borough's environment to keep it clean and green through enforcement. This supports Bracknell Forest being one of the healthiest places to live. Residents will therefore experience better health, both physical and mental.

#### Background Papers

None

#### Contact for further information

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Joey Gurney, Governance & Scrutiny Officer - 01344 351743

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# Overview and Scrutiny Panel Report

REVIEW TITLE	O&S PANEL	DATE
Integrated Enforcement	Environment and Communities	7 July 2022

“During this review it quickly became apparent how vast and complex enforcement can be. Nonetheless, it was encouraging to discover that the Council is working hard to tackle well known issues associated with enforcement and that a joint working approach is often adopted by officers. By using the opportunity to speak to different local authorities about their own approach to enforcement, panel members have deepened their understanding of what good enforcement looks like and how this is reflected in council policy and activity, which can help to further strengthen enforcement at Bracknell Forest Council”



**Councillor John Porter,**  
**Chair: Environment and Communities Overview and Scrutiny Panel**

## Recommendations



1. Introduce the Community Safety Accreditation Scheme (CSAS) as a new standard:
  - Provide appropriate officers with training, ensuring they become accredited.
  - Encourage other appropriate officers to participate in becoming accredited where practical and where resource is available.The scheme should be introduced by January 2023.
2. Introduce an allocation process where a team or officer is assigned as the lead for the duration of an enforcement case. This should be achieved by November 2022.
3. Develop enforcement strategies encouraging greater collaboration across services and with partners. This will be an ongoing process but an update on its progress will be expected in 12 months' time. It is recognised progress may be impacted by the outcomes of the Panel's upcoming review of the Council's enforcement strategies.
4. Run regular educational and awareness campaigns on enforcement policies and activities for residents. This includes information campaigns on CSAS as it is introduced. Good enforcement should also be publicised and celebrated, particularly when it involves a joint working approach. This will be an ongoing process but an update on its progress will be expected in 12 months' time.

## Key findings

The Panel found that:

- Joint working is often necessary during enforcement cases. A proactive attitude is adopted by Bracknell Forest officers when crossover between teams is required.
- There was evidence of productive partnerships with external agencies when carrying out enforcement activities
- The Public Protection Partnership enables the Council to be flexible and resilient when responding to emerging crises and provides greater access to enforcement specialist areas

- CSAS is a useful enforcement tool available to local authorities that provides additional powers to an approved officer while further improving relationships with the police by enhancing intelligence sharing.
- There is no one size fits all integrated enforcement model available to local authorities
- Integration of enforcement services is not judged by senior officers or the lead Executive members to be beneficial financially or structurally

## Introduction

For local authorities, enforcement covers a wide range of services across various departments, organisations, and agencies. Local authorities regularly have to tackle difficult issues often associated with enforcement such as lengthy delays caused by complex cases, public misinformation and rapidly emerging crises. Some of these problems are likely to be exacerbated due to increasing financial constraints on local councils.

 Financial implications are highlighted throughout the report using this symbol.

By its nature, enforcement in this context often requires collaboration between teams, services, and/or external partners. It is not unusual for an enforcement case to require crossover between departments and interventions from external organisations such as the police or fire service. Therefore, it is important a collaborative culture exists between all enforcement actors.

As part of this review, the Environment and Communities Overview and Scrutiny Panel wanted to explore whether a development of this collaborative approach, in the form of a more integrated model, could help to improve existing enforcement in Bracknell Forest. This would be achieved by looking at the current enforcement structures and policies at the Council while exploring a range of best practices relating to integrated enforcement from other local authorities.

Throughout the review the Panel recognised that the range of services and enforcement activities that could be considered was vast and varied. Unregulated activity had the impact of being anti-social, affecting local communities and impacting on community safety. In order to remain within the scope for this review, as originally commissioned by the Overview and Scrutiny Commission, the Panel focussed on those aspects which fell within the 'protecting and enhancing our environment' theme of the Council Plan, and not the 'communities' theme in which the phrase 'community safety' referred to activities to maintain good public order, reduce anti-social behaviour and combat drug related crime therefore, the council's Community Safety Team was out of scope.

The Panel identified and interviewed senior officers from Bracknell Forest Council including the Executive Director of Place, Planning and Regeneration, Assistant Director of Contract Services and the Head of the Public Protection Partnership, in addition to officers from partner organisations such as the Local Fire Authority and Thames Valley Police. Desk top analysis of policies and other relevant documents was also conducted by the Panel.

