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| Meeting of:   | <b>Homes and Safe Communities Scrutiny Committee</b>   |
| Date of Meeting:  | <b>Wednesday, 10 July 2024</b>   |
| Relevant Scrutiny Committee:  | Homes and Safe Communities   |
| Report Title:   | Shared Regulatory Services Business Plan   |
| Purpose of Report:  | For Committee to consider the Shared Regulatory Services Business Plan 2024-25                         |
| Report Owner:   | Director of Environment and Housing  |
| Responsible Officer:  | Head of Shared Regulatory Services   |
| Elected Member and Officer Consultation:  | Committee Reports – Legal and SRS – Accountant<br>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 SRS Business Plan for 2024/25 has been developed.</li> <li>• The Plan has been ratified by the Joint Committee and forms a part of the SRS Annual reporting process set out in the Joint Working Agreement.</li> <li>• This report provides the Homes and Safe Communities Scrutiny Committee with an opportunity to consider the Business Plan, including a number of key areas of relevance to them for their attention. Also, to help raise awareness among Committee Members on the work of the Shared Regulatory Service within the remit of the Homes and Safe Communities Scrutiny Committee.</li> </ul> |  |

## **Recommendation**

1. That the Committee notes the content of this report and considers the Shared Regulatory Services Business Plan for 2024/25.

## **Reasons for Recommendations**

1. In order that Committee has an opportunity to consider the Business Plan, including a number of key areas of relevance to them for their attention. Also, to help raise awareness among Committee Members on the work of the Shared Regulatory Service within the remit of the Homes and Safe Communities Scrutiny Committee.

## **1. Background**

- 1.1 The Shared Regulatory Services (SRS) Business Plan reflects the aspirations set out in each of the participant Councils' 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 SRS Business Plan has a 'golden thread' or 'line of sight' to the corporate priorities of the respective Councils. The strategic themes of the SRS identify the areas of work that are delivered in support of these corporate priorities.
- 1.3 The SRS Business Plan went to the meeting of the Shared Regulatory Services Joint Committee on Wednesday, 19 June 2024, where it was resolved that the content of the report be noted and the SRS Business Plan for 2024/25 be approved.

The original report and the finalised SRS Business Plan for 2024/25 are both attached to this report (Appendix 1).

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

- 2.1 The 2024/25 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 the work to respond to local, regional, and national agendas; as well as to global events as and when required. The 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 2024/25 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 2024/25 period, the financial projections for the year, and a review of performance for 2023/24.
- 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 consider the 2024/25 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 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. Climate Change and Nature Implications**

- 4.1** One of the key strategic themes for the SRS is *Protecting the Local Environment*.
- 4.2** The SRS Business Plan articulates the work carried out under this theme to deliver on the corporate priorities for the participant Councils, including their ambitions to minimise climate change and impacts on the natural environment.
- 4.3** In this context, the Joint Committee is regularly updated on the contribution of the Shared Service to this agenda, for example through its work in the areas of animal health and welfare, air quality, contaminated land, energy efficiency in the private rented sector and investigating greenwashing claims or environmental fraud.

## **5. Resources and Legal Considerations**

### **Financial**

- 5.1** The financial resource implications arising from budget reductions in this period have been considered previously as part of the budget preparation for 2024/25. The programmes of work identified in the plan can be delivered within budget.

### **Employment**

- 5.2** 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)**

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

## **6. 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 in 2017.

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| Meeting of:                              | <b>Shared Regulatory Services Joint Committee</b>  |
| Date of Meeting:                         | <b>Wednesday, 19 June 2024</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 2024-25  |
| Report Owner:                            | Head of Shared Regulatory Services   |
| Responsible Officer:                     | Director of Environment and Housing  |
| Elected Member and Officer Consultation: | Committee Reports – Legal and SRS – Accountant<br>Consultation with stakeholders has been carried out.   |
| Policy Framework:                        | This is a matter for the Shared Regulatory Services Joint Committee  |
| Executive Summary:                       | <ul style="list-style-type: none"> <li>The report sets out the process by which the draft SRS Business Plan for 2024/25 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 2024/25.
2. That the Head of the Shared Regulatory Service is authorised to make administrative amendments to the 2024/25 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 2023-24 as it moved on from the COVID response that dominated recent years and continued to regain ‘business as usual’. 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 2024/25 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
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All of which are underpinned by a fifth strategic priority, that of *Maximising the use of resources*

- 2.2** The 2024/25 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 2024/25 period, the financial projections for the year, and a review of performance for 2023/24.

- 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 2024/25 SRS Business Plan.

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- 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.

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- 4.2 The SRS Business Plan articulates the work carried out under this theme to deliver on the corporate priorities for the participant Councils, including their ambitions to minimise climate change and impacts on the natural environment.
- 4.3 In this context, the Joint Committee is regularly updated on the contribution of the Shared Service to this agenda, for example through its work in the areas of animal health and welfare, air quality, contaminated land, energy efficiency in the private rented sector and investigating greenwashing claims or environmental fraud.

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## **6. Background Papers**

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# Shared Regulatory Services

## Business Plan

### 2024/25



Gwasanaethau  
**Rheoliadol**  
a Rennir



# Foreword

The launch of this 2024-25 Business Plan represents a significant milestone as the Shared Regulatory Service enters its 10th year of delivering the Environmental Health, Trading Standards and Licensing functions across the Bridgend, Cardiff and Vale of Glamorgan Council areas.

Over that time, the Service has demonstrated how it is able to embrace change with ease and remain ever responsive to the needs of the partner Councils. Nothing demonstrates this better than the adaptability of the Service during its Covid response and more recently in dealing with the ongoing cost of living crisis and its impact on the public.

During 2023-24, service outcomes recovered on a number of fronts, particularly against our traditional performance metrics, in clearing longstanding inspection backlogs, and in restoring our various income streams many of which were impacted by the upheaval of the last few years.

Of course, 2024-25 comes with its own challenges, such as the ongoing recruitment and retention difficulties experienced by Regulatory Services across Wales and beyond. I very much hope that the long-awaited Regulatory apprenticeship for Wales becomes a reality in the near future, allowing the Service to further develop its 'growing our own' approach to staff development. With this in mind, we continue to forge excellent links with academic institutions and the relevant professional bodies.

The biggest challenge however will be in dealing with the continuing squeeze on public sector finances and the resultant need to deliver additional savings. This at a time of the Service taking on a number of new areas of Government legislation and enforcement, but with no dedicated funding associated with it. Now more than ever, the establishment of new income streams and cost recovery, building on our impressive track record to date, will play a crucial role in protecting and sustaining the Service.

I couldn't be prouder of our staff in all that they do to deliver first class services for the residents and businesses of the SRS three-authority region. The achievements and planned outcomes in the pages that follow are all thanks to their talent, dedication and hard work, and I very much look forward to seeing the fruits of the actions set out in the chapters of this Business Plan.



**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 the SRS Joint Committee meetings are held on the websites of each Council. The Joint Committee reports depict the development and future direction of the Service.

## 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 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. Amenity issues associated with empty homes that have fallen into disrepair are also addressed and we lead and co-ordinate across the 3 Councils the corporate strategies in place which aim to bring vacant homes back into beneficial use.



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.

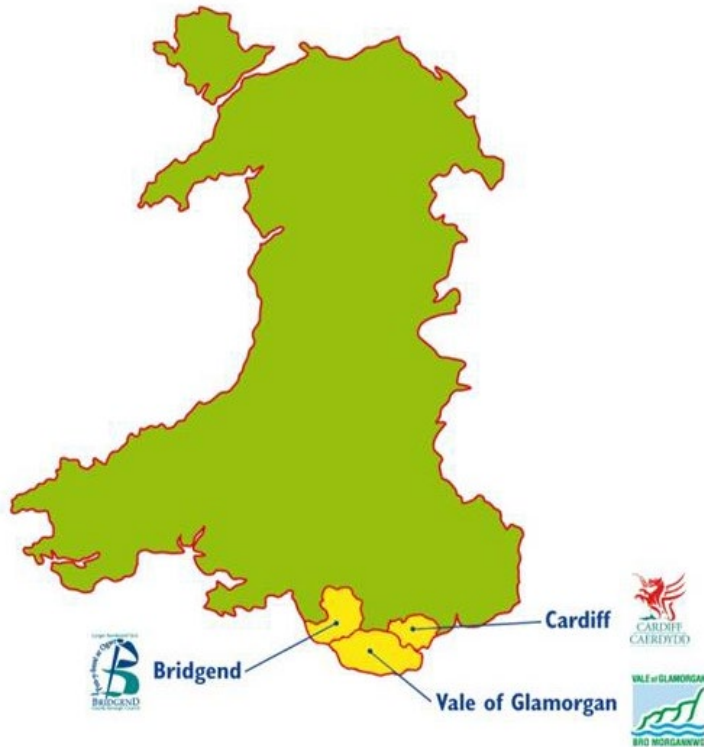
**Pest Control** offers services to the Vale area for the treatment of pests and infestations. This could include, rats, wasps, mice, fleas, cockroaches etc.

**Health Protection** - The unprecedented challenges of the Covid-19 outbreak saw SRS adapt and work in partnership to reduce the transmission of the virus across the region. This continues to be achieved through our Health Protection Team who work with the Health Boards and partner agencies to continue to provide support to care homes and other high risk settings in respect of Covid-19 and the wider health protection agenda.

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 around 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.** In population terms, it is the largest city in Wales with a population of nearly 370,000. Population alone however, does not fully represent Cardiff's significance as a regional trading and business centre as 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

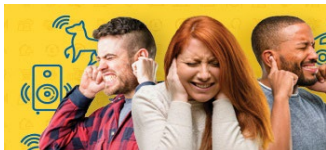
Our organisational structure focuses upon generic working and multi-disciplinary officers, while retaining capacity to develop specialist professionals. The structure allows the deployment of people in different ways enabling the service to offer income-generating services that complement the more traditional services. The Service currently employs 175 FTE operating across 3 distinct sectors populated largely by professionally qualified Environmental Health and Trading Standards Officers who focus on more complex issues, supported by Technical Officers that fulfil a monitoring and triage role. In addition, discrete specialist roles exist to support the service in fulfilling its duties.

## Our teams

**Commercial Services** ensure that businesses comply with a host of consumer and public protection requirements. The team ensure that the food we eat is safe through food safety and standards work; that health and safety risks in the workplace are managed properly; that a fair and safe trading environment exists for consumers; and that public health is protected by controlling and preventing cases and outbreaks of infectious disease and providing support to care homes and other high risk settings in respect of Covid-19 and the wider health protection agenda.



**Neighbourhood Services** deals mainly with activities relating to residential premises or those that have an impact on the local community. The team protects public health by working with private landlords and owners to provide warm, safe and healthy homes for tenants; controlling noise and air emissions into the environment and determining and enforcing a wide range of licensable activities.



**Enterprise and Specialist Services** deals with a diverse range of activities including air quality, contaminated land, pest control (Vale), animal welfare, major investigations and safeguarding and some elements of food safety, trading standards and health and safety. The team also has a role in generating income through the delivery of training, Primary Authority partnerships and paid for advice services and managing the UKAS Metrology Laboratory. Wales Illegal Money Lending Unit also operates on behalf of other Welsh Councils and the Business Support function provides centralised administrative support to the whole service.

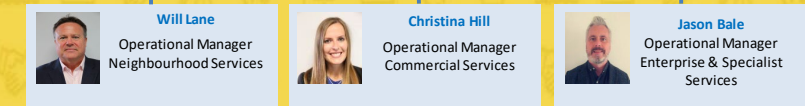


## SRS Management and Governance Arrangements

### Joint Committee



### Management Board



#### Neighbourhood Services

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

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

#### Commercial Services

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

- Food Safety & standards (retail)
- Health and Safety
- Trading Standards (retail)
- Communicable Disease
- Port Health
- Public Health & Health Protection

#### Enterprise & Specialist Services

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

- Contaminated Land & Air Quality
- Animal health & welfare
- Major investigations & safeguarding
- Stop Loan Sharks Wales
- Paid for advice and training
- Primary Authority Partnerships
- Health & Safety, Food Safety & Trading Standards (non retail & events)
- Metrology Laboratory
- Pest Control (Vale only)
- SRS Business Support

## 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 is

***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 and maintaining a flexible and agile workforce that is responsive to change and that have the right skills to deliver quality services meeting 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 Councils   |  |   |
|---|--|---|
| <b>Bridgend County Borough Council</b><br> | <b>Priorities</b> <ul style="list-style-type: none"> <li>• A County Borough where we protect our most vulnerable</li> <li>• A County Borough with fair work, skilled, high-quality jobs and thriving towns</li> <li>• A County Borough with thriving valleys communities</li> <li>• A County Borough where we help people meet their potential</li> <li>• A County Borough where people feel valued, heard and part of their community</li> <li>• A County Borough where people feel valued, heard and part of their community</li> <li>• A County Borough where we support people to live healthy and happy lives.</li> </ul> | <b>Outcomes/Aims</b> <ul style="list-style-type: none"> <li>• Protect our most vulnerable</li> <li>• Fair work, skilled, jobs and thriving towns</li> <li>• Creating thriving valleys communities</li> <li>• Helping people meet their potential</li> <li>• Responding to the climate and nature emergency</li> <li>• Making people feel valued, heard and part of their community</li> <li>• Supporting people to be healthy and happy.</li> </ul> |
| <b>City of Cardiff Council</b><br>        | <b>Priorities</b> <ul style="list-style-type: none"> <li>• Cardiff is a great place to grow up</li> <li>• Cardiff is a great place to grow older</li> <li>• Supporting people out of poverty</li> <li>• Safe, confident and empowered communities</li> <li>• A Capital City that works for Wales</li> <li>• One Planet Cardiff</li> <li>• Modernising and integrating our public services</li> </ul>   | <b>Outcomes/Aims</b> <ul style="list-style-type: none"> <li>• Cardiff is a great place to grow up</li> <li>• Cardiff is a great place to grow older</li> <li>• Supporting people out of poverty</li> <li>• Safe, confident and empowered communities</li> <li>• A Capital City that works for Wales</li> <li>• One Planet Cardiff</li> <li>• Modernising and integrating our public services</li> </ul>   |
| <b>Vale of Glamorgan Council</b><br>     | <b>Priorities</b> <ul style="list-style-type: none"> <li>• To work with and for our communities</li> <li>• To support learning, employment and sustainable economic growth</li> <li>• To support people at home and in their community</li> <li>• To respect, enhance and enjoy our environment</li> </ul>   | <b>Outcomes/Aims</b> <p>A Vale that is:</p> <ul style="list-style-type: none"> <li>• Inclusive and Safe</li> <li>• Environmentally Responsible and Prosperous</li> <li>• Aspirational and Culturally Vibrant</li> <li>• Active and Healthy</li> </ul>   |



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 nine 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 2024/25 and our risk management approach (Appendix 1).

