



Norfolk County Council

# Communities Committee

Date: **Wednesday, 10 October 2018**

Time: **10:00**

Venue: **Edwards Room, County Hall,  
Martineau Lane, Norwich, Norfolk, NR1 2DH**

**Persons attending the meeting are requested to turn off mobile phones.**

## **Membership**

Mrs M Dewsbury - Chairman

Ms J Barnard

Dr C Jones

Mr D Bills

Mr K Kiddie

Mrs S Butikofer

Mr B Long - Vice-Chairman

Mr N Dixon

Ms C Rumsby

Mr R Hanton

Ms S Squire

Mr H Humphrey

Mr J Ward

**For further details and general enquiries about this Agenda  
please contact the Committee Officer:**

Julie Mortimer on 01603 223055 or email [committees@norfolk.gov.uk](mailto:committees@norfolk.gov.uk)

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# A g e n d a

1. To receive apologies and details of any substitute members attending
  
- 2a. To confirm the minutes of the Communities Committee meeting held on Wednesday 29 August 2018. Page 5
  
- 2b. To confirm the minutes of the Communities Committee meeting held on Wednesday 5 September 2018. Page 15

## 3. Declarations of Interest

If you have a **Disclosable Pecuniary Interest** in a matter to be considered at the meeting and that interest is on your Register of Interests you must not speak or vote on the matter.

If you have a **Disclosable Pecuniary Interest** in a matter to be considered at the meeting and that interest is not on your Register of Interests you must declare that interest at the meeting and not speak or vote on the matter

In either case you may remain in the room where the meeting is taking place. If you consider that it would be inappropriate in the circumstances to remain in the room, you may leave the room while the matter is dealt with.

If you do not have a Disclosable Pecuniary Interest you may nevertheless have an **Other Interest** in a matter to be discussed if it affects

- your well being or financial position
- that of your family or close friends
- that of a club or society in which you have a management role
- that of another public body of which you are a member to a greater extent than others in your ward.

If that is the case then you must declare such an interest but can speak and vote on the matter.

## 4. Any items of business the Chairman decides should be considered as a matter of urgency

## 5. Public QuestionTime

Fifteen minutes for questions from members of the public of which due notice has been given.

Please note that all questions must be received by the Committee Team ([committees@norfolk.gov.uk](mailto:committees@norfolk.gov.uk)) by **5pm Friday 5 October 2018**. For guidance on submitting a public question, view the Constitution at [www.norfolk.gov.uk/what-we-do-and-how-we-work/councillors-meetings-decisions-and-elections/committees-agendas-and-recent-decisions/ask-a-question-to-a-committee](http://www.norfolk.gov.uk/what-we-do-and-how-we-work/councillors-meetings-decisions-and-elections/committees-agendas-and-recent-decisions/ask-a-question-to-a-committee)

## 6. Local Member Issues/ Member Questions

Fifteen minutes for local member to raise issues of concern of which due notice has been given.

Please note that all questions must be received by the Committee Team ([committees@norfolk.gov.uk](mailto:committees@norfolk.gov.uk)) by **5pm on Friday 5 October 2018**.

7. **Verbal update/feedback from Members of the Committee regarding Member Working Groups or bodies that they sit on.**
  
8. **Annual review of the Enforcement Policy** **Page 23**  
Report by the Executive Director of Community & Environmental Services.
  
9. **Development of Norfolk Fire and Rescue Integrated Risk Management Plan 2020-2023** **Page 87**  
Report by the Executive Director of Community & Environmental Services.
  
10. **Strategic and Financial Planning 2019-20 to 2022-23** **Page 92**  
Report by the Executive Director of Community & Environmental Services.
  
11. **Mobile Library Services** **Page 108**  
Report by the Executive Director of Community & Environmental Services.
  
12. **Performance management** **Page 139**  
Report by the Executive Director of Community & Environmental Services.
  
13. **Risk management** **Page 154**  
Report by the Executive Director of Community & Environmental Services.
  
14. **Finance Monitoring** **Page 164**  
Report by the Executive Director of Community & Environmental Services.
  
15. **Forward Plan and decisions taken under delegated authority** **Page 170**  
Report by the Executive Director of Community & Environmental Services.

### **Group Meetings**

Conservative	9:00am Conservative Group Room, Ground Floor
Labour	9:00am Labour Group Room, Ground Floor

**Chris Walton**  
**Head of Democratic Services**

County Hall  
Martineau Lane  
Norwich  
NR1 2DH

Date Agenda Published: 02 October 2018



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## **Communities Committee**

**Minutes of the Extraordinary Meeting Held on Wednesday 29 August 2018  
10:00am, Edwards Room, County Hall, Norwich**

### **Present:**

Mrs M Dewsbury – Chairman

Ms J Barnard  
Mr D Bills  
Mrs S Butikofer  
Mr N Dixon  
Mr R Hanton  
Mr H Humphrey

Dr C Jones  
Mr K Kiddie  
Mr B Long – Vice-Chairman  
Ms C Rumsby  
Ms S Squire  
Mr J Ward

The Chairman advised Members that the Chief Fire Officer was attending the meeting to answer any technical or service specific questions about current operations only and said it would not be appropriate for him to comment or answer any questions on the business case from the PCC or the County Council's response. The Chairman advised that other officers from the Community and Environmental Services Department were attending to answer any Member questions or queries.

### **1. Apologies and substitutions**

1.1 There were no apologies.

### **2. Declarations of Interest**

2.1 There were no declarations of interest.

### **3. Urgent business**

3.1 There were no items of urgent business.

### **4. Public Questions**

4.1 One public question was received from Mr T Allison, Unison Rep NFRS which is attached at Appendix A, together with the response.

4.2 As a supplementary question, Mr Allison asked if the Committee would give assurance that they would seek to protect support staff jobs in the light of the fact that there was a ratio of 9% in Norfolk compared to the national average of 17%. He added that support jobs had been lost in every budget cut to save frontline jobs and in his view, this loss was impacting on delivery of front-line services and also

added that support staff did not feel they were “in safe hands” and were likely to vote for the PCC move.

4.2.1 In response, the Chairman advised that Norfolk had a ratio of back office staff of 9.85% against a national average of 17% which equated to the 6<sup>th</sup> lowest average of support staff in the country. Members recognised this and that support staff were needed to continue the safe running of the service. They reassured Mr Allison that the Integrated Risk Management Plan (IRMP) process would need to be carried out to assess the impact of any changes that could affect front-line services.

4.2.2 The Executive Director of Community & Environmental Services said that Norfolk Fire & Rescue Service (NFRS) was part of Norfolk County Council, and therefore some core County Council staff regularly worked with NFRS. He highlighted recent examples of the significant contribution made in preparing the response to the PCC’s Business Case and the assistance in preparing for the HMICFRS inspection of NFRS, which was expected to take place in the next few months.

## **5 Local Member Questions**

5.1 No Local Member questions were received.

## **6 Norfolk Fire and Rescue Service – public consultation on business case for changing the governance of the service.**

6.1 The Committee received the report by the Executive Director of Community & Environmental Services, asking it to agree the County Council’s response to the Police & Crime Commissioner’s public consultation on a business case for changing the governance of the Norfolk Fire and Rescue Service.

6.2 The Committee received a presentation from the Head of Support and Development (CES) setting the scene for the item. A copy of the presentation is attached at Appendix B.

6.3 The following points were noted during the discussion:

6.3.1 The Executive Director of Community & Environmental Services stated that the Police & Crime Commissioner (PCC) had been clear about his intentions to produce an initial draft business case and he then decided to proceed to public consultation on a full local business case. He added that the PCC was under no obligation to submit the business case to Government if he considered the business case was not as robust as first thought; if the results of the consultation showed there was no public appetite for change; or if there was no strategic support from the County Council, which would make a change in governance difficult to implement. The Executive Director added that the decision was no fait accompli and that the PCC may decide not to submit a business case to the Home Office after he had considered all the responses to the public consultation.

6.3.2 Members felt there were substantial similarities between Suffolk and Norfolk and, as the Suffolk Police & Crime Commissioner had decided not to proceed with a proposed change of governance in Suffolk, they queried the differences in Norfolk that had made the Norfolk PCC decide to move to a formal business case.

- 6.3.3 The Chairman highlighted that the PCC had never asked to join the Fire Authority, nor had he attended any of its meetings. She also highlighted the many instances of collaboration between NFRS and the Police which were already taking place.
- 6.3.4 Some members expressed concern that the outline business case (titled Independent Review of Options for Police and FRS governance in Norfolk) published by the PCC previously had not been mentioned in the business case put forward by the PCC and agreed the following additional paragraphs be added to the NCC Response to the Business Case “Keep in Safe Hands”.

**Added into Section 3 under 3.3.5 –**

More fundamentally, it does not appear that the outcome of the independent analysis carried out as part of the initial business case process has been taken into account. In particular, the initial business case included the following:-

“If a local consensus cannot be achieved, the deliverability score of Option 3 will be severely affected. It would remain possible for the PCC to make a successful case to the Home Office without local consensus – as is being attempted elsewhere in the country. However, in our view this approach would carry a higher level of risk, with implications for public safety and value for money. In this case, Option 1 – to continue with voluntary collaboration under refreshed and strengthened arrangements - would need to be considered as a viable alternative.”

Given the County Council’s views (as set out in this document) it is difficult to see how local consensus could be achieved, meaning that the ‘higher level of risk, with implications for public safety and value for money’ highlighted in this independent assessment are relevant and should be taken into account.

- 6.3.5 The Committee **agreed** the following additional recommendation:

Note that the business case includes a number of assumptions and costings that have not been verified or validated and to suggest to the PCC that, if he wishes to pursue the process, he first commissions a process similar to one used to develop the Integrated Risk Management Plan in order to first validate assumptions and assess risks.

- 6.3.6 The Committee highlighted the amount of collaboration already taking place with the Police, but expressed concern that collaboration with other Norfolk County Council departments, for example Resilience, Trading Standards, Adult Social Care and Children’s Services may be lost if the Service was disaggregated from Norfolk County Council.
- 6.3.7 The Committee raised serious concerns about public safety if the service moved under the control of the PCC, with some Members expressing the view that they remained unconvinced by the business case put forward and the implications of the risks involved, as the proposals had not yet been through the risk assessment process to allay concerns over public safety.
- 6.3.8 Members expressed concern about how the quoted figure of £10m could be saved, how this figure could be validated and how much money the change of

governance would cost.

- 6.3.9 In response to a question about the additional cost pressure for NFRS as a result of the recent wildfire incidents, the Chief Fire Officer said that the final figure was not yet available, but the current estimate was that approximately £200k additional budget had been spent, which consisted of:
- On-call retained staff.
  - Replacing damaged equipment.
  - Diesel
  - Overtime payments.
- 6.3.10 The Committee queried where additional money to deal with unexpected incidents would be found from under new governance arrangements, particularly as the Council Tax precept could only be raised by 2%. Norfolk County Council had reserves and contingency funds to fall back on to pay for emergency incidents. Although it was noted that the Government sometimes gave grants to cover emergencies, the grants did not cover the total costs incurred.
- 6.3.11 Members stated that £4.696m of the savings included in the PCC's business case was already being progressed by Norfolk County Council and would be delivered with or without a change in governance. This would reduce the £10m savings quoted in the business case.
- 6.3.12 The Committee **agreed** the following amendment to Recommendation 4:
- Confirm the County Council's commitment to continued close collaboration with Norfolk Constabulary, and other emergency services, for example further exploring One Public Estate opportunities.
- 6.3.13 Members **agreed** to request meetings of the Collaboration Board be established on a more formal basis, with meetings taking place twice yearly and reporting back to Communities Committee.
- 6.3.14 The Committee expressed concerns about the Police moving into NFRS buildings leading to police stations being sold, with the money benefitting the Police and not the NFRS. The Chairman highlighted that 7 stations were currently open 24/7, 2 opened during daytime only, with the remaining 33 housing fire engines for use by retained firefighters when they were called out to emergencies or for training, and so they were not open most of the time. The costs of using buildings, for example heating and lighting did not appear to have been factored into the business case.
- 6.3.15 The Chief Fire Officer responded to a question about the current level of NFRS collaboration with the Police and highlighted that the bulk of the NFRS headquarters team were located at the OCC building in Wymondham, with plans in the advanced stages of moving the control room there by the end of the year. The collaboration was effective, allowing information to be shared which led to improved responses to any emergency situation. The Chief Fire Officer also referred to the development of Reepham and Holt Fire Stations which were having extensions built to accommodate Police Officers.



The Chief Fire Officer also highlighted many examples of improved collaboration from an operational perspective, including using the same risk assessments meaning that when an incident occurred all 'blue light' services were ready to respond; the Norfolk Resilience Forum which had been proven to work effectively in recent wildfire incidents, the threat from the north sea with mechanisms being put in place to collaborate and respond effectively. He also highlighted assisting paramedics to gain access to properties on behalf of the police when necessary and the development of drones which had recently led to the successful rescue of a missing person.

- 6.3.16 As the Committee was unable to answer a question about how many police officer's salaries the business case had cost to produce, the Chairman suggested the question be put to the Police and Crime Panel at its next meeting.
- 6.3.17 Members asked who would be responsible for governance if the Police & Crime Commissioner was unavailable as there was no other elected representative available, unlike the current governance arrangements where the Communities Committee consisted of 13 elected representatives. The Chairman responded that the answer was unknown but decisions could possibly be delegated to the Chief Executive of the Office of the Police & Crime Commissioner. The Committee expressed concern about the lack of resilience in the business case and **agreed** to include the following paragraph into the proposed response:

**Added into section3 under 3.4.4 -**

"In addition, we are concerned about the resilience of governance arrangements under the PCC. At present, the Fire and Rescue Authority (the Communities Committee) consists of 13 elected Members. Given that the Deputy PCC role was abolished by PCC, under the proposed model governance would be vested in a single person – the PCC – which does not provide any resilience if, for example, the PCC was not available for any reason".

- 6.3.18 Some Members expressed concern about the lack of information available to members of the public during the PCC's roadshows which had been arranged so the PCC could meet members of the public to answer their questions about governance of the Fire Service. Members' queried how many people could have been influenced by the headline figures but had not actually read the whole business case before responding to the consultation.
- 6.3.19 The Committee **agreed** the following additional recommendations:
- Note that the business case includes a number of assumptions and costings that have not been verified or validated and to suggest to the PCC that, if he wishes to pursue the process, he first commissions a process similar to one used to develop the Integrated Risk Management Plan in order to first validate assumptions and assess risks.
- 6.3.20
- In submitting the County Council's formal response, ask the PCC to consider not progressing or submitting the business case to the Home Office, on the basis that there is insufficient evidence to demonstrate a case for change.

- 6.3.21 The Committee **agreed** that there were sufficient concerns to add an additional risk to the Communities Committee Risk Register titled 'Change of governance in the Fire and Rescue Service' and to recommend to Policy & Resources Committee that this should be a corporate risk due to the financial and reputational impact.
- 6.4 Upon each recommendation being put to a separate vote, the Committee unanimously **RESOLVED** to:
- 1 **Agree** that the proposal set out in the business case published by the PCC:-
    - Is not in the interests of economy, efficiency or effectiveness, and
    - Will negatively impact on the public safety of Norfolk.
  - 2 **Agree** that the County Council should respond to the PCC's consultation to 'disagree' with the proposal.
  - 3 **Agree** the County Council's detailed formal response to the PCC's consultation, as set out in Appendix A of the report (including the additional comments raised during the discussion at the meeting).
  - 4 **Confirm** the County Council's commitment to continued close collaboration with Norfolk Constabulary, and other emergency services, for example further exploring One Public Estate opportunities.
  - 5 **Ask** the Chair of the Committee to ensure that a copy of the agreed formal consultation response is submitted directly to the Home Secretary so that the County Council's views and concerns can be known.
  - 6 **Agree** to add a new risk titled 'Change of governance in the Fire and Rescue Service' to the Communities Committee risk register, as set out in Appendix C of the report and to recommend to Policy & Resources Committee that this be a corporate risk due to the financial and reputational impact.
  - 7 In submitting the County Council's formal response, **ask** the PCC to consider not progressing or submitting the business case to the Home Office, on the basis that there is insufficient evidence to demonstrate a case for change.
  - 8 **Note** that the business case includes a number of assumptions and costings that have not been verified or validated and to suggest to the PCC that, if he wishes to pursue the process, he first commissions a process similar to one used to develop the Integrated Risk Management Plan in order to first validate assumptions and assess risks.
  - 9 **Ask** the Chair of Communities Committee to write to the PCC to request a copy of the full set of responses to the public consultation so that the Fire and Rescue Authority is able to view and consider any comments relating to the Fire and Rescue Service, to ensure any suggestions and learning can be captured and acted on.

The meeting concluded at 11.30am.

**Chairman**

**Communities Committee  
Wednesday 29 August 2018**

**4 Public Question Time**

**4.1 Question from Tim Allison, Unison Rep NFRS:**

The council has identified a 'potential' £874k saving described as a pro-rata share of the budget shortfall for 2019/20.

Will there be an honest and transparent assessment of the impact, on any level of saving, to the service and will this include stakeholders such as employees of the service and union representation?

**Response from the Chairman of Communities Committee:**

Thank you for asking about this. We have had a number of questions about this figure (£874k) which was included in the business case published by the PCC and welcome the opportunity to explain it.

Firstly, this is not a saving figure or even a potential saving figure.



The Committee will consider budget proposals for 2019/20 at our meeting in October, following the same process the Council has taken for a number of years. That is when the Committee will come to a view about potential budget changes. Any decisions will be taken in the public domain, and a public consultation on the Council's proposals will start later in the year so that Norfolk people, stakeholders and employees can have their say about the proposals before any final decisions are taken. This is an open, honest and transparent process.

To clarify, the £874k figure is a pro-rata share of the total 2019/20 budget shortfall that the County Council needs to address. This is a figure that the PCC's office asked us for so that they could include in their business case.

You may already be aware that the Council's approach to budget savings does not involve allocating each service a pro-rata share and requiring them to deliver it. If we did work in this way, the Fire and Rescue Service would have needed to deliver much more significant levels of saving over the past few years. Instead, we have sought to protect Fire and Rescue budgets by only taking forward savings and efficiencies that can be delivered without any impact on the front-line services provided. At the same time, we have also continued to make significant investment in the service.

## Norfolk Fire and Rescue Service – public consultation on business case for changing the governance of the service

Communities Committee – 29 August 2018





## Policing and Crime Act 2017

Placed a new duty on police, fire and rescue and ambulance services to collaborate.

Also enabled the involvement of Police and Crime Commissioners in Fire and Rescue Services. Provision for three alternative models for the governance of fire and rescue services.

- 1. Representation model**  
PCC represented on their local fire and rescue authority
- 2. Governance model**  
PCC to take on governance of fire and rescue – as a separate entity to the Police
- 3. Single employer model**  
PCC to take on governance of fire and rescue – with a single chief officer for both policing and fire and rescue



## Policing and Crime Act 2017


Schedule 1 - extract  
4A Power to provide for police and crime commissioner to be fire and rescue authority

(4) An order under this section may be made only if the relevant police and crime commissioner has submitted a proposal for the order to the Secretary of State.

(5) An order under this section may be made only if it appears to the Secretary of State that—

- it is in the interests of **economy, efficiency** and **effectiveness** for the order to be made, or
- it is in the interests of **public safety** for the order to be made.

(6) The Secretary of State may not make an order under this section in a case within subsection (5)(a) if the Secretary of State thinks that the order would have an adverse effect on public safety.



## The national picture - examples Combined authorities

- Essex**  
Business case agreed by Home Secretary, New Police, Fire and Crime Commissioner in place since October 2017.
- North Yorkshire, Staffordshire**  
Business cases agreed by Home Secretary.
- Cambridge & Peterborough, Shropshire, Hereford & Worcester**  
Business case agreed by Home Secretary, Fire and Rescue Authority challenging decision under Judicial Review.
- Devon & Somerset and Kent**  
PCC sits on the Fire and Rescue Authority.



## The national picture - examples County fire authorities

- Suffolk**  
PCC commissioned independent review. Outcome was insufficient evidence to suggest a change – PCC decided not to pursue.
- Hertfordshire**  
Business case submitted to Home Secretary, not supported by County Council. Business case submitted August 2017. To date no decision by Home Secretary.
- Northamptonshire**  
Business case approved by Home Secretary. Context of failing authority (two S114 notices) and change to unitary status.





## A Case for Change

### A better way of working for a safer Norfolk

Under a Police, Fire and Crime Commissioner:

- Joint working between fire and rescue and police will be simpler, faster and better.
- Better joint working will mean more efficient services.
- Improved efficiency can release £10 million over 10 years.
- Financial benefits will be reinvested in frontline services to improve public safety in our communities.
- The fire and rescue service will retain its cultural identity and gain operational and financial independence.
- Independence will mean greater transparency and accountability over where your money is spent.

## Norfolk Fire and Rescue Service - Keep in safe hands

- Removing the fire and rescue service from the County Council presents a significant financial risk to the service, and therefore a risk to public safety.
- The claimed £10m efficiency figure is speculative and misleading.
- The medium term financial plan figures are flawed.
- It is not clear which Service will benefit from any claimed savings and additional investment.
- The proposal makes a number of assumptions and untested claims.
- The cost and disruption of change is unquantified and untested.
- The proposed changes to operational response are not clearly articulated and have not been risk assessed, and therefore there is a significant risk to their deliverability and ultimately public safety.
- The claimed benefits could be achieved without a change in governance, and without the associated cost and disruption.



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County Council

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## **Communities Committee**

**Minutes of the Meeting Held on Wednesday 5 September 2018  
10:00am, Edwards Room, County Hall, Norwich**

### **Present:**

Mrs M Dewsbury – Chairman

Mr D Bills  
Mrs S Butikofer  
Mr M Castle  
Ms K Clipsham  
Mr N Dixon  
Mr R Hanton

Mr H Humphrey  
Dr C Jones  
Mr B Long – Vice-Chairman  
Ms C Rumsby  
Mr T Smith  
Mr J Ward

### **1. Apologies and substitutions**

- 1.1 Apologies for absence were received from Ms S Squire (Mr M Castle substituted); Mr K Kiddie (Mr T Smith substituted) and Ms J Barnard (Ms K Clipsham substituted).

### **2. To agree the minutes of the meeting held on 4 July 2018.**

- 2.1 The minutes of the meeting held on Wednesday 4 July 2018 were agreed as an accurate record by the Committee and signed by the Chairman.

### **3. Declarations of Interest**

- 3.1 There were no declarations of interest.

### **4. Urgent business**

- 4.1 The Chairman reported that she had recently taken part in the Nick Conrad Show on Radio Norfolk and that she had issued an invitation to the Chief Constable to attend a Communities Committee meeting. The Executive Director of Community & Environmental Services had spoken with the Chief Constable and had invited him to attend the Communities Committee meeting on Wednesday 7 November 2018 when the Committee was due to consider an update on collaboration from the Chief Fire Officer.

### **5. Public Question Time**

- 5.1 No public questions were received.

## **6 Local Member Issues / Members Questions**

6.1 A question and supplementary question had been received from Mr M Castle, the responses to which were circulated and attached at Appendix A.

## **7 Verbal update/feedback from Members of the Committee regarding any Member working groups or bodies they sit on.**

7.1 There was nothing to report.

## **8 Update on the Business and Intellectual Property Centre.**

8.1 The Committee received the report by the Executive Director of Community & Environmental Services advising it on progress made with the British Library to develop and deliver a Norfolk based Business and Intellectual Property Centre (BIPC) within the Norfolk and Norwich Millennium Library. The BIPC was part of a national network of similar centres, providing specialist business information and resources for anyone thinking about self-employment, setting up, or growing, a business.

8.3 The following points were noted in response to questions from the Committee:

8.3.1 Members were pleased to see the variety of business sectors involved in the BIPC, but were disappointed about the 22% which had either not replied or had responded "other". The Head of Libraries and Information said that many people taking part had not completed evaluation forms and in order to try to improve the return rate of evaluation forms, some work was being undertaken to incentivise responses which it was hoped may improve results in the future.

8.3.2 There were trained staff in King's Lynn, Thetford and Great Yarmouth as well as the Forum offering specialist information and resources for anyone considering becoming self-employed or setting up a business.

8.3.3 Norfolk County Council had joined the BIPC network which received some funding from the Government. Although a direct payment was not received, the benefits of the network were in providing a service.

8.4 The Committee **RESOLVED** to **note** the report.

## **9 Health Improvement Campaigns**

9.1 The Committee received the report by the Executive Director, Community and Environmental Services presenting a summary of the most recent public health campaigns and media initiatives. It set out the proposals for two sustained public health campaigns aimed at two core demographic groups, plus two further partnership campaigns through 2018-19.

9.2 The Committee viewed a short video clip highlighting some of the work being undertaken through publicity campaigns.

9.3 In response to questions from the Committee, the following points were noted:



- 9.3.1 To help raise public interest, it was suggested that adverts in foreign languages included an English translation.
- 9.3.2 Evaluating the effectiveness of media campaigns was difficult. Some work was being undertaken to try to run a campaign with Occupational health and pharmacies which could produce data. Evidence suggested that approximately 3,500 people had read the information on the website, although it was not possible to confirm if they then went on to have their blood pressure checked.
- 9.3.3 Some work had been undertaken with the Norfolk and Norwich University Hospital to consider piloting a baby box scheme, similar to ones that originated in Finland, to promote safe sleeping. At that time, no product was found that had the sufficient safety standard kite mark, and although that issue had now been resolved there was no evidence to show that the provision of a box was as safe as using a cot. The Director of Public Health did not think a baby box would add value in the UK and provide value for money for the investment involved, although it did raise the profile of safe sleeping.
- 9.3.4 It was acknowledged that men aged 40-70 years of age was a hard to reach demographic and Members questioned whether the campaign was hard-hitting enough. The Public Health Consultant advised that a person within that age group had been identified to be a Champion and share his experiences to get the messages across. He said that an announcement would be made in the near future about who the celebrity was.
- 9.3.5 The key target objective of reducing sexually transmitted diseases among 20-25 year olds was because the vast majority of infections were incurred by that age group. This did not mean other adult age groups were not targeted and work was being done with all adults, regardless of a person's age.
- 9.3.6 Very few campaigns were carried out in isolation, with the majority of campaigns carried out in partnership with other organisations, for example Pharmacies carrying out blood pressure checks. GPs were made aware of the blood pressure campaign as we were aware of a possible impact on raising awareness of blood pressure would have on GP surgeries. The Director of Public Health advised that, as part of the Men's mental health campaign, the EDP would be publishing a monthly blog.
- 9.3.7 All opportunities to identify more cost-effective campaigns were being explored, including working with the football club.
- 9.3.8 In a similar way that some Councillors had taken part in the recent HIV campaign to raise awareness by having themselves tested for HIV, it was suggested that Councillors take part which would help raise awareness and encourage others to take part.
- 9.4 The Committee **RESOLVED** to:
- **Approve** proposals for a public health media campaign activity including two core year-long campaigns promoting the health of our target demographics, men aged 40 to 70 years and young families.

- **Approve** the partnership campaigns on road safety and ‘Stay well in winter’.

## **10 Development of Healthy Lifestyle Service.**

- 10.1 The Committee received the report by the Executive Director of Community and Environmental Services proposing a comprehensive review and redesign of lifestyle and behaviour changes services commissioned and provided by Norfolk County Council. Current services were siloed, based on a medical model and did not sufficiently reflect the distribution of need across the county.
- 10.2 In response to a question from the Committee, it was noted that further work needed to be done about identifying a database which could collate information about health-checks and which could then be used to provide feedback on the outcomes from health checks. Currently health checks were carried out in surgeries but as it was difficult to retrieve data due to the computer software not being compatible this meant information needed to be downloaded into a spreadsheet and sent by email.
- 10.3 The Committee **RESOLVED** to
- **Recommend** a comprehensive review of the council’s healthy lifestyle services to develop a modern, integrated and affordable service offer for implementation in 2020.

## **11 Norfolk Fire and Rescue Service – Community Safety Strategy.**

- 11.1 The Committee received the report by the Executive Director of Community and Environmental Services setting out the Norfolk Fire and Rescue Service Community Safety Strategy 2018-20.
- 11.2 The following points were noted in response to questions from the Committee:
- 11.2.1 Intelligence into fatal accidents in the home was shared and was included as part of the strategy and target.
- 11.2.2 The Committee praised the work of organisations such as Crucial Crew and the Princes Trust, with approximately 60,000 young people having undertaken crucial crew training.
- 11.2.3 Some Members expressed concern about waste premises, particularly illegal waste premises and how the risks could be addressed in the strategy as a preventative measure. The Area Manager - Planning and Protection, Norfolk Fire & Rescue Service said that regular meetings were held with the Environment Agency and joint inspections took place, including to unlicensed sites to offer advice.
- 11.2.4 The main causes of accidental dwelling fires were due to electrical equipment, with 60-70% of fires starting in the kitchen. The number one cause of death in dwellings was due to discarded smoking materials. There were also some cases of chimney fires in the winter months, as well as fires caused by the use of portable heaters, particularly in areas of deprivation.

- 11.3 The Committee **RESOLVED** to:
1. **Approve** the Norfolk Fire and Rescue Service Community Safety Strategy 2018-20 as set out in Appendix A of the report.
  2. **Note** the intention to carry out an annual assessment of community safety risk, and include it with the Fire and Rescue Service – Service Delivery Plan which was considered annually by the Committee.

## 12 Finance Monitoring

- 12.1 The Committee received the report by the Executive Director of Community and Environmental Services providing it with financial monitoring information for the services reporting to Communities Committee for 2018-19.

- 12.2 In introducing the report, the Finance Business Partner Community and Environmental Services advised that the report covered the period up to the end of July 2018. He also advised that Communities Committee was forecasting a small overspend due to the pressure of the emergencies covered by NFRS during the recent wildfires caused by the recent prolonged period of hot weather.

A review and assessment was currently underway and the Committee was pleased to note that where possible, the overspend would be managed within the Community & Environmental Services Department.

- 12.3 In response to questions from the Committee, the following points were noted:

- 12.3.1 The Executive Director of Community & Environmental Services advised that 18 months ago, the first recruitment campaign to recruit full-time fire fighters for five years had taken place. The Committee was reassured that the staff demographics had been considered and it had been noted that a number of fire fighters were approaching retirement age. The Committee was also reassured that the service was working to ensure there were sufficient fire fighters available to meet all the challenges.

- 12.3.2 Members praised the management of the budget, as the figures showed that the Communities Committee budget, if the recent overspend on the fire service was removed, was balanced which was testament to the work carried out by the budget managers and gave members confidence that the budget was being well managed.

- 12.4 The Committee **RESOLVED** to **note**:
- a) The 2018-19 revenue budget and forecast out-turn position for this Committee.
  - b) The Capital programme for the Committee.
  - c) The balance of reserves brought forward to 2018-19 and the planned use of reserves

## 13 Strategic and Financial Planning 2019-20 to 2021-22

- 13.1 The Committee received the report by the Executive Director of Community & Environmental Services providing it with the latest information about service

budget planning for 2019-20 to 2021-22. The report detailed the link between the Council Strategy, Norfolk Futures and the development of transformation and savings plans relevant to the Committee.

- 13.2 In introducing the report the Executive Director of Community & Environmental Services laid out the timetable for the budget process.
- 13.3 In response to questions from the Committee, the following points were noted:
- 13.3.1 The Committee felt that the use of the word “savings” should be replaced with the words “reducing the gap” as it was wrong to call them savings when they were being used to reduce the budget gap.
- 13.3.2 Although there was no specific mention of libraries in the report, the Committee would be receiving a report on Mobile Libraries at its October meeting.
- 13.3.3 The Executive Director of Community & Environmental Services advised that the report before the Committee set out the overall budget gap. He advised that the Committee would be receiving a further report at its October meeting which would set out the detailed proposals for Communities Committee for it to agree before they were considered by Policy & Resources Committee and circulated for public consultation.
- 13.3.4 Members felt that it would be useful to have the breakdown of savings figures presented as a percentage of savings for each Committee in future reports.
- 13.4 The Committee **RESOLVED** to:
1. **Note** the Council’s budget assumptions and the budget planning principles for 2019-20 which have been approved by Policy & Resources Committee (paragraphs 3.3 and 3.4 of the report);
  2. **Note** the forecast budget gap of £94.696m which reflects the changes from the 2018-22 Medium Term Financial Strategy, and the resulting indicative savings targets for the Committee over the period 2019-20 to 2021-22;
  3. Consider and identify any further key areas of risk in relation to 2019-22 budget planning for the Committee’s budgets, including any additional pressures and the robustness of existing planned savings as set out in section 5, noting that any changes may impact on the overall budget gap and will require additional offsetting savings to be found;
  4. **Agree** the proposed approach and key themes to focus on in developing savings proposals for 2019-20 and 2021-22 including how the principles of the Council’s Strategy, Norfolk Futures, will inform and shape budget planning activity set out in section 5 of the report, having regard to the existing savings for 2019-20 and beyond which were agreed as part of the 2018-19 budget round;
  5. **Commission** officers to develop detailed savings proposals to be presented to the Committee for consideration at the October meeting in order to help close the forecast 2019-20 to 2021-22 budget gap; and
  6. **Note** the budget planning timetable (section 6 of the report).

## 14 Forward Plan and Decisions taken under delegated authority

- 14.1 The Committee received the report by the Executive Director of Community and Environmental Services setting out the Forward Plan for Communities Committee, together with the relevant decisions taken under delegated powers by the Executive Director (or his team) within the Terms of Reference of Communities Committee.
- 14.2 The Committee agreed to add the following items to the Forward work Programme.
- Report on Collaboration for November meeting.
  - Mobile Libraries – October meeting.
- 14.3 In response to a question about decisions taken under delegated powers with the money being spent before being reported to Committee, the Chairman replied that the Committee would have considered the items in the previous years budget. The Executive Director reassured Members that the department was rigorous in ensuring delegated decisions were reported to Committee.
- 14.2 The Committee **RESOLVED** to **note**:
1. The Forward Plan at Appendix A of the report.
  2. The delegated decisions detailed in Section 2 of the report.

The meeting concluded at 12.50 pm.

**Chairman**

**Communities Committee  
Wednesday 5 September 2018**

**5 Local Member Question**

**5.1 Question from Cllr Mick Castle.**

Given the Committee's overwhelming resolve to oppose the transfer of the Norfolk Fire and Rescue service to the jurisdiction of the Norfolk Police and Crime Commissioner can the Chairman tell me what governance arrangements will be put in place from May 2019 when the authority returns to a Cabinet system?

**Reply by the Chairman:**

As you will be aware, the council has established a Member Working Group to consider the reintroduction of a Cabinet System and they will make recommendations to the Policy and Resources Committee. The final arrangements will be for Full Council to determine.

In terms of specific arrangements for the governance of the Fire and Rescue Service, the Member Working Group will need to consider this as part of their deliberations. In particular, they will need to determine which body will fulfil the role of the Fire and Rescue Authority. There are a number of models already in place across the country within Cabinet systems and I am sure the Working Group will consider these in forming their recommendations.

In relation to the PCC, the Policing and Crime Act 2017 includes provision for PCC's to request representation on the Fire and Rescue Authority in their area. We have not received any such request from the PCC in Norfolk. However, at the meeting of the Communities Committee on 29 August, the Committee indicated that they would be happy to agree to such a request, if it was made.

**5.2 Supplementary question from Cllr Mick Castle.**

Is it her intention that the Council set up a new Norfolk Fire and Rescue Panel with District Council representation along the line of the existing Police and Crime Panel?

**Reply by the Chairman:**

As I have said, the Member Working Group established will consider and recommend arrangements for the reintroduction of a Cabinet system. It is for them to consider. I will draw your questions, and my responses, to their attention so that they can be aware.

# Communities Committee

<b>Report title:</b>	<b>Annual review of the Enforcement Policy</b>
<b>Date of meeting:</b>	<b>10 October 2018</b>
<b>Responsible Chief Officer:</b>	<b>Tom McCabe - Executive Director, Community and Environmental Services</b>
<b>Strategic impact</b> The Enforcement Policy provides a framework to ensure that we work in an equitable, practical and consistent manner in the way we deliver regulatory activities and law enforcement. Norfolk County Council is committed to the principles of better regulation, reducing burdens on business with proportionate responses and ensuring we act to protect and support residents, businesses and the environment.	