As part of the Panel's work on best practice in terms of enforcement they spoke to officers and looked at policies from other borough councils who have introduced different variations of an integrated enforcement model. This included interviewing the Assistant Director of Community Safety and Environmental Health from the Royal Borough of Greenwich who oversaw the implementation of the integrated enforcement model at Greenwich.

 Good practice is highlighted throughout this report using this symbol.

## Review findings

### Place, Planning and Regeneration

Enforcement is undertaken through:

- Planning enforcement as a mechanism to uphold the integrity of the wider planning system to protect the public, businesses and the environment from unauthorised development and its harmful impacts. Potential breaches are examined and appropriate action determined by the Planning team.
- Building Control officers use the powers to impose fines for contraventions of the Building Regulations and to remove or alter offending building work as appropriate, subject to a successful prosecution.
- The Highways and Transport team manage:
  - street work permit enforcement and issue penalty fines for non-compliance or over-run-on road space
  - overgrown vegetation notices, highway obstruction, failure to maintain ditches to recover all costs if there is a failure to comply
  - Advanced Payment Code (APC) notices, securing bond against unfinished new roads (debt applied to Land Charges Register)

Officers with enforcement powers:

	<b>Building control officers</b>
	<b>Planning enforcement officers</b>
	<b>Highway works inspectors</b>

Enforcement duties are carried out as part of different engineering roles, requiring a range of different skillsets. Some of these roles are only part enforcement focused and so have other functions. Enforcement staffing is therefore difficult to quantify. The Panel were advised that income in terms of fines was hard to quantify and varied, but the revenue income was very low.

### Parking

Bracknell Forest Council is responsible for parking enforcement on its streets and in its car parks using the civil parking enforcement powers provided by the Traffic Management Act 2004. It is also responsible for the operation and management of the Council owned car parks and both these functions are undertaken by contractors (NSL Ltd) working on behalf of the Council. Revenue to the Council for Penalty Charge Notices (PCNs) is approximately £65k per year.

<b>NSL Ltd:</b>
<ul style="list-style-type: none"> <li>• distinctive blue uniforms</li> <li>• an identification number and badge</li> <li>• serve PCNs to vehicles parked illegally</li> <li>• do not get incentives for issuing tickets enforce parking regulations:</li> <li>• PCNs processed end to end by NSL</li> </ul>

### NSL Contracted Staff

<b>Civic Enforcement Officers</b>	
<b>Cleaners</b>	
<b>Supervisor</b>	
<b>Senior Supervisor</b>	
<b>Client Account Manager</b>	

It is recognised by senior officers and by the Executive portfolio holder that the contract with NSL has seen improvements in parking enforcement within the borough. The Panel was also pleased to discover postal PCNs had recently been introduced as a means of allowing officers to issue tickets quicker.



In response to Covid-19 restrictions, NSL provided the Council with Covid Ambassadors to advise and support members of the public and businesses on following social distancing rules. Their success was recognised last year when Bracknell Forest Council and NSL were given a British Parking Award in the 'a positive response to the pandemic' category.

## Public Protection Partnership



The Public Protection Partnership (PPP) is a shared service delivering Environmental Health, Licensing and Trading Standards on behalf of two authorities Bracknell Forest Council and West Berkshire Council.

These services encompass a wide range of areas of responsibility.

- Air quality management
- Animal warden
- Animal welfare
- Contaminated land
- Communicable diseases
- Community education
- Community mediation
- Consumer advice
- Environmental nuisance protection
- Fair trading
- Financial investigations
- Fraud and counterfeiting
- Food safety
- Gambling
- Health and safety at work

- Health promotion
- Industrial pollution
- Licensing
- Metrology
- Overloaded vehicles
- Pest control
- Petroleum and explosives
- Primary Authority
- Private sector housing
- Product safety
- Public health
- Rogue trading
- Scams
- Taxi licensing
- Underage sales
- Water supplies

The PPP's priorities are informed by the assessment of evidence from across a wide range of sources which include assessment of resident concerns, council and national priorities as well as emerging issues.