**Delivering the SRS in the future** – The creation of SRS reflected the Welsh Government collaboration agenda, with one of the main drivers being to realise significant cost savings. These, and subsequent savings have been made by SRS over the years and we continue to deliver the SRS with a reducing resource. The 2023-24 SRS budget stood at £8.645 million with a full time equivalent staffing in the region of 180 working across 3 local authority areas. When compared to the 2013-14 stand-alone positions of the partner authorities, this means that the essential statutory services that we provide are being delivered for around £1.7 million (20%) less budget and by 82 (32%) less staff. *This is despite the impacts of inflation, pay awards and similar pressures over that time.* Furthermore over that time SRS has taken on additional responsibilities under new legislation and areas of regulation. Our move toward the Intelligence Operating Model facilitates the delivering of some services using a risk based approach to our activities, where appropriate. However, any further reductions will require the need to further examine and introduce new ways of prioritising our services, or the charging for some services and difficult decisions about the level of service provision. Simply put, SRS has no assets, with the service being made up of staff, so any budget savings inevitably mean cuts to staffing which the service cannot sustain without significantly impacting on service delivery. (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 we know that better facilities now exist to support officers carrying out their duties 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. Similarly as systems across the 3 authorities are upgraded it has become vitally important to ensure continued access to the systems of the partner authorities to safeguard the effective delivery of services. (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. Further refinement of our approach to recruitment and retention will be a key target for the SRS management team during 2024-25. 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. The Covid-19 pandemic and the key involvement of SRS in Test Trace Protect and the enforcement of Coronavirus Regulations has put the service very much in the spotlight during the last few years, and this area of work continues through our role in the wider health Protection Partnership. More recently our work on the minimum energy efficiency standards (MEES) demonstrates how we contribute to the climate change agenda of the partner authorities. Notwithstanding this, we recognise there is still a 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 few 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)

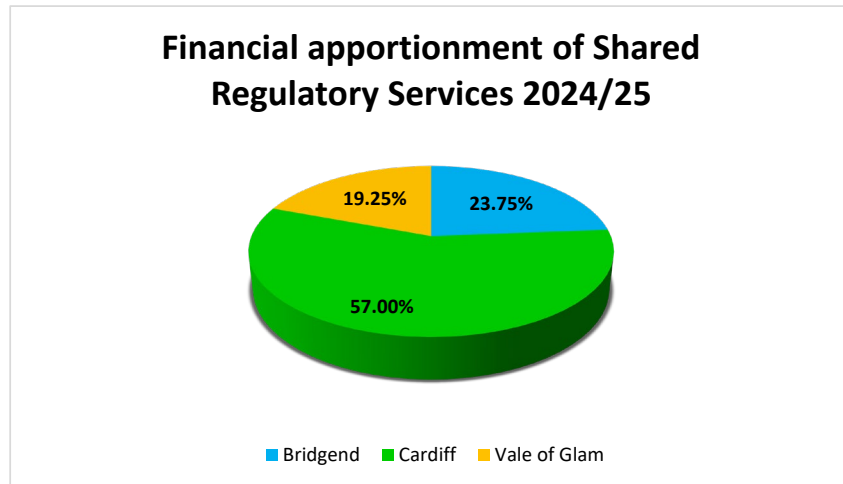
**Out of Hours** - SRS operates an “out of hours” duty rota to enable the service to respond to incidents that arise outside normal office hours. These responses include responding to nuisance calls relating to burglar alarms, food incidents, etc. To date, officers have operated the rota on a voluntary 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. 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 harms of the cost of living crisis continues to be felt, and without doubt will continue 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 continued need for managers and colleagues to spot warning signs among team members 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. 2024-25 represents Year 10 of the SRS. The Joint Committee approved the proposed Shared Regulatory Services budget for 2024-25 at its January 2024 meeting. The aggregate budget for the service has increased to £8,813 which is a net increase of £168k. This is as a result of £182k of savings made through the deletion of vacant posts, reduction of budgets attributed to goods and services expenditure and the identification of 3 new income streams, which is offset by £30k salary costs to fund the shortfall in the 2023/24 pay award plus the anticipated 2024/25 national pay award. 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 2024/25 |               |              |                |
|--------------------------------------|---------------|--------------|----------------|
| Area                                 | Core<br>£'000 | AS<br>£'000  | Total<br>£'000 |
| Bridgend                             | 1,454         | 463          | 1,917          |
| Cardiff                              | 3,488         | 1,664        | 5,152          |
| Vale of Glam                         | 1,178         | 566          | 1,744          |
| <b>Total</b>                         | <b>6,120</b>  | <b>2,693</b> | <b>8,813</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<br>Kennelling & Vets Costs<br>Empty Homes<br>Public health burials   |
| Cardiff  | Licensing<br>Additional HMO Licensing at Cathays & Plasnewydd<br>Empty Homes<br>Night time Noise<br>Port Health<br>Student Liaison |
| Vale     | Licensing<br>Kennelling & Vets<br>Pest Control<br>Public health burials<br>Port Health<br>Empty Homes                              |

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

The creation of SRS reflected the Welsh Government collaboration agenda, with one of the main drivers being to realise significant cost savings. The reshaped SRS continues to eliminate unnecessary bureaucracy and simplify processes.

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

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

We pride ourselves on our partnership working and the opportunities this provides to further maximise the use of resources to improve service delivery.

As we generate additional income through our paid for services, such as advice visits, training and primary authority partnerships, we are able to enhance service delivery and support to business by ensuring resilience in the SRS moving forward. With the continued pressures on public sector finances, now more than ever, the establishment of new income streams and cost recovery will play a crucial role in protecting and sustaining the service.

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 wherever 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 refine our measures to ensure 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 2022 sought the views of employees on the themes of wellbeing and recruitment and retention. Results were generally positive with 56% of the results falling into the very good to excellent range. Positive themes emerging from the survey were around flexibility and working from home, management and colleagues and work/roles, while improvement themes included workload and resources, pay and benefits and communication and engagement. It will be important during the forthcoming year, to ensure that

improvement themes are explored and an action plan developed as part of the wider review of the SRS Workforce Plan.

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. Emerging themes

Section 3 of this Business Plan highlighted the key challenges that face SRS as a collaborative service working across 3 local authority areas. Sitting behind these challenges are a range of issues and additional pressures that influence the ability of SRS to deliver services. These emerging issues are detailed below and encompass themes such as new legislation, national and world affairs, changes to the regulatory landscape, cost of living, climate change, recruitment and retention and ICT and infrastructure. Linking all of these is a crosscutting theme of resources and capacity, which can be severely impacted at a time when services are facing significant budgetary pressures.

### New legislation

**Public Health (Wales) Act – Special procedures** - The all-Wales licensing regime for special procedures (tattooing, cosmetic piercing, acupuncture and electrolysis) in accordance with the Public Health (Wales) Act 2017 is due to be introduced in November 2024. This licensing regime will replace the existing registration scheme with a more robust regulatory system that will require a personal licence and premises approval to be renewed at 3 yearly intervals (or 7 days for temporary events), and the completion of a level 2 infection control training course before a licence can be issued.

The full impact of this new regulatory regime on resources has yet to be determined, and whilst the costs associated with administering the scheme will be recoverable to some extent through agreed, all-Wales Licensing fees, no additional Welsh Government funding will be made available for Local Authorities to fully deliver this piece of work alongside existing statutory functions. Since SRS has the largest number of registered skin piercing practitioners and premises throughout all of the Welsh Authorities, it will likely experience the greatest impact from this new legislative regime.

**Tobacco and Vapes Bill** – Welsh Government have announced plans to introduce legislation to ban the supply of single-use vapes with the intention of such legislation coming into force in Wales on 1 April 2025. This follows similar steps taken by England and Scotland. It is estimated that 360 million vapes are bought each year in the UK with valuable and critical materials such as lithium and copper being disposed of that could power nearly 5000 electric vehicles. The proposal to ban single use vapes recognises the significant environmental impact these products have. SRS Trading Standards Officers currently tackle the sale of illegal vapes, and this legislation if introduced will place a significant burden on trading standards teams within SRS.

**Review of Technical Advice Note 11 (TAN 11)** – In October 22, Welsh Government commenced a consultation on the review of TAN 11 seeking views on draft revised planning guidance in respect of air quality, noise and soundscape. The proposed guidance provides a more joined up approach between planning and air and noise pollution issues recognising the need to take an integrated approach and give early consideration to air quality, noise and soundscape issues in the planning process. While little progress has been made during the last year, the proposals include updating and replacing existing advice on noise currently contained in TAN 11:Noise 1997, adding advice relating to air quality and soundscape and providing a supporting document on the subject of soundscape design.

**The Environment (Air Quality and Soundscapes) (Wales) Act** received Royal Assent on 14 February 2024. The Act will implement measures that contribute to improvements in the quality of the air environment in Wales and will look to reduce the impacts of air pollution on human health, biodiversity, the natural environment and the economy. A key aspect of the Act, is how Local Air Quality Management (LAQM) is due to be amended, and it will become a duty for local authorities to review the current and future air quality in their area on an annual basis.

**Workplace Recycling Regulations** – New recycling laws came into force on 6 April 2024 applying to all workplaces in Wales. The new law means all workplaces such as businesses, public sector and charities need to separate their recyclable materials in the same way households already do. Another aspect of this legislation is the ban it introduces in relation to sending food waste to sewers, and applies to any premises that produces over 5kg of food waste per week, such as hotels, restaurants, cafes, takeaways, catering businesses etc. This means that any food waste produced will not be allowed to be put down the sink or drain into a public drain or sewer. This includes the use of macerators (or similar technologies such as enzyme digestors or de-waterers). While enforcement of the waste separation requirements is a responsibility of Natural Resources Wales, enforcement of the ban on food waste going into the sewer has fallen on local authorities. As a consequence, there is an expectation that this enforcement will be carried out by SRS Officers in the course of their duties when inspecting food businesses without any additional funding.

### Regulatory landscape

**Meeting the required frequency of food inspections** – The Food Standards Agency Food Law Code of Practice sets out the criteria that local authority food law regulatory services need to follow and stipulates the required frequency of food business inspections according to risk, with those of a higher risk requiring more frequent inspections. For example those rated as Category A, require

inspections every 6 months, Category B annually and Category C every 18 months etc. While SRS successfully inspected those businesses with the highest ratings (A, B and C) during the last year, this was only made possible through the appointment of contractors to support existing Food Officers in completing these inspections which also consisted of a significant backlog of C rated inspections. There are certain unique challenges facing SRS in delivering the full food hygiene and standards programmes which result from the sheer number of food businesses within our footprint (around 20% of all those in Wales), the diverse and vibrant nature of the food scene locally, and the very frequent churn of new business start ups. A number of other factors have also emerged post pandemic which add to the challenges faced, including the significant increase in enforcement action necessary at food premises and the increase in pests, which impact Officers' ability to carry out inspections and programmed work. In addition, officers are dealing with many cases where standards have deteriorated; while an increase in new and different cuisines being offered at food businesses requires officers to research and understand these new approaches so that appropriate advice can be given and action taken if required. Given that the Food service within SRS is not adequately resourced to undertake current programmes of inspection without the aid of contractors, this presents a significant risk for SRS in balancing current budgetary pressures with the need to meet specific requirements of the Food Law Code of Practice, the failure of which could lead to the service being placed in 'special measures.

**Food Hygiene Rating Scheme Appeals and Re-ratings** – The Food Hygiene Rating Scheme (FHRS) for Wales was introduced in 2013 with the purpose of allowing consumers to make informed decisions about the places they eat or shop for food, and through these decisions encourage businesses to improve their hygiene standards. SRS officers inspect the hygiene standards found in food businesses providing a Food Hygiene Rating from 0-5 together with a sticker that must be displayed in a conspicuous place where it can be easily read by consumers before they enter the establishment. Under the Scheme, food businesses have the right to appeal against their food hygiene rating if they consider it unjust, and also request a re-rating inspection if improvements have been made following the inspection. Appeal inspections and re-rating inspections represent a significant amount of work for SRS as they sit outside the food hygiene programme of inspections and officers are required to undertake these inspections within defined timescales. A recent report by the Food Standards Agency indicated that during the period 28 November 22 to 27 November 2023, 75 appeal applications were received across Wales. Given the sheer number of food businesses in the SRS region, it is perhaps not surprising that the Service received 22 of these appeal applications representing 29% of all those received across Wales. Furthermore, in terms of re-rating applications, SRS received 54 applications during the same period.

**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 2023/24 889 food business registration inspections were planned following receipt of applications, 519 in Cardiff, 189 in Bridgend and a further 181 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.

**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, or visiting or working in hospitals, to quit. The service is currently engaging with Cardiff and Vale Health Board and the Vale Enforcement Team to explore the feasibility of introducing an innovative approach to the enforcement of smoke-free requirements on hospital grounds to optimise staff efficiency.

**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 and noise monitoring associated with a particular event, SRS plays an essential role in ensuring that food sold at these events is safely prepared, stored and 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 noise pollution, food safety, health and safety and brand protection. While summer is traditionally the busiest time for events, we are seeing a pattern of exceptionally busy periods where events are being held back to back putting a great deal of pressure on SRS officers. 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. 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.

**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 covid pandemic, 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 reported that the proportion spent online soared to 37.8% in January 2021, and though this has decreased since, in March 2024, 25.4% of total retail sales were internet sales. 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 to react to incidents and not prevent them.

**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.

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.

**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 uncovered evidence of unlicensed breeding, the over-breeding of dogs, illegal importation and mutilation. We are also now seeing incidences of cuckoo breeding where breeding bitches are left with other people, then if puppies are not up to standard, the breeders refuse to take the puppies leaving them with the person looking after them. 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 animal related licensing** – SRS is responsible for a range of animal related licensing and continues to engage with Welsh Government consultations on the legislative framework for the licensing of animal related activities. Such feedback has enabled SRS to highlight shortfalls of the legislation and opportunities for improvement that could be made based on officers’ experience during the course of investigations into illegal dog breeding where a number of practices allied to breeding could 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.

**Changes to the Food Regulation Landscape** - Through the Achieving Business Compliance (ABC) programme the Food Standards Agency are looking to modernise the way food businesses are regulated in England, Wales and Northern Ireland. Within the programme there are three key workstreams;

1. Modernising the delivery of food regulation-through which the risk rating and interventions completed by local authorities are looking to be changed to enable resources to be targeted at areas posing the highest risk to food safety.

2. Testing new approaches to Regulation-Projects within this workstream include Enterprise Level Regulatory Approaches which will test new regulatory models for some large businesses that are compliant with regulation by the business being regulated as a whole, rather than as multiple small premises.
3. Designing the blueprint for the future regulatory assurance system-to identify where different approaches could be tested or opportunities for future legislative changes made.

It is important that the Service continues to engage with the Food Standards Agency on any proposals to ensure the views and experience of the service are reflected.

**Brexit Developments** – There are significant implications for SRS as a result of the Retained EU Law (Revocation and Reform) Bill which provides ministers with powers to amend, retain or revoke any pieces of retained EU law (REUL), of which there are thousands. Originally, a sunset clause meant that any piece of REUL would be revoked at the end of December 2023 if ministers hadn't actively saved it by that point, however an announcement from UK Government made last year has overturned this position. There will now be no fixed 'sunset clause' deadline and instead it would appear that officials will continue to work through each piece of legislation in turn until this task is complete. While this announcement is welcome, the issue continues to be a cause for concern for regulatory services, particularly in legislative areas such as food safety, health and safety and product safety which rely heavily on EU law. The service will continue to lobby alongside environmental health and trading standards professional bodies to raise awareness of the associated risks stemming from the Bill, in terms of business certainty, compliance and enforcement.

**Building Safety** – Welsh Government has repeated its commitment to introduce a new Building Safety Bill in the current Senedd term. SRS represents the Directors of Public Protection Wales group on the Building Safety Stakeholder Group which acts as a strategic, independent advisory group for Welsh Government on matters relating to the Welsh Building Safety Programme.

The final members of the Joint Inspection Team (JIT) have recently been appointed and are planning to be operational within the next two months. The JIT are beginning to engage with local authorities and the Fire and Rescue Service (F&RS) to design and implement an inspection programme of high-rise buildings in Wales which will augment the existing inspection programme and audit undertaken by the F&RS.

Welsh Government has made it clear that it does not expect leaseholders to bear the cost of repairing fire safety issues that are not of their making and eleven of the major developers have made a public commitment to address fire safety

issues in buildings of 11 metres and over which they have developed over the last 30 years. Welsh Government continues to develop the Leaseholder support fund for those leaseholders who face financial hardship as a result of fire safety issues in their homes and are also planning further resident engagement on the various measures being developed.

There remains a great deal of work to be undertaken in this area and SRS continue to represent the three local authorities we serve (as well as Directors of Public Protection Wales) in the various stakeholder groups helping inform Welsh Government and shape the legislative programme as it moves forward.

**Guidance on air source heat pumps** – Currently installation of one air source heat pump used solely for heating purposes is normally permitted, under permitted development rights. This is subject to it complying with the Microgeneration Certification Scheme (MSC) planning standards (or equivalent) which stipulate the noise levels of a pump and is subject to a number of conditions. They must be sited to have a minimal effect on the external appearance of a property and the wider amenity of the area. As more properties move over to this type of heating, SRS is beginning to receive complaints about noise levels of the air pumps from neighbouring properties. Heat pumps are known to be greener than traditional boilers as they don't release carbon emissions into the atmosphere running entirely on electricity and grants are available to encourage property owners to move over to this type of heating. It is therefore likely that the number of properties with air source heat pumps will increase together with the possibility of increased noise complaints. This does suggest that there may be a need to review permitted development rights, however due to the planning consultation responses required of SRS, this would significantly increase the work of the service in responding to planning applications and would require adequate resourcing.