## Executive summary

The Community and Environmental Services (CES) directorate is responsible for a range of regulatory functions, including Trading Standards, Planning enforcement (mineral and waste sites), Flood and Water (land drainage), Norfolk Fire and Rescue (fire safety) and Highways (networks, maintenance and blue badge enforcement). Each area of work uses different legislation to secure its aims and each has its own framework of regulations, codes of practice and guidance.

The Enforcement Policy, which is subject to annual review by Members, has recently been reviewed and updated to reflect recent changes to legislation and guidance, and now includes a new enforcement protocol for Blue Badge Enforcement.

Trading Standards continues to carry out the majority of our enforcement activity, and this year have worked closely with Suffolk County Council Trading Standards towards a common enforcement policy, including for cross border crime.

The revised policy has also been subject to a consultation process with key stakeholders, including representatives from local businesses and charities, those working in related enforcement fields and members of the public. Amendments have been made to the policy and Annex 4 in response to the feedback received.

A revised CES Enforcement Policy (appendix 1) has been produced with all the proposed changes highlighted in yellow, supported by explanatory notes.

The revised Policy, once adopted, will be published via the NCC web pages.

### Recommendation:

**The Communities Committee is asked to confirm the revised CES Enforcement Policy and its annex documents meet the requirements of Communities Committee services, prior to final approval by the Policy & Resources committee (Policy & Resources Committee is the approval body for the policy).**

## 1. Proposal

- 1.1. The current Enforcement Policy (the Policy) was first developed as a cross-departmental policy in 2013. The Policy covers a range of regulatory functions, including Trading Standards, Planning enforcement (mineral and waste sites), Flood and Water (land drainage), Norfolk Fire and Rescue (fire safety) and Highways (networks, maintenance and blue badge enforcement). It does not try to capture all the detailed, complex and often changing background to enforcement, but instead seeks to summarise the overall approach to the use of enforcement powers; whether that is criminal prosecution at one end of the

spectrum or informal warnings and advice at the other. The policy is supported by detailed procedures for officers within each service area and, where necessary, additional protocols can be appended to the main policy. There are now five areas of work which appear as annex documents to the main policy; these relate to minerals and waste planning, flood and water management, the Norfolk Fire and Rescue Service, Highways Enforcement and Blue Badge Enforcement - see annexes 1 – 5 to the main Policy.

- 1.2. The current Enforcement Policy has recently been reviewed by CES regulatory services, and updated to reflect recent changes to legislation and guidance. Work has also been undertaken by our Trading Standards team and colleagues in Suffolk County Council Trading Standards, to better align our respective Enforcement Policies, in order to deliver a common approach to enforcement, and improve collaboration in areas such as cross border crime.
- 1.3. The revised Policy continues to seek to ensure the application of any enforcement is:
  - proportionate to the offence and risks, and mindful of previous transgressions
  - transparent - in that any person affected understands what is expected of them, what they should expect from the local authority and the reasons for the action
  - consistent with the Equality Act 2010 and the Council's Equalities Policies
  - consistent in approach, and appropriate.
- 1.4. This year the revised policy has also been subject to a consultation process with key stakeholders, including representatives from local businesses and charities, those working in related enforcement fields and members of the public. The consultation responses and the resultant amendments made are detailed in section 2 below.
- 1.5. All the proposed changes to the Policy (appendix 1) are highlighted in yellow, and supported by explanatory notes.
- 1.6. The revised Policy, once adopted, will be published via the NCC web pages.
- 1.7. **Recommendation: The Communities Committee is asked to confirm the revised CES Enforcement Policy and its annex documents meet the requirements of Communities Committee services, prior to approval by the Policy & Resources committee.**

## **2. Evidence**

- 2.1. A CES wide Enforcement Policy is considered to be the most effective way to demonstrate how CES intends to fulfil its regulatory/legal responsibilities. An alternative option would be for each service area within CES to produce its own enforcement policy. However as described in section 1.1 above there is need for consistency in overall approach. This draft policy does provide for additional (detailed) protocols where necessary or appropriate.
- 2.2. There were 22 respondents to the consultation, 15 of whom responded on behalf of local businesses. 77% of respondents agreed or strongly agreed with the Principles of Inspection and Enforcement and proposed use of Enforcement Actions. Only one respondent disagreed with the Principles of Inspection and Enforcement, and two (9%) disagreed with our proposed use of Enforcement Actions.
- 2.3. One member of the public commented that they found the Policy to be unnecessarily complicated and resource intensive, with too many options before legal action is even contemplated. Another respondent, who works in a related



enforcement area, commented that local government should be more robust in its enforcement, where it has appropriate powers, and considered that there are too many 'let's do nothing' options.

Conversely, a respondent on behalf of a community organisation considered the Policy seeks to change behaviour in the first instance and use the least action to achieve the best outcome and a business respondent considered the approach to be fair, pragmatic and thorough.

The Policy meets the requirements of the Regulators' Code in adopting a staged approach to enforcement, and the Code for Crown Prosecutors in respect of the need for legal action to meet the test for Public Interest. Therefore, we have not amended the draft Policy in light of these comments.

- 2.4. One respondent commented that, whilst they felt the complaints and appeals process to be clear, they had difficulty in finding a suitable telephone number as an alternative to using the email/online form provided. The County Council Compliments and Complaints Team has confirmed that the existing NCC process includes alternative access routes, and that NCC contact details are clearly displayed on each page of the NCC website. Accessibility adjustments are also available. However, we have decided to add the alternative access routes to the draft Policy itself for clarity, as a result of this feedback.

Another respondent commented that including the phrase in Section 5.1 'and will try and find a solution' implies that a complaint about the Service is valid. They go on to say that this may not be the case and this should be clear in the Policy to avoid unnecessary and costly complaint investigation. We have therefore amended the draft Policy to clarify this by amending the phrase to 'and will try and find a solution, if appropriate'.

- 2.5. One person, responding on behalf of a charity or community organisation, raised concerns about the enforcement of public rights of way, specifically that although mentioned in Annex 4, there is an absence of any detail around public rights of way, whereas detail is provided for other areas of enforcement. In most cases, the legal processes relating to Highways enforcement are well established, including those dealing with public rights of way issues under the Highways Act. We have provided more detail on enforcement processes for those areas where these are less well established, such as those relating to the enforcement of vehicles for sale on the highway. We have further amended Annex 4 for clarity, as a result of this feedback.

- 2.6. One person, responding on behalf of a business, commented 'I don't see anything in here about cybercrimes and what you are doing to enforce those who use technology for illegal purposes'. It is true that cybercrime is an increasing threat, and our Trading Standards Service, in its 2018-19 Service Plan sets out the following priorities:

- Protecting consumers and supporting legitimate businesses by tackling the most serious fraudulent, illegal and unfair trading, including e-crime
- Safeguarding vulnerable people by tackling rogue traders and scams

Put simply, cybercrime is crime committed online, usually involving misleading and/or fraudulent practices. As a result, cybercrime is considered seriously and will often result in immediate formal action for the most serious breaches, in line with paragraph 4.10 of the Enforcement Policy. In some cases, we will work with partners and internet providers/web hosting companies to arrange for the removal of a website where it is clear it is being used for illegal purposes. This has been added to the draft Policy as an example of an intervention we may take under Paragraph 4.21 of the Policy, as a result of this feedback.

### **3. Financial Implications**

- 3.1. There are no immediate resource implications as a result of this proposal although there is the recognition in the policy that enforcement resources are not limitless and need to be targeted at areas where risk is highest. Higher performing, more compliant businesses require less resource, with regulators focusing their efforts on rogue and higher-risk businesses.

### **4. Issues, risks and innovation**

- 4.1. There is a legal context to the deployment of enforcement powers. In 2014 the [Regulators' Code](#) (the Code) was published and seeks to provide a clear, flexible and principles-based framework for regulators to work to. It covers how we develop and implement items such as our service standards, policies and legal procedures, and sets out the type of information we must include in our Enforcement Policy. The Council has a legal obligation to have regard to the Code, including ensuring a consistent approach to enforcement. However, we are able to make changes to the Policy, if these would better explain or clarify the requirements arising from the Code.

In certain instances, officers may conclude that a provision in the Code is either not relevant or is outweighed by another provision. Officers will ensure that any decision to depart from the Code is properly reasoned, based on material evidence and documented. The Code requires the Council to publish its Enforcement Policy.

The Council must also have regard to The Code for Crown Prosecutors (CPS) guidance which requires extensive consideration of the evidence (for example is it admissible, substantial and reliable) before a decision is made to institute legal proceedings; with any decision also considering whether it is in the public interest to prosecute. This CES Enforcement Policy provides a clear framework and mitigates any risk of legal challenge regarding the delivery of the regulatory enforcement function within the directorate.

#### **4.2. Human Rights**

In carrying out its enforcement role, the directorate has regard to the Freedom of Information Act 2000, the Data Protection Act 2018, Regulation of Investigatory Powers Act 2000 and the Human Rights Act 1998 (e.g. in the latter context the right to a fair trial, right to respect for private and family life, prohibition of discrimination and protection of property).

#### **4.3. Equality Impact Assessment (EqIA)**

No significant changes to the Policy are proposed which would require an Equality Impact Assessment, however the stakeholder consultation process also sought feedback from the CES Equalities team, who has suggested a clarification that the use of interpreters at paragraph 4.6 should apply to both language and British Sign Language. The draft Policy has been amended as a result of this feedback.

#### **4.4. Risks**

This policy provides a clear framework and mitigates any risk of legal challenge regarding the delivery of the regulatory enforcement function within CES.

#### **4.5. Health and Safety Implications**

There are no health and safety implications of which to take account.

#### **4.6. Environmental Implications**

There are no direct environmental implications to take into account as part of this report. However, the Policy does provide for consideration of formal enforcement action where there is a significant risk to infrastructure or the environment. The

Policy also includes a specific enforcement protocol for Flood and Water Management, and for planning controls.

4.7. **Section 17 – Crime and Disorder Act**

CES, through its public protection and regulatory functions, has an important role to play dealing with crime and disorder. This Policy will support the directorate in protecting the public and the environment in a consistent, fair and transparent way, in line with both local and national priorities and legal requirements.

**5. Background**

5.1. CES regulatory activities are aimed at protecting the economic wellbeing and safety of Norfolk's residents and businesses and protecting the environment. How we carry out regulatory activities is key to supporting this aim.

5.2. Experience in regulatory enforcement shows that, in most cases, businesses and individuals comply with the law. Failure to do so generally stems from ignorance or carelessness, but sometimes from wilfulness or malice. A range of enforcement options is available to the Council but there is a need to discharge these in a consistent, fair and transparent way, as well as ensuring that the public or environment is adequately protected.

5.3. This Policy, once adopted, will be published via the NCC web pages.

**Officer Contact**

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

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# Enforcement Policy

Community and Environmental Services



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September 2018

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## 1 Introduction

1.1 This document applies to the enforcement activities carried out by the Community and Environmental Services (CES) Directorate of Norfolk County Council, including Trading Standards, Highways, Planning and the Norfolk Fire and Rescue Service (Fire Safety).

1.2 Where appropriate, additional enforcement protocols or policy may be developed to support this policy, for example where there are national requirements regarding a particular enforcement process. These will be appended to this policy as required. When read in conjunction with Annex 1 this policy constitutes the Local Enforcement Plan for Norfolk County Council Planning Services, as recommended by Paragraph 207 of the National Planning Policy Framework.

**Commented [NS1]:** Clarification

1.3 This Policy has been developed in conjunction with a range of stakeholders, including business representatives and is subject to annual review and approval.

**Commented [NS2]:** This has been re-worded to reflect the intention to engage with stakeholders as part of the 2018 review of this Policy

1.4 The purpose of this Policy is to provide a framework to ensure that local authority enforcement is delivered in an equitable, practical and consistent manner. This is in line with the principles of good enforcement, as set out in the Legislative and Regulatory Reform Act 2006, and regard has been given to the associated [Regulators' Code](#) (the Code) in the preparation of this policy. In certain instances it may be concluded that a provision in the Code is either not relevant or is outweighed by another provision. Any decision to depart from the Code will be properly reasoned, based on material evidence and documented.

1.5 Compliance with this Policy will ensure that we will strive to be fair, impartial, independent and objective. We are committed to ensuring that the decisions we take and the services we deliver take proper account of equality issues and, where necessary, put actions in place to address any barriers faced by protected groups.

1.6 Within the context of this Policy, 'enforcement' includes action carried out in the exercise of, or against the background of, statutory enforcement powers. This is not limited to formal enforcement action, such as prosecution or issue of notices, and so includes inspection to check compliance with legal or other requirements and the provision of advice to aid compliance.

1.7 For the purposes of this document 'formal action' includes: Prosecution, Simple Caution, Injunctive Action, Enforcement Order, Issue of Notices, Monetary Penalties, Seizure, Suspension, Withdrawal, Recall, Forfeiture, Revocation/Suspension of a licence, registration or approval, Disqualification of weighing or measuring equipment, Works in Default, Criminal Behaviour Orders, or any other criminal or civil/injunctive proceedings or statutory sanctions, applied either separately or in any other combination.

**Commented [NS3]:** Clarification this means inclusive of

**Commented [NS4]:** clarifies that formal actions include Injunctive Actions, withdrawal and recall of illegal products, Disqualification of weighing or measuring equipment' and Criminal Behaviour Orders

1.8 Where appropriate we will seek to recover our enforcement costs, including making formal applications for costs through the Courts.

## 2 Principles of Inspection & Enforcement

## 2.1 Proportionality

- 2.1.1 We are committed to avoiding the imposition of unnecessary regulatory burdens and will endeavour to minimise the cost of compliance by ensuring that any action taken, or advice offered, is proportionate to the seriousness of the breach, as well as the risk to people, businesses, other organisations, animals, property, the community or the environment. In doing so we will choose approaches that are based on relevant factors including, for example, business size and capacity.
- 2.1.2 We will usually give notice of our intention to carry out routine inspection visits, unless we are required by law to visit unannounced, or we have a specific reason for not giving prior notice. For example, this would include where the identity of the person or premises is unknown, or where it would defeat the objectives of the inspection visit to give such notice. Similarly, routine or reactive inspections of the highway and blue badges are not normally subject to such notice.
- 2.1.3 As far as the law allows, we will take account of the circumstances of the case and attitude of the people involved when considering action. We will take particular care to work with businesses and individuals so that, where practicable, they can meet their legal obligations without unnecessary expense, to support and enable economic growth.
- 2.1.4 The most serious formal action, including prosecution, will be reserved for serious breaches of the law.

**Commented [NS5]:** Re-worded to clarify scope of risk considerations in applying equally to businesses, other organisations and animal health and welfare, also to align with Suffolk CC Enforcement Policy

**Commented [NS6]:** Clarification that this includes blue badge enforcement

## 2.2 Accountability

- 2.2.1 We will actively work with businesses and individuals to advise and to assist with compliance and requests for help. Contact points and telephone numbers will be provided for business and public use.
- 2.2.2 We will aim to carry out visits and inspections at a reasonable time and where appropriate to do so. In most cases our staff will show their identification (and authority if requested) at the outset of every visit and explain the reason for the visit. However, so that we can see things from the point of view of a customer or ordinary member of the public, we may carry out informal visits or arrange to buy goods or services and not introduce ourselves. Where we have to use a young person to carry out work on our behalf, such as in attempting to purchase age-restricted products, we will always use the latest Code of Best Practice.
- 2.2.3 Out of hours contact for services will be provided where there is a need for an immediate response/risk to public health, safety or damage to property, infrastructure or the environment.
- 2.2.4 The whole range of enforcement activities will be dealt with as promptly and efficiently as possible in order to minimise time delays.
- 2.2.5 Where appropriate, feedback questionnaires will be used to gather and act upon information about the services we provide.
- 2.2.6 We will include information to highlight new legal requirements on our website, with letters sent after an inspection or visit; and by providing or

**Commented [NS7]:** Re-worded to clarify circumstances in which ID would not be shown on informal visits, test purchasing etc, also to better align with Suffolk CC Enforcement Policy

signposting advice and information to help businesses and individuals keep up to date.

**2.2.7** We will have regard to fairness and individuals' human rights in all of our enforcement work through conforming to the European Convention on Human Rights (as implemented by the Human Rights Act 1998).

**Commented [NS8]:** Clarification on applicability of Human Rights Law

## 2.3 Consistency

2.3.1 All officers are required to act in accordance with this enforcement policy and our published service standards.

2.3.2 We will carry out our enforcement and advisory functions in an equitable, practical and consistent manner. We will adopt and adhere to relevant policy and guidance and will ensure that our officers are suitably trained, qualified and authorised to undertake their enforcement duties, and understand the principles of good regulation.

2.3.3 Where appropriate, we will publish clear service standards providing information on:

- a) How we communicate and how we can be contacted
- b) Our approach to providing information, guidance and advice
- c) Our risk assessment methodology used to determine inspection activity, clearly setting out what can be expected from us at the time of visit
- d) Any applicable fees and charges; and
- e) How to comment or complain about the service provided and the routes to appeal.

## 2.4 Transparency

2.4.1 In most circumstances we will seek to ensure that people affected by formal action are informed of what is planned, and allow for discussion and time to respond before the action is taken. We will also give them a named officer's contact details. These arrangements must have regard to legal constraints and requirements.

2.4.2 When a notice is served it will say what needs to be done, why, and by when, and that in the officer's opinion a breach of the law has been committed and why the notice is necessary. We will also make a clear distinction between legal requirements and recommended works.

2.4.3 As part of our commitment to equality we will communicate in a clear, accessible, concise, format using media appropriate to the target audience, in plain language. Where businesses or the public do not have English as a first language we offer translations of correspondence on request.

2.4.4 This Enforcement Policy is published via the Norfolk County Council website and we may also publish further guidance about specific/technical areas, such as the use of civil sanctions.

2.4.5 The publicity generated by legal proceedings acts as a deterrent to others, and reassures the general public that we take a serious view of illegal behaviour. We therefore publish the outcome of court proceedings, including undertakings; as part of this we include the name of the defendant(s), unless directed not to do so by the Courts.



2.4.6 We will routinely publish the names and trading addresses of traders subject to legal proceedings, including prosecutions, enforcement orders, undertakings or the administrative issue of penalties/fines.

**Commented [NS9]:** Clarification that legal outcomes will be routinely published

2.4.7 We may also publish the names and trading addresses of traders who act in ways that represent a significant risk to consumers or the interests of legitimate businesses, subject to the following conditions:

- There is no risk of prejudice to legal proceedings or other formal enforcement action, and
- The evidence of unfair or illegal trading is conclusive, and
- It is in the public interest to do so, taking into account the personal circumstances of the offender and community cohesion, and
- To do so does not breach Human Rights or Data Protection Law, or the Children and Young Persons Act 1933.

**Commented [NS10]:** Clarification that a traders details may also be published where there is a significant risk to consumers or the interests of legitimate businesses, subject to all 4 of the conditions being met.

2.4.8 Examples of the current published enforcement action is via the [Norfolk Trading Standards web pages](#).

## 2.5 Targeted (Intelligence and Risk Led) Enforcement

2.5.1 Enforcement will be primarily targeted towards those situations that give rise to the most serious risks, and against deliberate/organised crime. Other determining factors will include local priorities, Government targets and priorities, new legislation, national campaigns and public concerns.

2.5.2 By having a coherent and risk based intelligence system, effective strategies can be formed to enable and co-ordinate solutions to particular problems. This enables the identification of new, current and emerging issues, allowing provision of strategic and tactical direction on how the issues can best be tackled. Subject to the provisions of Data Protection and Human Rights Law, we may also refer cases and/or share information and intelligence with other law enforcement agencies.

**Commented [NS11]:** Additional clarification that we may refer cases and/or share information and intelligence where it is legally permissible to do so

## 2.6 Supporting the local economy

2.6.1 We recognise that a key element of our activity will be to facilitate and encourage economic progress against a background of protection.

2.6.2 Wherever possible, we will work in partnership with businesses and individuals, and with parish councils, voluntary and community organisations, to assist them with meeting their legal obligations without unnecessary expense.

## 2.7 Reducing enforcement burdens

2.7.1 If there is a shared enforcement role with other agencies, e.g. the Police, Environment Agency or other local authorities, we will consider co-ordinating with these agencies to minimise unnecessary overlaps or time delays and to maximise our overall effectiveness. We will also liaise with the other regulators to ensure that any proceedings instituted are for the most appropriate offence.

- 2.7.2 We will follow the principle of “collect once, use many times” and share information that we collect with other local authority regulatory services to minimise business impact.
- 2.7.3 When conducting farm visits, we will have due regard to the [Farm Regulators’ Charter](#), which makes sure visits are carried out consistently across regulators. The charter covers all inspection types and visits of agricultural and aquaculture activities carried out by Farm Regulators.

### 3 Primary Authority Partnerships

- 3.1 Primary Authority is a statutory scheme established by the Regulatory Enforcement and Sanctions Act 2008. It allows an eligible business to form a legally recognised partnership with a single local authority in relation to the provision of tailored advice, guidance and assistance relating to regulatory compliance. The single local authority (known as the “Primary Authority”) is registered with the [Office for Product Safety & Standards](#) (OPSS), via the Primary Authority Register.
- 3.2 The Primary Authority then acts as the single point of contact between its partner business and the local authorities that regulate it. The Primary Authority can issue assured advice upon which the business can rely and can also, where appropriate, devise inspection plans for businesses. The inspection plan can place specific requirements on other local authorities and can require feedback on their checks to be given to the Primary Authority.
- 3.3 Where an enforcing local authority is considering enforcement action against a business that has a Primary Authority it is required to make a statutory notification to the Primary Authority. In most cases, this notification must be made before the action can be taken. However, in certain circumstances the notification can be retrospective. These currently include:
- abatement notices the Environmental Protection Act 1990
  - emergency prohibition notices under specified food hygiene legislation
  - prohibition notices under the Regulatory Reform (Fire Safety) Order 2005
  - notices of emergency remedial action under the Housing Act 2004
  - emergency prohibition orders under the Housing Act 2004
  - enforcement action that is required urgently to avoid a significant risk of harm to human health, the environment or the financial interests of consumers; and
  - enforcement action where the ‘pre-notification’ requirements of the scheme would be wholly disproportionate.
- 3.4 If another local authority proposes enforcement action which the Primary Authority deems to be inconsistent with the assured advice, the Primary Authority may seek to block the enforcement action. Where this is the case but is disputed, or there is a need for further considerations, the matter would be referred to the [Office for Product Safety & Standards](#) (OPSS) for their consideration/determination.

**Commented [NS12]:** The OPSS has replaced ‘Regulatory Delivery’

**Commented [NS13]:** The OPSS has replaced ‘Regulatory Delivery’

## 4 Enforcement Actions

**Commented [NS14]:** This section has been partly re-numbered for clarity

- 4.1 Nothing in this policy shall be taken to compel us to take enforcement action. In certain instances we may conclude that an enforcement response is not appropriate given the circumstances.
- 4.2 In deciding what enforcement action to take, we will have regard to the following aims:
- to change the behaviour of the offender
  - to eliminate financial gain or benefit from non-compliance
  - to be responsive and consider what is the most appropriate sanction for the particular offender and the regulatory issue concerned
  - to be proportionate to the nature of the offence and the harm/potential harm caused
  - to repair the harm caused to victims, where appropriate to do so
  - to deter future non-compliance.
- 4.3 Any decision to undertake formal enforcement action will be taken in the context of operational priorities, this policy and the [Council Constitution and scheme of delegations](#). Such decisions will include the use of intelligence in determining the nature of any response, as well as being subject to ongoing monitoring and review.
- 4.4 Where a right of appeal against a formal action exists other than through the courts, advice on the appeal mechanism will be clearly set out in writing at the time the action is taken.
- 4.5 ~~Where it is necessary to carry out a full investigation, the case will be progressed without undue delay.~~ All investigations into alleged breaches of legislation will be conducted in compliance with statutory powers, time limits and all other relevant legislation (and relevant Codes of Practice), including the requirements of:
- Police and Criminal Evidence Act 1984 (PACE)
  - Criminal Procedure and Investigations Act 1996 (CPIA)
  - Regulation of Investigatory Powers Act 2000 (RIPA)
  - Investigatory Powers Act 2016 (IPA)
  - the Criminal Justice and Police Act 2001 (CJPA)
  - Human Rights Act 1998 (HRA).
- 4.6 As part of any criminal investigation process, persons suspected of having committed a criminal offence will, wherever possible,
- be formally interviewed in accordance with PACE
  - be given the opportunity to demonstrate a statutory defence
  - have the opportunity to give an explanation or make any additional comments about the alleged breach
  - be offered translation/interpretation services [\(language and British Sign Language\)](#) where English is not their first ~~language~~ language e-
- 4.7 As part of our enforcement function we may exercise a wide variety of powers, including the power to enter premises and inspect goods, to require the production of documents or records and, when necessary,

**Commented [NS15]:** This is has been removed as it is already a requirement arising from the legislation listed under 4.5

**Commented [NS16]:** New legislation and now in force

**Formatted:** Highlight

**Commented [NS17]:** This section has been amended as a result of consultation feedback – see committee report

**Commented [NS18]:** Amended from 'Officers' to 'our' to clarify this includes officers of the Council and any other person legally delegated to enforce the law on behalf of the Council

the power to seize and detain such material where they believe it may be required as evidence.

4.8 We may also take with us such other persons as may be necessary as part of our enforcement function. This may include Police Officers where there is the possibility of an arrest. In certain cases, we may exercise an entry warrant issued by a Magistrate in order to gain access to premises.

4.9 We may also use investigation equipment whilst undertaking our their duties, including hand held and Body-Worn Video (BWV) cameras. BWV devices are capable of recording both visual and audio information and can provide a number of benefits to enforcement agencies, including a deterrent to aggressive, verbal and physical abuse towards officers, and in providing additional evidence to support investigations. BWV will usually be deployed on an overt basis for a specific purpose, and where it is necessary and proportionate to do so. Any decision to deploy BWV on a covert basis will be made in accordance with the Regulation of Investigatory Powers Act (RIPA), related legislation, Codes of Practice and associated Council Policy.

**Commented [NS19]:** Clarified to include deployment via young people for Test Purchasing

#### 4.10 Immediate Formal Action

4.10.1 Whilst recognising that most people want to comply with legal requirements, we also recognise that some will operate outside the law (both intentionally and unintentionally). Where possible, a staged approach to enforcement will be adopted, with advice and informal action explored to resolve the matter in the first instance. However, we will consider taking immediate formal action for the most serious breaches, including any of the following circumstances:

- Where the infringement causes or is likely to cause actual or emotional damage, or substantial loss or prejudice to people, businesses or other organisations
- Where there is a significant risk to public health, safety or wellbeing, or damage to property, infrastructure or the environment.
- Fraud, aggressive or deceptive/misleading practices/equipment, or practices seeking an unfair 'competitive advantage'.
- Illegal practices targeted at vulnerable people, including young people and the elderly.
- For matters where there has been recklessness or negligence, or a deliberate or persistent failure to comply with advice, warnings or other enforcement action.
- Where food fails food safety requirements.
- Any act likely to affect animal health or welfare, disease prevention measures, or the integrity of the food chain.
- Obstruction or assault (including verbal assault) of an officer in the execution of their duties.

**Commented [NS20]:** Amended to clarify the impact of actual or emotional damage to people, businesses etc

**Commented [NS21]:** Includes aggressive practices

**Commented [NS22]:** Not needed as covered by Fraud

**Commented [NS23]:** To clarify that immediate disqualification of weighing or measuring equipment may be necessary where the equipment is found to be so inaccurate as to be misleading and/or seeking an unfair competitive advantage

#### 4.11 Advice, Guidance and Support

4.11.1 We are committed to using advice, guidance and support as a first response to the majority of breaches of legislation, subject to any need to take immediate formal action for the most serious breaches (see paragraph 4.10 above).

**Commented [NS24]:** Amended to clarify this is subject to 4.10 (Immediate Formal Action)

4.11.2 Any initial requests for advice from individuals or businesses on non-compliance will not necessarily ~~in themselves directly~~ trigger enforcement action. In such cases we will seek to assist in rectifying such breaches as quickly and efficiently as possible, where there is a clear willingness to resolve the matter.

Commented [NS25]: Amended for clarification

4.11.3 Any correspondence will clearly differentiate between legal requirements and good practice, and indicate the regulations contravened and the measures which will enable compliance.

4.11.4 Follow up checks will be carried out on a risk and intelligence-led basis and where a similar breach is identified in the future, previous advice will be taken into account in considering the most appropriate enforcement action to take on that occasion.

4.12 Where more formal enforcement action has previously been taken, such as a simple caution or prosecution, we recognise that there is likely to be an ongoing need for compliance advice and support, to prevent further breaches.

#### 4.13 Verbal or written warning

4.13.1 Compliance advice can be provided in the form of a verbal or written warning. In doing so we will clearly explain what should be done to rectify the problem, and how to prevent re-occurrence. Warnings cannot be cited in court as a previous conviction, but may be presented in evidence. Failure to comply with warnings or advice could result in more serious enforcement action being taken.

Commented [NS26]: Amended for clarification

#### 4.14 Statutory (Legal) Notices

4.14.1 Statutory Notices are used as appropriate in accordance with relevant legislation. Such notices are legally binding. Failure to comply with a statutory notice can be a criminal offence and may lead to prosecution and/or, where appropriate, the carrying out of work in default.

4.14.2 A statutory notice will clearly set out actions which must be taken and the timescale within which they must be taken. It is likely to require that any breach is rectified and/or prevented from recurring. It may also prohibit specified activities until the breach has been rectified and/or safeguards have been put in place to prevent future breaches. Where a statutory notice is issued, an explanation of the appeals process for such notices will be provided to the recipient.

#### 4.15 Monetary penalties

4.15.1 Fixed or variable monetary penalties may be issued where there is a specific power or delegated authority to do so and under the following circumstances:

- To provide an effective and visible way to respond to less serious crimes without going to court
- As a response to genuine problems or as part of a wider enforcement strategy.

4.15.2 Specific guidance for legislation, which includes the power to issue monetary penalties, may be produced to support this policy. Such guidance will be published alongside via our website. ~~An example of this is Norfolk County Council guidance for the enforcement of the Single Use Carrier Bags Charges (England) Order 2015, which is available [here](#).~~

**Commented [NS27]:** Other more recent guidance is available e.g secondary ticketing so no longer relevant to include this an example

4.15.3 Where the offender fails to discharge their liability resulting from any monetary penalty issued, alternative enforcement action will automatically be considered under this policy (including prosecution of the initial offence). Where prosecution is brought; an assessment will be made of other offences that may also have been committed in order that those charges may be considered at the same time.

Consideration will be given to the adoption of alternative remedies to the issue of a monetary penalty, such as those involving dedicated advice and training sessions, which aim to change the behaviour of the offender, whilst remaining proportionate to the nature of the offence and the harm/potential harm caused.

#### 4.16 Licences, registrations and approvals

Local authorities have a role to play in ensuring that appropriate standards are met in relation to licences, registrations and approvals. We may ~~refuse to grant,~~ seek to review, temporarily remove, suspend or revoke any licence, registration or approval if we are made aware that actions have been carried out which undermine scheme objectives and/or would be unlawful. This includes those issued by other agencies.

**Commented [NS28]:** Amended for clarification

#### 4.17 Seizure and Destruction

4.17.1 Some legislation permits our Officers to seize items such as goods and documents that may be required as evidence. When we seize goods, we will give an appropriate receipt ~~or other record of seizure~~ to the person from whom they are taken. On some occasions we may also ask a person to voluntarily surrender and transfer ownership of illegal goods to us.

**Commented [NS29]:** clarification of other types of record of seizure

4.17.2 Where we seize food for failing food safety requirements, or animal feed for non-compliance with feed law, an application will be made to the Court for a condemnation order, for the illegal product to be destroyed. We will provide details of where and when this application will be made to allow interested parties to attend the hearing.

**4.17.3** Where products are found to present a serious risk we may seek to destroy or otherwise render them inoperable by virtue of EC Regulation 765/2008, the Regulation on Accreditation and Market Surveillance (RAMS).

**Commented [NS30]:** Clarification of this specific provision under EC Regulation 765/2008

#### 4.18 Detention

4.18.1 Where food is suspected of failing food safety requirements, or where animal feed does not comply with specified feed law, it may be detained to allow further investigation.

4.18.2 When food or animal feed is detained, a notice of detention will be provided, detailing the detention arrangements, including the location where the product(s) will be detained.

#### 4.19 Forfeiture

4.19.1 Where an accused has not agreed to voluntarily surrender any infringing goods then, on successful conclusion of legal proceedings, forfeiture may be applied for.

4.19.2 Where illegal goods have been seized but there is insufficient evidence of a defendant's identity or other circumstances which do not justify any other course of action, proceedings may be instituted for the forfeiture of those goods. This action is by way of a complaint to the Magistrates Court.

**Commented [NS31]:** Amended to include provision for destruction of illegal goods outside of parallel legal proceedings

4.19.3 This does not preclude us from taking forfeiture proceedings in their own right in any other appropriate circumstances. We may also seek to recover costs of forfeiture proceedings from the defendant(s).

**Commented [NS32]:** Clarification that we may also seek to recover costs of forfeiture proceedings from the absent defendant(s).

#### 4.20 Injunctive Actions, Enforcement Orders etc

4.20.1 We will consider formal civil enforcement action in pursuance of breaches of law which have a detrimental impact on the collective interests of consumers or businesses.

4.20.2 When considering formal civil enforcement action, an Officer will, where appropriate, first discuss the circumstances with those suspected of a breach and, through consultation, attempt to resolve any issues. Alternatively, we will look to redress detrimental practices via a range of enforcement actions. These include the following:

- informal and formal undertakings
- interim and other court orders
- contempt proceedings.

We may ask the Court to consider other remedies as part of any proceedings, including compensation for victims.

#### 4.21 Other Sanctions or Interventions

**Commented [NS33]:** This section has been amended as a result of consultation feedback – see committee report

4.21.1 We will consider other sanctions or interventions where legally available and appropriate to do so, including criminal behaviour orders under the Anti-Social Behaviour, Crime and Policing Act 2014, injunctions under the Local Government Act 1972 or equivalent orders to disrupt and/or prevent activities that may contribute to crime or disorder. This may also include arranging for the removal of websites where it is clear they are being used for illegal purposes.

#### 4.22 Taking animals into possession/banning orders

4.22.1 Under the Animal Welfare Act 2006, if a veterinary surgeon certifies that 'protected animals' are suffering or are likely to suffer if their circumstances do not change, we will consider taking them into our possession and applying for Orders for re-imbusement of expenses incurred and subsequent disposal. We may also look to other legislation where appropriate to ensure that similar standards of care and/or control

of animals is properly maintained. In some circumstances we will also consider applying to the Court to ban a person(s) from keeping animals.

#### 4.23 Simple Cautions

4.23.1 In certain cases a simple caution may be offered as an alternative to a prosecution, for example for first time offending. The purpose of a simple caution is to deal quickly with less serious offences, to divert less serious offences away from the Courts, and to reduce the chances of repeat offences.

**Commented [NS34]:** Reflects Home Office Guidance on first time offenders

4.23.2 Officers will comply with the provisions of relevant Home Office Circulars. The following conditions must be fulfilled before a caution is administered:

- The offender has made a clear and reliable admission
- There is a realistic prospect of conviction
- It is in the public interest to offer a simple caution; and
- The offender is 18 years old or older at the time that the caution is to be administered.

4.23.3 A simple caution may appear on the offender's criminal record. It is likely to influence how we and other enforcement agencies deal with any similar breaches in the future, and may be cited in court if the offender is subsequently prosecuted for a similar offence. If a simple caution is issued to an individual (rather than a corporation) it may have consequences if that individual seeks certain types of employment, or wishes to travel or move to certain countries. Simple cautions will be issued with regard to Home Office and other relevant guidance.

**Commented [NS35]:** clarification that for some less serious offences this does not necessarily result in a criminal record

**Commented [NS36]:** Clarifies restrictions on travel/residency in some countries arising from a Simple Caution

#### 4.24 Prosecution

4.24.1 We may prosecute in respect of serious or recurrent breaches, or where other enforcement actions, such as statutory notices have failed to secure compliance. The Council recognises that the decision to prosecute is significant and could have far reaching consequences on the offender.