The priorities of the PPP are:

- community protection
- protecting and improving health
- protection of the environment
- supporting prosperity and economic growth
- effective and improving service delivery
- partnership working.

Senior officers explained that the PPP aims to make it clear how they operate and show why it does the work it does as they identify communication and transparency as key to the partnership's success. They explained that each project undertaken should be linked back to an evidence-based approach.

There are approximately 100 officers covering the Bracknell Forest and West Berkshire areas. Being part of the PPP provides the Council with not only greater resilience when resources are stretched but also greater access to specialist officers. There is also a shared Trading Standards Service with Wokingham who also buy into the PPP case management and intelligence functions. Due to the

nature of these types of enforcement services it would be difficult to further integrate them. To keep services as they are within the PP would be cost effective for the Council.



**The PPP have their own case management function who have had a high level of success in pursuing criminal actions. These have resulted in publicity which in turn acts as a deterrent for those considering offending. Therefore, it is recommended that good enforcement across the Council is regularly publicised for the reasons set out above. It is also recommended that the Council develops the PPP's drive for transparency by ensuring regular educational campaigns on enforcement are run for residents. This will help to tackle local misinformation on enforcement while increasing awareness of rules and regulations across the borough.**

Services under the PPP were put under immense pressure during the Covid-19 pandemic. Due to its fluidity in structure and design the service was able to adapt and react to the challenges the crisis saw emerge. Covid is just one such example of a fast-emerging issue from over the years that have required the PPP to not only be flexible but resilient and resourceful too. Other examples include the Foot and Mouth outbreaks in the 2000's. By design the PPP must be able to adjust its plans for such eventualities and the partnership has so far proved itself to be responsive when faced with quickly changing demands.

### **A Joint Working Approach**

Enforcement cases often require crossover between teams and services and the Panel discovered this is regularly the case within the borough. For example, teams across services of the Council often work together on 'problem sites' – particular sites that have been identified as having multiple sets of enforcement related issues. Officers from different services will coordinate and seek to work closely by meeting regularly to tackle 'problem sites'.

Teams within the PPP regularly coordinate with other officers at Bracknell Forest Council. PPP officers within environmental health will work closely with the Council's Highways and the Planning teams on issues of air quality. For instance, the PPP is working closely with Civil Enforcement Officers to tackle car idling near schools. On issues concerning street trading, appropriate officers from the PPP's licensing team will collaborate with officers from Highways and Planning. Examples of joint working between officers from the PPP and from the Council are not limited to these two and the Panel was pleased to hear there were many more.

### **External Partnerships**

Bracknell Forest Council has a good working relationship with the Local Fire Authority. On enforcement the Council has signed a Memorandum of Understanding (MoU) with Royal Berkshire Fire Authority (RBFRS), alongside other borough councils in the county. The objective of the MoU is to ensure appropriate standards of fire safety and other safety provisions are provided and maintained in high and medium rise flats common to both the local authority and RBFRS areas. It also aims to establish a joint working team to carry out joint inspections.

Due to the specialist issues the different teams cover within the three main areas of the PPP, they regularly coordinate with a wide range of other partners outside the Council.



Fly tipping has increasingly become a challenging issue both nationally and locally. In the Bracknell area there are, on average, 25 reports a week of fly tipping. In response, the PPP has recruited an enviro-crime officer as well as introduced CCTV at local hotspots. In addition to this, the PPP has worked alongside several Thames Valley teams, The Driver and Vehicle Standards Agency and HMRC on operations designed to tackle a variety of enforcement issues, including fly tipping. As a result of these campaigns there are now currently a significant number of enviro-crime related investigations being undertaken and several files are with the PPP case management unit for progressing through to court.

## Integrated Enforcement at other local authorities

The Panel quickly discovered the term integrated enforcement can be interpreted in many ways, particularly in a local authority setting. For some authorities it can mean the merging of all enforcement services together under one structure while for others it could simply mean the introduction of a single integrated enforcement policy. This is because enforcement can be highly complex and so there isn't a 'one size fits all' model.

By speaking to the Assistant Director of Community Safety at the Royal Borough of Greenwich, the Panel discovered Greenwich had recently adopted what was described as a 'hybrid model'. At Greenwich integrated enforcement was reflected not only in their approach to enforcement but they also have a more integrated service design in order to reduce delays caused by silo working. Most enforcement cases will require some crossover between services, and this can cause unnecessary delays as cases are often 'ping-ponged' back and forth between teams. To tackle this, Greenwich has introduced a process where a team will take ownership from start to finish of a case, ensuring they regularly follow up cases once they are with different teams. Responsibility for an enforcement case is decided on a case-by-case basis.