## Cost of living

The cost of living crisis continues in the UK and across the world. We have seen food and energy prices rise markedly together with price increases of consumer goods and services. The financial pressures this puts on both businesses and individuals impacts many of the services delivered by SRS. Businesses may seek to cut corners resulting in a drop in standards, while consumers may be tempted to purchase cheaper alternatives which could negatively impact the health and safety of our communities. This inevitably places greater demands on SRS at a time when the service itself is facing budgetary pressures. The following examples highlight some of these emerging issues.

**Drop in standards in businesses** - Food businesses, for example, already struggling following the pandemic, 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. We are finding that many businesses are having to reconsider their trading patterns and operations with a view to cutting costs and attracting more trade. Fewer staff employed at the businesses means less ability to keep on top of cleaning and compliance procedures to meet food safety standards and we are seeing an increase in pests at food premises which has resulted in a rise in enforcement action taken.

**Increase in food banks** – The cost of living crisis has seen a significant increase in the number of food banks available to support people who struggle to afford to buy enough food to eat. These food banks are usually operated by volunteers relying heavily on donations from supermarkets, schools, churches and businesses. Like any food business, these food banks are regulated and inspected to ensure compliance with food safety requirements. Often the food donations come from supermarkets where food supplied is close to expiry of the use by date which gives food banks only a limited time to distribute the food. Food with best before date can be legally sold, redistributed, and consumed after the date if judged to be of sufficient quality to be donated and made available to be eaten. There has been recent incidences of food past its use by date being supplied by a food bank and this emerging issue suggests that greater engagement with these charitable organisations may be needed.

**Consumers** on the other hand, finding themselves with less disposable income may be tempted to take on cheaper rogue traders to undertake work in their homes, purchase illicit tobacco, and fall prey to unregulated forms of credit, loan sharks and scammers. All of which could negatively impact the health and safety of our communities.

**Deterioration of private rental properties** – The landscape of private sector rental housing in terms of property condition appears to be deteriorating and the service is seeing an increase in complaints. While this is believed to be, in part as a result of the covid pandemic and the decline in routine maintenance due to the lack of availability of contractors, the cost of living crisis is also contributing to the issues being experienced. Tenants struggling to pay for heating, may use it less, which in turn can cause damp and mould in a property about which they complain to SRS. This becomes difficult for officers in requiring landlords to improve the heating in properties when tenants can't actually afford to put the heating on and there is a need to be mindful of both the needs of tenants and landlords.

**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. People who are struggling to pay the bills can easily fall prey to loan sharks and scammers. Research commissioned by Stop Loan Shark Wales revealed a number of key findings that indicate how the crisis is driving people to borrow money. Of particular concern is that nearly half of the respondents who borrowed money did so informally

through friends, family or co-workers, increasing the risk of these financially vulnerable people falling victim to illegal money lenders. In addition the research showed that people aged between 18-34 are most susceptible to being targeted by illegal money lenders. The results suggest that this age group are most likely to consider borrowing money to pay for essentials and are also most likely to have engaged in borrowing in the last 12 months. Research also shows that 18–24-year-olds are most likely to have already used an unlicensed money lender but are less likely to know that this type of lending is illegal, so may unknowingly borrow from a loan shark. Furthermore the research revealed that illegal lending hotspots, including Merthyr Tydfil, Caerphilly, and Swansea, saw the highest proportions of respondents aware of potentially illegal lending in their area.

**Buy now pay later** deals have increased dramatically during recent years. 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 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.

**Dog ownership** –During the covid pandemic 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'. The ban on XL Bully breeds has the potential to add an extra layer of complexity in this regard.

## National and World Events

**Refugees and re-settlers** - Whilst recent international humanitarian emergencies have enabled SRS to welcome, and support, refugees and re-settlers into the region, it has necessitated the introduction of measures to ensure that diseases endemic in other countries are not introduced in the UK. This is particularly poignant for the importation of pets by refugees from countries where Rabies, tick and tapeworm infections, and conditions such as *Brucella canis* are prevalent.

Many re-settlers and refugees are also re-locating from conditions with limited sanitation; poor access to clean food and water; and over-crowded conditions. This could result in an increase of reported cases of Giardiasis; Tuberculosis and

Shigella across the region that will require the service to formally exclude cases from school or work until medical clearance has been achieved; support the funding of cases to remain off work if they are required to undergo prolonged and complex medical treatment; and potentially ensure risks to public health are mitigated through the 'request to co-operate' and Part 2A Order mechanisms.

**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. This was also demonstrated in our response to the arrival of Ukrainian refugees into the region, which saw the Service undertake hundreds of property checks for the partner Councils under the Homes for Ukraine initiative. The Service continues to work with health boards and partner agencies providing support to care homes and other high risk settings in respect of Covid-19 and the wider health protection agenda through our Health Protection team. 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.

**Health Protection** - Building upon the success of the co-production approach of partner agencies throughout the COVID-19 pandemic, and recognising the huge importance of local authorities continuing to play a central role in the health protection system moving forward, SRS continues to work with the Health Boards and partner agencies to support care homes and other high-risk settings in respect of COVID-19 infections. However, in the context of the wider health protection agenda and its funding, the work of the service in this regard is much broader than simply dealing with COVID. The service continues to benefit from the additional resource enabling initiatives to protect public health to remain within the service but it will be important to ensure that long term sustainable funding is made available for this work to continue.

**Animal Disease** – 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. While the Avian Influenza Prevention Zone that was in place across the UK was lifted last year, keepers are expected to remain vigilant, practising stringent biosecurity to protect the health and welfare of their birds. A more recent concern in terms of animal disease is Bluetongue Virus which is an infectious vector borne viral disease affecting wild and domestic ruminants such as sheep, goats, cattle, deer and camelids such as llamas and alpacas. The disease was confirmed for the

first time in November 2023 in England with farmers being urged to be vigilant for signs of the virus in animals. Bluetongue does not affect people or food safety and is transmitted by midge bites.

**South Wales Metro Construction** – During 2023-24 SRS worked closely with Transport for Wales on controlling noise from works associated with the South Wales Metro Construction. The work includes the installing of cabling for the electrification, removal/replacement of footbridges, platform alterations and the construction of the new stations and will continue during the year. As most of the work needs to be undertaken when there are no trains running, works tend to occur at night and on weekends/public holidays which are outside usual construction hours Mon-Fri 08:00-18:00, Sat 08:00-13:00, no noisy works on Sundays/Public Holidays. As a result, this requires Transport for Wales to apply for permission to conduct the work outside these hours and SRS needs to ensure that they are using the best practicable means to reduce disturbance to residents as much as possible and to ensure they are effectively communicating with residents. Transport for Wales are providing some funding towards an officer to support this work.

## Climate change

The **Domestic Minimum Energy Efficiency Standard (MEEs) Regulations** set a minimum energy efficiency level for domestic private rented properties requiring properties that need 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. 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 began last year and will continue during 2024/25. It is particularly important given the need to improve energy efficiency and reduce carbon emissions, but also as a result of the reduction in energy required by tenants to heat their properties at a time of such high energy price rises.

## ICT and Infrastructure

**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, however it has become evident that there is a need to consolidate the long term access requirements of SRS, particularly in Cardiff, 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. 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 with a view to introducing tablet devices for officers to conduct inspections to ensure that we deliver services to our customers both efficiently and effectively.

**Office footprint** – The changes to working practices brought about as a result of the covid pandemic saw organisations adapt to facilitating employees working away from the office. Whilst the majority of SRS staff were already accustomed to these arrangements due to our agile/remote working culture, others quickly adjusted. 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 SRS are already seeing the office space provided by the partner authorities reducing as they move over to hybrid working. SRS occupies office space in Bridgend, Cardiff and the Vale of Glamorgan and it will be necessary to continue to work with these authorities to adjust to new arrangements while ensuring adequate office space is maintained and fit for purpose.

**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, more recently we have 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.

**Business Support** –The demands of providing a collaborative service over 3 local authority areas are significant, and crucial to the delivery of services is the need for an effective business support function to provide administrative support to officers and teams in undertaking their important duties. As processes and procedures have evolved, together with customer expectations, it has become apparent that there is a need to review the Business Support function within SRS to ensure that it operates more efficiently and effectively and has greater resilience.

## Recruitment and retention

**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, and continues to take the lead on development of the regulatory apprenticeship for Wales. We do however 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 terms solutions that make working for SRS as attractive as possible.

## 6. 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 2024/25 to deliver on the strategic priorities. This framework will be continually reviewed to ensure it remains relevant and meaningful to stakeholders.

## Priority

# Improving health and wellbeing

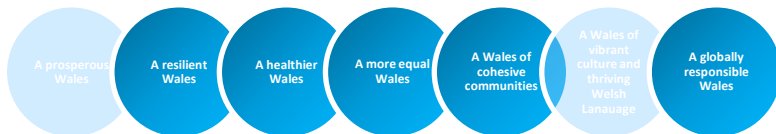
## Outcomes



## Outputs



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

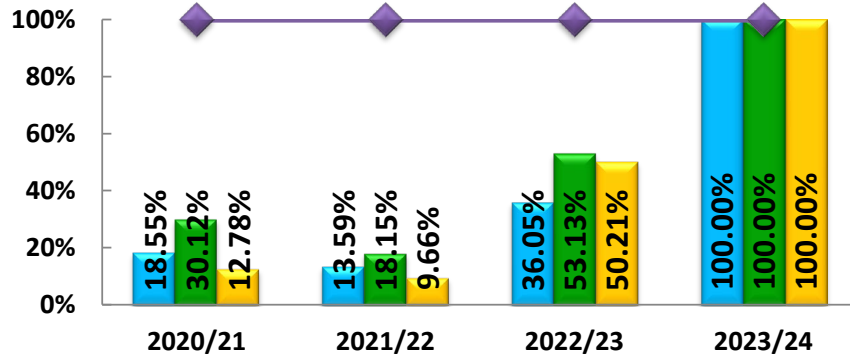


**Improving health and wellbeing** is a key priority for SRS. The Service delivers a diverse range of services to businesses, consumers and residents many of which are “taken for granted”. Their contribution toward our stated outcomes, and their impact upon communities, should not be overlooked. Work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

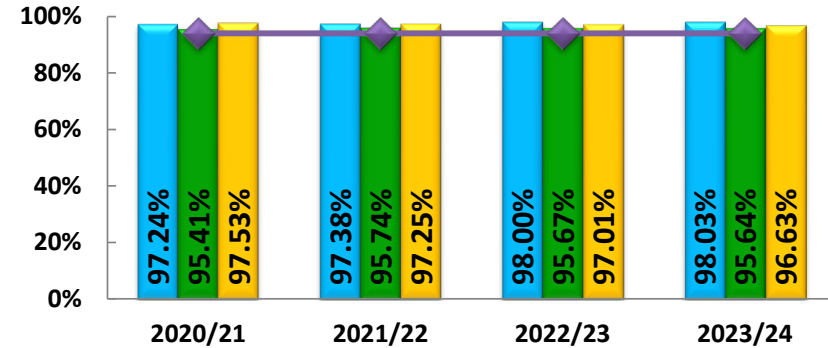
# How we performed

■ Bridgend   
 ■ Cardiff   
 ■ Vale of Glamorgan

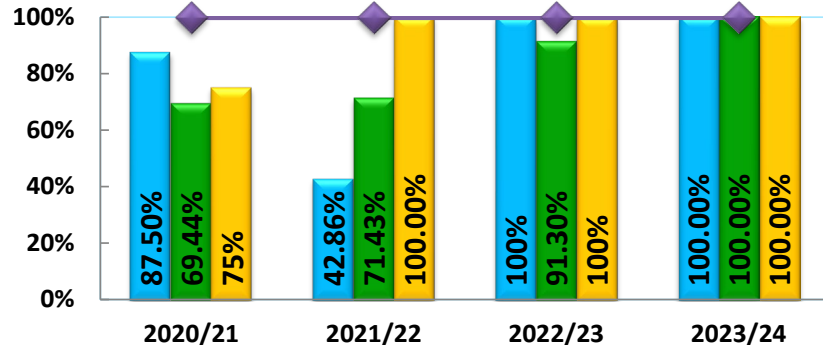
**% of high risk inspections  
Food Hygiene (A, B & C rated premises)**



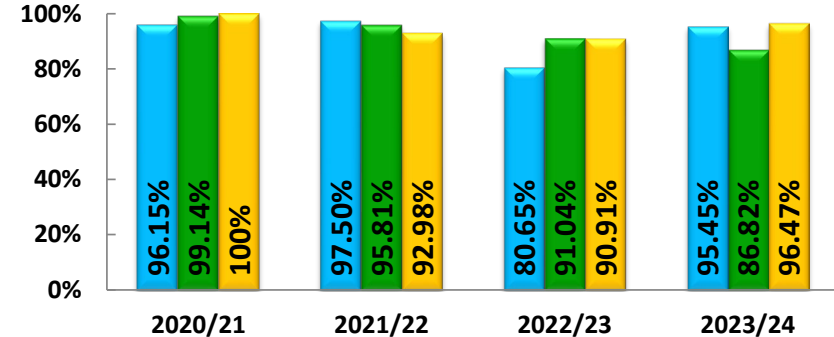
**PAM 023 - % of food establishments that meet  
food hygiene standards**



**% of high risk inspections  
Trading Standards**



**% of significant breaches that were rectified for  
Trading Standards**



| % of private rented properties and HMOs improved through the removal of category 1 and 2 hazards 2023/24 |          |         |              |
|--|----------|---------|--------------|
|  | Bridgend | Cardiff | Vale of Glam |
| Total no. of assessments which contain category 1 & 2 hazards  | 78       | 1376    | 37           |
| No. of HMOs and non HMOs where hazards have been resolved as a result of local authority action.         | 51       | 324     | 30           |
| % Total resolved   | 65.38%%  | 23.55%  | 81.08%       |



# What we have achieved

## The Food chain is safe and free from risks

**Recovering lost ground of the food hygiene inspection programme** - The Food Standards Agency stipulate the required frequency of food business inspections according to risk, with those of a higher risk requiring more frequent inspections. There has however been a significant backlog of these inspections as a result of the unique challenges that have faced SRS over the last few years, most notably the sheer number of food businesses within our footprint (around 20% of all those in Wales), the diverse and vibrant nature of the food scene locally, the very frequent churn of new business start ups coupled with recruitment and retention pressures. It is pleasing to report however that during 2023/24 excellent progress was made in ensuring that not only the programmed high risk inspections for the year were completed but the backlog of C rated inspections was cleared, together with substantial progress being made with new business inspections. This was achieved through the appointment of contractors to provide an additional resource to support the work of our food officers in our efforts to meet the requirements of the Food Law Code of Practice.

**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 98% in Bridgend, 96% in Cardiff and 97% in the Vale of food businesses being broadly compliant. The results have shown a positive upward trend, year on year, consistently 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. The 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 2023/24, the service concluded a number of successful prosecutions against individuals/businesses in relation to food safety and standards offences. In total 8 cases against 13 defendants were concluded which resulted in 9 months of suspended sentences, 60 hours community order and 3 hygiene prohibition orders. Furthermore fines totalling £29,070 and costs of £11,553 were awarded. The following examples showcase the impact and value of this work.



**Cardiff Convenience Store and company director fined over £10,000 for food hygiene offences** – On visiting the store in July 2022, officers found mouse droppings in storerooms and around packets of foods on the shelves of the shop together with gnawed packets of

crisps and chocolates. As a result, officers deemed there to be an imminent risk to health and the company director agreed to voluntary close the premises to allow effective cleaning to take place, signing a voluntary closure agreement to this effect. However, a few days later officers discovered the premises open with customers inside, which necessitated a formal court order being obtained to require the premises to remain closed while the infestation was dealt with and thoroughly cleaned.

While guilty pleas were subsequently entered for the majority of the 16 food hygiene offences, the defendants maintained that they were not trading when visited, but simply taking in a delivery. This necessitated a Newton hearing in which the District Judge found the evidence presented persuasive and the prosecution case approved.