4.24.2 Before a decision to prosecute is taken, the alleged offence(s) will be fully investigated, a report compiled by the Investigating Officer and the file reviewed by a Senior Manager for legal decision. A prosecution will only be considered if the sufficiency of the evidence and the public interest falls within the guidelines as laid down by the Attorney General and Crown Prosecution Service [Code for Crown Prosecutors](#).

**Commented [NS37]:** Clarifies that the legal decision will always rest with a Senior Manager

4.24.3 Before making a decision whether or not to prosecute, consideration will also be given to:

- How well the prosecution supports our aims and priorities
- The factors contained in paragraphs 4.2 and 4.10 of this policy
- Action taken by other enforcement agencies for the same facts
- The nature and extent of any harm or loss, including potential harm and loss, and any offer of redress made by the offender to victims
- The willingness of the alleged offender to prevent a recurrence of the infringement

**Commented [NS38]:** Amended (numbering only)



- The likelihood of the alleged offender being able to establish a statutory defence
- The calibre and reliability of witnesses
- The probable public benefit of a prosecution and the importance of the case, e.g. the possibility of establishing legal precedent
- Cost effectiveness of a prosecution
- The scope for alternative routes for redress for 'victims' and their likelihood of success
- The impact of the intervention on small businesses in particular, to ensure action is proportionate.

A conviction can result in a criminal record and the court may impose a fine and, for particularly serious breaches, a prison sentence. The court may order the forfeiture and disposal of non-compliant goods and/or the confiscation of assets. Prosecution may also lead, in some circumstances, to the disqualification of individuals from acting as company directors (see 4.26 below).

**Commented [NS39]:** clarification that for some less serious offences a conviction does not necessarily result in a criminal record

#### 4.25 Proceeds of Crime Actions

4.25.1 Where appropriate, we will seek to recover the benefit that the offender has obtained from their criminal conduct through financial investigation.

4.25.2 Financial investigations will be undertaken in accordance with the Proceeds of Crime Act 2002. Such investigations may include applications to the Court requiring financial information to be provided (production orders) or in serious cases applications to freeze and/or confiscate criminal assets (restraint and confiscation orders). Where appropriate, consideration will also be given to seek compensation for victim losses as part of this process.

#### 4.26 Directors

On the conviction of a Director connected with the management of a company the prosecutor will, in appropriate cases, draw to the Court's attention their powers to make a Disqualification Order under the Company Directors Disqualification Act 1986.

## 5 Complaints, Compliments and Comments

**Commented [NS40]:** This section has been amended as a result of consultation feedback – see committee report

5.1 If you are unhappy with the service you have received, or we have failed to live up to our promises, managers are always willing to discuss with you the cause of your dissatisfaction, and will try to find a solution.

5.2 If you wish to make a complaint or send us a compliment or comment about our service please use our online procedure by going to:

[www.norfolk.gov.uk/compliments and complaints](http://www.norfolk.gov.uk/compliments_and_complaints)

Complaints can also be submitted by telephone to 0344 800 8020 or in writing to the Compliments and Complaints Team, at:

Norfolk County Council  
County Hall

Martineau Lane  
Norwich, NR1 2DH

If you are still not satisfied, and feel you have been caused injustice, our complaints process explains how the matter will be escalated, including how to complain to the Local Government Ombudsman.

- 5.3 If you wish to appeal against any enforcement action taken or have any other comments about this policy, you should write to The Executive Director - Community and Environmental Services, using the address in 5.2 above.

## 6 Conflict of Interest in Enforcement Matters

- 6.1 Where a breach is detected in which the enforcing authority is itself the responsible operator, for example operating as a food business, the following protocol will be followed:

- Where a breach of law is sufficiently serious to warrant more than the provision of advice, information, assistance or a written warning, or where the response to remedy the breach is considered insufficient, an additional authorised officer from another local authority will be requested to assist in the decision making process as to the action required. Senior Managers of the Council will be informed of serious breaches without delay.
- The additional officer's role is to assist and challenge the decision making process to ensure that appropriate, proportionate and consistent action is taken to remedy the breach, prevent re-occurrence and to minimise the risk of 'conflict of interest' for the enforcing authority. An auditable record of the additional officer's involvement will also be kept.

**Commented [NS41]:** Clarification that this is an additional officer

**Commented [NS42]:** Clarifies process

## 7 Where to get further information

- 7.1 Copies of this document and other information/advice are available from by writing to the Trading Standards Service using the address in 5.2 above.
- 7.2 We will make this policy available on tape, in Braille, large type, or in another language on request.

**Commented [NS43]:** This section has been changed to reflect the same postal address as paragraph 5.2

# **LOCAL MONITORING AND ENFORCEMENT PROTOCOL**

**For the Extraction and Processing of  
Minerals, Waste Management Facilities and  
for County Council Development under  
Regulation 3 of the Town and Country  
Planning General Regulations 1992**

**in**

**Norfolk**

**September 2018**

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## **1.0 BACKGROUND**

- 1.1 This document provides supplemental guidance to the County Council's Enforcement Policy (Community and Environmental Services) and is provided in the context of specific requirements arising from planning legislation and the National Planning Policy Framework (NPPF).
  
- 1.2 The National Planning Policy Framework, March 2012 (NPPF) replaced previous Planning Guidance from Central Government, including PPG18 on Planning Enforcement. Paragraph 207 of the NPPF states, 'Effective enforcement is important as a means of maintaining public confidence in the planning system. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. Local Planning Authorities should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so.' In conjunction with the overarching CES Enforcement Policy, this Annex represents Norfolk County Councils Local Enforcement Plan for planning.
  
- 1.3 Schedule 1 to The Town and Country Planning Act 1990 as amended sets down the responsibilities for Town Planning within a two tier Planning Authority in England and Wales. Regulation 3 of The Town and Country Planning General Regulation 1992 authorises an authority to determine (subject to regulation 4), an application for planning permission by an interested planning authority to develop any land of that authority, or for development of any land by an interested planning authority or by an interested planning authority jointly with any other person, unless the application is referred to the Secretary of State under section 77 of the 1990 Act for determination by him.
  
- 1.4 The Development Plan for the County comprises the Norfolk Core Strategy and Minerals and Waste Development Management Policies Development Plan Document (DPD) 2010 -2016 (Adopted 2011), Norfolk Waste Site Specific

Allocations DPD, Norfolk Minerals Site Specific Allocations DPD (both adopted in 2013) and the adopted Borough and District wide Local Plans, including Development Plan Documents and Area Action Plans. Adopted Neighbourhood Plans which have been developed by local communities, also form part of the Development Plan. The County Council maintains an up-to-date list of local planning authority policy documents and Neighbourhood Plans.

## **2.0 GENERAL STATEMENT**

- 2.1 Section 19 of The Waste (England and Wales) Regulations 2011 makes it a duty that where a Planning Authority has planning functions in relation to establishments or undertakings carrying on disposal or recovery of waste, the Planning Authority must ensure that appropriate periodic inspections of those establishments or undertakings are made.
- 2.2 There are two elements within this plan. The first being periodic inspections (Section 3.0), the second being the investigation and enforcement of planning breaches (Sections 4-8).
- 2.3 Planning breaches are normally not criminal offences and no sanction can usually be imposed. However, failure to comply with a formal notice is a criminal offence and making the person committing the breach liable to prosecution.
- 2.4 Where a planning breach occurs a Local Planning Authority (LPA - 'the Authority') is required to consider the expediency of formal enforcement action. Formal enforcement notices may be issued, including a Breach of Condition Notice, Enforcement Notice, Temporary Stop Notice, Stop Notice, Injunction, or Direct Action (following failure to comply with an Enforcement Notice). Enforcement action may result from any of the above or a combination of the above.
- 2.5 The Service of a Planning Contravention Notice constitutes formal action but does not in itself constitute enforcement. Rather it is a request for information relating to interests in the land and the nature of the alleged planning breach, although failure to comply with notice may lead to enforcement action as may the information contained in the response.

- 2.6 Similarly the serving of a notice requesting information on land ownership and occupation under Section 16 of Local Government (Miscellaneous Provisions) Act 1976 is not considered to be enforcement.
- 2.7 The taking of formal enforcement action is discretionary. The Authority may choose to take no action, but will need to justify any decision not to enforce, and equally, any decision to take proportionate enforcement action. Any decision will be taken in line with the County Council's Communities and Environmental Services policy on enforcement.

### **3.0 MONITORING INSPECTIONS**

- 3.1 To ensure confidence in the planning control system it is essential that the public and operators are conscious of a fair and effective system of monitoring all authorised and unauthorised development.
- 3.2 Monitoring of permitted sites is an essential tool of controlling development and preventing problems from developing. It is this 'pro-active' approach that often enables officers to anticipate likely breaches of planning control arising before they occur. It enables them to take immediate action to ensure that deterioration in the situation does not arise.
- 3.3 There are currently 213 operational and active mineral and waste sites in Norfolk. As there are no reserves of hard rock in Norfolk recycling of concrete and other rubble is a significant source of sub-base and fill material. The scale of an operation being undertaken at a site is not an accurate yardstick for allocating resources; experience will often show that small recycling and waste transfer sites can give rise to more complaints and the need for more officer time, in comparison with large sites.
- 3.4 Following an inspection of the site and relevant planning permissions, a report shall be prepared and copied to the operator/owner usually within two weeks of such inspection taking place. The report shall amongst other matters detail any

breaches identified and specify timescales for compliance with conditions that have been breached.

- 3.5 The Monitoring and Control Team will be consulted on all proposals to permit development by the Development Control Team in particular they will be consulted on the planning conditions intended to be attached to the planning permission.

### MONITORING FEES

- 3.6 On 6 April 2006 The Town and Country Planning (Fees for Applications and Deemed Applications) (Amendment) (England) Regulations 2006 came into force. This amendment, together with subsequent updates, enables Mineral and Waste Planning Authorities (MWPAs) to charge operators, where sites have planning permissions for mineral extraction and/or waste landfill, for the re-imbursment of the average costs calculated over all MWPAs providing a monitoring service.
- 3.7 The Authority has agreed a guidance note with minerals and waste operators on the charging regime for minerals and waste site inspections. The guidance note sets out the categories of sites and associated fees, the methodology for agreeing the number of site visits and the monitoring regime.

## **4.0 INVESTIGATION AND ENFORCEMENT**

- 4.1 In seeking to secure the highest possible level of compliance with relevant legislation whilst conforming with The Human Rights Act 1998, The Police and Criminal Evidence Act 1984 (P.A.C.E.) the Enforcement Concordat, the Code for Crown Prosecutors the principal enforcement activities of the Authority are directed towards avoidance of infringements. It is nevertheless inevitable that breaches and offences will occur and the purpose of this protocol is to ensure that they are resolved in a consistent, transparent, balanced and fair manner.
- 4.2 Similarly, where an operator carries out development without complying with the conditions attached to a planning permission and this gives rise to problems leading to an unacceptable injury to amenity, the County Council's approach will be to seek to remedy the injury in the first instance by negotiation and persuasion.



- 4.3 All enforcement action, be it verbal warnings, the issue of written warnings, statutory notices, or prosecution, is primarily based upon assessment of risk to public health, public safety, harm to amenity, economic well being or the environment.
- 4.4 Where appropriate, this Authority will endeavour to recover money under the Proceeds of Crime Act 2002.
- 4.5 This Authority will ensure that all clients subject to any enforcement action are informed of what is expected and the procedures that will be followed. This is to aim to avoid any misunderstandings and ensure transparency of all enforcement action.
- 4.6 This Authority, in exercising its function of ensuring compliance with planning control will:
- where there is serious harm caused to the amenity, take immediate action against a breach of planning control to stop further damage;
  - in all other instances, seek to resolve any problems within a reasonable timescale by discussion and negotiation without the need to resort to legal action;
  - only take enforcement action where it is necessary to do so to protect the public interest or to protect the environment, people and transport systems and the amenity of the area in accordance with the provisions of the local development framework;
  - ensure that action is always commensurate with the breach of planning control;
  - Give due regard to current legislation, policy framework, instructions, appeal decisions and relevant judicial authority;
  - where appropriate take into account comments made by the general public and consultees;
  - enable acceptable development to take place, even though it may initially have been unauthorised;
  - maintain the integrity of sites having interests of acknowledged importance;
  - where appropriate maintain liaison and contact with the general public, and

mineral and waste operators.

## **5.0 THE RELEVANT ENFORCING AUTHORITY**

- 5.1 There is often an overlap of enforcement of activities involving waste disposal and recycling between the Authority, the District and Borough Councils' Environmental Health Departments (EHO) and the Environment Agency (EA). Where the unauthorised activity results in, or has the potential to result in, pollution, the EA will normally be the lead Authority. Where the activities involve a statutory nuisance the District Council EHO may be better placed to take action. In all cases that potentially involve the above bodies, consultations and discussions will take place to see which Authority is in the better position to lead the investigation and if necessary, take action.
- 5.2 The Authority will have regard to the fact that unauthorised development and some breaches of planning conditions involving wastes may be a criminal offence under legislation enforced by the EA and the Authority will liaise with the EA accordingly. The EA may be in a stronger position to ultimately remedy harm to amenity by way of prosecution and enforcing cessation of the harmful activities. In cases where unauthorised development causes or has the potential for serious harm to human health the Authority will have regard to the fact that it may be more appropriate for the HSE to be the lead Authority and will liaise with them accordingly.
- 5.3 Norfolk County Council is a two-tier Authority with seven District, Borough and City Councils; King's Lynn and West Norfolk Borough Council, Breckland District Council; North Norfolk District Council; South Norfolk District Council; Broadland District Council; Norwich City Council and Great Yarmouth Borough Council. All of whom are also planning authorities. In addition to these councils the Broads authority also has planning responsibilities for the Norfolk and Suffolk Broads area.
- 5.4 It is the intention of the County Council to work closely with other regulatory bodies when investigating and remedying an alleged breach of planning control. The County Council in dealing with all complaints concerning an alleged breach of planning control will identify the authority responsible for taking action and redirect complaints to other regulating bodies where necessary.

## 6.0 GENERAL GUIDANCE

6.1 The County Council will have regard to the provisions of the Norfolk minerals and Waste development framework and relevant local plans and any other material considerations in the enforcement of planning control.

6.2 This Authority remains committed to fostering business enterprise and prosperity, provided that the necessary development can take place without unacceptable harm to local amenity. The regional 'Better Business for all' working group actively seeks to promote this aim. Whilst the Authority has a general discretion to take enforcement action when they regard it expedient, it does not condone wilful breaches of planning law. Moreover, in some cases effective enforcement action is likely to be the only appropriate remedy where a breach is causing unacceptable harm. The Authority will be guided by the following considerations:-

- (i) The Commissioner for Local Administration (the local ombudsman) has held, in a number of investigated cases, that there is "maladministration" if an Authority fails to take effective enforcement action which was plainly necessary or where an Authority fails to consider whether to take formal enforcement action or not and be able to show their reasoning for not initiating formal action, often resulting in an award of compensation payable to the complainant for the consequent injustice;
- (ii) The planning regulatory provisions are to ensure proper land use and to resolve breaches of planning control by removing unacceptable impacts on the environment and the amenity of the area. This ensures a 'level playing field' for legitimate businesses to develop and prosper.
- (iii) Enforcement action should always be commensurate with the breach of planning control to which it relates (for example, the Authority would usually consider it inappropriate to take formal enforcement action

against a trivial or technical breach of control which causes no harm to amenity in the locality of the site); and

- (iv) Where the Authority's initial attempt to persuade the owner or occupier of the site voluntarily to remedy the harmful effects of unauthorised development fails, negotiations will not be allowed to hamper or delay whatever formal enforcement action may be required to make the development acceptable on planning grounds, or to compel it to stop.

- 6.3 It is not an offence to carry out development without first obtaining planning permission for it. If the Authority's initial assessment indicates it is likely that planning permission would be granted for development which has already taken place, the person responsible will be asked to submit a retrospective planning application. However this initial assessment is not binding on the Authority's subsequent decision to grant or not grant planning permission.
- 6.4 While it is clearly unsatisfactory for anyone to carry out development without first obtaining the required planning permission, an enforcement notice will not normally be issued solely to "regularise" development which is acceptable on its planning merits, but for which permission has not been sought. This would only apply to development which would be granted without any planning conditions being attached to control the development.
- 6.5 The Authority will not normally invite an owner or operator to submit a planning application if the unauthorised development is contrary to development plan policies or if it appears that any actual or potential harm cannot be made acceptable by the imposition of planning conditions; however we cannot prevent a landowner who is determined to apply for permission retrospectively.
- 6.6 If an operator or owner submits a planning application that the Authority has requested, the Authority will not normally consider formal enforcement action whilst the application is being considered. If agreement can be reached between the operator and the Authority about the operation being reduced to an acceptable level (e.g. hours of operation, use of plant and equipment, routing of

vehicles etc) during any period between a planning application being submitted and its determination, and the person concerned honours the agreement, formal enforcement action may be avoided

- 6.7 Where the Authority considers that development has been carried out without the requisite planning permission, but the development could be made acceptable by the imposition of planning conditions the owner or occupier of the land will be invited to submit an application, and pay the appropriate application fee, voluntarily. However, if, after a formal invitation to do so, the owner or occupier of the land refuses or fails to submit a planning application in these circumstances within a reasonable timescale, the Authority will consider whether to take formal enforcement action.
- 6.8 Accordingly, where an owner or occupier of land refuses or fails to submit a planning application which would enable the LPA to grant conditional planning permission, the Authority will be justified in issuing an enforcement notice if, in their view, the unauthorised development has resulted in any harm, or has the potential to cause harm, which can only be satisfactorily removed or alleviated by imposing conditions on a grant of planning permission for the development.
- 6.9 If the location of the unauthorised development is unacceptable, but relocation is feasible, it is not the Authority's responsibility to seek out and suggest an alternative site to which the activity might be satisfactorily relocated. However, if an alternative site has been suggested, the Authority will make it clear to the owner or occupier of the site where unauthorised development has taken place that he is expected to relocate to the alternative site within a reasonable timescale. In such circumstances the Authority will usually agree a reasonable time-limit within which relocation should be completed.
- 6.10 What is reasonable will depend on the particular circumstances, including the nature and extent of the unauthorised development; the time needed to negotiate for, and secure an interest in, the alternative site; submit a planning application (if required) for the alternative site; consultation timescales; and the need to avoid unacceptable disruption during the relocation process. If the

owner or operator fails to provide justification for a suggested timescale, the Authority will set a timescale it considers reasonable. If a timetable for relocation is ignored, or it is evident that appropriate steps are not being taken to progress the relocation, the Authority will consider formal enforcement action. In that event, the compliance period in the notice will specify what the Authority regard as a reasonable period to complete the relocation.

- 6.11 Nevertheless if the unauthorised development is causing unacceptable harm to the environment or amenity, the Authority will consider issuing an Enforcement Notice and/or Stop Notice even if an alternative site has been identified and steps have been made towards relocation. The Authority considers that any difficulty or delay with relocation will not normally be a sufficient reason for delaying formal enforcement action to remedy unacceptable unauthorised development.
- 6.12 Where the Authority considers that unacceptable unauthorised development has been carried out, and there is no realistic prospect of its being relocated to a more suitable site, the owner or occupier of the land will be informed that the Authority is not prepared to allow the operation or activity to continue at its present level of activity, or (if this is the case) at all. If the development nevertheless provides valued local employment, the owner or occupier will be advised how long the Authority is prepared to allow before the operation or activity must stop, or be reduced to an acceptable level of intensity. If agreement can be reached between the operator and the Authority about the period to be allowed for the operation or activity to cease, or be reduced to an acceptable level, and the person concerned honours the agreement, formal enforcement action may be avoided. However the Authority will have regard to the possibility of intensification of the development after expiry of the statutory period for enforcement action. If no agreement can be reached, the issue of an enforcement notice will usually be justified, allowing a realistic compliance period for the unauthorised operation or activity to cease, or its scale to be acceptably reduced.

## 7.0 INVESTIGATION PRIORITIES

- 7.1 Investigating and remedying alleged breaches of control is labour intensive and the quality of the service is directly proportional to the resources available for regulating planning control. The resources allocated both in terms of staff and equipment (including noise monitoring equipment, topographical survey systems, IT and GIS based recording systems) for this purpose will, therefore, need to be reviewed on a regular basis as local circumstances change to take account of a fluctuating workload, advances in technology etc.

### COMPLAINTS

- 7.2 A complaint/incident is an event or matter that is either brought to the Authority's attention or that monitoring and control officers may become aware of as part of their duty, and which may have a planning related impact. The type of complaints/incidents received by the Authority are split into 3 priorities:
- 7.3 Priority 1  
Immediate or irreparable harm to the environment or immediate and substantial harm to amenity. Harm would be assessed in relation to impact on the environment. E.g. the impact of mineral, waste and Regulation 3 development would often be greater in an area close to residential amenities than it would be in the open countryside. The Authority will respond to the complainant within 24 hours and investigate the complaint within 3 working days.
- 7.4 Priority 2  
On-going low-level harm to amenity or moderate and reparable impact on the environment. E.g. HGV's occasionally going in the wrong direction, and causing the road verge to break up. The Authority will respond to the complainant within 3 working days and investigate the complaint within 1 working week.
- 7.5 Priority 3  
Occasional harm to amenity or the raising of long-standing issues leading to low level impact on the environment e.g. concerns about the permitted type of material (sand or waste) stored on a site with permission, but in the wrong place or slightly higher than the agreed height. The Authority will respond to the

complainant within 3 working days and investigate the complaint when the relevant officer is next in the area, but no later than one month of the receipt of complaint.

#### INVESTIGATION OF COMPLAINTS/INCIDENTS

- 7.6 A response to the complaint or incident will also require a record of the outcome of investigation. Where there is continued non-compliance and this results in further visits and investigation then these should additionally be recorded. (i.e. record as if they were new complaints/incidents). However, where the operator is taking known action to resolve the problem then this is classified as an ongoing event. It is not necessary to record this as a new complaint/incident.
- 7.7 Where separate members of the public report complaints/incidents about different issues relating to a site then these should be additionally recorded. Where multiple residents complain about the same incident then this is recorded as one complaint.
- 7.8 As part of our regular monitoring of planning permissions there are matters identified by officers that if reported to us separately would have been dealt with and recorded as a complaint/incident. These should now be recorded and information captured. The same applies as above in that, where there is continued non-compliance then this will be reported as a complaint/incident. However, where there is known action to resolve this then this would be considered an ongoing event and not separately recorded as a complaint/incident.
- 7.9 The Monitoring and Control Team will liaise with the Legal Services; Environment Agency; District Council or any other relevant Authority as necessary throughout the investigation.
- 7.10 When complaints about alleged breaches of planning control are received, they will be properly recorded and investigated. If the Authority decides to exercise its discretion not to take formal enforcement action it should be prepared to explain its reasons to the complainant, including where complaints are attributable to



repeated allegations from vexatious complainants and they have been previously proved unsubstantiated.

- 7.11 The Authority will ensure that anyone who does complain about a breach of planning control is dealt with in a polite, efficient and responsive way. All complaints that are received although confidential will be recorded and stored on a complaints register, which is an electronic and paper based system. The complaints register will enable the receiving officer to detail both the nature of the complaint and the action the Authority has taken to resolve it. Keeping a record of complaints will enable the Authority to assess and improve its overall service.
- 7.12 It may not always be necessary to visit sites to satisfactorily resolve a complaint. However, in most cases it may be necessary to establish whether there has been a breach of planning control by visiting the site. Where, following the investigation of a complaint, the Authority decides not to take formal enforcement action to resolve a substantive issue, the matter being satisfactorily resolved by other methods, the reason for this decision will be explained to the complainant. If, however, the Authority elects to instigate enforcement proceedings against the offender the complainant will be notified of the progress of that action.
- 7.13 The County Council in dealing with all complaints concerning an alleged breach of planning control within their responsibility will:
- treat them confidentially as far as practical;
  - ensure that they are acknowledged and actioned within the timescales prescribed in the priority rating;
  - deal with them expeditiously in a professional and efficient manner;
  - visit the site where necessary, and establish whether there has been a breach of planning control;
  - notify the complainant upon request of the progress of any action taken to resolve substantive matters forming the basis of the complaint;
- notify the complainant if the authority elects to commence enforcement action against the alleged breach of planning control and be prepared to explain the reason in the event formal enforcement action has not been taken.

## **8.0 PROSECUTIONS**

8.1 Persons who fail to comply with a formal notice will normally be prosecuted if the non-compliance meets both of the following criteria:

(i) Evidential test i.e. where the evidence is sufficient for a realistic prospect of successful prosecution; and

(ii) Public Interest test i.e. where the prosecution is in the public interest.

## **9.0 MONITORING OF REGULATION 3 DEVELOPMENT**

9.1 A procedure has been agreed between Norfolk County Council's Children's Services Department and the Monitoring and Control Team where by Schools development which falls within Regulation 3 of The Town and Country Planning General Regulation 1992 can be monitored and a fee levied.

9.2 The developments to be pro-actively monitored will fall into one or more of the following categories:

- Developments where planning permission was granted after 1 January 2009 and includes permanent external substantial building works.
- Major developments where planning permission was granted prior to 1 January 2009 and construction is still in progress.
- Developments where planning permission was granted prior to 1 January 2009, include permanent external substantial building works, and remain unlawful due to the failure to discharge pre-development conditions.

9.3 Prior to the inspection taking place, notification will be passed to the applicant informing them that an inspection will be scheduled for a given school. An initial list of developments has been agreed with Children's Services and notification of future inspections will be sent out to individual applicants.

9.4 Where a development has been permitted on an open school an appointment will be made prior to inspection. This generally ensures that the school will allow

the officer onto the site without issue and, if required, allocate a member of staff to accompany the officer. This will also allow the inspecting officer to check that work has begun prior to going on site.

- 9.5 Where a planning permission is found not to have been implemented it will be removed from the list and an invoice will not be raised. It is generally agreed that a single chargeable inspection will be required for smaller developments such as extensions, although a second non-chargeable visit may be required after completion of the development.
- 9.6 For major developments, such as new schools, two chargeable visits per year for the life of the construction phase will be required. A final chargeable visit to check completion and landscape implementation will also be required.
- 9.7 Failure to comply with all planning conditions could result in further chargeable visits being undertaken until full compliance is achieved. There will be a maximum of two chargeable visits per school in any one financial year.
- 9.8 Once the report has been completed, it will be sent to the applicant along with a copy of the planning permission and an invoice for payment.

## **10. MEMBER PROTOCOL**

- 10.1 Local Norfolk County Council members will be informed when an Enforcement Notice is served in their division.
- 10.2 Members of the Council will be presented on a regular basis of not less than once per year with a report detailing the decisions made under delegated authority, performance statistics and enforcement update for the work of the Monitoring and Control Team.

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## Norfolk County Council Flood and Water Management Enforcement Protocol

### 1.0 Introduction

This document provides supplemental guidance to Norfolk County Council's Community and Environmental Services (CES) Enforcement Policy, and is provided in the context of specific requirements arising from the Flood and Water Management Act 2010 and the Land Drainage Act 1991.

Norfolk County Council (NCC) is the Lead Local Flood Authority (LLFA) for the county. This role is fulfilled by the Flood and Water Management team.

This Protocol and guidance note has been adapted from best practice identified within local authorities in England. It is intended for use as guidance by Risk Management Authorities, developers and landowners.

### 2.0 Regulation of Ordinary Watercourses

The Lead Local Flood Authority has powers under the Land Drainage Act 1991 to exercise its regulatory powers in relation to watercourses outside of Internal Drainage Board areas and where they are not Environment Agency designated main rivers.

The Lead Local Flood Authority will take a risk-based and proportionate approach to exercising its regulatory powers under the Land Drainage Act 1991, taking into account the location and nature of any nuisance caused by;

- the failure to repair or maintain watercourses, bridges or drainage works
- un-consented works
- impediments to the proper flow of water

This approach will take into account whether the contraventions have or are likely to increase flood risk and what the consequences of any increase in risk may be. Where works are un-consented the Lead Local Flood Authority would require the landowner, person and/or Risk Management Authority responsible for the works to prove that the un-consented works would not cause a nuisance or increase flood risk.

With regards to the causes of the nuisances described above, the Lead Local Flood Authority has powers under Sections 21, 24 and 25 of the Land Drainage Act 1991 to serve notice on individuals who have caused contraventions.

In issuing a notice the Lead Local Flood Authority may set out the works required to resolve the contravention to an acceptable standard and the date by which the works should be completed.

If the works are not completed by the date set out in the notice, the Lead Local Flood Authority may take action to remedy the effect of the contravention or failure and seek to recover the costs incurred, as well as pursue any necessary prosecution.

### **3.0 Guiding Principles**

Enforcement under the Land Drainage Act, 1991 will be carried out using the guiding principles as set out in the CES Enforcement Policy.

### **4.0 Process**

#### ***a) Initial response***

Where the Lead Local Flood Authority receives a complaint in relation to an ordinary watercourse, we will carry out an initial assessment to establish whether the actual or potential flood risk meets our threshold for intervention. We aim to complete this assessment within 21 days. However, there will be occasions when it is necessary to extend the period of assessment for more complex matters and/or to accommodate exceptional circumstances e.g. weather, flood conditions, etc. At the outset the complainant will be informed of the case officer who will follow up the enquiry and of the outcome of the assessment.

#### ***b) Initial assessment***

The threshold for intervention will be based on the Lead Local Flood Authority's [impact criteria](#).

To assess the potential impact the initial assessment will consider the on-site conditions, any available historical data and high level indicators of potential risk, such as Environment Agency (EA) Flood risk maps for surface water flooding and flooding from rivers. It will also consider any other status of land e.g. conservation designations, common land etc.

To substantiate incidents of actual flooding as part of the initial assessment we will need to be provided with one or more of the following types of evidence:

- I. An insurance claim
- II. Records of emergency services and utility companies i.e. fire brigade attending to pump out a property
- III. Dated photos of the event
- IV. Written report from a Risk Management Authority

The evidence supplied will be determined in line with the guiding principles as set out in the CES Enforcement Policy.

The Lead Local Flood Authority may close an enforcement case file, where there is a lack of physical evidence to corroborate the impact of a flood event. If further relevant evidence was to come forward then the Lead Local Flood Authority may re-open the case file and undertake a further investigation.

### **C) Further Investigation**

Where the initial assessment has identified an actual or potential risk of flooding that exceeds the adopted impact criteria, but where a site inspection has failed to identify the primary cause of the problem the authority may;

- consult with other organisations including other local authorities, Highway Authorities, Environment Agency, Natural England as appropriate.
- require or commission appropriate site surveys and inspections.

In deciding whether or not to carry out the above steps the LLFA will consider whether it is in the public interest to do so. Having regard to the actual and potential impacts of the flooding, the costs of carrying out the works and the likelihood of obtaining sufficient evidence to enable enforcement activity. Where the Lead Local Flood Authority is made aware of breaches of other legislation it will advise the appropriate authorities.

### **D) Outcome of initial assessment/Further Investigation**

Once an initial assessment/further investigation has been carried out the complainant will be informed in writing as to the next course of action and this may include;

- I. Informing relevant party(s) of works that are required to be undertaken within the set timescale OR
- II. No further action by the LLFA and:
  - Providing advice to those affected on referral to the [First Tier Tribunal \(Property Chamber\), Agricultural Land and Drainage \(AL&D\)](#) or other relevant organisation, where appropriate
  - Informing relevant parties of their [riparian responsibilities](#)

Where it is considered that further action needs to be taken by the relevant landowner, person and/or Risk Management Authority responsible this will be explained within the letter that sets out the outcome of the initial assessment/further investigation. This will include the following:

- An explanation of the problem and the remedy required in accordance with the Land Drainage Act 1991.
- Depending on the nature of the problem we aim to ensure that remedial work is carried out within the timeframe specified in the letter (between 7 and 21 days of the date of the letter). However, there will be occasions when it is necessary to extend the period of compliance for more complex matters and/or to accommodate exceptional circumstances e.g. weather, flood conditions, etc. The time allowed will be reasonable in the circumstances. The extent of the work required will be proportionate to the scale of the problem.

- In certain circumstances practicalities may not allow for works to be done within the timeframe specified in the letter. The Lead Local Flood Authority will assess the circumstances with regards to enforcement and whether any works need to be deferred or amended to take into account the impacts of any works on wildlife. Examples where this may occur include:
  - Seasonal farming practices and Environmental Schemes can restrict access or time schedules to carry out works;
  - The nesting season for some birds occurs between the 1 March and 31 August and works might cause disruption if nests are present;
  - Presence of protected species will influence when it is most appropriate to carry out work.

### ***Seeking resolution prior to serving notices***

The Lead Local Flood Authority will seek to resolve the situation by means of negotiation with the person responsible and obtain compliance with a request to satisfactorily undertake the work required.

### ***Serving notices under the Land Drainage Act 1991***

If a positive response to the Lead Local Flood Authority's letter has not been received within the timescale specified and on inspection no work has been satisfactorily undertaken as required, a notice under the relevant section of the Land Drainage Act 1991 will be served. The notice will include the nature of the work to be carried out, the period within which it is to be carried out and any relevant right of appeal to a magistrates' court within 21 days of service of the notice (where applicable). A Notice under the Land Drainage Act 1991 is a legal document formally requiring specific work to be carried out within a set timescale.

A letter will accompany the notice and inform the responsible person that in the event of their failure to satisfactorily undertake the work, the Lead Local Flood Authority may carry out the work itself and recover from the person responsible the expenses reasonably incurred in doing so which will include recovering the costs of pursuing the case.

### ***Enforcement of notices***

Following service of the notice, one of four things will happen:-

- The responsible person will carry out the work to the satisfaction of the council.
- The responsible person may appeal the notice.
- The responsible person will fail to carry out the work to the satisfaction of the Lead Local Flood Authority and the Lead Local Flood Authority will seek to recover their expenses; and /or

- The Lead Local Flood Authority will, where appropriate, decide whether to take a prosecution against the responsible person, in addition to carrying out the work and seeking to recover the costs of that work.

### **Completion of proceedings**

If the responsible person complies with the notice and completes the work to the satisfaction of the Lead Local Flood Authority, the Lead Local Flood Authority will write to the responsible person confirming the closure of the case and the end of the action.

### **No further action**

The Lead Local Flood Authority may take no action where:

- there is no actual or potential risk to properties or infrastructure; and/or
- that the matter complained of is not the cause of the drainage problem; and/or
- the matter is trivial in nature

If this is the case, the complainant will be advised accordingly and a written communication will be sent to the complainant explaining the reason why no action is to be taken. The complainant will also be referred, where appropriate, to the [First Tier Tribunal \(Property Chamber\), Agricultural Land and Drainage \(AL&D\)](#) or other relevant organisation. The riparian owner will also be informed, as appropriate.

Examples of matters not requiring action may include minimal silting of the watercourse, slight vegetation overgrowth, the accumulation of a small quantity of debris etc

### **Advice**

The Lead Local Flood Authority will provide basic information and advice to individuals of their riparian ownership responsibilities and of the route for appeal against other riparian owners where appropriate. The Lead Local Flood Authority may suggest that independent legal and/or technical advice is sought, where appropriate.

### **Data Protection**

Information may be shared with [Risk Management Authorities](#) under Section 13 and 14 of the Flood and Water Management Act 2010 in order to exercise flood and coastal erosion risk management functions.

This information will be held securely and any processing will be performed in line with the requirements of the Data Protection Act 1998 and the General Data Protection Regulation from 25 May 2018. Norfolk County Council is registered as a Data Controller with the Information Commissioner's Office. Further details about how we process personal data can be found in our [Privacy Notice](#).

### **Further Information**

Please consult the [Glossary of terms](#) document which supports this protocol.



**Norfolk Fire and Rescue Authority**

**Fire Safety Policy Directive**

**ENFORCEMENT POLICY STATEMENT**  
**(England and Wales)**

**Introduction**

We are approachable and want to engage with and hear from you.

The following pages explain our enforcement policy. This document is supported by other documents required by the Regulators Code, namely our Service Standards and our Challenges, Appeals and Complaints procedure. This guidance has been produced in consultation with the Better Regulation Delivery Office (now Regulatory Delivery). This policy aims to explain our approach to our regulatory functions in relation to fire safety and public safety in our communities. It also explains the behaviours that business can expect receive from us and legal constraints and frameworks under which we operate.