The Royal Borough of Greenwich has received several plaudits for its joint enforcement work, including a Met Police Excellence Award 2021 for 'Safer Neighbourhood Team of the Year' due to its outstanding productivity, performance, and partnership working.

Other local authorities such as Spelthorne Borough Council and Reigate and Banstead Borough Council have introduced a Joint Enforcement Team (JET). The JETs see council officers working collectively with the police to combat local issues such as noise, anti-social behaviour and low-level crime. The JET team at Reigate and Banstead Borough Council is made up of five CSAS accredited officers. They act as a point of contact and have been described as "enforcement coordinators". Most of their cases are related to environmental crime.

Good enforcement practices shared by all the aforementioned borough councils include:



- Regular formal meetings between all enforcement teams to reflect and review ongoing enforcement challenges as well as share relevant intelligence
- A collaborative culture exists. Officers actively seek to work closer with internal and external partners to ensure cases are solved both efficiently and quickly
- An enforcement officer usually takes responsibility of a case from start until finish to avoid delays caused by silo working



**It is recommended that the Council introduces an allocation process where a team or officer is assigned as the lead for the duration of an enforcement case. It is also recommended that the Council develops enforcement strategies that encourage greater collaboration across services and with partners. Upon strengthening their knowledge of good enforcement practices at other local authorities the Panel feel these recommendations will complement and enhance existing enforcement activities within the borough.**

A further consideration highlighted during the Panel's work on integrated enforcement at other Councils is the importance of Executive Members' and Officers' buy-in to an integrated enforcement model as a means of improving local enforcement.

## CSAS

The Community Safety Accreditation Scheme (CSAS) allows organisations and their employees to be given targeted police powers by the Chief Constable. There are currently over 40 powers available to an Accredited Person which are set out in Schedule 5 of the Police Reform Act 2002. These include issuing fixed penalty notices for various low level offences, power to control traffic and the power to require giving of name and address.

The Chief Inspector advised the Panel that the CSAS allows for greater partnership working between the police and local organisations. The scheme creates a framework for public and private bodies to work in partnership with the police, providing additional uniformed presence in communities and capitalising on the skills and information captured by those already engaged with the community.

### Benefits of CSAS

- ▲ Allows for a closer working relationship between the Council and TVP
- ▲ Raises priority of community safety
- ▲ Increasing uniformed presence on the streets
- ▲ Reductions in a range of local issues such as street drinking and dog fouling
- ▲ Public reassurance
- ▲ Enhanced intelligence sharing
- ▲ Save police valuable time

Thames Valley Police have seen council schemes introduced at Cherwell District Council and Royal Borough of Windsor and Maidenhead Council. Both have accredited warden schemes which are working well. Furthermore, the CSAS accredited JET officers at Spelthorne have experienced some success with the scheme. As a result of enforcement officers having CSAS powers, they have been able to ensure convictions for serial fly-tippers and the seizure of fly-tippers vehicles.

Registration CSAS costs are as below:

Organisation fee for set up: nil

Individual fee: £75 per person for Level 2 Vetting (usually valid for 3 years)



Further to an application, the staff seeking accreditation will be required to undergo police vetting checks and complete a CSAS training course with an approved training provider, before they can be accredited. The cost of the training will be met by the organisation seeking accreditation. The training will cover the specific powers that are being requested together with other elements such as personal safety and conflict resolution. Costs for the training course vary depending on the provider, also the number of employees, no of power being accredited. CSAS training lasts for 5-7 days.