In passing sentence the District Judge was satisfied that the offences were committed with high culpability and posed a serious and imminent risk to the public. The company was subsequently fined a total of £8000, ordered to pay costs of £1456.65 and a court surcharge of £2000. The company's sole director was fined a total of £2900, ordered to pay costs of £1456.65 and a court surcharge of £1160.

**Bridgend restaurant involved in food hygiene prosecution** - Following an investigation by SRS officers, two directors involved in the operation of a Bridgend restaurant pleaded guilty to 8 offences under the Food Hygiene (Wales) Regulations 2006.

On receipt of a complaint from the public reporting that rats had been seen inside the restaurant, officers visited the premises and discovered an active pest infestation, together with a range of other issues. These included a lack of effective pest control procedures in place, poor general hygiene and cleanliness throughout the premises and lack of personal hygiene and no food management safety system in place. As a result of the inspection findings, the restaurant's Food Hygiene Rating Scheme score was downgraded to zero, indicating that urgent improvement was required.

In light of the inspection findings, the business voluntarily closed to undertake a deep clean of the premises, fix all pest access points, and eradicate the infestation. When visited 6 days later it was found that the business had made significant improvements and the rat infestation had been eradicated. There was however still an absence of hand soap but once this was replenished the voluntary closure notice was revoked.

The District Judge fined the first of the two defendants a total of £380 and ordered him to pay costs of £250 together with a victim surcharge of £152. The second defendant was fined a total of £235 and ordered him to pay costs of £125 and a victim surcharge of £95. In addition, the first defendant was permanently prohibited from participating in the management of any food business in future.

**Port Health and infectious disease** – Climate change presents the opportunity for new species of mosquito that are vectors of disease to be introduced via the ports and pose a public health risk. This emerging risk is illustrated by Paris fumigating areas of the French capital for the first time to kill disease-carrying tiger mosquitoes in August 2023. Mosquito surveillance was undertaken at Cardiff Airport between June and October at 4 locations. Thankfully no mosquitos were caught at any of the locations. It is hoped to extend this surveillance to the seaports next year so that we continue to contribute to this important national data which is vital for forward planning of identifying control measures to protect public health.

Potable water supplies are regularly bunkered onto vessels from shoreside hydrants at the seaports. Sampling of these shoreside waters is in progress and being completed with the assistance of Welsh Water to check for compliance with drinking water standards. No unsatisfactory results have been received to date and the remaining hydrants will be sampled.

Water sampling was also completed to verify that the water management procedures were adequate to meet water quality standards for the supply of aircraft with water for personal hygiene via water bowsers. Out of the three water bowsers failed to meet the required standards despite the procedures being adequate and it was eventually identified that the internal surface had degraded to such an extent that it is was required to be taken out of use.

## Risks in the workplace are managed properly

**Sunbed safety** – The use of tanning equipment has been linked to an elevated risk of developing melanoma and is thought to be in the order of a 20% increased likelihood. A study undertaken in 2005 cites a 75% increase in the risk of melanoma when sunbeds are used during adolescence or young adulthood (under 25 years of age). Less obvious negative impacts include sunbed rash which can be a reaction to skin products such as tanning accelerators or cleaning products or transmission of infections from a previous customer. Eye damage can also be considerable, particularly if customers elect not to wear appropriate eye protection.

Following an undercover investigation of tanning salons by the BBC Wales consumer programme “X ray”, it was revealed that businesses in Cardiff had permitted 2 minors to pay for tanning sessions without identification checks to verify their age. The findings of this programme provided SRS with the necessary evidence to engage with the sector, by sending formal warning letters to businesses reminding them of their legal duties and enforcement expectations. This exercise was later followed up by unannounced visits during 23-24.

A total of 22 premises containing sunbeds were inspected across Bridgend, Cardiff and Vale where a range of non-conformities were identified. These included not having adequate

management arrangements in place to verify the age of clients; operating with supervisors that were not considered to be adequately competent; failing to display the prescribed health information; failing to provide clients with the prescribed information; displaying a health benefits poster which is prohibited; failing to adequately assist customers with their skin assessments and providing an inadequate level of advice to clients once their skin type had been determined. While all premises visited had either their single-use eye protection and/or reuseable goggles, 4 failed to activity check if clients had eye protection with them prior to using the UV tanning equipment.

Appropriate enforcement action was taken where failings were observed, which in the majority of cases resulted in verbal advice or confirmation of minor issues requiring attention. Where several contraventions were observed, a formal warning letter was sent to the duty holder. One premises was served with a Health and Safety Improvement Notice, one a departmental warning and another is subject to escalated enforcement action.

**Cardiff Trampoline Park owner prosecuted for health and safety failings** – During March 2017, concerns were raised about the standard of equipment being installed in a new indoor trampoline park and its compliance with health and safety legislation. Despite providing guidance to the business at the time, subsequent visits identified a continued failure to undertake a ‘suitable and sufficient’ risk assessment for the foam pit, airbag and overall supervision of the trampoline area together with a lack of manufacturer information about some of the equipment, including the airbag. Further complaints were received from parents which included injuries to 6 children including 5 leg fractures and one spinal fracture. The recurring themes throughout the incidents was the lack of supervision by staff, lack of training, and lack of safety briefing for users of equipment. Officers made a number of visits serving improvement notices to secure improvements until eventually charges were brought under the Health and Safety at Work etc. Act 1974 against the company and its Director.

In sentencing the Judge told the Director that he had a cavalier attitude towards safety and there had been an absence of basic safety provisions. The risks were obvious, there had been inadequate protective equipment and no desire to listen or investigate incidents. Basic safety standards were missing. The problems should have been anticipated and people should have been able to trust that all precautions had been taken. The defendant had intentionally or flagrantly disregarded the law. The local authority had provided him with advice and guidance and advised him what he was doing wrong. The same accidents continued to happen as there were the same fundamental issues. The Judge sentenced the Director to 10 months imprisonment suspended for 18 months. He will also be required to carry out 200 hours of unpaid work requirement. The company was fined £10,000 and ordered to pay costs of £10,000.

## Infectious Disease is controlled and prevented

**Infection Control Training for Special Procedures** – Under the Public Health (Wales) Act 2017, a licensing regime will be introduced that requires special procedures such as acupuncture, body piercing, electrolysis and tattooing (including semi permanent make-up) to be licensed and practitioners to obtain qualifications in Infection Control and Prevention. In readiness for this, SRS has become one of a small number of accredited training centres in Wales for the delivery of the qualification. Officers have now run the day long course a number of times training 54 individuals. Sessions have been well-attended with positive feedback received. Work is now in hand to broaden the delivery models available for the course so that as many practitioners as possible can be trained ahead of the new licensing regime anticipated to be going live in November 2024.

1939

Communicable disease cases notified to SRS.

**Communicable Disease** – The Communicable Disease Team is responsible for protecting public health by controlling and preventing cases and outbreaks of infectious disease. The team were at the heart of the Covid-19 pandemic, acting as the Regional Response team, which saw the focus of the team almost entirely shift to tackling Covid 19 during that time. Recent years, however, has seen the team return to 'business as usual'. During 2023/24 the team dealt with 1939 confirmed and suspected communicable disease cases reported to them. These included instances of campylobacter, salmonella, E.coli 0157, legionella, hepatitis and other diseases. Furthermore the team dealt with 129 outbreaks in care homes, schools, nurseries, domiciliary care establishments and hotels across the 3 areas that had to be effectively managed to avoid further transmission.

## Noise and Air Emissions are controlled

3700+

Noise and air complaints received

**Noise Pollution** - Noise nuisance can have a negative effect on people's quality of life, affecting their health and wellbeing, and our officers deal with thousands of complaints each year. In 2023/24 over 3700 complaints were received in relation to noise and air across Bridgend, Cardiff and the Vale of Glamorgan. Analysis of the SRS website reveals that advice on noise complaints consistently receives the most 'hits' of all the services that we deliver. Where serious nuisance is identified SRS will take appropriate enforcement action and the last year saw the enforcement tools available to officers being improved in Cardiff via the introduction of Fixed Penalty Notices for certain noise offences occurring after 11pm. While there were no occasions to use these notices during the year they remain a valuable tool to be utilised under appropriate circumstances.

## A safe trading environment is maintained

**Disposable vapes**– Nicotine inhaling products such as vapes 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 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 vapes and e-liquids are required to be notified to the Medicines and Healthcare Products Regulatory Agency before they can be sold. In response to continued high levels of intelligence and complaints received concerning such products, SRS officers undertook several exercises to identify the sale of such products. As a result, 141 test purchases were attempted and 53 premises found to be selling them. In addition, 50 inspections were conducted, 32 of which resulted in seizures of 7105 illegal vapes equating to an estimated retail value of £75,305. Retailers identified as selling these products received a written warning and advice and were subject to further inspection to check for non-compliance. Six investigations are currently ongoing as a result of repeated offences.

## Licensed premises operate responsibly



**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, that the storage is safe and the business operates in a safe manner. In the run up to 'bonfire night' in 2023, 31 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, which were subsequently reported to the respective primary authorities.

## 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. During 2023/24 SRS successfully prosecuted 5 defendants resulting in £133,151 in fines

In terms of general housing prosecutions, 11 defendants (9 cases) were successfully concluded across Bridgend and Cardiff. These consisted of poor management practices and failure to comply with improvement notices.

**Cardiff landlord fined £20,000** – Following a complaint by a tenant, officers carried out an inspection of a 2 storey Victorian end of terrace Cardiff property that had been converted into 4 self-contained flats. The inspection revealed significant defects which were deemed to be a danger to tenants living at the property including no fire alarms, defective fire doors, no escape route for the inner rooms of the building, unsafe kitchens, dirty carpets, penetrative damp, unprotected electricity meters, unsafe electrical installations and unsafe windows. The case was first brought to court in December 2022 where the defendant was fined £10,000. It was made clear at the time that the improvement works identified through the inspection had to be completed by March 2022, but these were never carried out. As a consequence a further summons was issued and a further fine of £20,000 was handed down along with a charge of £1,000 in costs and a further £2,000 surcharge.

**Illegal Evictions and pre-occupancy checks** - In Bridgend and the Vale of Glamorgan SRS investigated and gave advice regarding 9 cases of illegal eviction which allowed us to prevent the households from becoming homeless in the majority of cases.

**Homes for Ukraine** - As part of the response to the humanitarian crisis caused by the war in Ukraine, the UK and Welsh Governments developed a number of schemes to assist refugees displaced by the conflict. The Homes for Ukraine scheme relies on individuals in the UK, with at least six months leave to remain, acting as a sponsor and matching with Ukrainian individuals and groups. Local authorities have played a critical role in the support for people from the Ukraine arriving in Wales. They are seen as best placed to provide a 'wrap around service' to ensure refugees are provided with access to a full range of public services.

The SRS have played a central role in assisting the three host Authorities to discharge their responsibilities by working with the teams set up to manage the crisis across Bridgend, Cardiff and the Vale. This has predominantly been through providing property checks to

ensure that accommodation that has been offered meets basic standards of safety and suitability. SRS carried out 105 inspections during 2023/24.



# What we plan to do next

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

|  |                     |
|--|---------------------|
| <b>Improving health and wellbeing</b>  | Lead Responsibility |
| <b>The food chain is safe and free from risks</b>  |                     |
| Protect public health through the delivery of actions set out within the Food and Feed Law Enforcement Plan 2024/25. ***   | C Hill              |
| Protect public health through the delivery of actions set out within the Port Health Plan 2024/25.   | C Hill              |
| <b>Risks in the workplace are managed properly</b>   |                     |
| Protect public health through the delivery of actions set out in the Health and Safety Enforcement Plan 2024/25. ***   | C Hill              |
| Explore the feasibility of introducing an innovative approach to the enforcement of smoke-free requirements on hospital grounds to optimise staff efficiency.  | C Hill              |
| <b>Noise and air emissions are controlled</b>  |                     |
| Review and explore options for future proofing the Duty Officer Rota.  | W Lane              |
| Continue to work with Transport for Wales in minimising noise disturbance to residents from works associated with the South Wales Metro Construction.  | W Lane              |
| <b>A safe trading environment is maintained</b>  |                     |
| Undertake seasonal product safety projects encompassing products such as contact lenses and fancy dress costumes.  | 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              |
| <b>Licensed premises operate responsibly</b>   |                     |
| Review the Statement of Gambling Act Policies in Bridgend and Vale.  | W Lane              |
| <b>The quality of private rented property is improved</b>  |                     |
| Drive up standards in the private rented housing sector by undertaking robust enforcement action to deal with rogue agents and landlords letting and managing properties. **   | W Lane              |
| Continuing to work with Welsh Government and stakeholder organisations in the development of their Building Safety Programme for medium and high-rise buildings in the private sector. **  | W Lane              |
| Review and harmonise the annex to the SRS Compliance and Enforcement Policy in relation to Housing Enforcement.  | W Lane              |
| <b>Infectious disease is controlled and prevented</b>  |                     |

Protect public health through the delivery of actions set out within the Communicable Disease and Health Service Plan.\*\*\*

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/W Lane

## What we will measure

### Performance Measures 2024/25

### 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

The number of private rented sector properties where significant hazards (Category 1 and 2) have been removed following intervention by SRS.

Varies depending on authority

## Priority

# Safeguarding the vulnerable

## Outcomes



Children are protected from harmful substances and products



Older and vulnerable people are protected from unscrupulous traders & scams



Vulnerable people are not subject to exploitation, slavery and trafficking



Illegal money lending activities prevented



Taxi provision is safe and fair.

## Outputs

Undertake underage test purchases

Monitor supplies of tobacco, alcohol & harmful products

Help vulnerable consumers obtain redress

Provide support to those targeted by scams, doorstep crime & rogue traders

Hold awareness raising events on scams, consumer rights & financial capability

Protect people from illegal eviction

Undertake criminal investigations of fraud

Investigate cases of illegal money lending across Wales

Provide support to those targeted by illegal money lenders

Monitor the fitness and propriety of licence holders

License taxi drivers and vehicles

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

A prosperous Wales

A resilient Wales

A healthier Wales

A more equal Wales

A Wales of cohesive communities

A Wales of vibrant culture and thriving Welsh Language

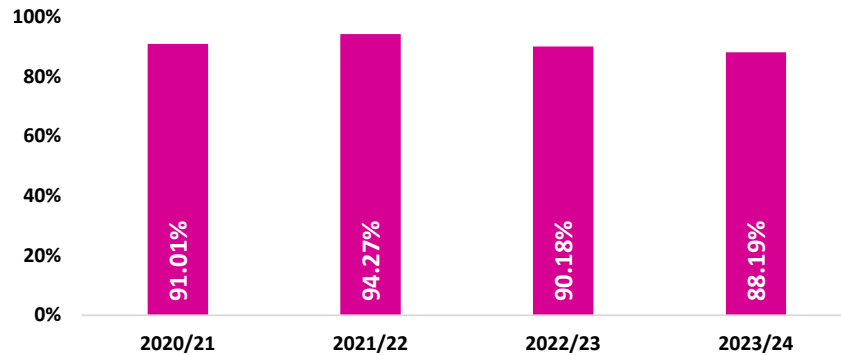
A globally responsible Wales



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



444

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



16

Victims of doorstep crime and scams identified. This work included 28 visits to customers and 3 rapid responses.

## What we achieved

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

**Bridgend Rogue Trader sentenced to imprisonment** – In this case a number of offences took place over a period of 10 months and involved 15 victims, a number of whom were elderly complainants, including a 90 year old woman. Charges related to the carrying out of UPVC installations and home improvements with a total loss to consumers amounting to £22,487. Complaints received were all similar in nature. Victims had been cold called via a knock on the door. In some instances work had been started but was of a very poor standard and the defendant had failed to return. Money for works and materials had been taken but the contract was never started. The defendant provided multiple excuses such as the weather, incorrect measurements being taken, supplier fault and personal and health problems. It was clear from victim impact statements that the offences had deeply affected them and their mental wellbeing. The court was informed that the defendant had a number of previous convictions for fraud, robbery and assault, and in sentencing, that the offences were aggravated by the number of offences, the age of the victims and his previous convictions. The defendant was sentenced to 19 months imprisonment for each offence to run concurrently, ordered to pay a court surcharge of £156 within 3 months of leaving prison. A compensation order was not made by the recorder due to the defendant's imprisonment.