# Quick-guide

## 1. Introduction

The Norfolk Fire and Rescue Authority (the Service) (and its officers) will exercise its regulatory functions in accordance with the principles of better regulation and will comply with all relevant laws. Business should have a mainly positive experience of being regulated by the Service. To learn more, [click here](#).

## 2. Principles

The Service is tasked with seeing that people are safe in case of fire and believes that deaths and injuries caused by fire in regulated premises are preventable, if the right measures are taken. The Service and its officers will engage and work with business, in preference to enforcing fire safety standards. To learn more, [click here](#).

## 3. Regulation

The purpose of enforcement action is to bring about improvements in safety and in attitudes to providing safety. While the Service has laid down procedures for its officers, we will take each case on its merits. To learn more, [click here](#).

## 4. Helping Those We Regulate (Transparency)

The Service aspires to help regulated businesses and to work with them to resolve fire safety problems but will robustly enforce where the risk to people is highest and when those responsible refuse to help them. To learn more, [click here](#).

## 5. Targeting

The regulatory policy of the Service focuses on risk in case of fire and in places where we will be most effective in saving life. To learn more, [click here](#).

## 6. Accountability To Those We Regulate

The Service is accountable for its actions and is open to analysis and questioning of our regulatory work. To learn more, [click here](#).

## 7. Principles of Enforcement Action

A range of relevant factors will be considered before any enforcement action is taken by the Service. When action must be taken to improve safety, the Service will be clear about what is required. To learn more, [click here](#).

## 8. Our Enforcement Action

The Service would rather work with business to make places safe than enforce against them. When enforcement is needed; we will be clear about what must be done. Letters or notices may be sent to confirm what business needs to do to. All enforcement will be proportional to the risk. To learn more, [click here](#).

## **9. After Enforcement Action**

The Service encourages dialogue and open communication during and after the enforcement process. Requirements for safety and how to challenge what we are asking for will be made clear. To learn more, [click here](#).

## **10. Failure to Comply With Requirements**

When the Service makes an enforcement decision, there might be a route to appeal or challenge what we have said. How to do this (and how to complain about our behaviour) will be made clear. Business can talk to us. To learn more, [click here](#).

## **11. Simple Cautions and Prosecution**

If an offence has been committed, it means the law has been broken and the Service can take the matter to court. In addition to going to court, there are other actions that the Service can take. To learn more, [click here](#).

## **12. Public Register**

The Service must enter details of certain notices (called “relevant notices”) into a register to which the public have access. (In accordance with the Environment and Safety Information Act 1988). Further details are available on request or from the [CFOA public register web pages](#)

## **13. Other Duties of the Service**

As well as ensuring that people are kept safe in case fire, the Service is also responsible for some other laws relating to public safety. To learn more, [click here](#).

## **14. Data Protection**

The Service will comply with data protection laws. To learn more, [click here](#).

## **15. Freedom of Information**

The Service is subject to the Freedom of Information Act, which provides a right of access to regulatory information held by the Service. To learn more, [click here](#).

**-End-**

## ***More on the Introduction***

1.1 This statement sets out the service that business and others being regulated by the Norfolk Fire and Rescue Authority (the Service) can expect from its regulatory and enforcement function and its appointed inspectors. It goes some way to satisfying the Regulators' Code by committing the Service and appointed inspectors to the principles of good enforcement with the assistance of effective procedures and clear guidance, which can be viewed by businesses and members of the public. [Procedures and Guidance](#)

1.2 This Enforcement Policy Statement has been prepared with regard to the following legislation and statutory guidance:

The Regulators Code - [\[more\]](#)

The Regulatory Enforcement and Sanctions Act 2008 - [\[more\]](#)

The Legislative and Regulatory Reform Act 2006 - [\[more\]](#)

The Legislative and Regulatory Reform (Regulatory Functions) Order 2007 - [\[more\]](#)

The Environment and Safety Information Act 1988 - [\[more\]](#)

The Regulatory Reform (Fire Safety) Order 2005 - [\[more\]](#)

The Licensing Act 2003 - [\[more\]](#)

The Explosive Regulations 2014 - [\[more\]](#)

The Petroleum (Consolidation) Regulations 2014 - [\[more\]](#)

1.3 The primary function of the regulatory part of the Service is to achieve safety in case of fire (in premise to which fire safety law applies).

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## ***More on Our Principles***

2.1 Fire safety regulation is founded on the principle that people should be kept safe in case of fire. We regulate to help secure this safety and through our regulation, we aim to provide a consistently high quality service to those we regulate. Our regulatory activity generally extends to premises in which there is a trade, business or other undertaking.

2.2 Non-compliance with fire safety law will mean that, in our view, people are at risk in case of fire. Where we identify people at risk in case of fire, we will respond

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proportionately to that risk; taking account of the likelihood and severity of the risk, in line with our service standards.

2.3 The Service believes in firm but fair enforcement of fire safety standards. We aim to achieve this by:

- proportionally applying the law to secure safety;
- being consistent in our approach to regulation;
- targeting our resources and enforcement action on the highest risk;
- being transparent about how we operate and regulate; and
- being accountable for our actions.

2.4 We will have regard to the Regulators Code when developing the policies and procedures that guide our regulatory activities. We will encourage and promote fire safety while minimising the associated costs of providing safety from fire.

2.5 We believe that by fostering good relationships with our business community and by working with them, we can improve public safety, business resilience, and can remove any unnecessary burdens of complying with fire safety law.

2.6 The Service will endeavour to engage with the business community, to seek their views about our policies and practices. (Details of engaging with us are available on request and on our website)

2.7 In the most serious cases of danger in case of fire, we will take immediate and decisive action to secure safety, for example by serving a prohibition notice that can stop people from using the premises.

For more information see [\[CFOA fire safety law web pages\]](#).

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### ***More on the way we approach regulation***

3.1 In accordance with the Regulators Code, the Service takes enforcement action (and imposes sanctions and penalties) to:

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- (a) change the behaviour of the offender;
- (b) change societal attitudes to the risks from fire;
- (c) eliminate financial gain or benefit from putting people at risk in case of fire;
- (d) exercise a proportionate response to the nature of the offence and the harm caused;
- (e) restore safety to premises where fire safety risks were found; and
- (f) encourage fire safety to be secured in future.
- (g) impose an appropriate sanction for the particular offender, which can include punishment through the courts (and the public stigma that should be associated with a criminal conviction);

[Click here for more information on the Regulators Code](#)

3.2 Avoiding fires is better than protecting people when fire occurs. Where fire is likely and / or the consequences of fire pose a hazard to people, it becomes necessary for us to take action (against the responsible person / duty holder) to reduce the risk. We have a wide range of enforcement action available to us. The actions we may take include:

- (a) no action;
- (b) providing advice;
- (c) informal action;
- (d) formal action (including enforcement, alterations and prohibition notices);
- (e) taking samples of dangerous materials or extracts of recorded information; and
- (f) securing information to prepare for prosecutions.

3.4 The enforcement actions listed above are not written in an absolute order of escalation. Enforcement action taken by the Service is scalable and appropriate to the risk to people in case of fire.

3.5 When formal enforcement action is necessary, each case will be considered on its merits. All enforcement decisions will be fair, independent and objective. They will not be influenced by issues such as ethnicity or national origin, gender, religious beliefs, political views or the sexual orientation of the suspect, victim, witness or offender. Such decisions will not be affected by improper or undue pressure from any source.

3.6 All enforcement activities, including investigations and formal actions, will always be conducted in compliance with the statutory powers of the officer and all other relevant legislation, including but not limited to the Police and Criminal Evidence Act 1984, the Criminal Procedure and Investigations Act 1996, the Human Rights Act 1998, and the Regulation of Investigatory Powers Act 2000, and in accordance with any formal procedures and codes of practice made under this legislation so far as they relate to the regulatory activity of the Service.

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### ***More on helping those we regulate***

4.1 We will help those responsible for delivering safety in case of fire (responsible persons and duty holders) to understand what is expected of them and what they should expect from the Service. Legal requirements will be clearly distinguished from best practice or non-statutory fire safety advice. We will publish guidance in a clear, accessible, concise, format using media appropriate to the target audience, in plain language.

4.2 (Details are available on request and on our website).

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### ***More on Targeting***

5.1 Our policy on inspections will be to focus primarily on those whose premises and activities give rise to the most serious risk to life in case of fire. In making an assessment of risk, we will take into account the fire safety record of those we regulate and the current risks to people in case of fire.

5.2 We will maintain a strategy that will identify and evaluate risks in premises as well as to the wider community and allocate resources to carry out inspections accordingly. We want to see fire safety provided in buildings and may take action against those regarded as putting people at risk in case of fire.

5.3 Earned recognition may be awarded to businesses for assurance of safety, including for example external verification of safety systems / practices.

5.4 Our Service Standards and plans including details of our risk-based approach to risk and are available on request.

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### ***More on our Accountability***

6.1 The Service is accountable to its community for its actions. This means we must have policies and standards against which we can be judged, and an effective and easily accessible mechanism for dealing with comments and for handling complaints.

6.2 (Details are available on request and on our website [\[Complaints\]](#))

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### ***More on the Principles of Enforcement Action***

7.1 In assessing necessary and proportionate enforcement action, consideration will be given to (amongst other things):

- the safety history at the premises,
- the history of operational attendances and false alarms at the premises,
- safety referrals to the premises from other authorities / interested parties,
- any Primary Authority relationship that might be in place with the business,
- the adequacy of fire safety arrangements at the premises,
- the attitude of the responsible person / duty holder to providing safety,
- statutory guidance,
- codes of practice, and
- legal advice.

7.2 Certain enforcement action, such as the decision to use a Simple Caution and / or the decision to investigate for prosecution, is further and specifically informed by those matters set out below at section 11

7.3 In every case, when we require action to remedy unsafe conditions, we will explain the nature of the unsafe conditions to those responsible and will confirm the same in writing.

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7.4 Because, subject to any letter or notice we give, work must be done to improve or secure the safety of people in case of fire; we will agree reasonable timescales within which the work must be completed that are agreed with those responsible.

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### ***More on Our Enforcement Action***

8.1 The Service will offer duty holders information and advice both verbally and / or in writing. This will include an explanation of why any specified work is necessary and a time period within which the specified work should be completed. Educating, informing and advising responsible persons and duty holders about their duties under fire safety legislation will form a fundamental element of our enforcement regime. The Service will fulfil its obligation under section 6(2) of the Fire and Rescue Services Act 2004 to give on request, advice on fire safety free of charge.

8.2 Where we find risks to safety, we may deal with them by informal means or (where appropriate) we may take formal action by serving alterations, enforcement and / or prohibition notices. We may also issue Simple Cautions, and (in the most serious cases) may prosecute. Before formal enforcement action is taken, inspectors will provide the person responsible with an opportunity to discuss the circumstances of the case and, if possible, resolve points of difference without recourse to formal enforcement action (unless immediate action is required to reduce the risk to life or to prevent evidence from being destroyed).

8.3 In certain circumstances, after evaluating the safety at premises, no action may be required. This will be the case when the safety of people in case of fire has been adequately secured.

8.4 If the likelihood of fire is high and the consequences in case of fire are low, advice may be given on how the likelihood can be reduced. Advice may also be given where the consequences of fire might cause harm to people but can be simply avoided. Advice can also be given to point out good practice or to

signpost business continuity advice or other business protections, for example protection from flooding.

- 8.5 Where the likelihood of fire is low / medium or the consequences of a fire are slight, informal action will be taken. Informal action will take the form of a letter, pointing out that people are at risk in case of fire, where in the building they are located and what has led to them being put at risk as well as what should be done to provide safety and how to prevent the same danger from recurring. Informal action may also be taken, if those responsible have displayed clear intentions to undertake corrective action. Failure to respond to informal action can result in escalation to formal enforcement action.
- 8.6 Formal action will take the form of serving a Notice (alterations, enforcement, and / or prohibition notices). Formal action will be taken when the consequences of fire are such that people are likely to be harmed, suffer serious injury or death. It can require specific action to be taken or certain activities to cease.
- 8.6.1 Where a reasonable known change to premises or to the use of premises could result in a significant increase in the risks to people on the premises, we may serve an Alterations Notice, which requires the responsible person / duty holder to notify us, before making that known change.
- 8.6.2 Enforcement Notices require improvements in safety and will point out: that people are at risk in case of fire; where in the building they are located; and what has led to them being put at risk, as well as what should be done to provide safety and how to prevent the same danger from recurring. Enforcement Notices include a reasonable period of time for safety to be put in place. Failure to respond to a formal Notice can result in escalation to an investigation for prosecution.
- 8.6.3 Where immediate action is considered necessary to keep people safe from fire, a Prohibition Notice, which can prohibit or restrict the use of premises, can be served. An explanation of why such action is required will be given at the time and confirmed in writing. Whereas a Prohibition Notice requires action to remove imminent and immediate risks in case of fire, an Enforcement Notice might also be served to deal with less imminent risks in case of fire.

8.7 Fire Safety law gives power to warranted inspectors to take samples of dangerous materials or extracts of recorded safety information and documents. When we take materials or documents we will provide an appropriate receipt.

8.8 In the most serious of cases we will gather information and conduct an investigation to prepare for a prosecution. The decision to prosecute a case will be taken by those with authority to do so in accordance with our Scheme of Delegations.

8.9 All our members of staff that make enforcement decisions will be required to follow the Regulators Code.

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### ***More about After Enforcement Action***

9.1 When the Service takes enforcement action we will discuss what is required to achieve safety for relevant persons with the responsible person / duty holder (taking into account the circumstances of the case, if they have been explained to us).

9.2 The Service will clearly explain any advice, required actions or decisions taken at the time of our visit and will be willing to discuss such matters on any future occasion to ensure those responsible have clarity of what must be done.

9.3 Our letters and notices will provide details in writing of what must be done and how to appeal against any of our regulatory decisions. Our letters and notices will also explain what will happen next, especially if you do not undertake the work. Our web-site has details of how to complain about our conduct, if you should feel it necessary. [\[Complaints\]](#)

9.4 We encourage those responsible for providing safety in case of fire to contact us, especially if there are any questions or comments about our regulatory activity. We will also maintain regular communication (where required) until safety has been provided.

## ***More on a Failure to Comply With Requirements***

10.1 Rights of and routes to appeal will be clearly set out in writing and issued with our letters.

10.2 The failure to comply with an alterations, enforcement or prohibition notice constitutes an offence and may result in prosecution.

10.3 We can withdraw alterations, enforcement and prohibition notices at any time but they will generally be deemed to be in force until such time as the notice is complied with, withdrawn or cancelled by the court.

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## ***More on Simple Cautions and Prosecution***

11.1 There are a number of offences that can be committed under Fire Safety law.

Among the foremost of these are failure to comply with a formal notice and failing to provide safety in case of fire to such extent that one or more people are put at risk of death or serious injury in case of fire.

11.2 The Service can deal with offenders through prosecution and Simple Cautions.

These legal actions are important ways to bring to account those responsible for alleged legal offences. Where appropriate, we will use one of these measures in addition to issuing a formal notice.

11.3 A prosecution may be taken following full consideration of the many factors arising for the alleged breaches of the law. Penalties for offences are awarded by the courts and can include fines, imprisonment or both.

11.4 A Simple Caution will only be used where a prosecution could be properly brought and there is a realistic prospect of conviction. A Simple Caution includes a written submission from the person responsible that an offence has been committed.

11.5 A record of a Simple Caution will be kept on file for three years and if a conviction for a further offence is brought within that period, the written submission of the previous offence will be introduced to the court for consideration.

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### ***More about the Other Duties of the Service***

13.1 In addition to Fire Safety law the Service is also responsible for the following regulations.

- Licensing authority for the Petroleum Consolidation Regulations 2014
- The Explosive Regulations 2014.

13.2 The Service can request a review of a premises license under Section 51 of the Licensing Act 2003. The options available to the Licensing Committee are:

- i. Modification of the conditions of the Licence
- ii. Exclusion of Licensable activity from the scope of the Licence
- iii. Removal of the Designated Premises Supervisor
- iv. Suspension of the Licence for a period not exceeding three months
- v. Revocation of the Licence
- vi. Issue of a Warning Letter
- vii. No Action

13.3 The Service enforces the requirements of Explosive Regulations 2014 through application of the Health and Safety at Work (etc) Act 1974 and the serving of improvement notices and prohibitions orders. [Regulating and Enforcing Health and Safety](#)

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### ***More on Data Protection***

14.1 The Service will comply with the principles of the Data Protection Act 1998 governing the use of personal data received or obtained and will respect the rights and freedoms of those individuals when processing their details. The following document Information Management Strategy lays out our strategic

approach to meeting these legal requirements. (Details are available on request and on our website [\[Information Management Strategy\]](#))

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### ***More on Freedom of Information***

15.1 Under the Freedom of Information Act 2000, individuals are given 'a general right of access to information held by public authorities in the course of carrying out their functions subject to certain conditions and exemptions'. Under Section 19 of that Act, public authorities are required to produce a publication scheme setting out details of the information routinely published or made available, how the information is made available (in hard copy and on-line), and whether it is available free of charge or on payment.

15.2 Details of The Service's publication scheme are available on request and on our website [Publication Scheme](#).

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### ***The Regulators Code***

The Regulators Code is a statutory code of practice for regulators and makes six broad requirements:

- i. To carry out their activities in a way that supports those they regulate to comply and grow;
- ii. To provide simple and straightforward ways to engage with those they regulate and to hear their views;
- iii. To base their regulatory activity on risk;
- iv. To share information about compliance and risk;
- v. To ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply; and
- vi. To ensure their approach to regulatory activity is transparent.

The service has taken regard of the Regulators Code in producing this policy statement.

For the full version click here: [‘The Regulators Code’](#)

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### ***The Regulatory Enforcement and Sanctions Act***

The Regulatory Enforcement and Sanctions Act (The RES) established The Local Better Regulation Office (later renamed as the Better Regulation Delivery Office (BRDO)). It also imposed a duty on Regulators to: (a) have regard to any guidance issued by BRDO, (b) a duty to comply with guidance where the Regulator is directed to do so by BRDO, and (c) a duty to have regard to any list of enforcement priorities published by BRDO. As a listed Regulator, the Service is committed to these duties.

For the full version click here: [‘The Regulatory Enforcement and Sanctions Act’](#)

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### ***Legislative and Regulatory Reform Act***

Part 2 of the Legislative and Regulatory Reform Act, requires the Service to have regard to the Principles of Good Regulation. We recognise that our regulatory activities should be carried out in a way which is: (i) proportionate; (ii) accountable; (iii) consistent; (iv) transparent; and (v) targeted to situations which need action.

When we exercise a regulatory function, which for the Service includes: the Regulatory Reform (Fire Safety) Order, [\[The Petroleum \(Consolidation\) Regulations 2014, Explosives Regulations 2014 and the Health and Safety at Work \(etc\) Act\]](#) we have regard to the Regulators Code.

For the full version click here: [‘Legislative and Regulatory Reform Act’](#)

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### ***The Legislative and Regulatory Reform (Regulatory Functions) Order 2007***

The Legislative and Regulatory Reform (Regulatory Functions) Order imposes a duty on the Service to have regard to the Regulators' Code when determining general policies or principles. It requires that the regulatory activities of the Service are carried out in a way which is transparent, accountable, proportionate and consistent, as well as being targeted only at cases in which action is needed.

For the full version click here: '[Legislative and Regulatory Reform \(Regulatory Functions\) Order](#)'

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### ***The Environment and Safety Information Act***

The Environment and Safety Information Act requires the Service to make a publicly accessible record of formal enforcement action that we have taken.

For the full version click here: '[The Environment and Safety Information Act 1988](#)'

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### ***The Regulatory Reform (Fire Safety) Order***

The Regulatory Reform (Fire Safety) Order 2005 principally imposes a general duty on responsible persons and duty holders to take general fire precautions to keep people safe in case of fire and establishes enforcing authorities to enforce the provisions of the Order. The Service is an enforcing authority under the Order and is empowered to inspect premises and serve notices to improve safety standards (among others).

For the full version click here: '[The Regulatory Reform \(Fire Safety\) Order](#)'

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### ***The Licensing Act 2003***

The Licensing Act establishes the Service as a 'responsible authority' with whom the Licensing Authority must consult in connection with Licensable activities, including the sale or supply of alcohol or the provision of regulated entertainment or late night refreshment. The licensing objectives are to promote: the prevention of crime and disorder; public safety; the prevention of public nuisance; and the protection of children from harm.

For the full version click here: '[The Licensing Act](#)'

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### ***The Explosive Regulations 2014***

The Service is the local authority for the purposes of dealing with applications for registration or for a licence to store explosives (under certain prescribed conditions).

For the full version click here: [The Explosive Regulations 2014](#)

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### ***The Petroleum (Consolidation) Regulations***

The Service is the 'petroleum enforcement authority' and can grant 'storage certificates' for premises at which petrol is dispensed, and enforces The Petroleum (Consolidation) Regulations in premises to which those regulations apply.

For the full version click here: '[The Petroleum Consolidation Regulations](#)'

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## Norfolk County Council Highways Enforcement Protocol

### 1.0 Introduction

The Highways area teams receive a significant number of customer complaints each year relating to enforcement matters. These range from trading on the highway, such as car sales on verges, caravans / motorhomes being parked on the highway, blocked public footpaths and trailer or van mounted advertising hoardings.

The CES enforcement policy is followed, although priority is given to highway safety matters. Increasingly, the teams work with District and Borough Councils and on a more local level with Town and Parish Councils to achieve successful outcomes.

In the majority of cases, the legal processes relating to enforcement are well established, such as dealing with public rights of way issues under various sections of the Highways Act. The following processes are less well established and have been the subject of recent Local Member interest.

### 2.0 Vehicles for sale on the Highway

When a complaint is received or issue identified, the Highways Area team will notify the owner and ask them to remove it immediately. A phone call will suffice provided that a record is kept of the time and date.

The Highways Area team will re-inspect the site at least twice within the next calendar month, taking photos and noting the date and time of the inspections. If the problem persists after 4 weeks, the Highway Engineer and Area Manager will assess situation and identify a way forward.

### 3.0 Advertising Boards and Trailers on the Highway

At joint authority meeting, which included NPLaw, it was concluded that the most appropriate way forward in addressing the issue of illegal advertising boards and trailers was to use the Town & Country Planning Act 1990 rather than the Highways Act 1980, as this offered the best chance of a successful prosecution combined with deterrent fines. In these cases, District and Borough Councils would take be the Lead Authority.

However, where a complaint is received and the issue identified is likely to cause a danger to other highway users, the Highways Area team will;

**Commented [NS1]:** This section has been amended as a result of consultation feedback – see committee report

- Check whether route is subject to an advertising ban by-law (generally District/Borough Council imposed)
- Laminated notices can be attached to towable hoardings if they are found to be on Highway land, illegal and causing a safety issue for highway users.
- If the contact details for the trailer owner are known, they can be contacted direct to remove the trailer. This can be by either telephone or the use of letter
- If letter is sent or contact details are unknown, a formal notice must be attached to the advertising hoarding. All fees charged should recover all costs incurred including Officer time, administration costs and hoarding collection costs.
- Officers can request the removal of unauthorised A Boards. Photographic records can be taken and re-inspection may be required
- Request for removal, by formal letter, should be made to the offending party, in their absence, immediate removal can be arranged and cost recovered.
- If there is a significant problem with a particular shopping area, precinct or high street it may be helpful for the Highways Engineer to arrange a meeting with the traders, town Councillors or Town Centre Managers to explain the procedure and our Duty of Care for all highway users
- In exceptional cases Area Managers can consider whether offenders should be prosecuted in Magistrates Court.

## 1.0 Introduction

In November 2011 Norfolk was designated as a Civil Enforcement Area and, following the commencement of the Disabled Persons' Parking Badges Act 2013, local authority enforcement officers are now able to inspect and retain a blue badge without police presence, if they have reasonable grounds for believing that an offence has occurred.

Wrongful or misuse of a Blue Badge is a strict liability offence. The County Council employs a Blue Badge Investigator to carry out follow up investigations and prepare the evidence in support of enforcements – including giving written warning, or recommendations for formal prosecutions or simple cautions.

The Community and Environmental Services Enforcement Policy is followed, and this protocol is to be read in conjunction with that over-arching document. The Blue Badge Investigations service forms part of the Infrastructure and Development Section. There is a close working arrangement with Trading Standards, who process the legal disposals, and with the Customer Services Centre (CSC) who administer the Blue Badge Scheme.

There is close liaison with District Councils who employ Civil Enforcement Officers (CEO), including guidance on the policy requirements for evidence-gathering and operational arrangements.

The misuse of the Blue Badge Scheme can have serious consequences for legitimate users by denying them access to essential services and facilities. Norfolk County Council are committed to reducing the level of misuse and increasing compliance with the scheme in pursuit of our traffic management duties and aims, and to support vulnerable people in Norfolk.

## 2.0 Identifying Offences

Blue Badge Offences are identified in 3 ways –

- Reports by members of the public via the online form or the CSC
- Badge Inspections and seizures by CEOs as part of normal patrol duties.
- Badge Inspections and seizures by the Blue Badge Investigator during specific patrols.

The County Council publicised the commencement of work by the Blue Badge Investigator and continues to publish on its website the results of enforcement action where a person is taken to court.

<https://www.norfolk.gov.uk/care-support-and-health/disabilities/blue-badges/blue-badge-enforcements>

We have provided guidance to Civil Enforcement Officers who have the power to inspect and retain Blue Badges. This includes when and when not to inspect/retain badges, what offences are likely to have been committed. How they should interact with members of the public in what is a stressful situation and the type of questions to ask to gather evidence.

### **3.0 Investigation Process**

All investigations into alleged offences are conducted in accordance with statutory powers, relevant legislation and codes of practice.

Persons suspected of committing an offence will always where possible be formally interviewed in accordance with Police and Criminal Evidence Act 1984 (PACE). This is undertaken in 3 ways –

- Roadside interview by the Blue Badge Investigator
- Interview in person with the Blue Badge Investigator
- Postal Interview

The method chosen is dependent on how the alleged offence was identified.

The opportunity to demonstrate a statutory defence and offer mitigating information is, where possible, always offered during the PACE interview. Unsolicited information may also be recorded and used as part of the decision making process. We will also give an additional opportunity to offer mitigation following a road side interview by writing to the alleged person providing them with a copy of their responses.

### **4.0 Disposal**

We are committed to giving advice, guidance and support to all those persons suspected of committing an offence and will do so at all stages of an investigatory process. Mitigating information where supplied will be used during the decision making process but, a formal disposal may still be the likely outcome.

There are four methods of disposal available to use in relation to the misuse of a Blue Badge.

1. No further Action (NFA) – the alleged offence may fall outside our jurisdiction, there may be insufficient evidence or formal action not in the public interest.
2. Written warning – The alleged offence was within our jurisdiction but there is insufficient evidence or formal action would not be in the public interest.
3. Simple Caution – In certain cases a simple caution may be offered instead of prosecution. When offering a simple caution we will comply with relevant Home Office Circulars and the offender will be made aware of the impact the simple caution may have on their life.
4. Prosecution - We may prosecute using different pieces of legislation depending on what offences are alleged. The legislation we use is;
  - Section 115/117 of the Road Traffic Regulation Act 1981
  - The Fraud Act 2006
  - Forgery and Counterfeiting Act 1981
  - The Theft Act 1968
  - Proceeds of Crime Act 2002

A person could also be issued with a penalty charge notice for any parking contravention that occurs.

In cases where a badge holder lets a third party use a badge, the issuing local authority can withdraw the badge under regulation 9(2)(a) of the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000 after a relevant conviction has been obtained.

In certain circumstances involving prolific offenders Courts are able to disqualify drivers for a period of time under section 46 of the Powers of Criminal Courts (Sentencing) Act 2000.

# Communities Committee

<b>Report title:</b>	<b>Development of Norfolk Fire and Rescue Integrated Risk Management Plan 2020-2023</b>
<b>Date of meeting:</b>	<b>10 October 2018</b>
<b>Responsible Chief Officer:</b>	<b>Tom McCabe – Executive Director, Community and Environmental Services</b>
<b>Strategic impact</b>	
The Integrated Risk Management Plan is the key strategic document for the Fire and Rescue Service. It sets out the vision for the service and how we will achieve it, and as such it drives the way the service is organised.	

## Executive summary

In accordance with the Fire and Rescue National Framework for England 2018, all Fire and Rescue Authorities are required to produce a local Integrated Risk Management Plan (IRMP) that sets out the authority's strategy, in collaboration with other agencies, for reducing the commercial, economic and social impact of fires and other emergency incidents.

Norfolk Fire and Rescue Authority's current IRMP<sup>1</sup> sets out the service strategy for the period 2016-2020. Therefore, there is a need to develop a new IRMP for 2020 onwards.

Work to develop the new IRMP is in the initial stages. This paper updates the Committee on this work and provides an opportunity to consider and shape the scope of the work that will be carried out over the next 18 months to enable a new IRMP to be approved by the County Council early 2020.

### Recommendations:

- 1. Approve the scope of work to develop an IRMP for 2020 onwards, as set out in para 2.2.2 of the report.**
- 2. To establish a Member Task and Finish working group to support and oversee the IRMP development process.**
- 3. Approve the proposed terms of reference for the Member Task and Finish working group, as set out in appendix A.**

## 1. Planning context

- 1.1. In accordance with the Fire and Rescue National Framework for England 2018, all Fire and Rescue Authorities are required to produce a local Integrated Risk Management Plan (IRMP) that sets out the authority's strategy, in collaboration with other agencies, for reducing the commercial, economic and social impact of fires and other emergency incidents.

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<sup>1</sup> <https://www.norfolk.gov.uk/safety/norfolk-fire-and-rescue-service/about-nfrs/publications/integrated-risk-management-plan>

## 1.2. The plan must:

- Reflect up to date risk analyses including an assessment of all foreseeable fire and rescue related risks that could affect the area of the authority;
- Demonstrate how prevention, protection and response activities will best be used to prevent fires and other incidents and mitigate the impact of identified risks on its communities, through authorities working either individually or collectively, in a way that makes best use of available resources;
- Outline required service delivery outcomes including the allocation of resources for the mitigation of risks;
- Set out its management strategy and risk-based programme for enforcing the provisions of the Regulatory Reform (Fire Safety) Order 2005 in accordance with the principles of better regulation set out in the Statutory Code of Compliance for Regulators, and the Enforcement Concordat;
- Cover at least a three-year time span and be reviewed and revised as often as it is necessary to ensure that the authority is able to deliver the requirements set out in this Framework;
- Reflect effective consultation throughout its development and at all review stages with the community, its workforce and representative bodies and partners; and
- Be easily accessible and publicly available.

1.3. In addition to developing the IRMP to cover the period for 2020 to 2023, there will be an opportunity to identify a 10 year forward view. This forward view will enable Norfolk Fire and Rescue Service to accurately plan capital expenditure and any necessary internal service change programmes

## 2. Developing Norfolk's new IRMP

### 2.1. Timescales

2.1.1. The IRMP planning process follows a six step approach:

**Step 1: Scope** – identification of all factors impacting on the FRS.

**Step 2: Assess Risk** – prioritising scope in accordance with overall risk and determine what level of reduction is required.

**Step 3: Develop Strategies** – identification of required resources to reduce risk.

**Step 4: Delivery** – a draft IRMP will need to be consulted on and subsequently delivered in Service.

**Step 5: Monitor** – performance against strategies.

**Step 6: Review** – identifying success and areas for further development to inform scoping of subsequent IRMPs.

2.1.2. The key milestones are:-

- Draft IRMP produced by September 2019
- Statutory public consultation on draft IRMP starts October 2019 (this will be carried out alongside the wider County Council consultation on budget proposals)



- Approval of final IRMP by Full Council in February 2020

## 2.2. **Scope**

- 2.2.1. For the new IRMP, it is proposed to take a broad approach to enable key service factors to be fully assessed and considered, and taken into account. In particular, the process will focus identifying the range of community risks in Norfolk and how resource can be best deployed to address and mitigate these risks.
- 2.2.2. The following areas are proposed to be specifically considered as part of the IRMP process:-
  - a) Identify opportunities to strengthen the capability and capacity of our statutory fire and community safety provision.
  - b) Examine the opportunity for NFRS to contribute to improving patient outcomes through emergency medical response and prevention.
  - c) Model fire station locations in relation to new and future infrastructure and housing development.
  - d) Identify and model opportunities for optimising estates and resources.
  - e) Review our emergency service models, response standards and capabilities to identify whether they fully reflect the communities and the geography of Norfolk, Norfolk's Community Risk Register and the National Risk Register.
  - f) Review the strategic outcomes and financial sustainability of our Youth Engagement services.
  - g) In the absence of grant funding, model the capabilities and capacity required for responding to and securing safe systems of work for water rescues in Norfolk.
  - h) Identify opportunities for NFRS to further help in delivering our County Councils 20 year vision and opportunities to contribute to demand reduction through the Local Service Strategy / Norfolk Futures.
  - i) Identify further opportunities for blue light and other agency collaboration to meet the requirements of the Policing and Crime Act 2017.
  - j) Consider the national fire reform agenda and the capacity of Norfolk Fire and Rescue to respond to it.

## 2.3. **Member Working Group**

- 2.3.1. Given that the IRMP is the key strategic document for the Authority, and that a broader approach is proposed, it is recommended that a Member Task and Finish working group is established to support and oversee the IRMP process.
- 2.3.2. It is suggested that the working group should consist of four to six Members with the aspiration that at least three political parties are covered by the membership.

## 3. **Financial Implications**

- 3.1. There are no financial implications arising from this report and the IRMP process can be carried out within available budgets.

## **4. Issues, risks and innovation**

- 4.1. Norfolk Fire and Rescue Service have a small fire intelligence and planning department and there is not sufficient capacity to develop the IRMP with just this resource. There will be a need for some support from relevant corporate services to ensure that the IRMP is developed using robust and appropriate data, including wider demographic, social and economic data. Appropriate arrangements are being put in place to secure this support.
- 4.2. Consideration will be given to whether any external technical or professional support is needed, for example to help model risk and check and validate key areas of assessment.

### **Officer Contact**

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

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## **Suggested terms of reference for the proposed IRMP Member Task and Finish Working Group**

- To consider the full range of fire related community risks in Norfolk
- To consider the wider aspect of the Fire and Rescue Service Reform agenda
- To help shape the development of the 2020/23 IRMP for the Fire and Rescue Authority.
- Identify proposals to be put forward to the Communities Committee for public consultation.

# Communities Committee

<b>Report title:</b>	<b>Strategic and Financial Planning 2019-20 to 2021-22</b>
<b>Date of meeting:</b>	<b>10 October 2018</b>
<b>Responsible Chief Officer:</b>	<b>Tom McCabe – Executive Director, Community and Environmental Services</b>
<b>Strategic impact</b>	
<p>This report provides an update on the Service Committee's detailed planning to feed into the Council's budget process for 2019-20. The Council's budget setting activity is informed by a range of documents including the Medium Term Financial Strategy, and the Council's Vision and Strategy. Together, these help to set the context for medium term service and financial planning, which support the development of a robust, balanced budget for 2019-20.</p> <p>In particular, the report sets out Communities Committee's specific proposals for savings in the context of the approach to developing options that was agreed at the Committee's meeting in September. Savings are now presented for consideration and recommendation to Policy and Resources Committee, which will agree the savings to go into the consultation process for 2019-20 budget setting later in October.</p> <p>The report also provides the latest information about the Council's overall budget planning position, including the forecast budget gap for 2019-20 to 2021-22.</p>	

## Executive summary

This report forms part of the strategic and financial planning framework for Service Committees. It provides an update on the Council's budget setting process, and sets out details of the actions required by Service Committees to enable the Council to set a balanced budget for 2019-20. The report details the link between the Council Strategy, the Norfolk Futures transformation programme, and the development of transformation and savings plans relevant to this Committee.