It is a police decision which powers would be appropriate after close consultation between the organisation and the police. They will need to consider:

### CSAS Considerations

- ▲ Organisation applying has a satisfactory complaints procedure



- ▲ The organisation applying has a fit and proper supervisory/management structure to oversee the accredited person
- ▲ The organisation must be suitable to exercise the accredited powers
- ▲ The organisation applying has a fit and proper supervisory/management structure to oversee the accredited person
- ▲ The organisation must be suitable to exercise the accredited powers
- ▲ The employee must be capable of executing the tasks provided by the accredited powers
- ▲ The employee must have received appropriate CSAS training – this is the employer’s responsibility



**It is recommended that the CSAS is introduced at Bracknell Forest Council. By doing so officers will be able to further strengthen their joint working approach while reassuring residents the Council aims to ensure the borough is a safer, cleaner and happier borough to live in. Any introduction of the CSAS must be accompanied by a public awareness campaign of the scheme.**

### Financial considerations

These recommendations will mean additional responsibilities are to be added to existing employees’ workloads.

All costs (including training) will be contained within existing budgets but if they exceed these they will be highlighted as budget pressures and additional funding will be requested as part of the annual budget cycle. Some costs may well be offset through additional income gained by enforcement activity.

## Review Panel

<b>Councillor Angell</b>	<b>Councillor Mrs Ingham</b>
<b>Councillor Allen</b>	<b>Councillor Kirke</b>
<b>Councillor Brossard</b>	<b>Councillor Mrs McKenzie-Boyle (Vice chair)</b>
<b>Councillor Brown</b>	<b>Councillor Porter (Chair)</b>
<b>Councillor Ms Gaw</b>	<b>Also attending: Councillor Temperton</b>

## Contributors to the review

<b>Andrew Hunter</b>	Executive Director: Place, Planning and Regeneration, Bracknell Forest Council
<b>Damian James</b>	Assistant Director: Contract Services, Bracknell Forest Council
<b>Sean Murphy</b>	Head of Public Protection Partnership
<b>Louise Watkins</b>	Head of Service: Parking Management & Leisure, Bracknell Forest Council
<b>Alison Beynon</b>	Strategic Manager, Public Protection Partnership
<b>Helen Kenny</b>	Chief Inspector, Thames Valley Police
<b>Sean McDermid</b>	Assistant Director: Community Safety & Environmental Health, Royal Borough of Greenwich
<b>Councillor Colin Dudley</b>	Chairman, Royal Berkshire Fire Authority
<b>Wayne Bowcock</b>	Chief Fire Officer, Royal Berkshire Fire and Rescue Service
<b>Tregear Thomas</b>	Area Manager, Royal Berkshire Fire and Rescue Service
<b>Councillor John Harrison</b>	Executive Member for Culture, Delivery and Public Protection
<b>Councillor Chris Turrell</b>	Executive Member for Planning & Transport
<b>Ben Murray</b>	Senior Manager for Regulatory Services, Reigate and Banstead Borough Council
<b>Martin Cole</b>	Neighbourhoods Manager, Spelthorne Borough Council
<b>Joey Gurney</b>	Governance and Scrutiny Officer, Bracknell Forest Council

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## Initial Equalities Screening Record Form

Date of Screening: May 2022 and updated following the review recommendations in June 2022	Directorate: Delivery	Section: Democracy and Governance	
<b>1. Activity to be assessed</b>	Overview and Scrutiny Panel for Environment and Communities review into Integrated Enforcement. This review will consult with witnesses from local enforcement partners, council officers and representatives from other local authorities.		
<b>2. What is the activity?</b>	<input type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input checked="" type="checkbox"/> <b>Review</b> <input type="checkbox"/> Service <input type="checkbox"/> Organisational change		
<b>3. Is it a new or existing activity?</b>	<input checked="" type="checkbox"/> New		
<b>4. Officer responsible for the screening</b>	Joey Gurney, Governance & Scrutiny Officer		
<b>5. Who are the members of the screening team?</b>	Joey Gurney, Paris O'Keeffe-Johnston, Cllr Porter, Cllr Mrs McKenzie-Boyle		
<b>6. What is the purpose of the activity?</b>	The purpose of the activity is to determine whether a more integrated approach to enforcement could lead to improvements across Bracknell Forest.		
<b>7. Who is the activity designed to benefit/target?</b>	All residents.		
<b>Protected Characteristics</b>	<b>Please tick yes or no</b>	<b>Is there an impact?</b>	<b>What evidence do you have to support this?</b>
<b>8. Disability Equality – this can include physical, mental health, learning or sensory disabilities and includes conditions such as dementia as well as hearing or sight impairment.</b>	N	No impact identified.	The recommendations will not impact disability equality but should have an overall positive impact on all groups by improving enforcement structures and activities.
<b>9. Racial equality</b>	N	No impact identified.	The recommendations will not impact racial equality but should have an overall positive impact on all groups by improving enforcement structures and activities.
<b>10. Gender equality</b>	N	No impact identified.	The recommendations will not impact gender equality but should have an overall positive impact on all groups by improving enforcement structures and activities.
<b>11. Sexual orientation equality</b>	N	No impact identified.	The recommendations will not impact on sexual orientation equality but should have an overall positive