**Safeguarding Week** - The 2023 National Safeguarding Week for Wales took place in 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 presented at the Money and Pension Services Wales Consumer Protection Forum focussing on scams and doorstep crime. During the week officers provided training to 50+ Forum volunteers in Cardiff focussing on how to spot scams and doorstep crime and how potential victims can report it. In addition to this training, the team also visited GP surgeries in the Vale of Glamorgan, raising awareness and requesting that the surgeries display SRS Scams/Doorstep advice to ensure further awareness be raised.



**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 2023-24 the service dealt with over 151 doorstep crime cases, 185 scams and 20 vulnerable civil cases. A total of 16 residents were identified through the year as having suffered a doorstep crime incident or as having been on the receiving end of a scam.

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.

**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, which make up 35% of all calls received. Since 2014 SRS has installed a total of 70 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. So far 50,765 calls have been blocked and an estimated 82 scams prevented. Comments received include *"This made a huge difference and enables my mother to live in her own home for longer"*, *"My mother no longer gets anxious and agitated. I cannot impress on you the positive impact this has made"*, and *"Thanks for making my phone my friend again"*.

## 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.

**Hoarding and self neglect** – In Bridgend and Vale Officers have dealt with a number of cases involving vulnerable people working alongside other departments and agencies to bring about improvements in living conditions for the householders and for their neighbours. In Bridgend officers attend the Cwm Taff Morgannwg (CTM) self-neglect panel to discuss cases so that a multi-agency approach can be pursued. Guidance received from the self-neglect panel was used to develop an assessment tool to record information in relation to hoarding cases. In all these cases the officers involved worked to build up a relationship with the vulnerable persons to persuade them to accept help from appropriate support agencies. This has resulted in home improvements being undertaken following referrals to the Care and Repair Agency, and working with Social Services to ensure that a tenant of a private rented property was supported in relation to issues with hoarding to improve their living conditions and enable works of repair to be completed by the Landlord. A further case was referred to voluntary agencies which resulted in a vulnerable person being assisted with debt and probate issues. As their home was in a condition which posed a threat to their health and safety and they were rehoused, and have now been found employment. Works in default will now be undertaken at their property and an enforced sale is then proposed to effect a change in ownership to bring the property back into beneficial use.

In Cardiff, the issues of hoarding and self-neglect continue to represent a significant demand upon the service, but the team is working alongside Cardiff Council's Home Space project in order to assist persons affected without recourse to enforcement solutions. Where hoarders feel unable to engage, regrettably an enforcement solution is required to deal with statutory nuisance and public health concerns. The team has carried out several clean and clear cases in default and has also carried out some works of repair so that persons can remain safely in their home. In one case, unfortunately the clearance of the significant hoarded materials revealed the full extent of the disrepair, and a prohibition order was served, preventing occupation. The owner appealed that decision to the Residential Property Tribunal but the decision to serve an order has been upheld with the owner and their family being rehoused in the public sector. The team is arranging a presentation to the Housing Expert Panel in Wales on the issue of hoarding, in order to explore best practice and develop innovative treatments and solutions.

## Children are protected from harmful substances and products

**Underage sales operations** – During 2023-24, SRS received 111 complaints/intelligence logs regarding the underage sale of alcohol, vapes, tobacco and knives across the 3 areas. In response to these, with the assistance of a young volunteers, 53 attempts were made to purchase a range of age restricted products during

the year. 10 of these attempts to purchase resulted in a sale of either alcohol or vapes (4 Bridgend, 5 Cardiff and 1 in the Vale) and the circumstances of each was fully investigated and appropriate enforcement action taken.

During 2023-24 SRS successfully prosecuted 2 businesses for the sale of age restricted products, including alcohol and vapes. Details of one of these cases can be found below.

**Cardiff Convenience Store fined for underage sales and non-compliant vapes** - In this case officers had previously visited the Cardiff store and seized a quantity of non-compliant vapes and issued a warning letter and guidance. However, on a subsequent visit some time later in order to undertake a test purchase, officers discovered that while compliant vapes were on display, non-compliant vapes were available on request underneath the counter. As a consequence 142 non-vapes were seized. In a further visit in June 2023, a 15 year old female volunteer was sent into the store with instructions to attempt to buy a vape and was sold a pink grapefruit Elfbar and not asked any questions to verify her age. In court the company pleaded guilty to 2 offences of supplying a disposable vape with a tank capacity greater than 2ml and one offence of supplying a nicotine inhaling product to a person under the age of 18 years of age. The company was fined a total of £1800 and ordered to pay costs of £620 and a court surcharge of £720. The company director was fined £153 for the underage sale offence and ordered to pay costs of £620 and a court surcharge of £61.

## Taxi provision is safe and fair

**Cardiff taxis - moratorium on new licences lifted** – Following a significant number of complaints from passengers about the availability of taxis and a resulting online survey with the public and trade in early 2023, Cardiff's Licensing Committee lifted the moratorium on the issue of new hackney carriage licences. Cardiff was one of the few remaining local authorities in the UK with a moratorium requiring those wishing to enter the taxi trade to either rent or purchase an existing licensed vehicle and this decision sought to improve not only the availability of taxis but improve emissions from these vehicles. To this end the moratorium was lifted but conditional on any new licences being issued in respect of full electric vehicles or wheelchair accessible vehicles under 5 years old that meet the Euro 6 emission standard.

**Unlicensed Cardiff taxi driver fined** – In this case South Wales Police stopped a vehicle in the early hours of the morning where the defendant was found to be carrying 4 female passengers. It was soon established that the driver was unlicensed and that the vehicle while appearing to be a Hackney Carriage (black and white with an illuminated taxi sign) was not licensed either. Statements from passengers gave an insight into the lengths the defendant went to in order to pick up passengers such as waiting with other taxis outside a nightclub, purporting to have a card machine when asked, and asking the

passengers to lie to the Police so that he didn't get into trouble. His behaviour demonstrated clear intent to trick unsuspecting passengers into believing both he and the vehicle were properly licensed and as a consequence he was fined £440, ordered to pay £150 in prosecution costs together with a £176 court surcharge.

## Illegal money lending activities are prevented

**Wales Illegal Money Lending Unit** – The increasing cost of living fills most people with fear, and we know from bitter experience that illegal lenders, more commonly known as loan sharks, will be looking to exploit people in their moments of crisis. 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. During 2023/24 20 pieces of intelligence were received, resulting in 8 operations being carried out, and 11 illegal lenders being identified. The total value of all loans given out by these illegal lenders was £25,000. A total of 25 victims have been identified and supported as part of the team's investigations; 6 of whom had their debts written off at point of intervention. Two prosecutions were successfully concluded during the year and details of one of these cases can be found below.

**Oldest loan shark in the UK ordered to pay £173,000 by Cardiff Court** – This case against an 83 year old illegal money lender followed concerns brought to the attention of the Wales Illegal Money Lending Unit. Investigations showed how the defendant had previously been a licensed lender but this had lapsed way back in 2003. When lending money the defendant charged 40% interest on every £100 and officers were able to determine that she had lent approximately £126,000 in loans. In some cases the lending was particularly irresponsible resulting in one low income couple paying her £120 more than their total monthly income just to service their debt to her which left them penniless every month. The illegal lending was accompanied by a pattern of threatening text messages and her interest charges kept her victims in a cycle of debt. The defendant was sentenced to 2 years imprisonment for the money laundering offence and 18 months imprisonment for each of the illegal money lending offences to run concurrently but suspended for 2 years. In a later Proceeds of Crime hearing the defendant was ordered to pay back over £173,000 of her ill-gotten gains, with more than £35,000 returned to her victims in compensation.

**Illegal Money Lending Education and Training** – Wales Illegal Money Lending Unit is a 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 and the team receives frequent requests for information and

training of frontline staff and community-based public facing support services. During 2023/24 training was delivered to 21 different organisations from all over Wales, reaching 516 participants. These training sessions were attended by colleagues from within local government and credit unions as well as from the housing, advice, and charitable sectors.

**Illegal Money Lending raising awareness** – In addition to education and training, Stop Loan Shark Wales attend a number of events throughout the year to raise awareness of illegal money lending and promote the assistance available from the team. During 2023/24 officers have attended 13 public events, many of which are associated with cost of living support.

**POCA Community Based initiatives** - Monies obtained from loan sharks under the Proceeds of Crime Act is used by WIMLU to develop 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. During the year SLSW continued to monitor 3 small scale pilots run by Credit Unions of Wales relating to express loans, digital

marketing and a prize draw and funded a 6 months digital marketing campaign to promote alternatives to illegal money lending. In addition a scheme through Money Works Cymru (a payroll salary and loan scheme) where low income employees, who would normally just miss out on being eligible for a loan, would be passed. The loan would then be guaranteed by the WIMLU POCA Fund. 21 loans were issued to the value of £7,773 with no defaults. In order to further promote Money works across Wales, SLSW also sponsored a monthly prize draw where all new members were eligible to win £150. This incentive saw an increase in members of 3.4%, an increase in savers of 1.92% and the number of borrowers increasing by 8.9%.

## What we plan to do next

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

### Safeguarding the vulnerable

Lead  
Responsibility

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

Consider how SRS could engage more with Elected Members regarding areas of concern and safeguarding for the public, such as rogue traders, scams, illegal money lending and doorstep crime.

H Picton

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

Work in partnership 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. \*\*\*

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

Raise awareness of illegal money lending and support individuals to access responsible lenders and debt advice, rebuild their finances and make a sustainable transition to legal credit. \*\* & \*\*\*

J Bale

## Taxi provision is safe and fair

Engage and respond to Welsh Government on the modernisation of taxi and private hire services in Wales.

W Lane

Undertake enforcement exercises with the taxi trade including mystery shopper exercises to ensure compliance with the Equalities Act, vehicle and licensing standards and fare refusals for short journeys .

W Lane

Review taxi vehicle testing regime in Bridgend.

W Lane

Ensure the decision by the Council to introduce mandatory card payment facilities in hackney carriages licensed by Cardiff Council is implemented.

W Lane

## What we will measure

### Performance Measures 2024/25

### Target

- % of reported scams/doorstep crime incidents prevented /resolved through intervention.
- No. of people reached through education or training on scams and doorstep crime.

80%

500

## Priority

# Protecting the environment

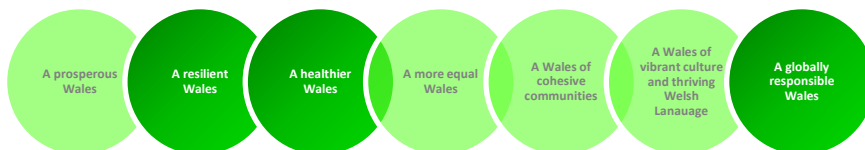
## Outcomes



## Outputs



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

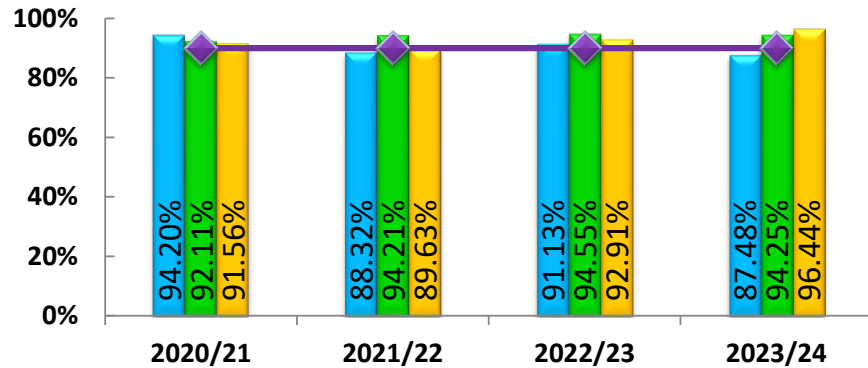


Protecting the environment is a core strategic priority of SRS. Many of the activities listed here such as water sampling, monitoring air quality, and remediating contaminated land contribute toward promoting a better environment which in turn means better long term prospects for the health and wellbeing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

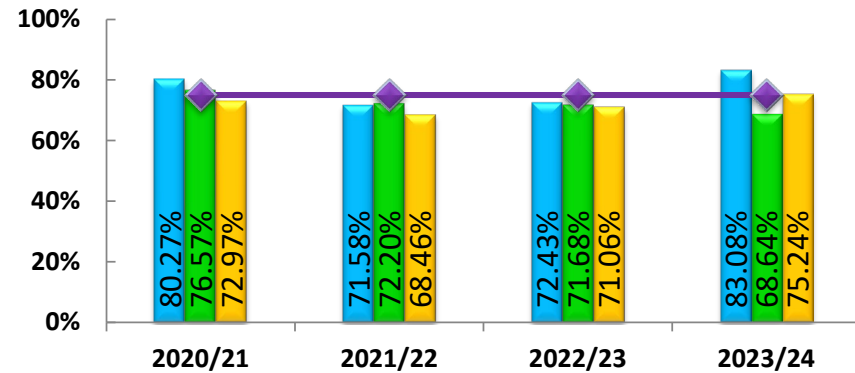
# How we performed

■ Bridgend   
 ■ Cardiff   
 ■ Vale of Glamorgan

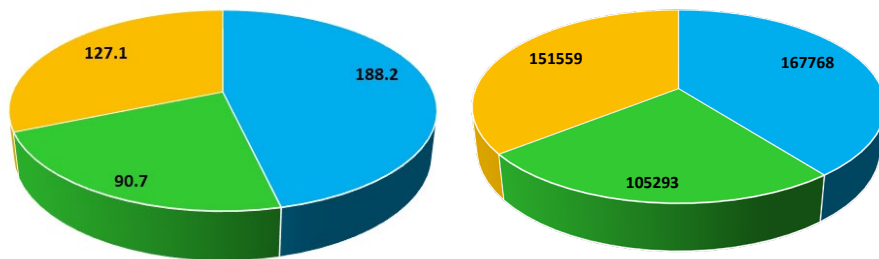
**% domestic noise and air complaints responded to within 3 working days**



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



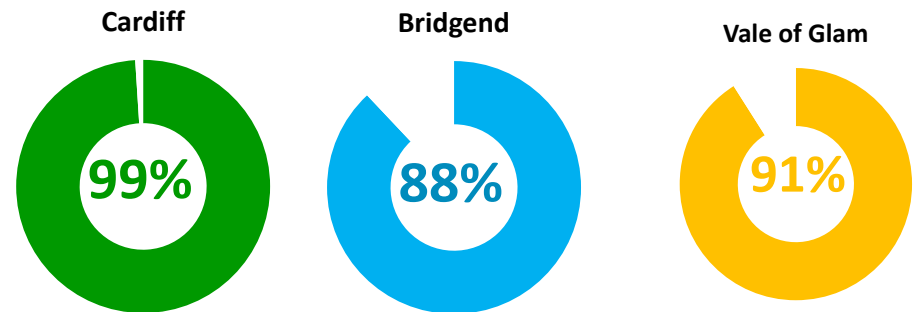
**Reduction of carbon dioxide produced and KWh in energy used for heating at rental properties as a result of improved EPCs**



Tonnes of CO2

KWh of energy

**% of alarm complaints responded to within one day 2023/24**



# 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. On the 14th February 2024, the Environment (Air Quality and Soundscapes) (Wales) Act received Royal Assent. The Act will implement measures that contribute to improvements in the quality of the air environment in Wales and will look to reduce the impacts of air pollution on human health, biodiversity, the natural environment and the economy. A key aspect of the Act, is how Local Air Quality Management( LAQM) is due to be amended, and it will become a duty for local authorities to review the current and future air quality in their area on an annual basis.

In **Bridgend** the 2023 APR demonstrated that only two sites, both located within Park Street Air Quality Management Area (AQMA) exceeded the air quality objective for nitrogen dioxide NO<sub>2</sub> as prescribed in the Air Quality (Wales) Regulations 2000 and the Air Quality (Amendment) (Wales) Regulations 2002. All other locations within Bridgend County Borough continued to meet all other relevant air quality objectives. Both locations recorded annual average figures in 2022 of 47.2 µg/m<sup>3</sup> & 45.5 µg/m<sup>3</sup> respectively. Whilst these results are still seen to be elevated and in exceedance of the objective it is worth noting that this represented a reduction in NO<sub>2</sub> concentrations of 12% and 17% at these locations since 2019. Furthermore, provisional results for 2023 show a further reduction in NO<sub>2</sub> concentrations at these locations. Further assurance and data ratification is required, and the results will be confirmed in the 2024 APR.