### Recommendations

Communities Committee is recommended to:

- 1) Consider the content of this report and the continuing progress of change and transformation of Communities services;**
- 2) Note the Council's latest budget assumptions and pressures, and the resulting revised forecast budget gap of £45.322m, which has been updated by Policy and Resources Committee to reflect the latest available information and following Service Committee input in September (paragraph 4.3 and table 1);**
- 3) Note the revised council tax planning assumptions set out in table 2;**
- 4) Approve the proposed savings for the 2019-20 budget round for recommendation to Policy and Resources Committee in October (table 5), in particular confirming those savings that are recommended to require consultation as set out in paragraph 6.4.**
- 5) Consider and identify any further key areas of risk in relation to 2019-22 budget planning for the Committee's budgets, including any additional pressures and the robustness of existing planned savings as set out in table 4, noting that any changes may impact on the overall budget gap and will require additional offsetting savings to be found;**
- 6) Note the budget planning timetable (section 7).**

## **1. Introduction**

- 1.1. The County Council agreed the 2018-19 Budget and Medium Term Financial Strategy (MTFS) to 2022 at its meeting 12 February 2018, at the same time as it agreed a new Strategy for the County Council, Norfolk Futures. The Council has a robust and well-established framework for strategic and financial planning which updates the MTFS position through the year to provide Members with the latest available financial forecasts to inform wider budget setting work across the organisation.
- 1.2. In July 2018, Policy and Resources Committee considered how the 2019-20 budget planning process would be aligned with the Council's Strategy, Norfolk Futures. The Committee agreed: budget assumptions and key areas of risk in relation to 2019-22 budget planning, the budget planning principles and guidance for 2019-20, and commissioned Service Committees to begin developing savings proposals.
- 1.3. In September, Communities Committee:
  - Agreed the proposed approach and key themes to focus on in developing savings proposals for 2019-20 to 2021-22, including how the principles of the Council's Strategy, Norfolk Futures, would inform and shape budget planning activity, having regard to the existing savings for 2019-20 and beyond which were agreed as part of the 2018-19 budget round; and
  - Commissioned officers to develop detailed savings proposals to be presented to the Committee for consideration at this meeting in order to help close the forecast 2019-20 to 2021-22 budget gap.
- 1.4. This report builds on the position reported to Service Committees in September and represents the next stage of the Council's budget planning process. In particular, the paper sets out details of the saving proposals identified for 2019-20 and subsequent years, for the Committee's consideration.

## **2. County Council Strategy and Norfolk Futures**

- 2.1. The report to Policy and Resources Committee sets out how the Council's Vision and Strategy will inform the development of the 2019-20 Budget.
- 2.2. Caring for our County, the vision for Norfolk, approved by Members in February 2018, outlines the Council's commitment to playing a leading role in:
  - Building communities we can be proud of;
  - Installing infrastructure first;
  - Building new homes to help young people get on the housing ladder;
  - Developing the skills of our people through training and apprenticeships;
  - Nurturing our growing digital economy; and
  - Making the most of our heritage, culture and environment.
- 2.3. The Council's Strategy for 2018-2021 – Norfolk Futures – will provide the mechanism to enable these ambitions for the County across all of its activities.
- 2.4. Norfolk Futures will deliver these transformational commitments in a context where demand for our services is driven both by demographic and social trends,

and where increasingly complex and more expensive forms of provision are becoming prevalent.

2.5. Norfolk Futures is guided by four core principles that will frame the transformation we will lead across all our work:

- Offering our help early to **prevent and reduce** demand for specialist services;
- **Joining up** work so that similar activities and services are easily accessible, **done once and done well**;
- Being **business-like** and making best use of **digital technology** to ensure value for money; and
- Using evidence and data to **target our work** where it can make the most difference.

2.6. Under the banner of Norfolk Futures we will deliver sustainable and affordable services for the people who need them most. The whole Council needs to change to keep up with increasing demands and ever better ways of working.

2.7. These principles frame the transformation that we must lead across all our services and activities. This is all underpinned by evidence and political support, to change how the Council works and how we work with the people of Norfolk.

2.8. By 2021 the strategy and underpinning Service Plans will have moved the Council towards a more sustainable future with affordable, effective services. This means that we will have radically changed the ways we do some things. We will know our citizens and manage their needs effectively using the best evidence to enable the most appropriate outcomes. We will be working jointly across the Council on our biggest challenges by default, and changing the way we work to reflect new technology and ways of working. This will enable us to work smarter, better and plan long term to be the Council the County needs.

2.9. These principles frame the transformation across all our services and activities and we currently have 7 priorities to help us to deliver the strategy:

- Safer Children and Resilient Families;
- Promoting independence for Vulnerable Adults;
- Smarter Information and Advice;
- Towards a Housing Strategy;
- Digital Norfolk;
- Local Service Strategy; and
- Commercialisation.

2.10. Further information about the Norfolk Futures priorities relevant to this Committee, and how they will inform and support 2019-20 budget planning, are set out below.

### **3. Service Transformation**

3.1. The overall vision for Communities Committee services was set out in strategic financial planning report discussed by the Committee in September. In terms of service transformation, as also set out in the September report, the focus of our approach is as follows.

#### **Registration Services (Managing Director's Department)**

- Continuing to drive down the cost of accommodation by considering more cost effective options for offices and ceremony suites.
- Continuing to develop staff competence and confidence to reduce time-consuming errors.
- Developing partnerships with registrars across the region to make more efficient use of time and reduce the bureaucratic burden on customers.
- Pro-actively managing sickness absence to reduce the need for temporary cover.

## **Community and Environmental Services Department (CES)**

CES has responsibility for the delivery of a wide range of services; there is no hierarchy as each area has a vital role to play in achieving better outcomes for Norfolk. Whilst our audience is “universal”, many of our services are now focused on supporting the principles and priorities laid out in Norfolk Futures, and in particular, the social care demand management agenda. We can proactively provide information and advice to help people to make better choices that enable them to live fulfilling independent lives.

We continue to provide vital services to ensure that our residents are safe, both in their own homes and when out and about in our County. Broadly, CES services are focussed around the following outcomes:-

- Safety and harm reduction
- Proactive prevention
- Providing choices
- Raising aspirations
- Improving outcomes and economic growth

In terms of transformation, as discussed at the September meeting, the broad approach across CES is focussed around:-

- Cost reduction
- Collaboration
- Development

## **4. 2019-20 Budget Planning**

4.1. The Medium Term Financial Strategy (MTFS) was agreed in February 2018 including £78.529m of savings and with a remaining gap of £94.696m. The MTFS provided the starting point for the Council’s 2019-20 Budget planning activity. Full details of cost pressures assumed in the Council’s MTFS are set out in the 2018-19 [Budget Book](#).<sup>1</sup> The September report to this committee set out:

- Budget planning principles 2019-20
- Budget assumptions 2019-20
- Council tax assumptions
- Budget risks identified
- Indicative savings requirements

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<sup>1</sup> <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/budget-and-council-tax/budget-book-2018-22.pdf?la=en>

## 2018-19 budget position

- 4.2. The latest information about the 2018-19 budget position is set out in the budget monitoring report elsewhere on the agenda. Budget planning for 2019-20 is based on the assumption that the 2018-19 Budget is fully delivered (i.e. that all savings are achieved as planned and there are no significant overspends). Further pressures in the forecast 2019-20 Budget have been provided for as detailed later in this report.

## Latest forecast budget gap 2019-20 to 2021-22

- 4.3. In September, following feedback from Service Committees, Policy and Resources Committee then considered the latest planning information and an updated budget position. The current position, taking into account the changes agreed by Policy and Resources Committee, and assuming that new savings can be identified at the required level of £22.089m for 2019-20, is shown in the table below. Changes in the Council's funding assumptions have mitigated some of the identified pressures.
- 4.4. Assuming that collectively Service Committees are successful in identifying savings at the indicative level required for 2019-20 (as identified in the July Policy and Resources report), the latest gap position indicates **a reduced forecast gap of £45.322m for the period 2019-20 to 2021-22, with a small £0.609m gap remaining to be closed in 2019-20.**
- 4.5. Policy and Resources Committee will receive a further update on the overall gap position for the County Council in October. The budget position and the associated assumptions are kept under continuous review, and will be updated to reflect any changes arising from the Government's Autumn Budget, or further information about the Council's funding position as it becomes available up until budget-setting by County Council in February.



**Table 1: Latest forecast budget gap 2019-20 to 2021-22<sup>2</sup>**

	<b>2019-20</b>	<b>2020-21</b>	<b>2021-22</b>	<b>Total</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>
<b>Forecast gap as reported to September Service Committees</b> (agreed at 16 July 2018 Policy and Resources)	<b>22.089</b>	<b>48.454</b>	<b>24.153</b>	<b>94.696</b>
<b>Pressures</b>				
Children's Services budget pressures including LAC	5.000	2.000	2.000	<b>9.000</b>
Children's Preventing Radicalisation pressure	0.120	0.000	0.000	<b>0.120</b>
Children's Centres saving delay	1.700	-1.700	0.000	<b>0.000</b>
Adult market pressures	2.000	0.000	0.000	<b>2.000</b>
Leap year pressure in Adult Social Care	0.550	-0.550	0.000	<b>0.000</b>
Property savings (including income targets) at risk	1.500	1.000	0.500	<b>3.000</b>
Pressure from 2019-20 national pay award and associated salary scale changes	0.345	0.000	0.000	<b>0.345</b>
<b>Total new pressures</b>	<b>11.215</b>	<b>0.750</b>	<b>2.500</b>	<b>14.465</b>
<b>Proposed mitigations</b>				
Collection Fund	-4.688	0.000	0.000	<b>-4.688</b>
Council tax tax base (additional 1.5%)	-5.918	-6.305	-6.341	<b>-18.564</b>
MRP pressure reprofiled	0.000	-5.000	5.000	<b>0.000</b>
Additional capital receipts	0.000	-10.000	0.000	<b>-10.000</b>
2% Council Tax increase 2021-22	0.000	0.000	-8.498	<b>-8.498</b>
<b>Total mitigations</b>	<b>-10.606</b>	<b>-21.305</b>	<b>-9.839</b>	<b>-41.750</b>
Delivery of 2019-20 savings target (as identified at 16 July 2018 Policy and Resources)	-22.089	0.000	0.000	<b>-22.089</b>
<b>Latest forecast gap for planning purposes</b> (24 September 2018 Policy and Resources)	<b>0.609</b>	<b>27.899</b>	<b>16.814</b>	<b>45.322</b>

4.6. In view of the budget gap and the difficulty in identifying future year savings, Policy and Resources Committee has been recommended to consider incorporating a planning assumption that council tax in 2021-22 be increased by 1.99% as shown in the table above. The level of council tax is ultimately subject to agreement by Full Council each year, and there will be an opportunity to consider the required level of council tax in light of any future Government announcements relating to the Fair Funding Review and Comprehensive Spending Review. The MTFs planning position set out in this paper is therefore based on the following council tax increase assumptions (and also assumes there is no scope to increase the Adult Social Care precept in 2019-20 under the current terms set out by Government):

<sup>2</sup> As presented to Policy and Resources Committee September 2018 (please note this does not reflect any amendments arising from Policy and Resources Committee decisions in September).

**Table 2: Council Tax assumptions (as per Policy and Resources Committee 24 September 2018)**

	<b>2019-20</b>	<b>2020-21</b>	<b>2021-22</b>
Assumed increase in general council tax	2.99%	1.99%	1.99%
Assumed increase in Adult Social Care precept	0.00%	0.00%	0.00%
<b>Total assumed council tax increase</b>	<b>2.99%</b>	<b>1.99%</b>	<b>1.99%</b>

- 4.7. The planned 2.99% increase in council tax is based on the current understanding of updated assumptions and flexibility offered by the Government in the 2018-19 local government finance settlement. Any reduction in this increase will require additional savings to be found. The assumed council tax increases are subject to Full Council’s decisions on the levels of council tax, which will be made before the start of each financial year.
- 4.8. Assumptions around increases in the council tax base have been increased to 2.0% (from the original assumption of 0.5% annual growth), based on recent trends.

### **Key budget risks 2019-20**

- 4.9. Uncertainties remain about a number of items **which have not currently been reflected in the budget planning assumptions**, but which could potentially result in an increase in the overall gap. As a result, additional pressures, which have not currently been provided for, may arise in 2019-20 relating to:
- Further pressures arising within Service Committee budgets including:
    - SEN High Needs pressures (Children's)
    - Pressures relating to the Health system (Adults)
  - Increasing the level of the General Fund reserve; and
  - Changes in the forecast 2018-19 level of savings delivery to allow for any mitigation of undeliverable savings.
- 4.10. The risks and assumptions relating to the 2019-20 Budget will continue to be monitored and updated as budget planning activity proceeds.

## **5. Savings allocation**

- 5.1. The following table sets out indicative savings required to close the identified gap by Committee which were agreed by Policy and Resources Committee and reported to Service Committees in September. As set out above, there may be an opportunity for the level of savings required in 2020-21 and 2021-22 to be reduced in future years based on the latest budget planning position.

**Table 3: Indicative savings by Committee**

	2019-20 £m	2020-21 £m	2021-22 £m	Total £m	Proposed share of new savings %
Adult Social Care	-9.626	-19.527	-9.745	<b>-38.898</b>	41%
Children's Services	-5.726	-12.064	-6.037	<b>-23.827</b>	25%
Environment, Development and Transport	-2.820	-5.988	-2.962	<b>-11.770</b>	12%
Communities	-1.647	-6.262	-3.115	<b>-11.025</b>	12%
Digital Innovation and Efficiency	-0.369	-0.736	-0.373	<b>-1.477</b>	2%
Business and Property	-0.154	-0.180	-0.045	<b>-0.379</b>	0%
Policy and Resources <sup>3</sup>	-1.747	-3.697	-1.875	<b>-7.319</b>	8%
<b>Total</b>	<b>-22.089</b>	<b>-48.454</b>	<b>-24.153</b>	<b>-94.696</b>	

5.2. Existing savings in the Council's MTFS are shown by Committee in the table below. These are the savings agreed as part of the 2018-19 (and earlier) budget process, and will need to be delivered **in addition** to any new savings proposed to close the remaining budget gap.

**Table 4: Planned net recurring savings 2018-19 to 2021-22**

Committee	2018-19 Saving £m	2019-20 Saving £m	2020-21 Saving £m	2021-22 Saving £m	Total Saving £m
Adult Social Care	-27.290	-9.351	-13.700	-3.900	-54.241
Children's Services	-2.641	-4.342	-2.000	-2.000	-10.983
Environment, Development and Transport	-1.440	-0.310	-0.350	-1.850	-3.950
Communities	-1.803	-0.435	-2.786	-1.500	-6.524
Business and Property	-1.051	-2.075	-2.050	-1.150	-6.326
Digital Innovation and Efficiency	-0.726	-1.000	-0.700	0.000	-2.426
Policy and Resources <sup>4</sup>	4.952	1.356	-0.387	0.000	5.921
<b>Grand Total</b>	<b>-29.999</b>	<b>-16.157</b>	<b>-21.973</b>	<b>-10.400</b>	<b>-78.529</b>

<sup>3</sup> Including Finance General

<sup>4</sup> The net savings position for Policy and Resources Committee reflects the reversal of a number of significant one-off savings from 2017-18, such as the use of the Insurance Fund and the use of Capital Receipts totalling £11.299m. The gross savings to be delivered by Policy and Resources Committee budgets in 2018-19 are £6.347m.

## 6. Committee response

6.1. Service Committees considered service-specific budgeting issues in September. These include:

- Public Health – the Public Health service is funded by a ring-fenced grant, which has seen significant reductions in recent years. Population growth in the context of a reducing grant means there are pressures in relation to activity based contracts with GPs and Pharmacists e.g. Health Checks.
- Fire and Rescue Service - governance – the Police and Crime Commissioner’s public consultation on a proposed change to the governance of the service closed on 5 September and the feedback is being collated and considered. If the proposal proceeds, and is approved by the Home Secretary, there will be a need to reach local agreement on the financial transfer of the service i.e. the level of associated budget which will transfer. This will need to consider any agreed budget changes, savings or efficiencies.
- Fire and Rescue Service – operations – the service continues to have an ongoing budget pressure in relation to water rescue. This is a non-statutory element of service which does not have any allocated core funding. The Committee has previously endorsed the continuation of this area of work on the basis that it addresses a significant risk for the county, and on the basis that this pressure is managed within the overall CES department budget.
- Customer Services deliver a corporate service, including the online digital offer, and multi-channel Customer Service Centre. They are a direct delivery mechanism for other NCC services, as well as leading on systems to enable efficiency savings through channel shift. As budget reductions and other service and policy changes are made across NCC, the pressure and workload on customer services increases.
- Registration Services - the income target for registrars doubled this year and there is a risk that this cannot be achieved if celebratory services become less popular with the public as financial austerity deepens. This will be mitigated by the development of a wider and more flexible range of celebratory services and a sustained and targeted marketing campaign. There is a risk of increased fraudulent activity if adequate resources are not retained. This risk is mitigated by the use of robust processes, spot checking and regular monitoring.

## 2019-20 Budget proposals

6.2. The new savings proposals are summarised in the table below, and further information on each is provided in Appendix A.

**Table 5: New 2019-20 Saving Proposals**

<b>Proposal</b> Note: savings are shown as a negative figure	<b>2019-20</b>	<b>2020-21</b>	<b>2021-22</b>	<b>2019-22 Total</b>	<b>Risk Assessment</b>
	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>£m</b>	<b>RAG</b>
Norfolk Record Office – reduction in search room opening hours	-0.075	0	0	<b>-0.075</b>	Amber
Reduction in Strategic Arts Development Fund	-0.015	-0.010	0	<b>-0.025</b>	Amber
Vacancy management – removal of vacant posts	-0.050	0	0	<b>-0.050</b>	Green
Restructure of teams – Millennium Library	-0.060	0	0	<b>-0.060</b>	Green
Library service back office efficiencies	-0.110	-0.010	0	<b>-0.120</b>	Amber
Increased income – Trading Standards and library service	-0.050	-0.070	0	<b>-0.120</b>	Amber
Review of contract inflation assumptions	-0.006	-0.006	0	<b>-0.012</b>	Green
Restructure of teams – various changes to team structures (reduction in overall numbers of posts)	-0.102	-0.120	0	<b>-0.222</b>	Amber
<b>Total new savings proposed</b>	<b>-0.468</b>	<b>-0.216</b>	<b>0</b>	<b>-0.684</b>	

6.3. The Committee’s discussions about proposed new savings will be reported to Policy and Resources Committee in October 2018 and used to inform development of the Council’s 2019-20 Budget to enable an overall assessment of the budget position to be made.

### 2019-20 Budget proposals requiring consultation

6.4. Of the new budget proposals set out in Table 5 above (and detailed in Appendix A), officers consider the following proposals require public consultation.

- Norfolk Record Office – reduction in search room opening hours

For some of the other proposals, although public consultation is not required, officers will discuss the proposals with relevant stakeholders during the consultation period.

6.5. For those proposals with staffing implications, the associated staff consultations will be carried out prior to the January Committee meeting.

## 7. Budget Timetable

7.1. The Council’s overarching budget setting-timetable for 2019-20 was agreed by County Council in February as part of the 2018-19 Budget. The timetable is updated as further information becomes available (for example about the timing of Government announcements). The latest version of the timetable is set out in the table below.

**Table 6: Budget setting timetable 2019-20 to 2021-22**

<b>Activity/Milestone</b>	<b>Time frame</b>
County Council agree recommendations for 2018-22 including that further plans to meet the shortfall for 2019-20 to 2021-22 are brought back to Members during 2018-19	12 February 2018
Spring Statement 2018 announced	13 March 2018
Consider implications of service and financial guidance and context, and review / develop service planning options for 2019-22	February – June 2018
Member review of the latest financial position on the financial planning for 2019-22	July 2018
Development of savings proposals 2019-22	June – September 2018
Member review of service and budget planning position including savings proposals	Committees in October 2018
Consultation on new planning proposals and council tax 2019-22	Late October to December 2018 / January 2019
Chancellor's Autumn Budget 2018	October 2018
Provisional Local Government Finance Settlement	December 2018
Service reporting to Members of service and financial planning and consultation feedback	January 2019
Committees agree revenue budget and capital programme recommendations to Policy and Resources Committee	Mid-January 2019
Confirmation of District Council tax base and Business Rate forecasts	31 January 2019
Final Local Government Finance Settlement	TBC February 2019
Policy and Resources Committee agree revenue budget and capital programme recommendations to County Council	28 January 2019
County Council agree Medium Term Financial Strategy 2019-20 to 2021-22, revenue budget, capital programme and level of council tax for 2019-20	11 February 2019

## **8. Financial implications**

- 8.1. Potentially significant financial implications for the Committee's Budget are discussed throughout this report. Any implications of the Autumn Budget and the three changes expected to be implemented in 2020-21 will be reflected as far as possible in the Council's 2019-20 budget planning, and these impacts will need to be refined as further information is made available by Government.
- 8.2. Specific financial risks in this area are also identified in the Corporate Risk Register, including the risk of failing to manage significant reductions in local and national income streams (RM002) and the potential risk of failure to deliver our services within the resources available over the next 3 years commencing 2018/19 to the end of 2020/21.
- 8.3. Risks relating to budget setting are also detailed in the Council's budget papers. There is a risk in relation to the Comprehensive Spending Review and the Fair Funding Review that a failure by the Government to provide adequate resources to fund local authorities could lead to a requirement for further service reductions,

particularly where the Fair Funding Review results in a redistribution between authority types or geographical areas.

## **9. Issues, risks and innovation**

9.1. Significant risks, assumptions, or implications have been set out throughout the report. Some general risks relating to development of budget proposals are as follows:-

- Income generation - as we continue to maximise and increase reliance on generation of income from various sources and become more reliant on market factors, we increase our risk. This includes work as part of the Commercialisation priority under Norfolk Futures.
- External funding – there are a number of projects and services being fully or partly funded by external funding, for example grants from other organisations and successful funding bids. Many of these include an element of match funding or similar expectations about the County Council’s input. Reductions in revenue funding could impact on our ability to do this and we could risk losing funding or our ability to successfully bid for funding in the future.
- Staffing - It is unlikely to be possible to deliver the level of savings required without some changes and reductions in staffing levels. The CES Department has already made a number of changes/reductions to staff in recent years, including reducing the number of managers in the department, but further reductions will be needed. Although we will take steps to minimise the impact of any changes as far as possible, including by introducing new ways of working, there is a risk that a reduced workforce will directly impact on the level of service we are able to deliver.

9.2. Equality issues were considered in the Equality Impact Assessment of 2018-19 budget proposals. Decisions about significant savings proposals with an impact on levels of service delivery will require public consultation. As in previous years, new 2019-22 saving proposals, and the Council’s Budget as a whole, will be subject to equality and rural impact assessments later in the budget-setting process.

## **Background Papers**

Norfolk County Council Vision and Strategy

<https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/corporate/council-vision-and-strategy>

Norfolk County Council Revenue and Capital Budget 2018-22 (Item 4, County Council 12 February 2018)

<http://norfolkcc.cmis.uk.com/norfolkcc/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/592/Committee/2/SelectedTab/Documents/Default.aspx>

Norfolk County Council Budget Book 2018-22

<https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/budget-and-council-tax/budget-book-2018-22.pdf?la=en>

Strategic and Financial Planning 2019-20 to 2021-22 (Item 10, Policy and Resources Committee, 16 July 2018)

<http://norfolkcc.cmis.uk.com/norfolkcc/Meetings/tabid/128/ctl/ViewMeetingPublic/mid/496/Meeting/1419/Committee/21/SelectedTab/Documents/Default.aspx>

Strategic and Financial Planning reports to Committees in September 2018

<http://norfolkcc.cmis.uk.com/norfolkcc/Meetings.aspx>

Strategic and Financial Planning 2019-20 to 2021-22 (Item 9, Policy and Resources Committee, 24 September 2018)

<http://norfolkcc.cmis.uk.com/norfolkcc/Meetings/tabid/128/ctl/ViewMeetingPublic/mid/496/Meeting/1420/Committee/21/SelectedTab/Documents/Default.aspx>

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## Communities Committee Budget Proposals

Ref	Proposal Note: Savings are shown as a negative figure	Further Information about the proposal	Saving 2019-20 £m	Saving 2020-21 £m	Saving 2021-22 £m	Total Saving £m	Risk Assessment
CMM19201	Norfolk Record Office – reduction in search room opening hours	This proposal would see the opening hours of the search room reduce from 41.5 hours a week to between 28 and 30 hours a week. There will also be reductions in the amount of documents the NRO is able to receive and process, educational and outreach work, support for the NRO's charitable partner and preservation work. This is not expected to impact on the income that the service generates from copy certificates and digitization.	-0.075	0	0	<b>-0.075</b>	Amber
CMM19202	Reduction in Strategic Arts Development Fund	Reduce the budget we make available for strategic arts initiatives which require local authority match-funding investment. This would still leave £0.035m in the budget to continue to support arts initiatives which leverage substantial external funding. We will continue our significant work supporting the Arts in Norfolk through other funding streams and major strategic projects.	-0.015	-0.010	0	<b>-0.025</b>	Amber
CMM19203	Vacancy management – removal of vacant posts	This relates to posts in various services within the CES department. As part of the overall recruitment approach in the department, we actively review vacancies and, where they arise, take opportunities to test out new ways of working, including alternative ways to structure work allocation within teams.	-0.050	0	0	<b>-0.050</b>	Green

<b>Ref</b>	<b>Proposal</b> Note: Savings are shown as a negative figure	<b>Further Information about the proposal</b>	<b>Saving 2019-20 £m</b>	<b>Saving 2020-21 £m</b>	<b>Saving 2021-22 £m</b>	<b>Total Saving £m</b>	<b>Risk Assessment</b>
CMM19204	Restructure of teams - Millennium Library	As part of previous savings proposals, a number of changes were made to the staffing structure in branch libraries. A saving associated with the staffing structure at the Millennium library was also agreed for 2019-20. Work to implement the agreed saving, and to develop a revised staffing structure, has identified opportunities to make additional savings with limited impact on front-line services through further rationalisation of management posts. As with the changes in branch libraries, the change will reflect the changing role of front-line library assistants and will bring the grading of these posts in line with colleagues in branch libraries (which will represent an increase in pay).	-0.060	0	0	<b>-0.060</b>	Green
CMM19205	Library service back office efficiencies	The saving will be delivered through re-procurement of contracts for public access PCs, cleaning and maintenance, and a reduction on the spend on the materials budget.	-0.110	-0.010	0	<b>-0.120</b>	Amber
CMM19206	Income Generation	The majority of this saving (£70k) relates to the Trading Standards service. This will be through generating additional income from the Metrology team and Primary Authority work. Based on previous activity, we feel that this is a level of income that can be delivered. The Amber rating reflects the inherent risk associated with income generation i.e. that we are subject to market factors. The remaining £50k will be delivered by renting space available at the Millennium Library – this will not affect the operation of the library.	-0.050	-0.070	0	<b>-0.120</b>	Amber

<b>Ref</b>	<b>Proposal</b> Note: Savings are shown as a negative figure	<b>Further Information about the proposal</b>	<b>Saving 2019-20 £m</b>	<b>Saving 2020-21 £m</b>	<b>Saving 2021-22 £m</b>	<b>Total Saving £m</b>	<b>Risk Assessment</b>
CMM19207	Review of contract inflation assumptions	The saving will be delivered by not applying inflation to contracts. There is no statutory requirement to apply inflation increases. There is an assumed level of inflation increase already built into planned budgets, and by not applying this inflation (where appropriate) we can revise this.	-0.006	-0.006	0	<b>-0.012</b>	Green
CMM19208	Restructure of teams – various changes to team structures (reduction in overall numbers of posts)	This proposal relates to reviewing and remodelling staffing structures in some teams in customer services, trading standards and museums. This includes taking further opportunities to further rationalise management structures and introduce new ways of working e.g. self-service. There will be an overall reduction in the number of posts but this should not have any significant impact on service delivery. The 2020/21 saving amount relates entirely to the Castle museum. There will be a need to deliver this saving for 2019/20, so that it can be used to offset anticipated income pressures as a result of works on the Castle Keep during that year.	-0.102	-0.120	0	<b>-0.222</b>	Amber
	<b>Total</b>		<b>-0.468</b>	<b>-0.216</b>	<b>0</b>	<b>-0.684</b>	

# Communities Committee

<b>Report title:</b>	<b>Mobile Library Services</b>
<b>Date of meeting:</b>	<b>10 October 2018</b>
<b>Responsible Chief Officer:</b>	<b>Tom McCabe – Executive Director, Community and Environmental Services</b>
<b>Strategic impact</b> Norfolk is a rural, geographically dispersed county and consideration of rural service delivery is of key importance, particularly with respect to socially isolated and vulnerable groups. The content of this report are reflective of the Council’s strategic aspirations: <ul style="list-style-type: none"><li>• Offering our help early to <b>prevent and reduce</b> demand for specialist services</li><li>• <b>Joining up</b> our work so that similar activities and services are accessible, <b>done once and done well</b></li><li>• Being <b>business like</b> and making the best use of <b>digital technology</b> to ensure value for money</li><li>• Using evidence and data to <b>target our work</b> where it can make the most difference</li></ul>	

## Executive Summary

A report was presented to the Communities Committee on 4 July 2018 outlining proposed principles for rural library service delivery, proposed criteria for mobile route planning, and offering ideas for alternative service delivery trials such as pop up libraries.

This paper explores the outcomes of that route planning, and alternative delivery work and looks at the impacts and possible options required to deliver the planned financial savings.

It was agreed at the meeting that:

*The proposed criteria for route planning and pilot schemes would be reviewed by the Committee and adjusted if necessary based on predicted impact.*

Having completed an outline mobile route review against the criteria, and assessing this using the equality impact assessment process, the overall potential impact was significant. Therefore, to maintain a consistent and viable service, which does not disproportionately affect people with protected characteristics or rural service users, we would now propose an alternative approach to reduce the cost of running the mobile library service by £100K, and address the remaining funding gap of £100k through further operational efficiencies set out in this paper.

### Recommendations:

Members are recommended to:

- 1. Adopt the proposals in section 2.1 and 2.2 to reduce costs by £100k and agree not to replace 2 mobile libraries vehicles.**
- 2. To agree the proposal to save the remaining £100k through operational efficiencies.**

## 1. Introduction

- 1.1 The Mobile Library service currently uses 8 vehicles to deliver fortnightly or 4 weekly visits to 1568 locations in Norfolk. In 2017/18 7525 individuals used the mobile library service. 58% *only* used a mobile library with the remainder using both mobile and building based libraries.
- 1.2 As discussed at July 2018 Communities Committee, a route planning exercise has been done using the following criteria to define a mobile library stop:
1. The location is two miles or more from a library building
  2. There will only be one stop to serve the needs of a rural community (currently there could be 2 stops in close proximity).
  3. Stops will be assessed as to their accessibility and predicted demand patterns
  4. Each stop will last for at least 20 minutes allowing time for information and advice provision and/or social interaction
  5. The stop will address the highest need and impact on the population
  6. Stops will be set at predictable, regular time intervals to allow residents to plan
  7. There are no other “stops” or immediate local service provision
- 1.3 A full mobile library route review is a significant exercise, especially one which takes into account the access needs of individuals living in rural areas. The work to date has focused on criteria 1, 2, 6 and 7, the outcome of which is listed below and detailed in the appendices. Criteria 3, 4 and 5 would need to be further assessed as Norfolk Futures programmes on Smarter Information and Advice, and Local Service Strategy develop.
- 1.4 **The location is two miles or more from a library building.** 155 of the current 1568 mobile library stops are within 2 miles by road from a library building. The full list of stops affected by this criterion is listed in **appendix 1**
- 1.5 **There will only be one stop to serve the needs of a rural community (currently there could be 2 stops in close proximity).** All stops within a quarter of a mile of each other would be consolidated into a single longer stop. The impact of this would mean that 192 of stops would need to be consolidated. A full list of the stops that would be included in this exercise are listed in **appendix 2.**
- 1.6 **Stops will be set at predictable, regular time intervals to allow residents to plan.** Of the current 125 mobile library routes 29 are carried out on a 2-weekly basis. Harmonising all routes to a 4-weekly visit interval across the county would create an equitable service. The stops affected by this are listed in **appendix 3**
- 1.7 **There are no other “stops” or immediate local service provision.** This criterion would be introduced in rural areas that had a pop-up service alternative

The overall impact of the criteria above would be to 725 of the existing stops as shown in the table below.

Criteria	Stops potentially Impacted	Notes
		Stops currently not used
Within 2 miles of a branch (via Road)	155	The number of stops in the annex 1 is greater, as a stop may be within 2 miles of one of more libraries
Stops within 1/4 mile	192	This is the total number of stops that would be in scope of rationalisation. Half would remain for a longer visit.
Converted from 2 to 4 weekly visit intervals	286	This is the number of stops that would be affected assuming that the criteria above had been implemented.

Members of the Communities Committee are invited to review the impact of the adoption of criteria 1, 2 and 6, as set out in the equality impact assessment shown in appendix 4. The overall impact would mean a removal or alteration in some way of 725 stops, however all rural communities would still receive a predictable and consistent service. This would reduce our costs by £200k.

Given the significant impact, on rural communities in particular, we have proposed a potential alternative as outlined in section 2.

## 2. Alternative Proposal for Mobile Libraries

- 2.1 The application of the proposed route criteria has a significant impact, and we have therefore proposed a viable alternative which has arisen as part of the review planning process. As an alternative to the reduction, or alteration in some way, of 725 stops, by adopting a 4-weekly visit interval for all routes we could retain a universal service offer and would save 1.4 mobile libraries from the current fleet.
- 2.2 There are a number of stops that are currently not used. In the normal course of service planning these would have been removed or replaced. However, pending the outcome of the review, this work has been put on hold. This means a further 92 stops can be taken from the timetable. This, with some other housekeeping would reduce a further 6/10 of a vehicle. As the Equality Impact Assessment (appendix 4) highlights, this option has little or no detrimental impact for existing service users.
- 2.3 Accepting the proposals above in 2.1 and 2.2 would reduce the fleet from 8 vehicles to 6 and reduce our costs by over £100k pa, due to the additional factor of the vehicles being at end of life. In total 92 stops would be removed and a further 286 would have their frequency reduced.
- 2.4 If Members were to agree the proposals in 2.1 and 2.2, an additional £100k would be identified from operational efficiencies, including implementing a different approach to stock management and further join up with neighbouring counties. These savings can be delivered without impacting staff numbers.
- 2.5 Given that this change means we can continue to deliver a universal service, retaining all current stops and with a standardised 4-weekly visit interval, it is not considered to be a significant service change that would give rise to the need for a public consultation.

### **3. Proposed pilots for Rural Service Delivery**

- 3.1 Planning for a pilot of pop up services is underway. Early investigations highlight that the introduction of a pop-up service would not save significant sums of money if offered on a comparable basis to the current mobile library service. Potential venues have quoted in the range of £40 to £50 for a half day hire.
- 3.2 We are still assessing the locations based on Wi-Fi options, size and suitability. The options are:
- Bradenham Village Hall
  - Tivetshall Village Hall
  - Old Buckenham Village Hall
  - Pulham St Mary Pennoyer Centre
  - Shipdham Church
- 3.3 Most locations are happy to offer a free trial period. However, as part of longer term budget planning we will request quotes for a weekly/fortnightly/4 weekly pop-up for 2 years.
- 3.4 Shipdham Church trial would happen on a Thursday:  
Shipdham church will be visited potentially from 9am – 12:30 to visit overlapping an already established coffee morning which runs 10am – 11:30. Before the coffee morning we are hoping to run a bounce a rhyme session for early years from 9:15 – 9:45
- 3.5 Bradenham village hall will be visited on Wednesdays to coincide with Tiddly Tots group.
- 3.6 Tivetshall village hall trial will start from the 24<sup>th</sup> of October. More details will be available prior to the start of the trial.
- 3.7 Pulham St Mary Pennoyer Centre. We have been offered the old school room; they have a café currently on site, so we will not run a coffee morning but will direct customers to the café. The Centre is a hub of history groups and has a lunch club. Library activities aimed at early years will be offered. Provisional start date is 26 October.
- 3.8 Old Buckenham. We are looking to start a trial from the 24 October.
- 3.9 Taking into consideration staff time organising the offer, pop ups may give customers a wider service offer, but the cost of transportation and other related set up costs, for example IT, may be prohibitive as a viable service alternative. Work is taking place to test this in more detail.
- 3.10 For the other potential alternatives Supported Volunteer Community Libraries, Home Library service, Digital Offer – including the promotion of the Libby library app - and transport for customers to bigger hubs, work to progress these continues.
- 3.11 A similar pop up service delivery option is being piloted by Harleston Information Plus with Carers Matters. We will be working with this organisation to investigate how we can work together and will provide information on dates and times to Members in due course.