				impact on all groups by improving enforcement structures and activities.
<b>12. Gender re-assignment</b>		N	No impact identified.	The recommendations will not impact on gender re-assignment equality but should have an overall positive impact on all groups by improving enforcement structures and activities.
<b>13. Age equality</b>		N	No impact identified.	The recommendations will not impact on age equality but should have an overall positive impact on all groups by improving enforcement structures and activities.
<b>14. Religion and belief equality</b>		N	No impact identified.	The recommendations will not impact on religion and belief equality but should have an overall positive impact on all groups by improving enforcement structures and activities.
<b>15. Pregnancy and maternity equality</b>		N	No impact identified.	The recommendations will not impact on pregnancy and maternity equality but should have an overall positive impact on all groups by improving enforcement structures and activities.
<b>16. Marriage and civil partnership equality</b>		N	No impact identified.	The recommendations will not impact on marriage or civil partnership equality but should have an overall positive impact on all groups by improving enforcement structures and activities.
<b>17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.</b>	No other impact has been identified.			
<b>18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?</b>	N/A			
<b>19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?</b>	N/A			
<b>20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?</b>		N		

<b>21. What further information or data is required to better understand the impact? Where and how can that information be obtained?</b>	We considered a wide range of data from local and national sources. This was collated in an evidence pack which is available on BFC website.		
<b>22. On the basis of sections 7 – 17 above is a full impact assessment required?</b>		N	
<b>23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.</b>			
<b>Action</b>	<b>Timescale</b>	<b>Person Responsible</b>	<b>Milestone/Success Criteria</b>
See recommendations contained in report.		Cllr Porter	Recommendations are endorsed by the O&S Commission and agreed by the Executive.
<b>24. Which service, business or work plan will these actions be included in?</b>	Overview & Scrutiny Commission work plan		
<b>25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?</b>	Please see recommendations contained in the report.		
<b>26. Assistant director's signature.</b>	Signature: 		Date: 27 June 2022

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**Enforcement Strategy Review  
Environment and Communities Overview & Scrutiny Panel**

**Reason for review**

Following a review of integrated enforcement, the panel identified that a companion review should be undertaken to complete looking at this important area of council work. The first review looked at the enforcement powers that the council holds and how these are distributed across the council's enforcement teams. This review specifically looks at the use of these powers and the effectiveness of the use of the powers, the consistency of their application and adherence to the principles of enforcement agreed by the council.

**Objectives/scope**

The review is focused on the four areas of enforcement activities:

- Planning (Development and Building Control)
- Parking
- Highways (including blocked pavements)
- Parks and Open spaces (Rangers)
- Fly-tipping

The review is aiming to understand:

- The council's enforcement strategy and how departmental / service team policies are linked to this.
- What processes are followed by each team
- Thresholds for action (stages leading to and including court action)
- Barriers to enforcement
- Any changes in policy or approach needed
- Understanding the customer/reporter's experience of asking for enforcement

**Delivery methods:**

- Desktop data review
- Interviews with enforcement officers (view from the front line)
- Presentation from each enforcement team
- Review effectiveness data (how has the contra behaviour been reduced from the enforcement stance taken)
- Reviewing court case data and outcomes
- Reviewing complaints
- Speaking to customers who have asked for enforcement

**Council theme:**

- Environment and Communities

**Council team:**

- Contract Services (Parking and PPP)
- Planning

**Review due:**

- Sept - Nov

**Proposed by:**

- Replacement work programme item

**Equality Impact Assessment**

- Potential for unintended discrimination (disproportionate enforcement)

**Financial and legal implications**

- There are potentially legal and financial implications of any recommendations arising from this review which will be fully addressed in the review report.

**Climate change implications**

The built environment can both positively and negatively impact on our climate change objectives. Strong and consistent enforcement can ensure that the policies agreed by the council are met by everyone.