During the course of 2023/24 work was progressed to further develop and refine measures of the AQAP for Park Street. This resulted in an additional modelling work being undertaken which assessed the impact of further measures including electrification of buses using Park Street and also banning HGVs on using Park St. The modelling showed that these additional measures had minimal impact in terms of reducing future NO<sub>2</sub> concentrations on Park Street and therefore were not taken forward for implementation, but retained as future options in the AQAP. Further work was also undertaken to forecast a likely year of compliance, as requested by Welsh Government as part of their review of the draft AQAP. The assessment demonstrated that compliance will be achieved by 2026 with all measures in place. The assessment also identified that

the implementation of Measure 18, would not bring forward compliance owing to the timescales for further consultation on any Traffic Regulation Order and potential objections etc. On this basis the Final AQAP plan to be approved by Cabinet has suggested to retain this measure. Cabinet approval was due to take place in April 2024.

In **Cardiff** the 2023 APR demonstrated that out of the 135 non automatic monitoring locations across the entire City, no monitoring sites recorded exceedances of the annual average objective set for NO<sub>2</sub> of 40 µg/m<sup>3</sup>. The APR provided an overview of the concentrations within each of the 4 AQMAs in Cardiff. Monitoring in the AQMAs demonstrated compliance was being achieved in each of the 4 AQMAs, although one location in the Llandaff AQMA, was close to exceeding the annual mean for NO<sub>2</sub> (39 µg/m<sup>3</sup>) and there has been a slight increasing trend in NO<sub>2</sub> concentrations since 2020 at this location.

The report detailed that owing to the continued increase of NO<sub>2</sub> concentrations at this location it will be necessary for the Council to consider additional specific actions for the Llandaff AQMA. That said results for 2023 show an improved picture at this monitoring location with a provisional result of 34 µg/m<sup>3</sup>. The APR also gave a further update on the ongoing work on Castle Street in relation to the Welsh Government Air Quality Direction. At the time of the Cabinet Report, the Council had submitted an updated Final Plan, which was being reviewed by Welsh Government's Expert Panel, and a final decision on funding for the Castle Street Scheme is anticipated in quarter 1 of 2024/25.

In the **Vale of Glamorgan**, the 2023 APR demonstrated that there were 50 specifically allocated non-automatic monitoring sites across the Vale of Glamorgan which monitored levels of nitrogen dioxide (NO<sub>2</sub>). From the 50 locations monitored throughout the Vale with the use of passive diffusion tubes, no sites breached the national NO<sub>2</sub> annual objective of 40 µg/m<sup>3</sup> or the NO<sub>2</sub> 1-hour objective (200 µg/m<sup>3</sup> not to be exceeded more than 18 times per year). Overall, the Vale of Glamorgan has seen a downward trend in NO<sub>2</sub> levels since before the Covid-19 pandemic.

The report also provided an update on a successful application to the Local Air Quality Management support fund from Welsh Government, for funding to upgrade and enhance the current real time air quality monitoring capabilities within the Vale. The bid enables the Vale to install an additional 5 monitors and the locations will be decided using a risk-based approach in line with relevant technical guidance.

**South Wales Metro Project** – The South Wales Metro Project will lead to huge improvements to the railway infrastructure in South Wales. The project will increase services on many lines as well as introducing new stations in areas such as Cathays, Cardiff Bay and East Cardiff. There is however a significant amount of construction work needed to be undertaken, including the electrification of the railway lines, upgrading of station access, and replacing footbridges. In order to keep essential public transport

operating, much of these works needs to be completed outside usual working hours, at night and on weekends which requires consent from SRS.

During the past year, Transport for Wales have made 71 applications to SRS under Section 61 of the Control of Pollution Act 1974 to undertake noisy out of hours construction works. These works are often carried out in close proximity to residents and officers review the applications to ensure that works to be carried out are being undertaken by 'best practicable means' to ensure any disturbance to residents is minimised. Frequent contact (fortnightly meetings) are held with Transport for Wales and Amey acoustics to discuss applications before they are submitted and ensure that appropriate communication is being provided to local residents and respond to complaints. This engagement with TFW also extends to de-vegetation works which requires no consent, but officers still worked closely with TFW to ensure 'best practicable means'. Given the amount of works being undertaken and the nature of those works, SRS have received relatively low numbers of complaints, with 12 in total, the majority of which related to the use of access points or compounds.

**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 56 visits across the region to take water samples at private water supplies. 5 Compliance Notices were served for private water supplies improvements. Water samples were taken at 8 events across the region.

## Animals are treated humanely

**Cardiff illegal dog breeder breached disqualification** – This case centred around a defendant who had been previously disqualified under the Animal Welfare Act from keeping any animals, dealing in them, owning them, participating in keeping them and from being party to any arrangements under which he was entitled to control or influence the way in which they are kept, transporting them and arranging for the transport of them for a period of 8 years. On investigating another illegal dog breeder, SRS officers established that the defendant had breached the court order imposed in July 2021. Mobile phones had been seized from the home of the other alleged illegal dog breeder and messages from these mobile phones were downloaded. Those messages indicated that he had been dealing with animals including being involved in the sale of puppies for £12,000. The defendant pleaded guilty to one charge of breaching the disqualification and was fined £1000, ordered to pay £590 together with a victim surcharge of £400.

**Illegal dog breeding** – The service continues to receive complaints about illegal dog breeding and a number of investigations are ongoing. During the year there have been

involved in several seizures of dogs and puppies from private properties where the environment they were being kept in was unsuitable and dogs were found to be suffering. Prosecutions are pending.

**SRS achieves gold standard in the RSPCA PawPrints Award** – 2023 saw our Animal Health and Welfare Team recognised via the RSPCA PawPrint Awards Scheme for their work in animal related licensing, stray dog provision and kennelling. It was particularly pleasing to see that not only did the service maintain its 2022 gold standard in animal related licensing and stray dog provision, but for the first time achieved the gold standard in kennelling for the first time. SRS is the only service in the UK to achieve the gold standard in 3 categories.

## People will use energy efficient buildings and products

**Empty Homes** – In **Bridgend** SRS have collaborated with Bridgend Council to ensure progress in relation to enforcement against properties that have been identified in the Empty Property Action Plan. This has resulted in the demolition of dangerous properties with the site being cleared for redevelopment. Works in default are ongoing at a number of other properties, the costs of which will be supported via successful bids made to the Welsh Government Empty Property Enforcement Fund and considered for enforced sale. A further property has been identified as being suitable for Compulsory Purchase. In terms of enforcement work, SRS successfully prosecuted a property owner on 2 occasions for failing to provide documentation and comply with enforcement notices.

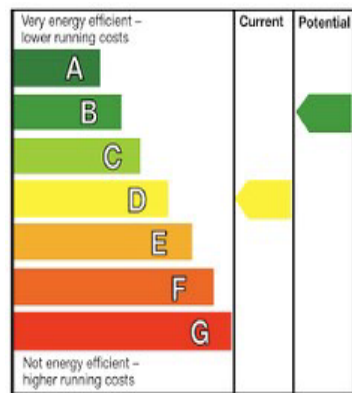
In **Cardiff**, SRS has continued to focus on tackling private sector empty homes across the city. This has included responding to complaints and enquiries and working proactively to engage with property owners providing assistance via site meetings, advice regarding property standards and rental requirements, referrals and signposting to other departments and avenues of financial assistance. This work has been further assisted with a corporate focus achieved through an empty homes working group. Good progress is being made with long term vacants identified in the action plan agreed with Welsh Government and discussions are currently ongoing to draw down funding from Welsh Government to support enforcement activities against the most challenging long term vacant properties. As a consequence of this work the number of properties brought back into use continues to increase year on year, with a total of 113 properties or dwellings brought back into occupation during the last year.

In the **Vale of Glamorgan**, following the appointment of an Empty Property Enforcement Officer as a result of additional funding received via the Council Tax Premiums work has begun to assess what actions SRS can assist with in relation to the Vale's Empty Property



Action Plan. A number of property owners of long term empty commercial buildings have been engaged with to encourage development and conversion to create residential units.

The **Domestic Minimum Energy Efficiency Standard (MEES) Regulations** set a minimum energy efficiency level for domestic private rented properties requiring properties that need an energy performance certificate (EPC) to have a minimum 'E' rating, or have a valid exemption registered. At the beginning of the year SRS began engaging with property owners of rental properties identified as having EPCs rated F and G requiring them to submit improved certificates rated A to E. As a result of this work, 138 improved certificates have been received which equates to an estimated reduction in carbon dioxide (CO2) emissions of 406 tonnes together with a reduction of 424620 kWh in energy needed for heating across the SRS region.



## 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.

**Student Liaison** – 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 elected Members on strategic ambitions for the city.

Work continues to strengthen the new governance structure of the partnership, which was established in 2021, and embed a work programme that reflects the partnership's four priority areas: 1) Community Life, 2) Student Health and Wellbeing, 3) Economic Development and 4) Net Zero. Student housing has been a key focus of the partnership since it was established.

In 2023/24 the SLO completed a comprehensive report reviewing student accommodation provision and trends in Cardiff. The report provides an assessment of the spread and density of student accommodation; the supply and occupancy of purpose-built accommodation; as well as the regulation of student accommodation including HMO licensing. The report found that the spread of student accommodation now covers all wards in Cardiff, in addition to the traditional student areas of Cathays and Plasnewydd. Grangetown and Riverside are seeing a particular increase in properties claiming student council tax exemptions. Recommendations of the report include that the report should be repeated annually, further data sets should be identified to provide insight into student accommodation, a panel should be established with partners to review housing related cases, and discussions between partners should take place to assess accommodation strategies and how housing demand can be met. These recommendations will be actioned by the SLO this year and an updated report produced.

The SLO has also focused on improving communications and increasing engagement with students and local communities. In the past year, this has included officers engaging with over 77800 students through in-person events and initiatives, which is an increase of 1000 more in-person engagements on the previous year. A further 8000 student households received information and advice during the student arrival and move-out periods regarding noise awareness, waste management, community safety, parking and transport. Over 2000 landlords and 150 property management companies were supported with information to help manage student properties, and the Cardiff Digs social media channels received over 14,000 impressions on the student arrival and housing information campaigns. The SLO is working with university partners to increase the reach of the partnership's campaigns further.

As part of the student move-out work, in addition to existing charities, the SLO has also worked with the British Heart Foundation and Cardiff Foodbank, to accept donations of unwanted goods/foods to reduce waste and support local communities during the move out period.

The Council has successfully bid for UK Shared Prosperity Funding in partnership with Cardiff University. This funding allows for the creation of a temporary Student Recycling Outreach and Communication Officer for a year, to be managed by the SLO. One of the main purposes of the role will be to assist in the development, implementation and delivery of waste minimisation, recycling campaigns and initiatives targeted at Cardiff students.

The SLO continues to contribute 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 and help to facilitate links between the University/Students' Unions and Local Authority Teams on specific case work.

# What we plan to do next

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

## 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

Use feedback from the public consultation to report back to Bridgend Cabinet to agree a finalised Air Quality Action Plan for Park Street and start work on the measure to improve air quality.

J Bale

Ensure good air quality by : 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 home owners and landlords to return empty properties back into use through engagement, support, consideration of varying the Council Tax premium scheme, and where necessary taking appropriate enforcement action to deal with the worst long term derelict empty homes. \*\*

W Lane

Engage with landlords and lettings agents to improve the energy performance ratings of private rented properties under the Minimum Energy Efficiency Standard (MEES) Regulations. \*\* & \*\*\*

C Hill

### Animals are treated humanely

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

### 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

## Performance Measures 2024/25

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 empty private sector properties brought back into use during the year through direct action by the local authority .(Cardiff only) | 5%                         |
| • Number of additional dwellings created as a result of bringing empty properties back into use. (Cardiff only)                           | 20                         |
| • The number of private rented properties where energy efficiency has been improved through direct action from SRS.                       | Varies between authorities |

## Priority

# Supporting the local economy

## Outcomes



A fair trading environment is maintained



Informed and confident consumers



Improved business practices and operation



Accessible services responsive to business needs

## Outputs

Disrupt the supply of illegal and unlawful products and services

Undertake inspection programmes

Take enforcement action against those that flout the law

Offer training and advice to businesses and consumers

Work with businesses to improve standards

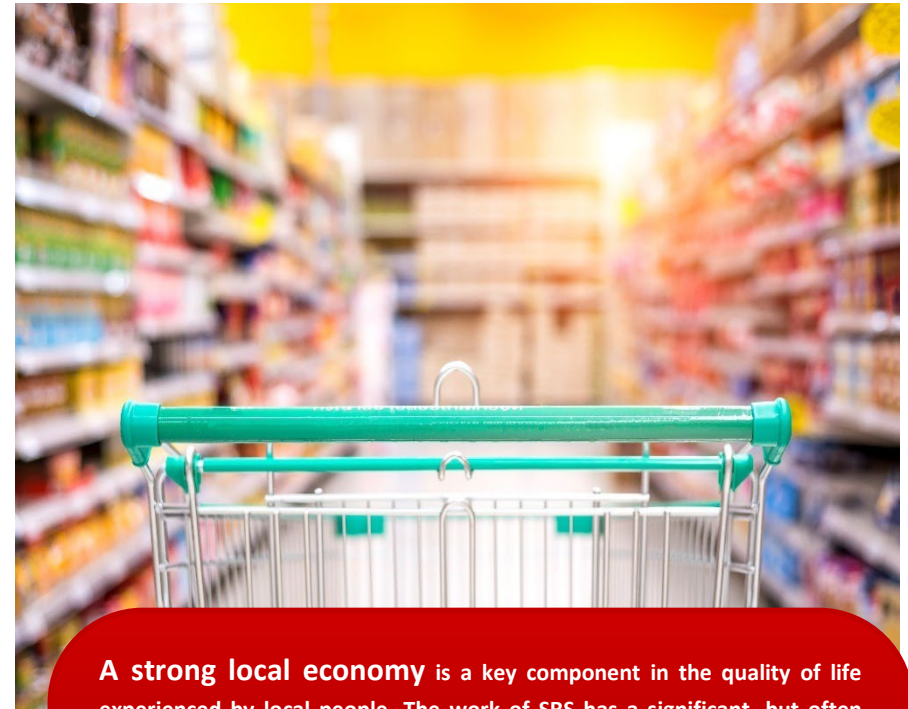
License business activities

Offer primary authority partnerships

Contribute to business events

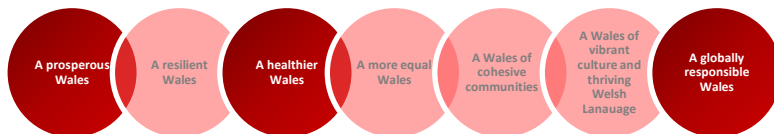
Major events liaison

Provide advice & information on licensing & planning applications



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.