### **4. Issues, risks and innovation**

- 4.1 Substantial changes to rural service delivery will be subject to an equality impact assessment, however the risks to vulnerable groups will be minimised if the proposed recommendations in section 2 are adopted.
- 4.2 The new models being proposed as part of the pilot take an innovative approach to rural service delivery and therefore it is important that they are properly planned and

evaluated. Where possible, learning and experience from other parts of the UK public sector and best practise will be applied.

## 5 Financial Implications

- 5.1 The financial implications are set out in this report, the proposals in this paper detail the revised plan to deliver the committed savings, from April 2019.

### Officer Contact

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

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## Stops within 2 miles of a library

Route Number	Within 2 miles of	Village	Stop
Cen 548	ACLE LIBRARY	UPTON	CARGATE LANE
Cen 548	ACLE LIBRARY	UPTON	RIVERVIEW DRIVE
Cen 548	ACLE LIBRARY	UPTON	OLD POST OFFICE
Cen 548	ACLE LIBRARY	UPTON	SOUTHEND COUNCIL HOUSES
Cen 548	BLOFIELD LIBRARY	BLOFIELD CNR & HEATH	CUTTONS CORNER
Cen 548	BLOFIELD LIBRARY	BLOFIELD CNR & HEATH	ALLENS CLOSE
Cen 221	BLOFIELD LIBRARY	LINGWOOD	NEVES CLOSE
Cen 221	BLOFIELD LIBRARY	LINGWOOD	ST PETERS ROAD
Cen 147	COSTESSEY/WEST EARLHAM LIBRARIES	OLD COSTESSEY	BARLEY COURT
Cen 322	COSTESSEY/WEST EARLHAM LIBRARIES	EARLHAM	EARLHAM EARLY YEARS CENTRE - MNTHLY
Cen 324	COSTESSEY/WEST EARLHAM LIBRARIES	NEW COSTESSEY	LORD NELSON DRIVE - HAMPDENS ESTATE
Cen 325	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	PEVERALL ROAD (VILLAGE HALL)
Cen 422	COSTESSEY/WEST EARLHAM LIBRARIES	NEW COSTESSEY	BASELINE CTR - WOODHILL RISE
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	COSTESSEY	CLEVERCLOGS NURSERY
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	BANANA MOON NURSERY
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	BELOE AVE - SEABROOK COURT
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	RAWLEY ROAD - BRADECROFT COURT
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	RAWLEY ROAD - LEYHAM COURT
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	YAXLEY WAY
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	CHAPEL BREAK COMMUNITY CENTRE
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	LISLE ROAD - ALNWICK COURT
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	BENDISH WAY - ASHWELL COURT
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	BISHY BARNABEE WAY
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	BOWTHORPE	CHAPEL BREAK COMMUNITY CENTRE
Cen 424	COSTESSEY/WEST EARLHAM LIBRARIES	COSTESSEY	ROUNDWELL TRAVELLERS SITE
NWA 448	CROMER LIBRARY	EAST RUNTON	BUXTON CLOSE
NWA 448	CROMER LIBRARY	EAST RUNTON	ST ANDREWS
Cen 2411	DEREHAM	DEREHAM	ECKLING GRANGE
Der 124	DERSINGHAM LIBRARY	DERSINGHAM	HANOVER COURT
Der 326	DERSINGHAM LIBRARY	INGOLDISTHORPE	LITTLE OWLS NURSERY
Der 540	DERSINGHAM LIBRARY	SANDRINGHAM	YORK COTTAGE
Der 549	DERSINGHAM LIBRARY	INGOLDISTHORPE	SANDY WAY

Der 549	DERSINGHAM LIBRARY	INGOLDISTHORPE	THE DRIFT
Der 549	DERSINGHAM LIBRARY	INGOLDISTHORPE	56 GROVELANDS
Der 549	DERSINGHAM LIBRARY	INGOLDISTHORPE	32 GROVELANDS
Der 549	DERSINGHAM LIBRARY	INGOLDISTHORPE	CHURCH HALL - HILL ROAD
Cen 446	DISS LIBRARY	ROYDON	HIGH RD LAYBY - RECYCLING CENTRE
Cen 441	DISS LIBRARY	TIBENHAM	CONKERS DAY NURSERY- CHESTNUT TREE FARM
Dow 447	DOWNHAM LIBRARY	WIMBOTSHAM	SOUTHSIDE (NO2)
Dow 447	DOWNHAM LIBRARY	WIMBOTSHAM	TURNERS CLOSE
Cen 429	EARLHAM LIBRARY	EATON(Waitrose only)	WAITROSE CAR PARK
Cen 420	EARLHAM LIBRARY	EATON	WAITROSE
Wel 244	FAKENHAM LIBRARY	PUDDING NORTON	GREEN LANE ESTATE
Wel 244	FAKENHAM LIBRARY	SCULTHORPE	FOUNDRY CLOSE
Der 427	GAYWOOD LIBRARY	SOUTH WOOTTON	POPLAR DRIVE/LARCH CLOSE
Der 427	GAYWOOD LIBRARY	SOUTH WOOTTON	OAK AVE
Der 427	GAYWOOD LIBRARY	SOUTH WOOTTON	MAPEL DRIVE/WILLOW ROAD
Der 427	GAYWOOD LIBRARY	SOUTH WOOTTON	MEADOW ROAD
Der 427	GAYWOOD LIBRARY	NORTH LYNN	LISBON COURT
Der 427	GAYWOOD LIBRARY	NORTH LYNN	WALPOLE ROAD SURESTART CTRE
Der 427	GAYWOOD LIBRARY	NORTH LYNN	WATERSIDE (4wkly)
Der 427	GAYWOOD LIBRARY	NORTH LYNN	COLUMBIA WAY BUNGALOWS (4wkly)
Der 427	GAYWOOD LIBRARY	FAIRSTEAD	WINDMILL COURT + 2 H/CALL (4wkly)
Der 427	GAYWOOD LIBRARY	FAIRSTEAD	MINSTER COURT (4wkly)
Der 427	GAYWOOD LIBRARY	FAIRSTEAD	HANOVER COURT (4wkly)
Der 427	GAYWOOD LIBRARY	HARDWICK	BRIDGE PARK, HARDWICK ROAD
Der 325	GAYWOOD LIBRARY	SOUTH WOOTTON	ASDA CAR PARK
Cen 3410	GORLESTON LIBRARY	BRADWELL	CURLEW WAY (Opp Raven Close)
Cen 3410	GORLESTON LIBRARY	BRADWELL	WREN DRIVE (Opp Siskin Close)
Cen 3410	GORLESTON LIBRARY	BRADWELL	MILL LANE COMMUNITY CTRE
Cen 3410	GORLESTON LIBRARY	BRADWELL	WILLOW AVENUE (Opp Cherry Close)
Cen 3410	GORLESTON LIBRARY	BRADWELL	LORDS LANE
Cen 3410	GORLESTON LIBRARY	BRADWELL	HOMEFIELD AVENUE (Outside No.10)
Cen 3410	GORLESTON LIBRARY	GORLESTON	POTTERS FIELD + Hsecall
Cen 3410	GORLESTON LIBRARY	GORLESTON	BUSY BEES AT GT. YARMOUTH
Cen 3410	GRT YARMOUTH LIBRARY	GORLESTON	GAPTON HALL TRAVELLERS SITE
Cen 546	HELLESDON LIBRARY	DRAYTON	HURN ROAD
Cen 546	HELLESDON LIBRARY	DRAYTON	HERBERT NURSEY CLOSE
Cen 546	HELLESDON LIBRARY	DRAYTON	CARTER ROAD
Cen 546	HELLESDON LIBRARY	DRAYTON	MOBILE HOMES
Cen 1410	HELLESDON LIBRARY	OLD CATTON	IVES ROAD (Nr Community Centre)

Cen 1410	HELLESDON LIBRARY	OLD CATTON	CATTON COURT
Cen 322	HELLESDON LIBRARY	OLD CATTON	GARRICK GREEN - SCHL MTHLY term time only
Cen 346	HETHERSETT LIBRARY	LITTLE MELTON	POST OFFICE
Cen 346	HETHERSETT LIBRARY	LITTLE MELTON	BRAYMEADOW LANE
Cen 346	HETHERSETT LIBRARY	LITTLE MELTON	CROSSWAYS
Cen 346	HETHERSETT LIBRARY	LITTLE MELTON	LITTLE MELTON PLAYGROUP
Cen 346	HETHERSETT LIBRARY	LITTLE MELTON	RINGWOOD CLOSE
Cen 346	HETHERSETT LIBRARY	LITTLE MELTON	LITTLE MELTON SCHOOL
Wel 441	HOLT LIBRARY	LEATHERINGSETT	THE GREEN
Wel 441	HOLT LIBRARY	LITTLE THORNAGE	THORN ROSE COTTAGE
Wel 441	HOLT LIBRARY	LEATHERINGSETT	LEATHERINGSETT HALL
Wel 447	HOLT LIBRARY	HIGH KELLING	AVENUE ROAD
Wel 447	HOLT LIBRARY	HIGH KELLING	LLOYDS COURT+KELLING HOSP DEP
Wel 447	HOLT LIBRARY	HOLT	DAY CARE CENTRE+SURESTART DEP
Wel 123	HUNSTANTON LIBRARY	HEACHAM	ROBIN HILL
Wel 249	HUNSTANTON LIBRARY	HUNSTANTON	DRIFTWOOD HOUSE
Wel 249	HUNSTANTON LIBRARY	HUNSTANTON	LYNDHURST COURT
Wel 249	HUNSTANTON LIBRARY	HUNSTANTON	HANOVER GARDENS
Wel 249	HUNSTANTON LIBRARY	OLD HUNSTANTON	HOWARDS CLOSE
Wel 249	HUNSTANTON LIBRARY	OLD HUNSTANTON	POST OFFICE
Der 427	KINGS LYNN LIBRARY	HARDWICK	BRIDGE PARK, HARDWICK ROAD
Der 427	KINGS LYNN LIBRARY	NORTH LYNN	WALPOLE ROAD SURESTART CTRE
Der 427	KINGS LYNN LIBRARY	NORTH LYNN	WATERSIDE (4wkly)
Cen 3411	LODDON LIBRARY	HALES	PRESTON LANE
Cen 3411	LODDON LIBRARY	HALES	MILLSIDE
Cen 5410	LODDON LIBRARY	HARDLEY	AIREY HOUSES HARDLEY ROAD
Cen 348	LONG STRATTON LIBRARY	THARSTON	THE STREET - WILLOW FARM LODGE
Cen 348	LONG STRATTON LIBRARY	THARSTON	HIGHFIELDS COUNCIL HOUSES
Cen 348	LONG STRATTON LIBRARY	WACTON	VILLAGE HALL
Cen 348	LONG STRATTON LIBRARY	WACTON	HALL ROAD
NWA 441	MARTHAM LIBRARY	SOMERTON	IVY HOUSE
NWA 123	MARTHAM LIBRARY	ROLLESBY	PARKVIEW AVE
Cen 1410	MILE CROSS LIBRARY	OLD CATTON	IVES ROAD (Nr Community Centre)
Cen 1410	MILE CROSS LIBRARY	OLD CATTON	PROCTOR ROAD (Nr No. 129 lay- by)
Cen 1410	MILE CROSS LIBRARY	OLD CATTON	BURMA ROAD
Cen 1410	MILE CROSS LIBRARY	OLD CATTON	THE WARREN (Nr No.27 opp ally to Warren Close)
Cen 1410	MILE CROSS LIBRARY	OLD CATTON	COLKETT DRIVE (Opp. No.1)
NWA 344	MUNDESLEY LIBRARY	WITTON	POINT HOUSE

NWA 441	MUNDESLEY LIBRARY	KNAPTON	CHURCH
NWA 342	NORTH WALSHAM LIBRARY	NORTH WALSHAM	BROOKES DRIVE
NWA 225	NORTH WALSHAM LIBRARY	NORTH WALSHAM	FURZE HILL DRIVE
NWA 545	NORTH WALSHAM LIBRARY	NORTH WALSHAM	WATERFIELD MEADOWS
Cen 120	PLUMSTEAD RD LIBRARY	THORPE ST ANDREW	POUND LANE - SAINSBURYS
Cen 540	REEPHAM	BOOTON	NEWINGTON HOUSE
Cen 222	ST WILLIAMS WAY	DUSSINDALE	TURNHAM GREEN (Opp Minion Close)
Cen 120	ST WILLIAMS WAY	THORPE ST ANDREW	POUND LANE - SAINSBURYS
NWA 448	SHERINGHAM LIBRARY	UPPER SHERINGHAM	CHURCH
NWA 448	SHERINGHAM LIBRARY	BEESTON REGIS	REGIS AVENUE
NWA 448	SHERINGHAM LIBRARY	BEESTON REGIS	CAXTON PARK
NWA 448	SHERINGHAM LIBRARY	BEESTON REGIS	ABBEY PARK
NWA 448	SHERINGHAM LIBRARY	BEESTON REGIS	OFF PRIORY CLOSE
NWA 448	SHERINGHAM LIBRARY	WEST RUNTON	GOLF CLOSE
NWA 448	SHERINGHAM LIBRARY	WEST RUNTON	CHURCH CLOSE
NWA 448	SHERINGHAM LIBRARY	WEST RUNTON	CHURCH HALL
NWA 448	SHERINGHAM LIBRARY	WEST RUNTON	STATION CLOSE
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	WOODLAND DRIVE (Nr No.12 - Opp No.5)
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	TAYLORS LANE
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	NORMAN DRIVE
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	DESMOND DRIVE (Nr No.90)
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	EDGEFIELDS CLOSE
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	THE PADDOCKS (Nr Three Corner Drive)
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	PIONEER ROAD (Nr No.11)
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	IVES ROAD (Nr Community Centre)
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	PROCTOR ROAD (Nr No. 129 lay-by)
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	BURMA ROAD
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	THE WARREN (Nr No.27 opp ally to Warren Close)
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	COLKETT DRIVE (Opp. No.1)
Cen 1410	SPROWSTON LIBRARY	OLD CATTON	CATTON COURT
Cen 120	SPROWSTON LIBRARY	OLD CATTON	MORRISONS CAR PARK
NWA 545	STALHAM LIBRARY	INGHAM	VILLAGE HALL
NWA 327	STALHAM LIBRARY	SUTTON	LAXFIELD CLOSE
NWA 327	STALHAM LIBRARY	SUTTON	VILLAGE HALL - playgroup
NWA 327	STALHAM LIBRARY	SUTTON	EX OLD WINDMILL PUBLIC HOUSE
NWA 327	STALHAM LIBRARY	SUTTON	NEVILLE ROAD
Cen 422	TAVERHAM LIBRARY	OLD COSTESSEY	ST EDMUNDS CLOSE
Cen 422	TAVERHAM LIBRARY	OLD COSTESSEY	WEST END
Cen 422	TAVERHAM LIBRARY	OLD COSTESSEY	TOWER HILL

Cen 422	TAVERHAM LIBRARY	OLD COSTESSEY	WEST END AVENUE
Cen 147	TAVERHAM LIBRARY	RINGLAND	THE SWAN
Cen 540	TAVERHAM LIBRARY	THORPE MARRIOTT	THE SQUARE (Nr.SUPERMARKET)
Cen 540	TAVERHAM LIBRARY	THORPE MARRIOTT	FELSHAM WAY
Cen 546	TAVERHAM LIBRARY	DRAYTON	ORCHARD BANK
Cen 546	TAVERHAM LIBRARY	TAVERHAM	SETON ROAD
Cen 546	TAVERHAM LIBRARY	DRAYTON	DRAYTON GROVE
Cen 546	TAVERHAM LIBRARY	DRAYTON	VILLAGE HALL
Cen 546	TAVERHAM LIBRARY	DRAYTON	FAIRVIEW CLOSE (LOW ROAD)
Cen 245	WATTON LIBRARY	WATTON	REDHILL PARK
Cen 245	WATTON LIBRARY	CARBROOKE	SALMOND ROAD
Cen 245	WATTON LIBRARY	CARBROOKE	LANCASTER AVENUE (opp no 55)
Cen 245	WATTON LIBRARY	MERTON	BROOM HILL FARM
Cen 549	WATTON LIBRARY	SAHAM TONEY	LAY-BY
Wel 342	WELLS LIBRARY	HOLKHAM	READING ROOM
Wel 343	WELLS LIBRARY	WELLS-NEXT-THE-SEA	HERITAGE HOUSE-2 MONTHLY
Wel 249	WELLS LIBRARY	WELLS NEXT THE SEA	DORRINGTON HOUSE
Cen 3412	WROXHAM LIBRARY	BELAUGH	HILL PIECE

There are several stops that appear more than once due to their proximity to libraries

## Stops within ¼ mile of another stop

Route Number	Village	Stop
Cen 128	EAST HARLING	HAMBLING PIECE
Cen 128	EAST HARLING	BREWSTERS Opp. No. 38
Cen 128	EAST HARLING	PARK COURT 1
Cen 129	MATTISHALL	RAYNERS WAY
Cen 129	MATTISHALL	LIME TREE CLOSE
Cen 129	MATTISHALL	CEDAR CLOSE No 18
Cen 129	MATTISHALL	BURGH LANE
Cen 129	MATTISHALL	HUNTER AVENUE
Cen 129	EAST TUDDENHAM	3 MATTISHALL ROAD
Cen 129	EAST TUDDENHAM	BULL CLOSE
Cen 140	HEMSBY	ST MARYS CLOSE HSECALL
Cen 141	GRISTON	THORPE HOUSE [HOME]
Cen 142	TACOLNESTON	DOVEDALE ROAD
Cen 142	TACOLNESTON	WEST WAY HSECALL NO4
Cen 143	WOODTON	THE CLOSE (TRIPLE PLEA ROAD)
Cen 143	WOODTON	KINGS HEAD
Cen 145	MARSHAM	WATHEN WAY
Cen 145	CAWSTON	MARKET PLACE
Cen 145	HEVINGHAM	HALL CORNER
Cen 147	EASTON	MARLINGFORD WAY
Cen 147	EASTON	ST PETERS DRIVE
Cen 1412	NECTON	BRACKENWOOD
Cen 1412	NECTON	JUBILEE WAY
Cen 1412	SPORLE	SYDNEY DYE COURT
Cen 1412	SPORLE	PRIORY CLOSE
Cen 221	LINGWOOD	CHRISTINE AVE
Cen 221	LINGWOOD	MANOR GARDENS
Cen 221	LINGWOOD	POST OFFICE CLOSE
Cen 241	EAST CARLTON	LAY-BY RECTORY ROAD
Cen 241	SHOTESHAM	THE GROVE
Cen 241	SHOTESHAM	THE SCHOOL
Cen 243	SPARHAM	LAY-BY OPPOSITE CHURCH

Cen 243	GT WITCHINGHAM	THE STREET
Cen 244	NTH PICKENHAM	WHITE OAKS
Cen 246	FORNCETT END	THE POPULARS, BENTLEY ROAD
Cen 247	REEDHAM	RIVERSIDE
Cen 247	HALVERGATE	CARR CLOSE
Cen 247	HALVERGATE	THE STREET
Cen 247	FREETHORPE	GREEN (GARAGE)
Cen 248	MORLEY ST PETER	CARLTONS DECOY
Cen 248	MORLEY ST PETER	SOUTH LODGE, HILL ROAD
Cen 2410	SHIPDHAM	RICHARD HAGGARD CLOSE
Cen 2410	BRADENHAM	HALE ROAD
Cen 321	BROOKE	HIGH GREEN
Cen 321	ALPINGTON/YELVERTON	FORTUNE GREEN
Cen 322	SPIXWORTH	CHRISTINE ROAD no5
Cen 322	SPIXWORTH	REDWINGS GARDENS
Cen 322	SPIXWORTH	ST PETERS WAY
Cen 323	DITCHINGHAM	WAVENEY ROAD
Cen 323	KIRBY ROW	YARMOUTH RD (No.21/23) Playgroup
Cen 341	GELDESTON	KELLS WAY
Cen 341	THURLTON	LINKS WAY
Cen 343	LYNG	GARAGE
Cen 343	LYNG	VILLAGE HALL (RICHMOND PLACE)
Cen 343	LYNG	5 PIGHTLE WAY
Cen 343	LYNG	34 PIGHTLE WAY
Cen 343	HOCKERING	SCHOOL
Cen 343	HOCKERING	MANOR CLOSE
Cen 344	BARNHAM BROOM	PLAYING FIELD
Cen 345	NORTH ELMHAM	ORCHARD CLOSE No.73
Cen 345	NORTH ELMHAM	METHODIST CHAPEL
Cen 345	NORTH ELMHAM	SPENCERS CLOSE
Cen 345	NORTH ELMHAM	BROOKSIDE
Cen 346	BARFORD	CLARKES CLOSE
Cen 347	SAXLINGHAM	WAR MEMORIAL
Cen 347	NEWTON FLOTMAN	FLORDON ROAD - LIMEBANK
Cen 348	BANHAM	THE GREEN

Cen 3412	HORSTEAD	PATRICIA AVE
Cen 422	EATON	BRADENHAM WAY
Cen 422	EATON	GREENWAYS/CRANLEIGH RISE JUNCTION
Cen 422	EATON	BUCKLAND RISE
Cen 427	MULBARTON	CUCKOOFIELD LANE
Cen 427	MULBARTON	BIRCHFIELD GARDENS
Cen 427	MULBARTON	THE POND - MULBARTON COMMON
Cen 428	TASBURGH	LAMMAS RD/HENRY PRESTON RD JUNCTION
Cen 428	TASBURGH	VALLEY ROAD (Nr No.27)
Cen 442	SCOLE	CLEMENTS CLOSE
Cen 442	DICKLEBURGH	MERLEWOOD
Cen 442	DICKLEBURGH	LIMMER AVENUE
Cen 445	NORTH LOPHAM	POST OFFICE
Cen 445	BRESSINGHAM	HIGH ROAD
Cen 448	GREAT ELLINGHAM	HOME CLOSE
Cen 449	WHISSONSETT	EX-POST OFFICE
Cen 449	GRESSENHALL	ROUGHOLME CLOSE
Cen 541	WINTERTON	BUSH ROAD (Chicken Farm)
Cen 541	WINTERTON	CHURCH ( off Empsons Loke)
Cen 542	PULHAM ST MARY	GOLDSMITH WAY
Cen 542	PULHAM MARKET	THE GREEN
Cen 543	EARSHAM	DUKES WAY
Cen 543	DENTON	TENNIS COURTS (NORWICH ROAD)
Cen 5410	ASHBY ST MARY	MILL COMMON
Cen 5410	THURTON	PARK CLOSE
Cen 5410	ROCKLAND ST MARY	102 THE STREET (EX SHOP)
Cen 5414	THURNE	OLD LION COTTAGES
Cen 5415	KENNINGHALL	CHURCH LAY-BY
NWA 123	ROLLESBY	COURT ROAD
NWA 123	HORNING	BROADWATER WAY
NWA 123	LUDHAM	SCHOOL CLOSE
NWA 126	TRUNCH	CROWN PUBLIC HOUSE
NWA 220	BRISTON	ALL SAINTS CLOSE



NWA 220	BRISTON	BAKERY CLOSE
NWA 225	WALCOTT	COASTLINE OSTEND ROAD END
NWA 327	HICKLING	THE GREEN
NWA 327	POTTER HEIGHAM	VICARAGE CLOSE
NWA 344	NORTHREPPS	KESWICK CLOSE
NWA 440	BACONSTHORPE	EX POST OFFICE
NWA 544	SWANTON ABBOTT	THE POPLERS
NWA 545	BARTON TURF	EX POST OFFICE
Wel 123	HEACHAM	NEVILLE ROAD
Wel 124	HEACHAM	SANDRINGHAM DRIVE
Wel 124	HEACHAM	BANKSIDE
Wel 124	HEACHAM	SPRUCE CLOSE - MARRAM WAY
Wel 242	GREAT MASSINGHAM	SUMMERWOOD EST/LAYBY
Wel 242	GREAT MASSINGHAM	WEASENHAM ROAD
Wel 242	GREAT MASSINGHAM	59 STATION ROAD
Wel 242	CASTLE ACRE	STOCKS GREEN
Wel 246	FOULSHAM	QUEENS HEAD
Wel 246	FOULSHAM	BEXFIELD ROAD
Wel 249	THORNHAM	SHEPHERDS PIGHTLE
Wel 341	BURNHAM NORTON	HIGH STREET 2
Wel 341	SYDERSTONE	14 ASHSIDE
Wel 342	BRANCASTER	MARKET LANE
Wel 342	BRANCASTER STAITHE	OLD POSTING HOUSE
Wel 342	BURNHAM MARKET	12 JEWEL CLOSE
Wel 343	BARNEY	THE OLD BELL
Wel 348	LT WALSINGHAM	CLEAVES DRIVE
Wel 348	DOCKING	POST OFFICE/SPAR
Wel 348	DOCKING	MARSUKI BUNGALOW
Wel 440	SHARRINGTON	VILLAGE HALL
Wel 441	BLAKENEY	VILLAGE HALL CAR PARK
Wel 441	BLAKENEY	KINGSWAY
Wel 443	HINDOLVESTON	3 THE STREET
Wel 443	HINDOLVESTON	THE STREET (Opp 56a)
Wel 443	SAXTHORPE	OLD POST OFFICE

Wel 443	CORPUSTY	COUNCIL HOUSES No 3
Wel 443	CORPUSTY	COUNCIL HOUSES No 16
Wel 447	WEYBOURNE	BECK CLOSE
Wel 447	WEYBOURNE	CHURCH
Wel 542	GREAT SNORING	OLD SCHOOL HOUSE
Wel 545	HINDRINGHAM	BARKERS CORNER
Wel 545	HINDRINGHAM	64 WELLS ROAD
Der 122	MIDDLETON	42 HALL ORCHARDS
Der 122	MIDDLETON	88 WALTER HOWES CRESCENT
Der 122	BLACKBOROUGH END	BLACKBOROUGH GREEN
Der 122	EAST WINCH	TOWN CLOSE
Der 124	POTT ROW	19 CHEQUERS CLOSE
Der 124	POTT ROW	17 THE GROVE
Der 124	POTT ROW	POST BOX
Der 124	POTT ROW	18 VONG LANE
Der 124	GRIMSTON	CLOCK TOWER
Der 246	CLENCHWARTON	RECTORY DRIVE
Der 246	CLENCHWARTON	WILDFIELDS CLOSE
Der 246	WEST LYNN	ST PETERS ROAD/HARROW CLOSE
Der 247	WEST WINCH	PINE TREE CHASE
Der 247	WEST WINCH	CHESTNUT AVE
Der 247	WEST WINCH	MAFEKING TERRACE
Der 247	WEST WINCH	ARCHDALE CLOSE
Der 325	NORTH WOOTTON	40 CARLTON ROAD
Der 325	NORTH WOOTTON	ALL SAINTS DRIVE - ALBAN ROAD
Der 325	SOUTH WOOTTON	CASTLEACRE CLOSE - ST AUGUSTINE'S WAY
Der 326	SEDFORD	KING WILLIAM PUB
Der 326	SNETTISHAM	GOOSE GREEN ROAD (BEWICK CLOSE)
Der 326	SNETTISHAM	PARK LANE (LAY-BY)
Der 326	SNETTISHAM	PINE CLOSE - STRICKLAND AVE
Der 422	GAYTON	LIME GROVE
Der 549	FLITCHAM	ABBAY ROAD - OLD CLUB
Der 549	BIRCHAM	SOCIAL CLUB

Dow 122	WATLINGTON	BRITTON CLOSE
Dow 122	WATLINGTON	WARREN CLOSE
Dow 126	MUNDFORD	IMPSON WAY
Dow 126	MUNDFORD	BRECKLANDS
Dow 126	MUNDFORD	WISSEY VIEW
Dow 126	MUNDFORD	MALSTERS CLOSE
Dow 222	TERRINGTON ST CLEMENT	RHOON ROAD
Dow 222	TERRINGTON ST CLEMENT	THE SALTINGS
Dow 244	UPWELL	BIRDBECK HOUSE
Dow 244	OUTWELL	CHURCHFIELD ROAD (OPP NO2 Broomstick Cattery)
Dow 245	EMNETH	VILLAGE HALL - GAULTREE SQUARE
Dow 245	MARSHLAND ST JAMES	HICKATHRIFT HOUSE
Dow 326	WIGG ST GERMANS	CROWN & ANCHOR PUB CARPARK
Dow 326	TILNEY ST LAWRENCE	THE BUCK
Dow 326	TERRINGTON ST JOHN	ORCHARD WAY
Dow 340	WEST WALTON	ST.PAULS ROAD NORTH
Dow 343	UPWELL	CROFT ROAD (outside 133)
Dow 440	FELTWELL	ST NICHOLAS DRIVE
Dow 440	FELTWELL	ADDISON CLOSE
Dow 441	NORTHWOLD	COUNCIL HOUSES
Dow 444	TILNEY ALL SAINTS	WILLOW DRIVE
Dow 444	WALPOLE CROSS KEYS	LOW ROAD
Dow 541	WEETING	RECTORY LANE
Dow 541	WEETING	ALL SAINTS WAY
Dow 541	METHWOLD	RED HOUSE

These are stops that remain after the application of 1.4 & 2.2

## Stops altered from 2 to 4 weekly visits

Route Number	Village	Stop
Cen 128	EAST HARLING	QUIDENHAM ROAD
Cen 128	EAST HARLING	PARK COURT 2
Cen 128	EAST HARLING	HIGH KERRIDGES NR 16
Cen 128	BRIDGHAM	THE STREET CHERRY CROFT LAY-BY
Cen 128	BRIDGHAM	THE STREET-PEAR TREE COTTAGE
Cen 128	EAST HARLING	MARKET PLACE
Cen 128	EAST HARLING	EAST HARLING PRIMARY SCHOOL
Cen 128	ROUDHAM & LARLING	HARLING RD STATION
Cen 129	MATTISHALL	ORCHARD ROAD
Cen 129	MATTISHALL	DAFFODIL WAY
Cen 129	MATTISHALL	WILLOW CLOSE
Cen 129	MATTISHALL	ROCKING HORSE NURSERY
Cen 129	MATTISHALL	CEDAR CLOSE
Cen 129	MATTISHALL	PARKERS ROAD
Cen 129	MATTISHALL	ALL SAINTS WALK /BURGH LANE
Cen 129	MATTISHALL	BISHY BARNABEES- STH GREEN PARK
Cen 129	MATTISHALL	SMITHSON DRIVE
Cen 129	EAST TUDDENHAM	EX POST OFFICE
Cen 129	EAST TUDDENHAM	AILWYN HALL (OLD PEOPLES HOME)
Cen 129	COLTON	EX POST OFFICE
Cen 228	STOKE HOLY CROSS	LONG LANE (LAY-BY)
Cen 228	STOKE HOLY CROSS	PAVILION PLAYGROUP
Cen 228	POSTWICK	VILLAGE HALL
Cen 228	STOKE HOLY CROSS	MILL GREEN
Cen 228	STOKE HOLY CROSS	PAVILLION Off Long Lane
Cen 228	STOKE HOLY CROSS	PETTINGALES
Cen 221	STRUMPSHAW	ST PETERS CLOSE
Cen 221	LINGWOOD	LINGWOOD NURSERY
Cen 221	LINGWOOD	POST OFFICE CLOSE
Cen 221	LINGWOOD	ST PETERS ROAD
Cen 221	LINGWOOD	BRIAR CLOSE
Cen 221	LINGWOOD	CHRISTINE AVE
Cen 221	LINGWOOD	THE PADDOCKS, CLARKSON ROAD LAY-BY
Cen 221	LINGWOOD	ELM ROAD
Cen 221	LINGWOOD	MANOR GARDENS
Cen 221	LINGWOOD	HOMELEA CRESCENT
Cen 221	LINGWOOD	LINGWOOD PRIMARY SCHOOL
Cen 221	LINGWOOD	POST OFFICE
Cen 223	NEWTON ST FAITH	NEWTON CLOSE
Cen 223	NEWTON ST FAITH	FAIRHOLME RD
Cen 223	HORSHAM ST FAITH	THE WARREN

Cen 223	HORSHAM ST FAITH	OLD NORWICH ROAD (opp no.104)
Cen 223	HORSHAM ST FAITH	ST MARYS CLOSE
Cen 223	HORSFORD	HORSFORD PRE-SCHOOL
Cen 223	HORSFORD	RECREATION GROUND
Cen 223	HORSFORD	GORDON GODFREY WAY
Cen 223	HORSFORD	DOG LANE nr No9
Cen 321	ALPINGTON/YELVERTON	VILLAGE HALL - PRESCHOOL term time only
Cen 321	BROOKE	VILLAGE HALL
Cen 321	BROOKE	CHURCHILL PLACE
Cen 321	BROOKE	OLD HALL GARDENS
Cen 321	BROOKE	BURGESS WAY
Cen 321	BROOKE	THE MERE
Cen 321	BROOKE	BROOKE HOUSE
Cen 321	BROOKE	ASTLEY COOPER PLACE
Cen 321	BROOKE	BRECON ROAD Outside No 26
Cen 321	BROOKE	BROOKE SCHOOL
Cen 321	ALPINGTON/YELVERTON	CHERRY WOOD
Cen 321	ALPINGTON/YELVERTON	VILLAGE HALL
Cen 322	SPIXWORTH	ROSETTA ROAD
Cen 322	SPIXWORTH	CHRISTINE RD/SYDNEY RD JUNCTION
Cen 322	SPIXWORTH	LONGE ARMS
Cen 322	SPIXWORTH	CHESTNUT AVE
Cen 322	SPIXWORTH	SPIXWORTH INFANT SCHOOL Incl. PRE-SCHOOL - MONTHLY VISIT
Cen 322	SPIXWORTH	BRAMBLES CLOSE
Cen 323	DITCHINGHAM	SCUDAMORE PLACE
Cen 323	DITCHINGHAM	VILLAGE HALL
Cen 323	DITCHINGHAM	RIDER HAGGARD WAY (OPP. TURNER ROAD)
Cen 323	DITCHINGHAM	ALL HALLOWS HOSPITAL
Cen 323	BROOME	BROOME SIGN 9 -YARMOUTH ROAD
Cen 323	BROOME	BROOME VILLAGE HALL
Cen 323	BROOME	YARMOUTH ROAD (OUTSIDE NO.88)
Cen 323	KIRBY ROW	CRISP ROAD (FIND NEW LOCATION BETWEEN STOPS)
Cen 323	DITCHINGHAM	DITCHINGHAM DAY NURSERY (ALL HALLOWS SITE)
Cen 424	QUEENS HILLS	SCHOOL - QUEENS HILLS
Cen 424	HARFORD BRIDGE	BROOKS GREEN TRAVELLERS SITE
Cen 429	CRINGLEFORD	OAKFIELDS ROAD (Opp. No.27)
Cen 429	CRINGLEFORD	TUNGATE CRESCENT
Cen 429	CRINGLEFORD	BRETtingham AVE. - JUST INTO KEDLESTON DRIVE
Cen 429	CRINGLEFORD	BRETtingham AVE
Cen 429	CRINGLEFORD	THE WILLOW CENTRE
Cen 429	CRINGLEFORD	THE RIDINGS
Cen 427	MULBARTON	BLUEBELL ROAD
Cen 427	MULBARTON	CHILDRENS CENTRE PLAYGROUP +Puddleducks

Cen 427	MULBARTON	HANOVER GARDENS
Cen 427	MULBARTON	VILLAGE HALL
Cen 427	MULBARTON	MULBERRY BUSH DAY NURSERY
Cen 427	MULBARTON	LARK RISE
Cen 427	MULBARTON	THE SCHOOL
Cen 428	HEMPNALL	OLD MARKET WAY (BAINARD RISE)
Cen 428	HEMPNALL GREEN	THREE HORSESHOES
Cen 428	TOPCROFT	THE OLD CHAPEL
Cen 428	TOPCROFT	CHURCH ROAD
Cen 428	HEMPNALL	ROAD GREEN FARM
Cen 428	HEMPNALL	MILLFIELDS
Cen 428	HEMPNALL	ROLAND DRIVE
Cen 428	HEMPNALL	FAIRSTEAD LANE
Cen 428	HEMPNALL	JACK IN THE BOX NURSERY
Cen 428	TASBURGH	HARVEY CLOSE
Cen 428	TASBURGH	VALLEY ROAD (Opp No.2)
Cen 428	TASBURGH	ORCHARD WAY
Cen 422	CRINGLEFORD	STRATFORD CRESCENT
Cen 422	CRINGLEFORD	NEWFOUND DRIVE
Cen 422	EATON	LINDFORD DRIVE
Cen 422	EATON	CHURCH LANE/LINDFORD DRIVE JUNCTION
Cen 422	EATON	AMDERLEY DRIVE
Cen 422	EATON	GREENWAYS/DUVERLIN CLOSE
NWA 123	CATFIELD	THORN ROAD
NWA 123	CATFIELD	VILLAGE HALL
NWA 123	CATFIELD	ELDERBUSH LANE
NWA 123	ORMESBY ST MICHAEL	VILLAGE HALL - CAR PARK
NWA 123	ROLLESBY	KING GEORGE AVE
NWA 123	LUDHAM	BROAD REACHES
NWA 123	HORNING	VILLAGE HALL - CAR PARK
NWA 123	HORNING	PARKLAND CRESENT
NWA 123	HORNING	HORNING SCHOOL
NWA 123	LUDHAM	WHITEGATES
NWA 123	LUDHAM	HIGH STREET
NWA 126	TRUNCH	CHURCH CLOSE
NWA 126	TRUNCH	KINGSLEIGH CLOSE
NWA 126	TRUNCH	ROBERT CLOSE
NWA 126	TRUNCH	VILLAGE HALL - PLAYGROUP
NWA 126	TRUNCH	CORNISH AVE GROUPED HOMES
NWA 126	SOUTHREPPS	VILLAGE HALL
NWA 126	AYLMERTON	ST. ANDREWS
NWA 126	OVERSTRAND	BRACKEN END (inside Church Close)
NWA 126	OVERSTRAND	HILLINGDON
NWA 126	OVERSTRAND	GLENDON HOUSE CARE HOME
NWA 126	OVERSTRAND	GRANGE AVENUE
NWA 126	TRIMINGHAM	STADEN PARK
NWA 126	TRIMINGHAM	BROADWOOD CLOSE
NWA 126	GIMINGHAM	HARVEY ESTATE
NWA 220	BRISTON	HILLSIDE (OUTSIDE No.30)

NWA 220	BRISTON	COPEMAN CENTRE / NURSERY
NWA 220	BRISTON	CAR PARK - OLD POST ROAD
NWA 220	BRISTON	HALL STREET (PHONE BOX)
NWA 220	BRISTON	LIME TREE 27 REEPHAM ROAD
NWA 220	BRISTON	ASTLEY SCHOOL
NWA 220	MELTON CONSTABLE	BURGH BECK ROAD
NWA 220	BRISTON	PROVIDENCE PLACE
NWA 220	BRISTON	HORSESHOE COMMON
NWA 225	WORSTEAD	VILLAGE HALL - PLAYGROUP
NWA 225	BRIGGATE	TELEPHONE KIOSK
NWA 225	HAPPISBURGH	LIGHTHOUSE CLOSE
NWA 225	HAPPISBURGH	BEACH ROAD
NWA 225	HAPPISBURGH	SCHOOL CAR PARK
NWA 225	RIDLINGTON	THE ROOKERY
NWA 225	WALCOTT	COASTLINE VILLAGE
NWA 225	WALCOTT	VILLAGE HALL
NWA 225	BACTON	VILLAGE SHOP
NWA 225	BACTON	ABBAY STREET
NWA 225	BACTON	BEACH ROAD
NWA 225	EDINGTHORPE	OLD SCHOOL
NWA 225	EDINGTHORPE	THE CHAPEL
NWA 327	MEETING HILL	THE OLD MEETING HOUSE
NWA 327	HICKLING	OUTSIDE HICKLING SCHOOL
NWA 327	HICKLING	TOWN STREET
NWA 327	HICKLING	THE CHAPEL
NWA 327	HICKLING	MILL CLOSE
NWA 327	HICKLING	BROADLANDS ROAD
NWA 327	POTTER HEIGHAM	POST OFFICE STORES
NWA 327	POTTER HEIGHAM	ST NICHOLAS WAY
NWA 327	POTTER HEIGHAM	BETHEL COURT
NWA 327	POTTER HEIGHAM	CHAPEL
NWA 327	POTTER HEIGHAM	REYNOLDS LANE
Wel 123	HEACHAM	RINGSTEAD ROAD
Wel 123	HEACHAM	NEVILLE COURT
Wel 123	HEACHAM	SITKA CLOSE
Wel 123	HEACHAM	MILLBRIDGE HME-4 weekly alternate
Wel 123	HEACHAM	REBECCA COURT - 4 WEEKLY
Wel 123	HEACHAM	ALTERNATE
Wel 123	HEACHAM	POPLAR AVE
Wel 123	HEACHAM	GYMKHANA WAY
Wel 123	HEACHAM	JENNINGS CLOSE
Wel 123	HEACHAM	COLLEGE DRIVE
Wel 124	HEACHAM	COLLINGWOOD CLOSE
Wel 124	HEACHAM	SOUTHMOOR DRIVE
Wel 124	HEACHAM	FENSIDE
Wel 124	HEACHAM	WOODSIDE AVENUE
Wel 124	HEACHAM	FRIDHEM CARE HOME
Wel 124	HEACHAM	ROLF CRESCENT (Opp.No.22)
Wel 124	HEACHAM	WOODEND ROAD
Wel 124	HEACHAM	GIDNEY DRIVE

Wel 124	HEACHAM	NORWAY CLOSE - MARRAM WAY
Wel 124	HEACHAM	NEVILLE ROAD - MARRAM WAY
Der 122	MIDDLETON	OAKDALE/VILLAGE HALL
Der 122	FAIR GREEN	PARK HILL EST
Der 122	FAIR GREEN	GRAHAM DRIVE
Der 122	FAIR GREEN	PAUL DRIVE
Der 122	MIDDLETON	ST MARYS CRESCENT
Der 122	LEZIATE	HOLT HOUSE LANE
Der 122	ASHWICKEN	GARDEN ROW
Der 122	ASHWICKEN	GLOSTHORPE MANOR
Der 122	EAST WINCH	GAYTON ROAD (Opp Windyridge)
Der 122	EAST WINCH	47 TOWN CLOSE
Der 122	EAST WINCH	VILLAGE SIGN
Der 122	BLACKBOROUGH END	THE FIRS
Der 124	POTT ROW	CHEQUERS ROAD
Der 124	POTT ROW	13 HILLINGS WAY
Der 124	POTT ROW	OLD POLICE HOUSE
Der 124	POTT ROW	BARLOWES GARAGE
Der 124	POTT ROW	COMPASS PRE-SCHOOL
Der 124	GRIMSTON	LOW ROAD
Der 124	GRIMSTON	WESLYAN CHAPEL
Der 124	GRIMSTON	22 GAYTON ROAD
Der 124	GRIMSTON	CHURCH & OLD SCHOOL
Der 124	POTT ROW	HOLLY MEADOWS SCHOOL
Der 124	GRIMSTON	CHURCH CLOSE
Der 325	NORTH WOOTTON	HEATHER CLOSE
Der 325	NORTH WOOTTON	CARTON DRIVE (OPPS) POST OFFICE
Der 325	NORTH WOOTTON	JULIAN ROAD
Der 325	NORTH WOOTTON	LODGE COTTAGE NURSERY SCHOOL
Der 325	NORTH WOOTTON	WYNDHAM HOUSE CAREHOME
Der 325	NORTH WOOTTON	NURSERY LANE (Nr GARAGE)
Der 325	SOUTH WOOTTON	THETFORD WAY/WALSINGHAM CLOSE
Der 325	SOUTH WOOTTON	SHOPS - ST AUGUSTINE'S WAY
Der 325	SOUTH WOOTTON	THE BIRCHES
Der 325	SOUTH WOOTTON	BURGHLEY ROAD/ICKWORTH CLOSE
Der 326	SEDFEFORD	SEDFEFORD MEMORIAL
Der 326	SEDFEFORD	JARVIE CLOSE
Der 326	SEDFEFORD	SEDFEFORD CHURCH
Der 326	SNETTISHAM	THE PADDOCKS
Der 326	SNETTISHAM	STILEMAN WAY
Der 326	SNETTISHAM	THE AVENUE
Der 326	SNETTISHAM	ST MARY'S CHURCH HALL
Der 326	SNETTISHAM	LYNN ROAD - STRICKLAND AVE
Der 326	SNETTISHAM	BLOSSOM END
Der 326	SNETTISHAM	SAFFRONSIDE
Der 422	WESTACRE	THE WARREN



Der 422	WESTACRE	COUNCIL BUNGALOWS +H/CALL
Der 422	EAST WALTON	COMMON LANE, OUTSIDE SCHOOL
Der 422	GAYTON THORPE	CHURCH CROSSROADS
Der 422	GAYTON	CHURCH FARM BARN (CAR PARK)
Der 422	GAYTON	GRIMSTON ROAD LAY-BY
Der 422	GAYTON	GROVE GARDENS
Der 422	GAYTON	HILLS CRESCENT
Der 422	GAYTON	ST NICHOLAS CLOSE
Der 422	GAYTON	BIRCH ROAD/HAWTHORNE ROAD
Der 422	GAYTON	SPRINGVALE
Der 422	GAYTON	LANSDOWNE CLOSE No 7
Der 427	CASTLE RISING	ALMS HOUSES, CASTLE RISING
Der 427	SOUTH WOOTTON	SANDY LANE
Dow 122	MAGDALEN	STOW ROAD LAYBY
Dow 122	MAGDALEN	CHURCH CLOSE
Dow 122	WATLINGTON	JOHN DAVIS WAY
Dow 122	WATLINGTON	PETERSFIELD
Dow 122	WATLINGTON	THE ANGEL
Dow 122	WATLINGTON	CHESTNUT CLOSE
Dow 122	WATLINGTON	RECTORY LANE
Dow 122	WATLINGTON	PLOUGH LANE - OLD QUEENS HEAD
Dow 122	WATLINGTON	ORCHARD CLOSE
Dow 122	WATLINGTON	DOWNHAM ROAD
Dow 122	RUNCTON HOLME	THORPELANDS LANE
Dow 122	STOWBRIDGE	WARD'S CHASE
Dow 122	STOWBRIDGE	LOW ROAD (GOODINGS YARD)
Dow 126	WEREHAM	CHURCH ROAD OPP GEORGE&DRAGON
Dow 126	CRANWICH	LAY-BY
Dow 126	MUNDFORD	BRACKEN RISE
Dow 126	MUNDFORD	FIR CLOSE
Dow 126	MUNDFORD	CHURCH LANE
Dow 126	MUNDFORD	THE LAMMAS
Dow 126	WEST TOFTS	HOME FARM
Dow 126	MUNDFORD	THE CROWN
Dow 126	ICKBURGH	ASHBURTON ROAD
Dow 126	WHITTINGTON	NORMAN DRIVE
Dow 126	WEREHAM	QUEENS CLOSE
Dow 222	TERRINGTON ST CLEMENT	HUNTERS CLOSE (NO12)
Dow 222	TERRINGTON ST CLEMENT	NORTHGATE WAY
Dow 222	TERRINGTON ST CLEMENT	ALMA AVE (NO47)
Dow 222	TERRINGTON ST CLEMENT	BENNS LANE
Dow 222	TERRINGTON ST CLEMENT	THE KING WILLIAM
Dow 222	TERRINGTON ST CLEMENT	SPRING GROVE (NO48)

Dow 222	TERRINGTON ST CLEMENT	POPES LANE
Dow 222	TERRINGTON ST CLEMENT	ORANGE ROW
Dow 222	TERRINGTON ST CLEMENT	THE CHAPEL/CLEMENT COURT
Dow 326	SADDLEBOW	OPPOSITE METHODIST CHAPEL
Dow 326	WIGG ST GERMANS	LEGGE PLACE
Dow 326	WIGG ST GERMANS	ORCHARD ROAD - no 19
Dow 326	WIGG ST GERMANS	ALLEN CLOSE
Dow 326	WIGG ST MARY	SLUICE ROAD
Dow 326	ISLINGTON	CORONATION HALL (opp Bus Stop)
Dow 326	TILNEY ST LAWRENCE	VILLAGE HALL CAR PARK
Dow 326	TILNEY ST LAWRENCE	AYLMER DRIVE
Dow 326	TILNEY ST LAWRENCE	WEST FIELDS
Dow 326	TERRINGTON ST JOHN	A47 BUS STOP
Dow 326	TERRINGTON ST JOHN	BURMAN HOUSE, MILL RD

# **Mobile library service – mobile route planning criteria**

# **Equality and rural assessment – findings and recommendations**

September 2018

**Lead officer – Jo Richardson, Equality & Diversity Manager, in consultation with Ceri Sumner, Assistant Director, Community, Information and Learning, and Sarah Rhoden, Head of Support and Development**

**This assessment helps you to consider the impact of service changes on people with protected characteristics and in rural areas. The assessment can be updated at any time to inform service planning and commissioning.**

**For more information please contact Equality & Diversity team, email: [equality@norfolk.gov.uk](mailto:equality@norfolk.gov.uk) or tel: 01603 222611.**

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## The purpose of equality and rural assessments

1. The purpose of equality and rural assessments is to enable elected members to consider the potential impact of decisions on different people and communities prior to decisions being taken. Mitigating actions can be developed if detrimental impact is identified.
2. It is not always possible to adopt the course of action that will best promote the needs of people with protected characteristics or people in rural areas. However, assessments enable informed decisions to be made, that take into account every opportunity to minimise disadvantage.

## The Legal context

3. Public authorities have a duty under the Equality Act 2010 to consider the implications of proposals on people with protected characteristics. The Act states that public bodies must pay due regard to the need to:
  - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act<sup>1</sup>;
  - Advance equality of opportunity between people who share a relevant protected characteristic<sup>2</sup> and people who do not share it<sup>3</sup>;
  - Foster good relations between people who share a relevant protected characteristic and people who do not share it<sup>4</sup>.
4. The full Act is available [here](#).

## The assessment process

5. This assessment comprises three phases:
  - **Phase 1** – evidence is gathered on the proposal, to examine who might be affected and how. This includes reviewing the findings of related assessments, contextual information about local populations and other relevant data.
  - **Phase 2** – the results are analysed. The assessments are drafted, making sure that any potential impacts are fully assessed. If the evidence indicates that a proposal may have a detrimental impact on people with protected characteristics or in rural communities, mitigating actions are considered.
  - **Phase 3** – the findings are reported to decision-makers, to enable any impacts to be taken into account before a decision is made.

## The proposal

6. This equality impact assessment considers whether people with protected characteristics might be disadvantaged by proposed new mobile library route planning criteria, defined as the basis on which the routes, and stops, can be planned.

7. Communities Committee defined these criteria in July 2018: -
1. The location is two miles or more from a library building
  2. There will only be one stop to serve the needs of a rural community (currently there could be 2 stops in close proximity).
  3. Stops will be assessed as to their accessibility and predicted demand patterns
  4. Each stop will last for at least 20 minutes allowing time for information and advice provision and/or social interaction
  5. The stop will address the highest need and impact on the population
  6. Stops will be set at predictable, regular time intervals to allow residents to plan
  7. There are no other “stops” or immediate local service provision
8. A desk-top review of criteria 1, 2, 6 and 7 against the current route/stop schedule has been carried out. Basing the routes strictly around these criteria would mean: -
- Ceasing 155 of the current stops because they are within two miles of a library building
  - Consolidating stops in rural areas so that there is just one stop in each rural community would mean consolidating 192 stops
  - Harmonising the frequency of stops so that they are all four weekly would mean changing 29 routes from 2 to four weekly, this is an impact on 286 stops.

## Who is affected?

9. The proposal will affect residents, visitors and businesses in Norfolk, including people with protected characteristics and in rural areas, and our staff:

<b>People of all ages</b>	<b>YES</b>
<b>Disability</b> (all disabilities and long-term health conditions, including but not limited to people with, for example, reduced mobility; Blind and visually impaired people; Deaf and hearing-impaired people; people with mental health issues; people on the Autism spectrum; people with learning difficulties and people with dementia).	<b>YES</b>
<b>Gender reassignment</b> (e.g. people who identify as transgender)	<b>YES</b>
<b>Marriage/civil partnerships</b>	<b>YES</b>
<b>Pregnancy &amp; Maternity</b>	<b>YES</b>
<b>Race</b> (different ethnic groups, including Gypsies and Travellers)	<b>YES</b>
<b>Religion/belief</b> (different faiths, including people with no religion or belief)	<b>YES</b>
<b>Sex</b> (i.e. men/women/intersex)	<b>YES</b>
<b>Sexual orientation</b> (e.g. lesbian, gay and bisexual people)	<b>YES</b>

## About mobile library services in Norfolk

10. During 2017/18, the mobile library service was used by 7,525 individuals with 58% of these using only the mobile library i.e. individuals who are also not accessing services through attending branch/building based libraries.
11. Feedback from a survey of mobile library users in 2017 identified: -
  - 97% use mobile libraries for borrowing books
  - 16% use the service to find out information
  - 11% use the service to meet friends
  - 78% said they make positive connections with other people when the mobile library visited
  - 75% said they felt less isolated because of their mobile library use
12. The majority of mobile library stops are in rural communities, and are over two miles away from a branch/building based library. Typically, a mobile library visit lasts for 10-20 minutes, with only 22 stops lasting more than an hour. The average number of visitors per stop is 4.46.

## Potential impact

13. There is evidence that strictly applying the proposed new criteria for mobile library route planning could have a disproportionate and detrimental impact on people with protected characteristics, particularly disabled and older people; parents with young children and younger people with no access to a car. It would also impact on people in rural areas.
14. This is because the removal of stops in their entirety may mean that people from these groups may no longer be able to access the library service. They may be unable to access library services in a different way e.g. they may not be able to easily travel to branch/building based libraries if their local mobile library service stop was ceased.
15. Disabled and older people in rural areas may be the most affected, as disabled and older people in rural areas are more likely to have complex transport needs than people living in urban areas. They are likely to need to travel further or pay more to get to access alternative services than those living in urban areas. They may have limited alternative public transport options.
16. There would also be an impact in terms of social isolation. It is clear from the survey carried out that the service is seen as a way to socialise, and that users feel less isolated because of it.
17. The harmonisation of the frequency of stops alone would have a lesser impact because individuals would continue to be able to access the service, albeit on a slightly less frequent basis.
18. In view of this, work has taken place to consider ways to optimise routes within the available budget, in particular any route optimisation that would remove the need for

any stops to cease in their entirety and enable individuals who may be isolated to continue to access the service in some way.

19. This work has been completed, and as a result, it has been possible to identify a mitigating action to address the disadvantage described above. This is proposed below.

## Accessibility considerations

20. Accessibility is a priority for Norfolk County Council. Norfolk has a higher than average number of disabled and older residents compared to other areas of the UK, and a growing number of disabled young people.
21. Mobile libraries are design to enhance accessibility for users, enabling people who might find it difficult to travel to branch/building based libraries to access library service s in Norfolk.

## Human rights implications

22. Public authorities in the UK are required to act compatibly with the Human Rights Act 1998. There are no human rights issues arising from the proposals.

## Recommended actions

	Action	Lead	Date
1.	Consider how alternative models of service provision can mitigate the impacts for example pop-up libraries in rural areas.	Assistant Director CIL	Ongoing
2.	Consider an alternative proposal that would see all current stops and routes retained, but with frequency harmonised so that all stops would be visited every four weeks (meaning two weeks stops would cease).	Assistant Director CIL	Complete

## Evidence used to inform this assessment

- Equality Act 2010
- Public Sector Equality Duty
- Business intelligence and management data, as quoted in this report.
- Relevant service specific Codes of Practice and national guidance

## Further information

23. For further information about this equality impact assessment please contact Jo Richardson, Equality & Diversity Manager, Email [jo.richardson@norfolk.gov.uk](mailto:jo.richardson@norfolk.gov.uk)



If you need this document in large print, audio, Braille, alternative format or in a different language please contact Jo Richardson on 0344 800 8020.

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**<sup>1</sup> Prohibited conduct:**

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic they have or are thought to have, or because they associate with someone who has a protected characteristic.

Indirect discrimination occurs when a condition, rule, policy or practice in your organisation that applies to everyone disadvantages people who share a protected characteristic.

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”.

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint.

**2 The protected characteristics are:**

**Age** – e.g. a person belonging to a particular age or a range of ages (for example 18 to 30 year olds).

**Disability** - a person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

**Gender reassignment** - the process of transitioning from one gender to another.

**Marriage and civil partnership**

**Pregnancy and maternity**

**Race** - refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

**Religion and belief** - has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (such as Atheism).

**Sex** - a man or a woman.

**Sexual orientation** - whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

**3 The Act specifies that having due regard to the need to advance equality of opportunity might mean:**

- Removing or minimizing disadvantages suffered by people who share a relevant protected characteristic that are connected to that characteristic;
- Taking steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of others;
- Encouraging people who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such people is disproportionately low.

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4 Having due regard to the need to foster good relations between people and communities involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.

# Communities Committee

<b>Report title:</b>	<b>Performance management</b>
<b>Date of meeting:</b>	<b>10 October 2018</b>
<b>Responsible Chief Officer:</b>	<b>Tom McCabe – Executive Director, Community and Environmental Services</b>
<b>Strategic impact</b> Robust performance management is key to ensuring that the organisation works both efficiently and effectively to develop and deliver services that represent good value for money and which meet identified need.	

## Executive summary

This management report to Committee is based upon the revised Performance Management System, which was implemented as of 1 April 2016. Additionally, this is the second report to provide data against the new 2018/19 Vital Signs list derived from measures contained within the 'plans on a page' previously presented to and agreed by Committee.

There are currently 13 Vital Signs indicators under the remit of this Committee.

Performance is reported on an exception basis using a Report Card format, meaning that only those Vital Signs that are performing poorly or where performance is deteriorating are presented to Committee. To enable Members to have oversight of performance across all Vital Signs, all Report Cards (which is where more detailed information about performance is recorded) will be made available to view upon request.

Of the 13 Vital Signs indicators that fall within the remit of this Committee, four indicators have met the exception criteria:

- Number of people killed and seriously injured on Norfolk's roads
- Performance against NFRS Emergency Response Standards
- On call (retained) fire station availability
- Successful completion of substance misuse treatment - % of adult substance misuse users (opiate, non-opiate and alcohol) that left treatment successfully and did not re-present to treatment within 6 months

### Recommendations:

**Review and comment on the performance data, information and analysis presented in the body of the report and determine whether any recommended actions identified are appropriate or whether another course of action is required - refer to the list of possible actions at Appendix 1.**

In support of this, Appendix 1 provides:

- A set of prompts for performance discussions.
- Suggested options for further actions where Committee requires additional information or work to be undertaken.

## **1. Introduction**

- 1.1. This management report to Committee is based upon the revised Performance Management System, which was implemented as of 1 April 2016. Additionally, this is the second report to provide data against the new 2018/19 Vital Signs list derived from measures contained within the 'plans on a page' previously presented to and agreed by Committee.
- 1.2. There are currently 13 Vital Signs indicators under the remit of this Committee.
- 1.3. Work continues to see what other data may be available to report to Committee on a more frequent basis and these will in turn be considered for inclusion as Vital Signs indicators.
- 1.4. Of the 13 Vital Signs indicators that fall within the remit of this Committee, four indicators have met the exception criteria.

## **2. Performance dashboard**

- 2.1. The performance dashboard provides a quick overview of Red/Amber/Green rated performance across all Vital Signs. This then complements the exception reporting process and enables Committee members to check that key performance issues are not being missed.
- 2.2. The Vital Signs indicators are monitored during the year and are subject to review when processes are amended to improve performance, to ensure that the indicator correctly captures future performance. A list of all Vital Signs indicators currently under the remit of the Committee is available at Appendix 2.
- 2.3. Vital Signs are reported to Committee on an exceptions basis. The exception reporting criteria are as follows:
  - Performance is off-target (Red RAG rating or variance of 5% or more)
  - Performance has two consecutive months/quarters/years of Amber RAG rating (Amber RAG rating within 5% worse than the target)
  - Performance is adversely affecting the County Council's ability to achieve its budget
  - Performance is adversely affecting one of the County Council's corporate risks.
- 2.4. Where cells have been greyed out on the performance dashboard, this indicates that data is not available due either to the frequency of reporting or the Vital Sign being under development. In this case, under development can mean that the Vital Sign has yet to be fully defined or that baseline data is being gathered.

Key to services on the performance dashboard:

- CIL – Community, Information and Learning
  - CH – Culture and Heritage
  - NFRS – Norfolk Fire and Rescue Service
  - PH – Public Health
- 2.5. The performance dashboard for the Communities Committee is as follows:

NOTES:

In most cases the RAG colours are set as: Green being equal to or better than the target; Amber being within 5% (not percentage points) worse than the target; Red being more than 5% worse than target. 'White' spaces denote that data will become available; 'grey' spaces denote that no data is currently expected, typically because the indicator is being finalised. The target value is that which relates to the latest measure period result in order to allow comparison against the RAG colours. A target may also exist for the current and/or future periods.

Monthly	Bigger or Smaller is better	Aug 17	Sep 17	Oct 17	Nov 17	Dec 17	Jan 18	Feb 18	Mar 18	Apr 18	May 18	Jun 18	Jul 18	Target
{PH} Number of people killed and seriously injured on Norfolk's roads	Smaller	423	421	407	419	421	425	434	430	446	466			344
{CH} Increase in the amount of transactional level metadata available and being accessed - (Norfolk Record Office)	Bigger	2.3k	4.5k	5.3k	6.3k	7.5k	8.7k	10.0k	24.0k	0.5k	1.3k	1.7k		1.0k
{CH} Museums visits – total visitors and school visits	Bigger	64.5k	49.0k	40.0k	25.0k	18.5k	21.7k	26.7k	27.6k	35.4k	34.2k	30.5k	36.6k	33.8k
{NFRS} Performance against NFRS Emergency Response Standards	Bigger	80.3%	76.4%	77.7%	77.2%	79.2%	72.9%	78.8%	76.4%	78.6%	77.0%	77.9%	65.9%	80.0%
		417 / 519	331 / 433	296 / 381	277 / 359	389 / 491	320 / 439	267 / 339	308 / 403	271 / 345	305 / 396	320 / 411	423 / 642	
{NFRS} On call (retained) fire station availability	Bigger	79.6%	82.7%	83.2%	86.4%	82.9%	86.6%	86.1%	86.0%	86.8%	85.2%	83.3%	85.7%	90.0%
		70.4m / 88.4m	70.8m / 85.5m	73.5m / 88.4m	73.9m / 85.5m	73.3m / 88.4m	76.6m / 88.4m	68.7m / 79.8m	76.0m / 88.4m	74.2m / 85.5m	75.3m / 88.4m	71.3m / 85.5m	75.8m / 88.4m	
{CIL} % of businesses that are compliant with Trading Standards	Bigger	94.7%	94.9%	95.0%	94.99%	95.2%	95.6%	94.92%	94.7%	97.0%	97.0%	96.0%	95.6%	95.0%
		894 / 944	888 / 936	861 / 906	834 / 878	840 / 882	861 / 901	860 / 906	891 / 941	901 / 929	936 / 965	871 / 907	879 / 919	
{PH} Status of Norfolk Resilience Forum plans to where NCC is the lead agency	Bigger	95.8%	95.8%	95.8%	95.8%	95.8%	95.8%	95.8%	95.8%	95.8%	96.0%	96.0%	96.0%	85%
		23 / 24	23 / 24	23 / 24	23 / 24	23 / 24	23 / 24	23 / 24	23 / 24	23 / 24	24 / 25	24 / 25	24 / 25	
{CIL} Customer satisfaction (with Council services)	Bigger	84.7%	86.4%	86.2%	87.4%	87.8%	86.7%	84.6%	78.9%	92.5%	92.9%	91.9%	92.9%	90.0%
		2559 / 3021	2891 / 3345	2577 / 2990	3023 / 3457	2257 / 2572	4361 / 5029	3452 / 4082	4135 / 5240	2691 / 2908	2681 / 2887	2648 / 2882	2838 / 3055	
{PH} Successful completion of substance misuse treatment - % of adult substance misuse users (opiate, non-opiate and alcohol) that left treatment successfully and did not re-present to treatment within 6 months	Bigger	18.9%	19.6%	18.8%	18.7%	18.6%	18.4%	18.5%	18.3%					21.5%
		733 / 3875	748 / 3826	706 / 3758	693 / 3713	680 / 3663	659 / 3589	659 / 3561	650 / 3550	658 / 3532	645 / 3523			
{PH} Percentage of new-borns that received a 6-8 week assessment from the Health Visitor	Bigger	91.3%	96.7%	98.4%	97.2%	97.0%	98.1%	97.1%	95.7%	96.3%	97.2%			91.0%
								598 / 616	660 / 690	654 / 679	653 / 672			

Quarterly / Termly		Bigger or Smaller is better	Sep 15	Dec 15	Mar 16	Jun 16	Sep 16	Dec 16	Mar 17	Jun 17	Sep 17	Dec 17	Mar 18	Jun 18	Target
{PH} NHS Health Checks received by the eligible population	Bigger		22.4%	24.6%	27.3%	29.8%	31.8%	33.9%	36.2%	38.3%	40.5%	42.4%	44.4%		44%
			59.1k / 264.1k	65.0k / 264.1k	72.1k / 264.1k	78.6k / 264.1k	83.9k / 264.1k	89.5k / 264.1k	95.6k / 264.1k	101.2k / 264.1k	106.9k / 264.1k	111.9k / 264.1k	117.3k / 264.1k		
{PH} New STI diagnoses (excluding chlamydia in under 25 year olds) per 100,000 population aged 15 to 64	Smaller			582				536					576		794
Annual (financial / academic)		Bigger or Smaller is better	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Target
{Culture} Proportion (%) of participants engaged who were inactive	Bigger													37.80%	26.60%
														2010 / 5317	

### 3. Report Cards

- 3.1. A Report Card has been produced for each Vital Sign. It provides a succinct overview of performance and outlines what actions are being taken to maintain or improve performance. The Report Card follows a standard format that is common to all committees.
- 3.2. Each Vital Sign has a lead officer, who is directly accountable for performance, and a data owner, who is responsible for collating and analysing the data on a monthly basis. The names and positions of these people are specified on the Report Cards.
- 3.3. Vital Signs are reported to Committee on an exceptions basis. The Report Cards for those Vital Signs that do not meet the exception criteria on this occasion, and so are not formally reported, are also collected and are available to view if requested.
- 3.4. Provided at Appendix 1 is a set of prompts for performance discussions that Members may wish to refer to as they review the Report Cards. There is also a list of suggested options for further actions where Committee requires additional information or work to be undertaken.
- 3.5. The Report Cards for the indicators that meet the exception criteria are shown below, which include contextual information for the indicator, along with information about current and historical performance:
  - Number of people killed and seriously injured on Norfolk's roads (Performance is off-target (Red RAG rating or variance of 5% or more) for May 2018 Red 466 against a target of 344)

The member task and finish group on road safety has formulated some recommendations, which will be submitted to Communities Committee to consider in November 2018. This will include a basket of potential performance measures, a communications framework and the strategic approach. Next steps include discussions with partners, and agreeing actions, all of which will inform the new road safety partnership strategy.
  - Performance against NFRS Emergency Response Standards (Performance is off-target (Red RAG rating or variance of 5% or more) for July 2018 Red 65.9% against a target of 80%)

ERS performance declined in July because of the extraordinary increase in the number of ERS qualifying incidents. For example, forestry and large fires in the open went from 11 in June to 287 in July. Comparing June to July - July saw a 54% increase in Combined ERS incidents; an 84% increase in Life Risk Fire incidents; and an 11% increase in non-fire Life Risk incidents. NFRS attended 671 incidents in June and 1,162 incidents in July. The number of appliances per incident increased on average from 1.8 appliances to 2.2 appliances per incident and the time spent per incident increased on average from 1.8 hours to 2.8 hours. Together with many appliances operating outside of their Station Grounds, ERS performance inevitably suffered in July.
  - On call (retained) fire station availability (Performance has two consecutive months/quarters/years of Amber or Red RAG rating) for July 2018 Amber 85.7% against a target of 90.0%; for June 2018 Red 83.3%; and for May 2018 Amber 85.2%)

Challenges for RDS availability include recruitment and retention - finding people who are prepared to be firefighters and stay within five minutes of station and primary employment pressures. Efforts put into addressing these issues through a task and finish project are showing positive early signs with the overall establishment increasing.

- Successful completion of substance misuse treatment - % of adult substance misuse users (opiate, non-opiate and alcohol) that left treatment successfully and did not re-present to treatment within 6 months (Performance is off-target (Red RAG rating or variance of 5% or more) for March 2018 Red 18.3% against a target of 21.5%)

It has been agreed at Committee that this measure will not be reported up for a period of 12 months (will be reported next to the March 2019 Communities Committee) while the new provider processes are embedded. Therefore, no Report Card is included.

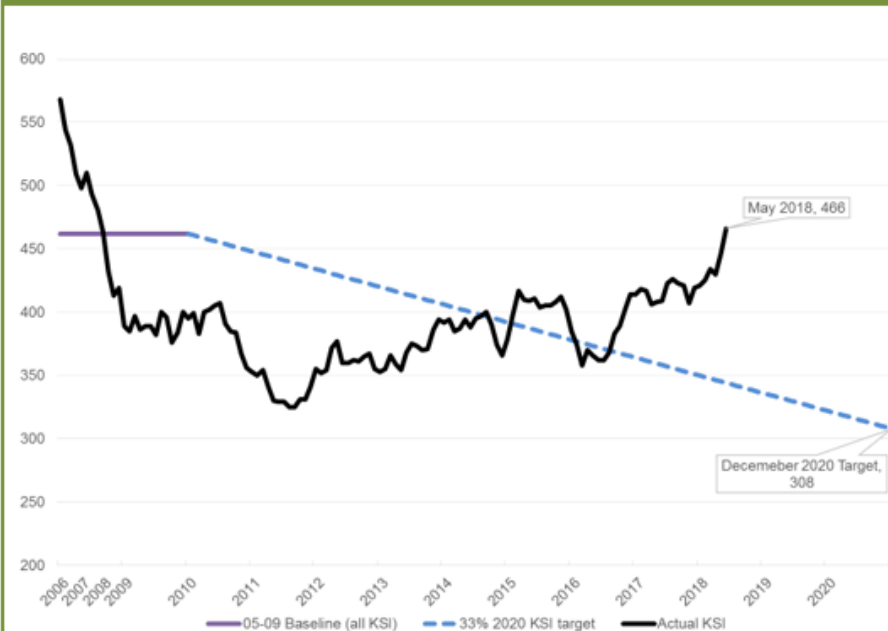


## People Killed or Seriously Injured (KSI) on Norfolk's Roads

### Why is this important?

In 2016, 37 people were killed and 377 were seriously injured in road collisions in Norfolk, representing a significant emotional and financial burden to local people and services. A target was set in 2010 to reduce Killed and Seriously Injured by a third – from 462 average in 2005-2009, by the end of 2020 to 308.

### Performance



This graph represents the 12-month rolling figure for the number of KSI.

### What is the background to current performance?

- Local authorities are required by statute to promote road safety, to undertake collision/casualty data analysis and devise programmes including engineering and road user education, training and publicity that will improve road safety.
- The vital sign reports the actual figure of killed and seriously injured, not performance measures for services. It is also not expressed as a rate.
- Factors which positively impact numbers include in-car safety standards, greater compliance with speed limits, and economic decline which suppresses casualty numbers by limiting access to certain modes of transport.
- The rise in the number of KSI 2011-2016 is greater than national figures: Norfolk KSIs rose 6.2% compared with 2.9% nationally (more recent figures are awaited nationally).
- Norfolk has a lower KSI rate per 100,000 people, and per billion vehicle kilometres than its statistical neighbour authority Lincolnshire, but is outperformed in both measures by other neighbours Somerset and Suffolk.
- Future performance cannot be accurately predicted due to the number of factors which influence collisions on the road.
- Changes to police accident recording methodology will mean that national 2016 data will include certain metrics will not be directly comparable to previous years, due to data quality issues.
- Norfolk ranked 6<sup>th</sup> (out of 31 peers) for Road Safety Education within the Highways and Transport survey

### What will success look like?

- A downward trend in recorded KSI casualties against increases in vehicle kilometres and population increases;
- A saving to the local economy and local services of around £1.8 million per fatal casualty prevented, and around £206,000 for every serious casualty prevented.