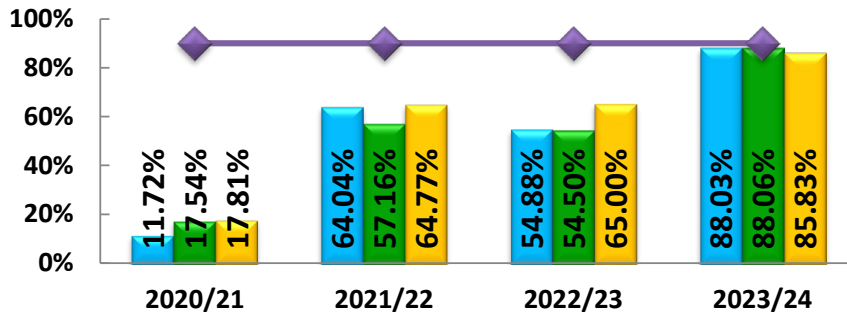
In addition, our outcomes also contribute to the following wellbeing goals:



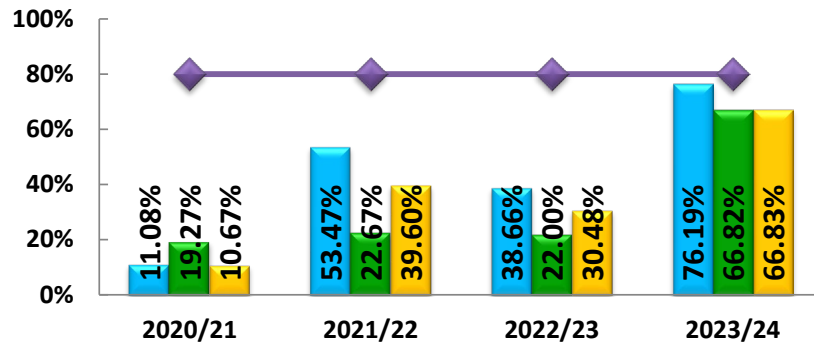
## How we performed

■ Bridgen
 ■ 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

**Trading Standards Impacts and Outputs** - Since the launch of the Association of Chief Trading Standards Officers (ACTSO) Impacts and Outcomes framework back in 2018, the impacts and outputs of Trading Standards work is reported annually as a means of demonstrating the vital contribution of these services in England and Wales in tackling detriment and preventing harm, supporting the local economy and promoting health and wellbeing. The latest report highlights the work of local authorities in Wales during 2022-23 demonstrates the significant contribution made by SRS. Across Wales, 228 months (19 years) worth of prison (or suspended) sentences were handed down as a result of trading standards prosecutions. Of these 48 months (3 years), equating to 16% of the Wales total were cases arising from SRS. Similarly SRS cases led to the convictions of 19% of defendants convicted across Wales, 5% of the fines imposed and 14% of all costs imposed by the Courts and 10% of compensation awarded to victims by the courts.

During 2023/24, the prosecution outcomes for trading standards have been significantly higher, with 165 months (over 13 years) of prison sentences handed down including both immediate and suspended sentences. Fines totalling £1,727, costs of £12,855 and compensation of £10,320 being awarded together with community orders totalling 1292 hours, a criminal behaviour order of 10 years duration and a 60 month disqualification under the Animal Welfare Act from keeping animals. Some examples of these prosecutions follow.

**Cardiff Rogue Trader jailed** – In this case the defendant took £113,000 from 4 victims to undertake building work leaving them in significant financial detriment. The work was of a very poor standard with 2 properties deemed unsafe. The defendant used pressure tactics by threatening to stop work if further monies were not paid, not doing work because he claimed to be unwell, taking monies for kitchens which he never ordered or provided and even threatened legal action against his victims when they challenged him on work not done, or goods not provided. Victims were ‘ranted at’ for more money and were forced to borrow money to get the remedial works completed. Victims were caused enormous stress and anxiety, suffered from insomnia and left out of pocket and in poor health due to the poor living conditions. The defendant was sentenced to 5 years imprisonment which was reduced for credit to 3 years and 9 months for the fraud offence and 8 months imprisonment for a firearm offence to run consecutively, giving a total of 3 years and 5 months. The judge was not able to award compensation to the victims as there were no funds.

**Bridgend car trader prosecuted under the Fraud Act 2006** – In this case the defendant sold a vehicle claiming he would register an extended warranty with Warranty Wise. However, despite taking £364 from the purchaser, he never registered the warranty resulting in financial detriment to the consumer. The defendant was given a 12 month community order consisting of 20 hours of rehabilitation to address his offending and 132 hours of unpaid work. He was also ordered to pay £1,500 costs and a £96 court surcharge.

**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. During 2023/24 the assistance of officers from Operation CeCe has allowed SRS resources to be deployed investigating intelligence primarily around illegal nicotine inhaling products/vapes and under age sales vapes. As a result most of the seizures of illegal tobacco have been at the same premises. In total 1078 packets of illegal cigarettes and 673 pouches of illegal hand rolling tobacco have been seized.

**Premises Closure Order** – The Service was successful in its first application to close a retail outlet under the Anti-social Behaviour, Crime and Policing Act 2014, this being in response to the harm caused in the community arising from the supply of illegal tobacco (and also in this particular case, nitrous oxide). The Magistrates Court hearing resulted in a 3-month closure order being imposed in March 2024, and a further application is being progressed to extend the closure of this outlet. Moving forward, this approach is seen as a highly compelling and impactful enforcement tool and applications are being considered in respect of a number of other problematic premises.

**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. 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. The supply of counterfeit goods is often considered a 'victimless' crime, 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 2023 the trading standards team participated in an exercise with the police on an investigation into the sale of high-end branded clothing and footwear that were believed to be counterfeit. These were being sold online through websites and social media accounts. 808 items of branded clothing were seized by the police much of which has been confirmed as counterfeit. The police investigation is ongoing.

In another exercise SRS officers carried out a series of high profile operations with Cardiff Council's city centre management team and South Wales Police to disrupt itinerant traders in Queen Street selling counterfeit goods including perfume, tobacco products and apple ear pods. This action followed complaints from members of the public that they were being pressured into buying goods from street sellers and were unable to get a refund when they realised the products they had purchased were not genuine. Several items were seized during the city centre operations and vital intelligence shared as it would appear the group was targeting cities across South Wales. As a result of this action there have been no further sightings of this group of sellers in Cardiff.



## Improved business practices and operation

**Training provision** - The Service has continued to consolidate its excellent reputation as a training provider, training over 670 delegates during the year. Courses covered a wide range of themes including Levels 1-3 Food Safety in Catering and food safety refresher training, allergens, weights and Measures, and the newly introduced Level 2 Award in Infection Prevention and Control in Special Procedures. Four consumer law webinars for over 200 Access Training students across the UK studying plumbing, gas and electrical engineering, etc. were also provided.

**96%**  
Of delegates felt  
training will help  
them improve  
standards of  
compliance

The feedback from the delegates on the training received has been extremely positive, with 96% indicating they feel the training they receive will help them improve standards of compliance in their business, 94% indicating the training will benefit their business. Similarly 97% indicated that would recommend the training to a colleague, employee or friend. 96% rated the training as good to excellent.

## 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 36 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.

**36**  
Primary  
Authority  
partnerships

**'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 22 podcasts 3 during 2023/24) on a range of topics. During this year

these included a podcast with our Student Liaison Officer providing advice to students, another featuring the British Retail Consortium focussing on how and why businesses are regulated, and another introducing Trading Standards week. 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 real 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.

# What we plan to do next

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

| Supporting the local economy   |  | Lead Responsibility |
|--|--|---------------------|
| <b>A fair trading environment is maintained</b>  |  |                     |
| Conduct intelligence led operations to investigate and disrupt businesses selling illegal vapes and tobacco products and raise public awareness of how to report it.                           |  | C Hill              |
| <b>Informed and confident consumers</b>  |  |                     |
| Continue to promote the 'Buy with Confidence' (responsible trader) scheme and take forward a business case to lead on the centralised administration of new applications to support other LAs. |  | J Bale              |
| <b>Improved business practices and operation</b>   |  |                     |
| Explore options for extending training provision including the provision of specific training to support people who commit offences.   |  | J Bale              |
| <b>Accessible services responsive to business needs</b>  |  |                     |
| Continue to review the primary authority framework to ensure the advice and support requirements for our current Primary Authority partners are appropriate.                                   |  | J Bale              |

# What we will measure

| Performance Measures 2024/25   | Target |
|--|--------|
| • % of new businesses identified which were subject to risk assessment visit or returned a self-assessment questionnaire during the year for food hygiene.     | 90%    |
| • % of new businesses identified which were subject to risk assessment visit or returned a self-assessment questionnaire during the year for Trading Standards | 80%    |
| • % of businesses who felt that interaction with SRS has helped them improve standards of compliance in their business.  | 85%    |
| • % of individuals who feel that the training they received through SRS will benefit their business.   | 95%    |



## Priority

# Maximising the use of resources

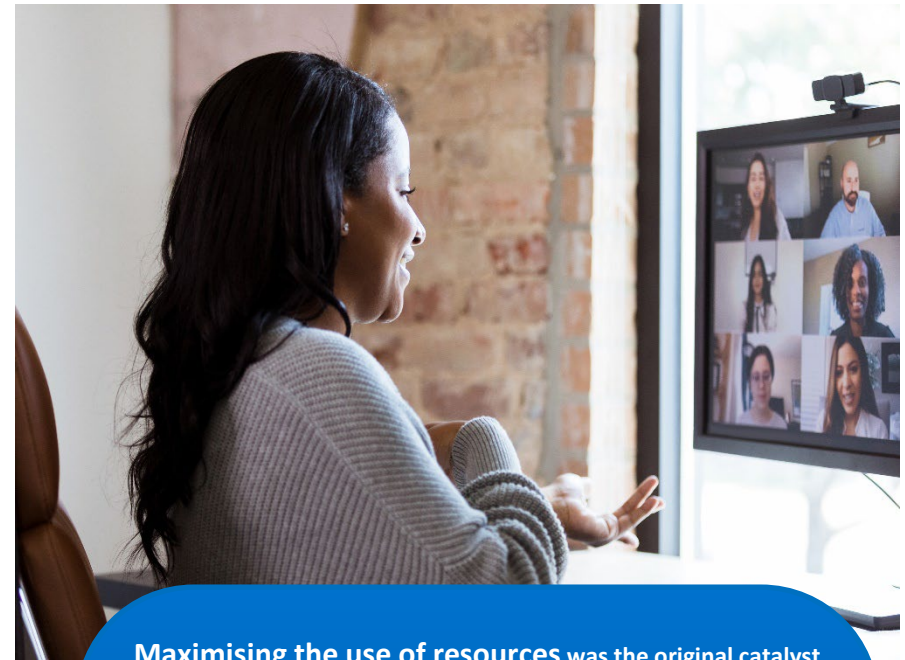
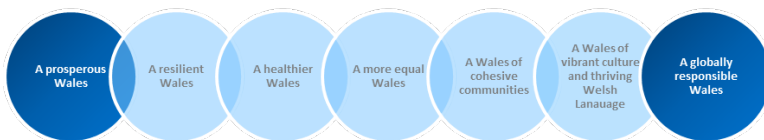
## Outcomes



## Outputs



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

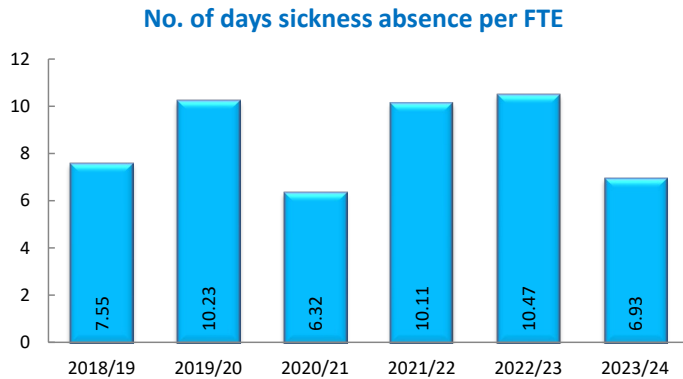


**Maximising the use of resources** was the original catalyst for creating SRS, and our work in this area continues. Reducing “triplication” of effort, introducing better processes, making our systems work without constant intervention, improving access into the service will all benefit our business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



## What we have achieved

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

**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 just wanted to say a huge thank you for all your support and time spent dealing with this matter. I am extremely grateful. As you know the incident was really affecting our*

*quality of life, my son felt very apprehensive and fearful leaving the flat and this caused me a great deal of distress and worry as his parent. Since your visit to the neighbour, we have not experienced another incident so I know your intervention has worked and this has had a huge impact on my son and I, he now feels safe to leave home and go to school independently and I am more at ease knowing this. I think the awareness raising was also needed to prevent such re-occurrences which, in my view, had the potential to cause lasting damage and injury to both my son and the dog in question. Thank you also for your professional, proactive and empathetic approach and for taking the time to check in. It is clear to see that you take great pride and effort in what you do - it has not gone unnoticed."* Service user of Animal Warden service.

*"...When I said that we had rats in our communal bin area he said whilst he was here he'd go down and put traps in there. He came back up and said he's found out where they were coming from. He went above and beyond what he was supposed to do, when many employees wouldn't have. The worker is absolutely fantastic"* Service user of our pest control service.

**Tablet devices** - In making the best use of its resources, SRS looks for opportunities to streamline how things are done in all areas of the Service. With this in mind, work continues to pilot the use of handheld tablet devices to replace the paper system currently being used to record the results of food inspections. It is hoped that this approach can be mainstreamed across the Food Service in 2024/25 to bring benefits such as the direct uploading of information onto the database avoiding the need for officers to spend time scanning multiple documents and the resulting delays in the uploading of information; reduction in the consumption of paper and lower printing costs; and less travel time for officers in having to pick up and drop off paperwork.

**In house Food and Safety Newsletter** - In March, the Service produced the latest version of its popular Food and Safety News (srs.wales) publication which was circulated to nearly 7000 businesses across the region. In a departure from the approach taken previously, the new edition has been put together in-house, meaning that its production is cost-neutral, other than officer time and a small investment in relevant and re-usable stock images. In the case of all previous editions of the publication, costs have been occurred for graphic design, Welsh translation, printing, and postage.

## 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 is extremely important for SRS and the use of technology to highlight and promote our services is utilised wherever possible.

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. During the last year, the website had 61,761 users, many of which were repeat visitors and 168,894 page views. Our Noise and Air Pollution web pages consistently receive the most page views.
- **Twitter account** – Since launching our own Twitter account @SRS\_Wales in 2017, the SRS continues to increase the number of followers which stood at 777 in March 2024. This means of communicating with our customers enables the service to share with the legacy authorities (to retweet to their followers) promoting the service and conveying key messages to residents and businesses alike.
- **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 enables complaints to be triaged, reducing the need for officers to visit homes to monitor disturbances.

## Income generation underpins sustainable service delivery

**UKAS Accredited Metrology Laboratory** - The Metrology laboratory based in Cardiff undergoes regular audits 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. In July, UKAS undertook an audit of the Lab and found the management system to be effective.

The provision of calibration services to business clients is well established, and has been expanded over time as new markets have been identified. One recent development is the provision of paid-for metrology courses for officers working towards their statutory weights and measures qualification and for qualified officers seeking refresher training. As the lab is the only UKAS accredited local authority metrology lab in Wales, the formal 2 day course is proving popular. Additional 'lab days' will also be offered to provide students the opportunity to practise what they have learnt in advance of their statutory Metrology practical and oral examinations.

**Income generation** – A key priority for SRS, is the further development of our commercial approach by increasing our 'paid for' services and marketing them to business. These commercial activities are aimed at complementing existing services whilst also providing income generation. We do this by developing Primary Authority partnerships with businesses of which we currently have 36 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 courses through a mixture of online and face to face opportunities. SRS was the first training centre in Wales to deliver the RSPH Level Two Award in Infection Prevention and Control for Special Procedures Practitioners. Income is also generated via our UKAS accredited Metrology Lab services and we are expanding our environmental services with an increase in Air Quality Monitoring Services/Local Site Operator Licences. As a result during 2023/24 the income generated by SRS was £122,437.

£122,000+

Income generated

## 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 continues to encourage SRS officers to engage in further study leading to recognised, higher level qualifications. For the past few years, support has been offered to a small number of staff by way of match funding, who have successfully demonstrated the benefits their desired qualification would bring to the service and to them personally. In the autumn of 2023, 4 members of staff received match funding support to begin further qualifications, 3 of whom are studying towards the MSc in Environmental Health and the other towards the HNC in the Built Environment. This is in addition to the 12 members of staff

who have successfully achieved additional qualification through match funded study. The qualifications attained since 2017 include:-

- Eight achieved the MSc in Environmental Health
- One achieved the MSc in Health and Public Services Management
- One achieved the MSc in Leadership and Management
- One achieved the MSc in Public Sector Leadership
- One achieved the MSc in Public Health.

The success of the initiative is evident, not only in demonstrating how SRS values its staff and supports their development, but in equipping the service with the necessary skills and behaviours to shape future leaders. All but two of the sixteen staff supported to date remain with the service. In the run up to the new academic year, expressions of interest will again be sought for opportunities for further match funded study. Of necessity, opportunities will be scaled back moving forward given the continued financial pressures facing the Service, with applications considered on a case by case basis in line with the performance review process.

- Secondments provide development opportunities for both the employee who is seconded and the employee who fills the empty position. Within SRS we now have one team manager seconded to a different stakeholder which has enabled their role to be filled on a temporary basis by an existing employee. Furthermore two officers were seconded to the Health Protection Partnership performing 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 and resilience of the service.
- Training in food standards work continued amongst our food safety officers to enable them to undertake low risk food standards interventions at the same time as a food hygiene inspection. This training and the concept of generic working not only provides team members with learning and career development opportunities but benefits the service by building a more cohesive and resilient approach to inspections.
- Looking to the longer term, the Service continued to work closely with Cardiff Metropolitan University offering a number of work placements for Environmental Health degree students during the year. This relationship has been further enhanced by the establishment of two academic awards in

memory of the SRS Environmental Health professionals who very sadly passed away in service in 2022. Awarded for the first time in June 2023, the Zoe Pieris Award recognised the highest achieving final year degree student by exam grade, and the Rachel Stickler Award recognised the student who best exemplifies the values of the Environmental Health profession through their commitment, drive and positive attitude.

- SRS fully supports and continues to take the lead on the development of the regulatory apprenticeship for Wales, recognising the benefits that such an approach will bring in addressing recruitment pressures in the regulatory field. While we wait for its implementation, SRS have successfully adapted the approach to 'grow our own' officers by recruiting 2 students into Technical Officer roles while they study for Higher Certificates in Food.

# 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

Explore options for introducing newer technologies that ensure officers can operate more efficiently and where possible reduce operating costs, for example strengthening the ICT interface between the partner authorities and introduction of mobile devices for inspections. \*\*\*

J Bale

Review all future service delivery options in light of the ongoing year on year financial pressures. \*\*\*

H Picton

Explore options to improve electronic payment options for SRS customers.

J Bale

Extend the scope of the Intelligence Operating Model across further SRS services, for example private sector housing complaints.

J Bale

Explore opportunities to provide digital forensic services to external organisations and assess feasibility of obtaining full accreditation.

J Bale

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

C Hill

Identify a clear process through which any significant reprioritisation of SRS services would be decided by partner Councils including how such an exercise would be communicated and consulted upon, as part of the process through which a final decision is made.

H Picton

Undertake a review of the Business Support function.

J Bale

### 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

Produce a workforce development plan for the service that addresses recruitment and retention pressures, incorporates the identification of staff learning and development needs and other HR approaches. \*\*\*

H Picton

Review mechanisms for engagement with staff to seek their ideas about the future delivery of services and opportunities to further improve staff wellbeing. \*\*\*

All OMs

Improve internal communication mechanisms to ensure staff are kept up to date on developments

H Picton

### Income generation underpins sustainable service delivery

|  |        |
|--|--------|
| Maximise options for cost recovery and income generation to ensure this approach underpins sustainable service delivery.***                | J Bale |
| Undertake a marketing campaign for Metrology Laboratory Services including training provision to increase income generation opportunities. | J Bale |

## What we will measure

| Performance Measures 2024/25  | 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 satisfied with their ability to access the facilities and services they need from SRS. | 90%    |
| % of SRS investigations resulting in prosecution that were successfully concluded.                    | 90%    |

# Appendix 1 – Risk Register

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

| Risk Description   | Inherent Risk Score (April 2024) |        | Risk    | Comments<br>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 creation of SRS generated significant cost savings at its inception and the service continues to deliver services with a reducing budget across 3 local authority areas. These, and the latest budget savings together with other factors, such as new and emerging legislation, the cost of living crisis, the rise in infringements and recruitment and retention pressures are all severely impacting our | 4                   | 3      | High 12 |

| Risk Description   | Inherent Risk Score (April 2024) |        | Risk    | Comments<br>What SRS are doing to mitigate risks  | Residual Risk Score |        | Risk              |
|--|----------------------------------|--------|---------|---|---------------------|--------|-------------------|
|  | Likelihood                       | Impact |         |   | Likelihood          | Impact |                   |
|  |                                  |        |         | ability to deliver planned services. To mitigate this, the Service is examining new ways of prioritising some services and using risk based approaches to activities in line with reduced resources, and through the recruitment of temporary staff and graduates. Serious concerns, however do remain in relation to the delivery of planned services as we enter the new financial year.  |                     |        |                   |
| 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. The shortage of applicants with the right skills, abilities and experience in the different professions has created a more competitive market due to the traditional supply of professional officers from universities being greatly reduced, and it now taking longer to qualify. The demands of working across 3 local authority areas, and job titles that do not reflect the professional disciplines and standing of roles are also thought to be contributory factors to recruitment and retention pressures. SRS has made a commitment to 'grow our own' practitioners and to this end has been forging excellent links with academic institutions and professional bodies. and continues to take the lead on development of the regulatory apprenticeship for Wales. Furthermore we are working with staff to make appropriate changes to job titles that better reflect the relevant disciplines. | 3                   | 3      | Medium/<br>High 9 |



| Risk Description   | Inherent Risk Score (April 2024) |        | Risk              | Comments<br>What SRS are doing to mitigate risks  | Residual Risk Score |        | Risk             |
|--|----------------------------------|--------|-------------------|---|---------------------|--------|------------------|
|  | Likelihood                       | Impact |                   |   | Likelihood          | Impact |                  |
| RR3: The complexities of resource allocation may result in a lack of understanding and misalignment of resources.  | 3                                | 3      | Medium/<br>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 loss of critical ICT systems and appropriate support will be detrimental to working as a single service unit and the ability to work smarter and more efficiently.  | 3                                | 3      | Medium/<br>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. There is however a need to improve our remote working capabilities together with the IT interface between the SRS and the partner authorities. Progress is being made in Cardiff to migrate across to a new way of accessing Cardiff systems and a pilot has commenced within the Food Team to utilise tablets to undertake food business inspections which will enable the service to deliver services more efficiently and effectively across all 3 areas. | 2                   | 2      | Medium 4         |
| RR5: Failure to identify and resource staff learning and development to address changes in roles together with the immediate needs and long term goals of the service, could result in staff capability issues amongst which would affect the SRS ability to deliver services. | 3                                | 3      | Medium/<br>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. A match funding offer to staff for personal development has resulted in a number of officers being supported in further development studies however this is likely to be unsustainable given the latest budget savings.  | 1                   | 3      | Medium/<br>Low 3 |
| RR6: Implementation of new legislation may create  |                                  |        |                   | Whilst workloads are reviewed and monitored and processes are in place to regularly report to   |                     |        |                  |

| Risk Description   | Inherent Risk Score (April 2024) |        | Risk     | Comments<br>What SRS are doing to mitigate risks  | Residual Risk Score |        | Risk     |
|--|----------------------------------|--------|----------|---|---------------------|--------|----------|
|  | Likelihood                       | Impact |          |   | Likelihood          | Impact |          |
| additional demands on service delivery.  | 4                                | 3      | High 12  | partner authorities, it is not always easy to predict the impact that new legislation may have on resources. An example of this was during the Covid 19 pandemic when SRS became responsible for enforcing the Coronavirus Regulations across the 3 partner authorities which required a change of focus and placed additional demands on the service. While our commitment to this has reduced the pressure continues with the new special procedures legislation which is expected to be implemented this year increasing demand on the service at a time when budgets are being cut and recruitment and retention pressures exist. | 4                   | 3      | High 12  |
| 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 paid voluntary basis however there can be periods where it is difficult to recruit officers resulting in shortage of cover. This has required managers to step in at short notice. While the policies and procedures have been reviewed and training provided for new officers to the rota there is still a lack of resilience with no further action that can be taken.   | 2                   | 2      | Medium 4 |
| RR8: The positioning of Shared Regulatory Services under a host authority, together with unique branding may result in the Service becoming divorced | 2                                | 2      | Medium 4 | The Service remains relevant to all 3 authorities through links into the 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  | 1                   | 2      | Low 2    |

| Risk Description  | Inherent Risk Score (April 2024) |        | Risk     | Comments<br>What SRS are doing to mitigate risks  | Residual Risk Score |        | Risk       |
|---|----------------------------------|--------|----------|---|---------------------|--------|------------|
|   | Likelihood                       | Impact |          |   | Likelihood          | Impact |            |
| from its constituent Councils or marginalised.  |                                  |        |          | successes taken where possible. The Covid-19 pandemic saw the critical involvement of SRS in the Test, Trace and Protect and the enforcement of Coronavirus regulations bring about greater attention and recognition from the 3 authorities we serve. We continue this approach with our work on minimum energy efficiency standards which contributes to the climate change agendas of the partner authorities.   |                     |        |            |
| RR9: Failure to sustain the shared regulatory services partnership.                         | 2                                | 3      | Medium 6 | As a collaborative service SRS provides a diverse range of services to Bridgend, Cardiff and the Vale of Glamorgan under a single management structure with shared governance arrangements. The partnership generated significant cost savings at its inception while providing greater resilience to the important services SRS provides across all 3 areas. To break up the partnership would therefore be hugely detrimental to the delivery of these services and have significant financial implications for the partners. In terms of mitigating measures, SRS maintains links into Corporate Plans of 3 authorities, attendance at the various Council/Executive meetings and has strong links with members and senior officers within each legacy authority with opportunities to promote successes taken where possible. | 1                   | 3      | Medium/Low |
| RR10: Failure to align agendas and objectives with key partners and remain relevant to all. | 2                                | 3      | Medium 6 | SRS operates under a Joint Working Agreement (JWA) which sets out 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 staffing and  | 1                   | 3      | Medium/Low |

| Risk Description | Inherent Risk Score<br>(April 2024) |        | Risk | Comments<br>What SRS are doing to mitigate risks   | Residual Risk Score |        | Risk |
|------------------|-------------------------------------|--------|------|--|---------------------|--------|------|
|                  | Likelihood                          | Impact |      |  | Likelihood          | Impact |      |
|                  |                                     |        |      | services to be provided by the host and other partners, financing and other functional issues and the financial operating model. Furthermore the service aligns its objectives with those of the partner authorities. Recent budget cuts however requested of SRS from the partners suggest possible disparities emerging which will make the delivery of services across SRS difficult to balance. The service however will continue to remain 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. |                     |        |      |

# Appendix 2 – Action Plan

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

|  |                            |
|--|----------------------------|
| <b>Improving health and wellbeing</b>  | <b>Lead Responsibility</b> |
| <b>The food chain is safe and free from risks</b>  |                            |
| Protect public health through the delivery of actions set out within the Food and Feed Law Enforcement Plan 2024/25\.  | *** C Hill                 |
| Protect public health through the delivery of actions set out within the Port Health Plan 2024/25.   | C Hill                     |
| <b>Risks in the workplace are managed properly</b>   |                            |
| Protect public health through the delivery of actions set out in the Health and Safety Enforcement Plan 2024/25.   | *** C Hill                 |
| Explore the feasibility of introducing an innovative approach to the enforcement of smoke-free requirements on hospital grounds to optimise staff efficiency.  | C Hill                     |
| <b>Noise and air emissions are controlled</b>  |                            |
| Review and explore options for future proofing the Duty Officer Rota.  | W Lane                     |
| Continue to work with Transport for Wales in minimising noise disturbance to residents from works associated with the South Wales Metro Construction.  | W Lane                     |
| <b>A safe trading environment is maintained</b>  |                            |
| Undertake seasonal product safety projects encompassing products such as contact lenses and fancy dress costumes.  | 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                     |
| <b>Licensed premises operate responsibly</b>   |                            |
| Review the Statement of Gambling Act Policies in Bridgend and Vale.  | W Lane                     |
| <b>The quality of private rented property is improved</b>  |                            |
| Drive up standards in the private rented housing sector by undertaking robust enforcement action to deal with rogue agents and landlords letting and managing properties.  | ** W Lane                  |
| Continuing to work with Welsh Government and stakeholder organisations in the development of their Building Safety Programme for medium and high-rise buildings in the private sector.   | ** W Lane                  |
| Review and harmonise the annex to the SRS Compliance and Enforcement Policy in relation to Housing Enforcement.  | W Lane                     |

## Infectious disease is controlled and prevented

Protect public health through the delivery of actions set out within the Communicable Disease and Health Service Plan..\*\*\*

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/W Lane

## Safeguarding the vulnerable

Lead Responsibility

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

Consider how SRS could engage more with Elected Members regarding areas of concern and safeguarding for the public, such as rogue traders, scams, illegal money lending and doorstep crime.

H Picton

### Children are protected from harmful substances and products

Work in partnership 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. \*\*\*

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

Raise awareness of illegal money lending and support individuals to access responsible lenders and debt advice, rebuild their finances and make a sustainable transition to legal credit. \*\* & \*\*\*

J Bale

### Taxi provision is safe and fair

Engage and respond to Welsh Government on the modernisation of taxi and private hire services in Wales.

W Lane

Undertake enforcement exercises with the taxi trade including mystery shopper exercises to ensure compliance with the Equalities Act, vehicle and licensing standards and fare refusals for short journeys .

W Lane

Review taxi vehicle testing regime in Bridgend.

W Lane

Ensure the decision by the Council to introduce mandatory card payment facilities in hackney carriages licensed by Cardiff Council is implemented.

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 |
| Use feedback from the public consultation to report back to Bridgend Cabinet to agree a finalised Air Quality Action Plan for Park Street and start work on the measure to improve air quality. | J Bale |
| Ensure good air quality by : 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 home owners and landlords to return empty properties back into use through engagement, support, consideration of varying the Council Tax premium scheme, and where necessary taking appropriate enforcement action to deal with the worst long term derelict empty homes. ** | W Lane |
| Engage with landlords and lettings agents to improve the energy performance ratings of private rented properties under the Minimum Energy Efficiency Standard (MEES) Regulations. ** & ***   | C Hill |

### Animals are treated humanely

|   |        |
|---|--------|
| 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 |
|---|--------|

### 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 vapes and tobacco products and raise public awareness of how to report it. | C Hill |
|--|--------|

### Informed and confident consumers

|  |        |
|--|--------|
| Continue to promote the 'Buy with Confidence' (responsible trader) scheme and take forward a business case to lead on the centralised administration of new applications to support other LAs. | J Bale |
|--|--------|

### Improved business practices and operation

|  |        |
|--|--------|
| Explore options for extending training provision including the provision of specific training to support people who commit offences. | J Bale |
|--|--------|

### Accessible services responsive to business needs

|  |        |
|--|--------|
| Continue to review the primary authority framework to ensure the advice and support requirements for our current Primary Authority partners are appropriate. | J Bale |
|--|--------|

## Maximising the use of resources

Lead  
Responsibility

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

Explore options for introducing newer technologies that ensure officers can operate more efficiently and where possible reduce operating costs, for example strengthening the ICT interface between the partner authorities and introduction of mobile devices for inspections. \*\*\*

J Bale

Review all future service delivery options in light of the ongoing year on year financial pressures. \*\*\*

H Picton

Explore options to improve electronic payment options for SRS customers.

J Bale

Extend the scope of the Intelligence Operating Model across further SRS services, for example private sector housing complaints.

J Bale

Explore opportunities to provide digital forensic services to external organisations and assess feasibility of obtaining full accreditation.

J Bale

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

C Hill

Identify a clear process through which any significant reprioritisation of SRS services would be decided by partner Councils including how such an exercise would be communicated and consulted upon, as part of the process through which a final decision is made.

H Picton

Undertake a review of the Business Support function.

J Bale

### 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

Produce a workforce development plan for the service that addresses recruitment and retention pressures, incorporates the identification of staff learning and development needs and other HR approaches. \*\*\*

H Picton

Review mechanisms for engagement with staff to seek their ideas about the future delivery of services and opportunities to further improve staff wellbeing. \*\*\*

All OMs

Improve internal communication mechanisms to ensure staff are kept up to date on developments

H Picton

### Income generation underpins sustainable service delivery

Maximise options for cost recovery and income generation to ensure this approach underpins sustainable service delivery.\*\*\*

J Bale

Undertake a marketing campaign for Metrology Laboratory Services including training provision to increase income generation opportunities.

J Bale