### Action required

- Continue with targeted local interventions and work with stakeholders
- Continue regular monitoring of sites which experience higher than expected collision numbers in order to identify remedial schemes
- Continue regular safety appraisal of new highway improvement schemes
- Member Task and Finish group to inform new strategy development

### Responsible Officers

Lead: Diane Steiner (Public Health)

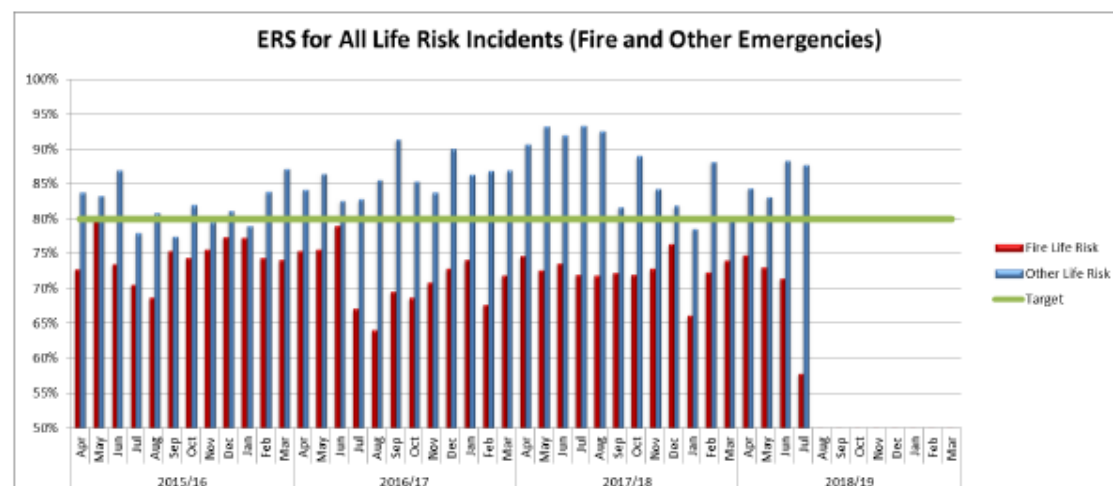
Data: Nile Pennington, Analyst Road Casualty Reduction

## Emergency Response Standards for NFRS

### Why is this important?

Responding quickly to an emergency can reduce the impact of the incident and save lives. We aim to get a fire engine to 80% of 'Fires where life may be at risk' within 10 minutes and for 'Other emergencies where life may be at risk' within 13 minutes.

### Performance



### What is the background to current performance?

- The combined ERS had been in steady decline from 2013/14 to 2015/16 (1.3%). From 2015/16 to 2017/18 we have seen a relative improvement in performance (1.3% back to the 2013/14 rate of 78.8%) however data for year to date 2018/19 shows a significant decline (12.9%). This decline is substantially the result of the abnormal temperature and periods of sunshine throughout June and July:
 

2013/14	78.8%	2014/15	78.7%
2015/16	77.5%	2016/17	78.4%
2017/18	78.8%	2018/19	65.9% (FYTD)
- The nature and location of calls we attend is changing. The number of AFA's has increased in the last 2 years however we have successfully reduced the number of false fire alarms (classified as Fires where life may be at risk) we attend. This has resulted in fewer calls in urban areas (which are quicker to get to).
- ERS performance declined in July because of the extraordinary increase in the number of ERS qualifying incidents. For example forestry and large fires in the open went from 11 in June to 267 in July. Comparing June to July, July saw a 54% increase in Combined ERS incidents; an 84% increase in Life Risk Fire incidents; and an 11% increase in non-fire Life Risk incidents.
- NFRS attended 671 incidents in June and 1,162 incidents in July. The number of appliances per incident increased on average from 1.8 appliances to 2.2 appliances per incident and the time spent per incident increased on average from 1.8 hours to 2.8 hours. Together with many appliances operating outside of their Station Grounds ERS inevitably suffered in July.

### What will success look like?

- We will consistently reach life risk calls within our emergency response standards (above the 80% of life risk calls) across Norfolk
- The economic cost of fire in Norfolk will reduce as we will get to emergencies quickly, reducing the impact of the fire/emergency in terms of damage caused and fewer casualties and fatalities.

### Action required

- We are currently reviewing the calls we classify as "life may be a risk" to make sure we are recording the right information.
- We are working to improve the availability of our retained firefighter resources to ensure we are available to respond quickly when needed.

### Responsible Officers

Lead: David Ashworth, Chief Fire Officer

Data: Stephen Maxwell *Intelligence and Performance Analyst*

## On Call (Retained) Fire Station Availability

### Why is this important?

Responding quickly to an emergency can reduce the impact of the incident. To do this the service needs its response resources to be available. This measure records the combined availability of the first on call fire engine from each station. The aim is to have these available 90% of the time.

### Performance



### What is the background to current performance?

- On call (retained) firefighters are employed on a contract to provide a set number of hours "availability". They must be located within 5 mins of their station and are paid to respond to emergencies. They often have alternative primary employment.
- Retained availability has been in decline so the service is taking action to improve this.
  - 2013/14 88.0%; 2014/15 85.4%; 2015/16 86.1%
  - 2016/17 82.1%; 2017/18 83.1%; **2018/19 85.3%** (Financial Year to Date). If Outwell were excluded the YTD becomes 85.8% and July availability improves by 1% to 86.7%
- Challenges for RDS availability include recruitment and retention (finding people who are prepared to be firefighters and stay within 5 minutes of station and primary employment pressures). Efforts put into addressing these issues through a task and finish project are showing positive early signs with the overall establishment increasing.

- Consistent performance improvement to achieve the 90% target
- The first fire engine responds to an emergency when they are needed (avoiding the need to send the next closest available fire engine).
- Wholetime (full-time) firefighting resources are almost always available so they have not been included in this data. They provide a level of resilience and support for surrounding RDS stations.

### Action required

- Currently recruiting on-call firefighters at a number of stations, a media campaign has recently been run with significant interest
- Outwell as an example has had significant issues with availability. As a result of publicity and efforts by local managers their performance has increased significantly from a low of less than 10%.
- Managers regularly review the availability provided by on call firefighters to ensure they comply with their contracted arrangements and performance manage this where required.

Responsible Officers

Lead: David Ashworth, Chief Fire Officer Data: Stephen Maxwell *Intelligence and Performance Analyst*

## **4. Recommendations**

- 4.1. Committee Members are asked to:  
Review and comment on the performance data, information and analysis presented in the body of the report and determine whether any recommended actions identified are appropriate or whether another course of action is required – refer to the list of possible actions at Appendix 1.

In support of this, Appendix 1 provides:

- A set of prompts for performance discussions.
- Suggested options for further actions where Committee requires additional information or work to be undertaken.

## **5. Financial Implications**

- 5.1. There are no significant financial implications arising from the performance management report.

## **6. Issues, risks and innovation**

- 6.1. There are no significant issues, risks and innovations arising from the performance management report.

### **Officer Contact**

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

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## Appendix 1 – Performance discussions and actions

Reflecting good performance management practice, there are some helpful prompts that can help scrutinise performance, and guide future actions. These are set out below.

### Suggested prompts for performance improvement discussion

In reviewing the Vital Signs that have met the exception reporting criteria and so included in this report, there are a number of performance improvement questions that can be worked through to aid the performance discussion, as below:

1. Why are we not meeting our target?
2. What is the impact of not meeting our target?
3. What performance is predicted?
4. How can performance be improved?
5. When will performance be back on track?
6. What can we learn for the future?

In doing so, Committee members are asked to consider the actions that have been identified by the Vital Sign lead officer.

### Performance improvement – suggested actions

A standard list of suggested actions has been developed. This provides members with options for next steps where reported performance levels require follow-up and additional work.

	<b>Action</b>	<b>Description</b>
1	Approve actions	Approve actions identified in the Report Card and set a date for reporting back to Committee.
2	Identify alternative or additional actions	Identify alternative/additional actions to those in the Report Card and set a date for reporting back to Committee.
3	Refer to Departmental Management Team	DMT to work through the performance issues identified at Committee meeting and develop an action plan for improvement and report back to Committee.
4	Refer to Committee Task and Finish Group	Member-led task and finish group to work through the performance issues identified at Committee meeting and develop an action plan for improvement and report back to Committee.
5	Refer to County Leadership Team	Identify key actions for performance improvement and refer to CLT for action.
6	Refer to Policy and Resources Committee	Identify key actions for performance improvement that have 'whole Council' performance implications and refer them to the Policy and Resources Committee for action.

## Appendix 2 – Communities Committee Vital Signs Indicators

A Vital Sign is a key indicator from one of the County Council's services which provides Members, officers and the public with a clear measure to assure that the service is performing as it should and contributing to the County Council's priorities. It is, therefore, focused on the results experienced by the community. It is important to choose enough Vital Signs to enable a good picture of performance to be deduced, but not so many that strategic discussions are distracted by detail.

There are currently 13 Vital Signs performance indicators that relate to the Communities Committee. The indicators in bold (on the Table below) are Vital Signs indicators deemed to have corporate significance and therefore will also be reported to the Policy and Resources Committee.

Key to services:

- CIL – Community, Information and Learning
- CH – Culture and Heritage
- NFRS – Norfolk Fire and Rescue Service
- PH – Public Health

Service	Vital Signs Indicator	What it measures	Why it is important	Data
PH	Road safety	Number of people killed and seriously injured on Norfolk's roads	Road casualties are a significant contributor to the levels of mortality and morbidity of Norfolk people, and the risks of involvement in KSI injuries are raised for both deprived and vulnerable groups in the Norfolk population.	Rolling twelve months
CH	Norfolk Record Office – Increase in Metadata on NRO Catalogue	Increase in the amount of transactional level metadata available and being accessed (Norfolk Record Office)	The most significant means of access to the Record Office Collection is via metadata provided in its catalogue. The better the metadata, the better the outcomes from the use of the Record Office.	Monthly
CH	Museum use	Museum visits – total visitors and school visits	Demonstrates contribution to Excellence sub outcomes and improvement curve.	Cumulative monthly
NFRS	Response to emergencies	Emergency Response Standards	Responding quickly to an emergency can reduce the impact of the incident and save lives. We aim to get to a fire engine to 80% of 'Fires where life may be at risk' within 10 minutes and for 'Other emergencies where life may be at risk' within 13 minutes.	Monthly

Service	Vital Signs Indicator	What it measures	Why it is important	Data
NFRS	Response to emergencies	On call fire station availability	Responding quickly to an emergency can reduce the impact of the incident. To do this the service needs its response resources to be available. This measure records the combined availability of the first on call fire engine from each station. The aim is to have these available 90% of the time.	Monthly
CIL	Business compliance with trading standards	% of businesses that are broadly compliant with trading standards	Helps ensure that poor business practice is corrected and consumers and legitimate businesses are protected.	Monthly
PH	Response to emergencies	Status of Norfolk Resilience Forum plans where NCC is the lead agency	Ensure that plans and procedures are in place to prepare, respond and recover from emergencies.	Monthly
CIL	Customer satisfaction	Customer satisfaction with council services	Helps to improve the service that we provide to our customers.	Monthly
PH	Engagement and retention of adult substance misuse clients	% of adult substance misuse users that left substance misuse treatment successfully and who do not re-present to treatment within 6 months.	Poor parental mental health, exposure to domestic abuse and alcohol/drug abuse by parents strongly affect children's outcomes.	Monthly



<b>Service</b>	<b>Vital Signs Indicator</b>	<b>What it measures</b>	<b>Why it is important</b>	<b>Data</b>
PH	New born babies 6-8-week assessment	% of new-borns that received a 6-8-week assessment from the Health Visitor	It supports early identification of families needing further health and social support, empowering parents to develop effective strategies that build resilience, support and information on feeding, healthy weight and nutrition.	Monthly
PH	NHS Health checks received by the eligible population	% of eligible population aged 40-74 who received an NHS Health Check	To measure Norfolk's delivery against that of England's % of NHS Health Checks received by the eligible population.	Quarterly
PH	Sexually Transmitted Infection (STI) diagnoses	New STI diagnoses per 100,000 population aged 15 to 64	Reducing the transmission of HIV and STIs results in a healthier population.	Quarterly
CH	Active Norfolk participants engaged who were inactive	% of participants engaging in Active Norfolk commissioned activities (for the purpose of reducing inactivity) who report a total of 30 minutes or less of at least moderate intensity activity a week	Demonstrates whether services are reaching those who need them most with regards to physical activity.	Annually

# Communities Committee

<b>Report title:</b>	<b>Risk Management</b>
<b>Date of meeting:</b>	<b>10 October 2018</b>
<b>Responsible Chief Officer:</b>	<b>Tom McCabe - Executive Director, Community and Environmental Services</b>
<b>Strategic impact</b> One of the Communities Committee's roles is to consider the management of Communities risks. Assurance on the effectiveness of risk management and the Communities departmental risk register helps the Committee undertake some of its key responsibilities. Risk Management contributes to achieving departmental objectives, and is a key part of the performance management framework.	

## Executive summary

This report provides Members with the Communities Committee departmental risks, reported as at October 2018, following the latest review conducted during September 2018. The reporting of risk is aligned with, and complements, the performance and financial reporting to the Committee.

### Recommendations:

Members are asked to consider:

- a) the reconciliation report in **Appendix A**, which details the significant changes to the Communities department level risks;
- b) the departmental level risk register containing risks for this Committee in **Appendix B**;
- c) The list of possible actions, suggested prompts and challenges presented for information in **Appendix C**;
- d) The background information to put the risk scoring into context, shown in **Appendix D**.

## 1. Proposal

- 1.1 The Community and Environmental Services (CES) Departmental Management Team (DMT) continues to be engaged in the preparation and management of the Communities departmental level risk register.

The recommendations for Members to consider are set out above.

## 2. Evidence

- 2.1. The Communities committee risk data detailed in this report reflects those key business risks that are managed by the Community and Environmental Services Departmental Management Team, and Senior Management Teams of the services that report to the Committee including amongst others Norfolk Fire and Rescue services, Health services, Community, Information and Learning

services, and Culture and Heritage Services. Key business risks materialising could potentially result in a service failing to achieve one or more of its key objectives and/or suffer a financial loss or reputational damage. The Communities departmental risk register is regularly reviewed and updated in accordance with the Council's Risk Management Policy and Procedures.

There are currently four departmental level risks reported to this Committee, of which one (risk RM14344 - Change of governance in the Fire and Rescue Service) is reported by exception (meeting the exception criteria of having a current score of 12 or more, with a prospects score of achieving the target score by the target date of amber or red).

A reconciliation of risk changes to departmental level risks since the July 2018 Committee can be located in **Appendix A**.

As per the request to receive full details of the departmental level risks for this Committee, these can be found in **Appendix B**.

To assist Members with considering whether the recommended actions identified in this report, and mitigating tasks of the risks, are appropriate, or whether another course of action is required, a list of such possible actions, suggested prompts and challenges are presented for information in **Appendix C**.

### **3. Financial Implications**

- 3.1. There are financial implications associated with risk RM14344 – Change in governance in the Fire and Rescue Service, which have been set out in the Council's [formal response](#) (Appendix A to the report – *Keep in Safe Hands*) to the PCC's consultation on governance of the Norfolk Fire and Rescue Service.

### **4. Issues, risks and innovation**

- 4.1. A horizon scan of other Local Authorities' and public organisations' risks has been carried out relating to services that fall within this Committee's remit. The risks identified are currently being reviewed and any new risks to adopt and adapt will be developed and managed at the appropriate risk level.

### **5. Background**

- 5.1. To assist Members with understanding the terminology used within this report, background information regarding risk scoring, and definitions can be found in **Appendix D**.

## **Officer Contact**

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

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### Risk Reconciliation Report

Significant changes\* to the Communities departmental risk register since it was last presented in July 2018.

#### New Risks

#### **RM14344 - Change of governance in the Fire and Rescue Service**

This risk was introduced to this Committee at the extraordinary August 2018 Communities Committee, and has been adopted on to the Communities departmental risk register. As per the agreed recommendation from the August 2018 Communities Committee meeting, it will be presented to the Policy and Resources Committee later this month for consideration as a corporate risk.

\* A significant change can be defined as any of the following;

- A new risk
- A closed risk
- A change to the risk score
- A change to the risk title, description or mitigations (where significantly altered).

<b>Risk Number</b>	RM14344		<b>Date of update</b>		04 September 2018					
<b>Risk Name</b>	Change of governance in the Fire and Rescue Service									
<b>Risk Owner</b>	Tom McCabe		<b>Date entered on risk register</b>		20 August 2018					
<b>Risk Description</b>										
<p>A change in governance for the Fire and Rescue service is proposed by the PCC. If this proposal, as currently written, was to go ahead it would create a number of issues which would lead to a less resilient service which is less able to address community risk and will impact on public safety:- 1) the service will be fully exposed to budget pressures and reductions in a way that they are not currently, and may need to make service reductions to manage these. 2) proposed changes to operations are not clearly articulated and have not been risk assessed, and could lead to inappropriate and unsafe practices being put in place. 3) a change in governance, if agreed, would take 14 months to implement and would require significant resource, which would distract resource from service operations and improvements. It would also cost around £1m, which would create an additional budget pressure. 4) there may be an impact on the morale of staff impacted by the change, and it is possible that there could be strike action.</p>										
<b>Original</b>			<b>Current</b>			<b>Tolerance Target</b>				
Likelihood	Impact	Risk score	Likelihood	Impact	Risk score	Likelihood	Impact	Risk score	Target Date	Prospects of meeting Target Risk Score by Target Date
3	5	15	3	5	15	2	4	8	Dec-18	Red
<b>Tasks to mitigate the risk</b>										
<p>1) Participate in the public consultation being carried out by the PCC until 05/09/2018 to ensure that the County Council's views and concerns can be understood, and taken into account.</p> <p>2) Keep affected staff updated on progress as and when there are further developments.</p> <p>3) Encourage Norfolk communities and other stakeholders to participate in the PCC's public consultation by 05/09/2018.</p>										
<b>Progress update</b>										
<p>1) A special meeting of the Communities Committee took place on 29 August to consider and agree the County Council's formal response to the consultation. Here, the recommendation for this risk to be managed at corporate level was agreed. It will now be considered by the Policy and Resources Committee.</p> <p>2) Regular messages sent to staff to keep them up to date on progress and how they can make their views known. Four staff sessions organised to enable the PCC to directly explain his business case and proposals. Staff sessions organised to allow the Chair of the Fire and Rescue Authority to explain the County Council's view on the business case.</p> <p>3) Information on the County Council's views published on the Norfolk County Council website, along with information about how to respond to the PCC's public consultation.</p>										

<b>Risk Number</b>	RM13974		<b>Date of update</b>	12 September 2018						
<b>Risk Name</b>	Failure to assure standards of operational competency for fires in the built environment.									
<b>Risk Owner</b>	Greg Preston		<b>Date entered on risk register</b>	13 October 2011						
<b>Risk Description</b>										
Standards of operational competency for fires in the built environment need to be maintained to avoid staff being exposed to avoidable risk of harm. Why is it important to manage this risk area? It is essential to manage the operational competency of Fire Officers operating in the built environment, and ensure that the facilities and training are in place that support the development of skills required for Fire Officers to operate as safely as possible.										
<b>Original</b>			<b>Current</b>			<b>Tolerance Target</b>				
Likelihood	Impact	Risk score	Likelihood	Impact	Risk score	Likelihood	Impact	Risk score	Target Date	Prospects of meeting Target Risk Score by Target Date
4	4	16	3	3	9	2	3	6	Jan-19	Amber
<b>Tasks to mitigate the risk</b>										
<p>This is a complex Risk which requires an integrated work programme to deal with elements of the risk :</p> <ul style="list-style-type: none"> <li>- Workforce Development programme delivered to schedule.</li> <li>- Development and delivery of Breathing Apparatus training.</li> <li>- Introduction of "Live Fire" training.</li> <li>- Risk file information accurate and up to date - format for all key risk premises.</li> <li>- Undertake Incident Command Breathing Apparatus (ICBAO) training and associated monitoring (complete and ongoing).</li> <li>- Implementation of "Lessons learned" from local and national incidents integrated into review processes (Serious Incident Review system in place and audits planned against lessons learned).</li> <li>- Operational reviews and actions undertaken for all significant incidents (complete and ongoing monitoring).</li> <li>- Quarterly monitoring of core skills levels. Part of Maintenance of Competence (MOC) Framework and Policy (In place and ongoing)</li> <li>- PDRPro software removed and move to recording of work place performance in parallel to MOC framework - (moved back in house). Training plans via Team Performance Meetings 1:1. Indicator 13 reviewed at strategic level which takes non competent staff "off the run".</li> </ul>										
<b>Progress update</b>										
<p>Live Fire Unit Update:</p> <p>NFRS have appointed a project manager to progress completion of the revised training delivery methodology and control measures. The project plan will now be updated and reported via NFRS Programme management.</p> <p>NNDC have placed a formal restriction notice on NFRS which simply reflects the control measures we already had in place – these are working well and being applied diligently.</p> <p>ICON, our planning consultants have submitted the necessary planning application required. This includes an amendment to the original permission to facilitate the gas crib installation, and also a separate application for an alternative Compartment Fire Behaviour Training burn site.</p> <p>Estimated time to a decision on planning permission is around October 2018. Target date has moved to 31/01/19. The tender process has closed for the gas crib works. Two bidders entered quotes and evaluation has taken place. The contract was awarded in early September 2018 to KFT. The existing BA refresher programme will continue until the new unit can be commissioned for the revised programme.</p>										

<b>Risk Number</b>	RM14130a		<b>Date of update</b>		04 September 2018					
<b>Risk Name</b>	Lack of consistency and delivery of IMT related systems and services for Cultural Services.									
<b>Risk Owner</b>	Steve Miller		<b>Date entered on risk register</b>		18 August 2017					
<b>Risk Description</b>										
Lack of consistency and delivery of IMT related systems and services could lead to a breakdown to service delivery to the public, loss of credibility, and non-realisation of savings for Cultural Services.										
<b>Original</b>			<b>Current</b>			<b>Tolerance Target</b>				
Likelihood	Impact	Risk score	Likelihood	Impact	Risk score	Likelihood	Impact	Risk score	Target Date	Prospects of meeting Target Risk Score by Target Date
3	3	9	3	3	9	2	3	6	Mar-19	Amber
<b>Tasks to mitigate the risk</b>										
Ongoing discussions with IMT to improve communications, forward planning, and identifying ways of resolving ICT issues with the minimum of Service disruption. Ongoing discussions with third party providers to ensure service levels are maintained.										
<b>Progress update</b>										
Plans are in place in terms of frequent communication to mitigate against potential disruption to Norfolk Record Office and Norfolk Museums Service sites from weekend power-downs and ICT outages out-of-hours and during public holidays.										



<b>Risk Number</b>	RM14223		<b>Date of update</b>		04 September 2018					
<b>Risk Name</b>	Payment Card Industry compliance of call monitoring system									
<b>Risk Owner</b>	Andrew Blaxter		<b>Date entered on risk register</b>		10 March 2015					
<b>Risk Description</b>										
The current call monitoring system is not up to current PCI compliance standards, potentially leaving the organisation exposed from a compliance perspective.										
<b>Original</b>			<b>Current</b>			<b>Tolerance Target</b>				
Likelihood	Impact	Risk score	Likelihood	Impact	Risk score	Likelihood	Impact	Risk score	Target Date	Prospects of meeting Target Risk Score by Target Date
3	5	15	2	3	6	1	3	3	Nov-18	Amber
<b>Tasks to mitigate the risk</b>										
New phone payment system being implemented mid September, this will remove CSC staff capturing credit card details. The new pause and resume call centre recording is due for October 2018. With the new payment system the need for pause and resume will no longer be required, but be a back up.										
<b>Progress update</b>										
Voice and data contract awarded. Updata have produced a Project Initiation Document (PID) and solution. Implementation has been rolled back from January 2018. Finance looking at new payment system, where calls transferred to an automated service, removing all PCI risk of card data. New pay.net system will go live in November 2018, where the CSC will transfer calls to a payment line, removing the need to take credit card details.										

## Risk management discussions and actions

Reflecting good risk management practice, there are some helpful prompts that can help scrutinise risk, and guide future actions. These are set out below.

### Suggested prompts for risk management improvement discussion

In reviewing the risks that have met the exception reporting criteria and so included in this report, there are a number of risk management improvement questions that can be worked through to aid the discussion, as below:

1. Why are we not meeting our target risk score?
2. What is the impact of not meeting our target risk score?
3. What progress with risk mitigation is predicted?
4. How can progress with risk mitigation be improved?
5. When will progress be back on track?
6. What can we learn for the future?

In doing so, committee members are asked to consider the actions that have been identified by the risk owner and reviewer.

### Risk Management improvement – suggested actions

A standard list of suggested actions have been developed. This provides members with options for next steps where reported risk management scores or progress require follow-up and additional work.

All actions, whether from this list or not, will be followed up and reported back to the committee.

#### Suggested follow-up actions

	Action	Description
1	Approve actions	Approve recommended actions identified in the exception reporting and set a date for reporting back to the committee
2	Identify alternative/additional actions	Identify alternative/additional actions to those recommended in the exception reporting and set a date for reporting back to the committee
3	Refer to Departmental Management Team	DMT to work through the risk management issues identified at the committee meeting and develop an action plan for improvement and report back to committee
4	Refer to committee task and finish group	Member-led task and finish group to work through the risk management issues identified at the committee meeting and develop an action plan for improvement and report back to committee
5	Refer to County Leadership Team	Identify key actions for risk management improvement and refer to CLT for action
6	Refer to Policy and Resources Committee	Identify key actions for risk management improvement that have whole Council 'Corporate risk' implications and refer them to the Policy and Resources committee for action.

## Background Information

A **departmental risk** is one that requires:

- strong management at a departmental level thus the Departmental Management Team should direct any action to be taken.
- appropriate management. If not managed appropriately, it could potentially result in the County Council failing to achieve one or more of its key departmental objectives and/or suffer a significant financial loss or reputational damage.

Each risk score is expressed as a multiple of the impact and the likelihood of the event occurring.

- Original risk score – the level of risk exposure before any action is taken to reduce the risk
- Current risk score – the level of risk exposure at the time the risk is reviewed by the risk owner, taking into consideration the progress of the mitigation tasks
- Target risk score – the level of risk exposure that we are prepared to tolerate following completion of all the mitigation tasks. This can be seen as the risk appetite.

The prospects of meeting target scores by the target dates reflect how well the risk owners consider that the mitigation tasks are controlling the risk. It is an early indication that additional resources and tasks or escalation may be required to ensure that the risk can meet the target score by the target date. The position is visually displayed for ease in the “Prospects of meeting the target score by the target date” column as follows:

- Green – the mitigation tasks are on schedule and the risk owner considers that the target score is achievable by the target date.
- Amber – one or more of the mitigation tasks are falling behind and there are some concerns that the target score may not be achievable by the target date unless the shortcomings are addressed.
- Red – significant mitigation tasks are falling behind and there are serious concerns that the target score will not be achieved by the target date and the shortcomings must be addressed and/or new tasks introduced.

# Communities Committee

<b>Report title:</b>	<b>Finance monitoring</b>
<b>Date of meeting:</b>	<b>10 October 2018</b>
<b>Responsible Chief Officer:</b>	<b>Tom McCabe – Executive Director, Community and Environmental Services</b>
<b>Strategic impact</b> This report provides the Communities Committee with financial monitoring information for the services reporting to this Committee for 2018-19.	

## Executive summary

The services reporting to this Committee are mainly delivered by Community and Environmental Services, but also includes elements of services provide through the Managing Director's office.

The 2018-19 net revenue budget for this committee is £47.480m. The Current Forecast out-turn is £0.560m overspend.

The total capital programme relating to this committee for the years 2018 to 2021 is £16.987m. Details of the capital programme are shown in Section 3 of this report.

The balance of Communities Committee reserves as of 1 April 2018 was £7.466m. The reserves at the beginning of the year included committed expenditure and unspent grant income which was carried forward from 2017/18. Details are shown in Section 4 of this report.

### Recommendations:

Members are recommended to note:

- a) **The 2018-19 revenue budget and forecast out-turn position for this Committee.**
- b) **The capital programme for this Committee**
- c) **The balance of reserves brought forward to 2018-19 and the planned use of reserves.**

## 1. Proposal

- 1.1. Members have a key role in overseeing the financial position for the services under the direction of this committee, including reviewing the revenue and capital position and reserves held by the service. Although budgets are set and monitored on an annual basis it is important that the ongoing position is understood and the previous year's position are considered.
- 1.2. This report reflects the budgets for 2018-19 budget and forecast outturn position as at the end of August 2018.

## 2. Evidence

- 2.1. Community and Environmental Services deliver a wide range of services reporting

to a number of different committees, EDT, Business and Property, Digital and Innovation and this Committee, the revenue budget for CES is managed by the Director on a Departmental basis. Elements of services provided through the Managing Directors office also report into this committee.

- 2.2. The 2018-19 NET revenue budget for this committee is £47.480m. Which is £0.041m lower than previously reported to committee in September due to the transfer of the Complaints team which now reports to Policy and Resources.

<b>Table 1: Communities NET revenue budget</b>				
	2018-19 Budget	2018-19 Forecast Outturn	Forecast variance	Actual Spend to Period 5
	£m	£m	£m	£m
Community and Consultation	0.214	0.214	0.000	0.061
Community, Information and Learning	15.846	15.846	0.000	4.816
Culture and Heritage	3.827	3.894	0.067	1.745
Director of Public Health	(0.488)	(0.534)	(0.046)	(5.470)
Equality and Diversity	0.183	0.183	0.000	0.203
Fire Service	28.243	28.782	0.539	10.542
Registrars	(0.345)	(0.345)	0.000	(0.126)
<b>Total for Committee</b>	<b>47.480</b>	<b>48.040</b>	<b>0.560</b>	<b>11.771</b>

- 2.3. Table 1 above reflects the services net revenue budget, details of the Gross budgets are shown in table 2 below

<b>Table 2</b>	<b>Current year budget</b>	<b>Forecast</b>	<b>Forecast Variance</b>	<b>Actuals to period P05</b>
	£m	£m	£m	£m
Expenditure	110.024	110.497	0.473	41.922
Income	(62.544)	(62.457)	0.087	(29.721)
<b>Net</b>	<b>47.480</b>	<b>48.040</b>	<b>0.560</b>	<b>11.771</b>

2.4. Forecast variances

2.5. As at period 5 RBOs have identified the following forecast variances

<b>Table 3</b>		
Service Area	Forecast Variance £m	Narrative
Culture and Heritage	£0.087	Current forecast over spend due to reduced admission fee income over the early part of the year which is due to the good weather.
Culture and Heritage	(£0.020)	Forecast underspend on Salary costs
Director of Public Health	(£0.046)	Forecast underspend on Salary costs
Fire Service	£0.539	Forecast overspend see paragraph 2.6 below.
<b>Net Forecast Overspend</b>	<b>£0.560</b>	

2.6. There are number of pressures currently within the Fire Service:

Period 4 Variance	Reason for variance	Period 5 variance	Reason for movement
200	Additional cost due to recent peak of activity	276	Increase due to continued levels of activity after end of period and delays in claims
100	Additional cost due to current over recruitment to establishment	100	
100	Additional cost of training	100	
40	Additional cost of training specific to Flood water rescue	40	
	Logistics	23	
440		539	

The forecasts are based on current levels of activity and the service will continue to review the profile of expenditure throughout the year and manage costs wherever possible.

Other areas:

2.7. Salary budgets – 45% of the gross expenditure for this committee relates to salary costs. The budget is reviewed annually and is set assuming there will be some turnover of staff. Whilst we are still early in the year there is a turnover of staff above the assumptions in the budget which are reflected in the forecasts. We would anticipate further underspends from salary budgets due to turnover over staff.

### 3. Capital budget

3.1. The overall capital budget for the services reporting to this committee is £16.987m,

an increase of £1.361m from previously reported to Committee. £10.906m is currently profiled to be delivered in 2018-19.

<b>Table 4: Communities Capital programme</b>						
	<b>2018-19 Budget £m</b>	<b>2019-20 Budget £m</b>	<b>2020-21+ Budget £m</b>	<b>Total Programme £m</b>	<b>Actuals to period 5</b>	<b>Forecast Out-turn 2018-19</b>
<b>Norfolk Fire and Rescue Service</b>	5.202	1.590	2.150	8.942	0.140	4.413
<b>Culture and Heritage – Museums</b>	2.629	0.750		3.379	0.243	2.629
Customer Services Strategy	0.165	0.065		0.230	0.070	0.165
E-Commerce Digital Development	0.114	0.003		0.117	0.025	0.114
Single employee portal	0.028	0.261		0.289	0.012	0.028
Libraries	1.309	2.532		3.841	0.277	1.177
Traveller Sites Improvement	0.089			0.089		0.089
Public Health – reducing domestic violence	0.100			0.100		0.100
<b>Committee total</b>	<b>9.636</b>	<b>5.201</b>	<b>2.150</b>	<b>16.987</b>	<b>0.767</b>	<b>8.715</b>

- 3.2. The overall programme has increased by £1.361m due to:
- The inclusion of £0.789m CLG grant funding for Fire service
  - £0.470m of s106 funding for library improvements and
  - £0.100m for reducing domestic violence
- 3.3. The Fire programme includes planned replacement of the Red Fleet (£5.479m) over the 3 years and replacement of critical equipment (£0.669m).
- 3.4. The Library programme includes £0.800m for the refurbishment of the self-service kiosks and building improvement.
- 3.5. The capital programme is managed over multiple years due the nature of delivery of projects as they can take time to plan and deliver. Budget virements may take place throughout the year to reflect the expected profile of deliver.

#### **4. Reserves 2018-19**

- 4.1. The reserves relating to this committee are generally held for special purposes or to fund expenditure that has been delayed, and in many cases relate to external

grants and contributions. They can be held for a specific purpose, for example where money is set aside to replace equipment or undertake repairs on a rolling cycle, which help smooth the impact of funding.

- 4.2. A number of the reserve balances relate to external funding where the conditions of the grant are not limited to one financial year and often are for projects where the costs fall in more than one financial year.
- 4.3. Services continue to review the use of reserves to ensure that the original reasons for holding the reserves are still valid.
- 4.4. The balance of unspent grants and reserves as at 1 April 2018 stood at £7.466m
- 4.5. Table 5 below shows the balance of reserves held and the planned usage for 2018-19.

	Balance at 1 April 2018	Forecast balance 31 March 2019	Forecast Net Change
	£m	£m	£m
<b>Table 5 : Communities Reserves</b>			
<b>Culture, Heritage and Planning</b>			
Income Reserve	(0.163)	(0.163)	0.000
Repair and Renewal Fund	(0.165)	(0.165)	0.000
Residual Insurance and Lottery	(0.183)	(0.176)	0.007
Unspent Grants and Contributions Reserve	(1.491)	(1.176)	0.315
<b>Culture, Heritage and Planning Total</b>	<b>(2.002)</b>	<b>(1.680)</b>	<b>0.322</b>
<b>Head of Support and Development</b>	<b>(0.059)</b>	<b>(0.059)</b>	0.000
<b>Community, Information and Learning</b>			
Income Reserve	(0.114)	(0.114)	0.000
Information Technology	(0.617)	(0.219)	0.398
Repair and Renewal Fund	(0.923)	(0.651)	0.271
Unspent Grants and Contributions Reserve	(0.160)	(0.118)	0.042
<b>Community, Information and Learning Total</b>	<b>(1.814)</b>	<b>(1.101)</b>	<b>0.711</b>
<b>Chief Fire Officer</b>			
EU Regs-Retained fire fighters and P/T Workers	(0.048)	(0.048)	0.000
Fire Pensions Reserve	(0.155)	(0.155)	0.000
Operational Equipment	(0.378)	(0.331)	0.046
Repair and Renewal Fund	(0.456)	(0.472)	(0.016)
Retained Turnout Payments	(0.031)	(0.031)	0.000
Unspent Grants and Contributions Reserve	(0.140)	(0.103)	0.037
<b>Chief Fire Officer Total</b>	<b>(1.208)</b>	<b>(1.141)</b>	<b>0.067</b>
<b>Director Public Health</b>			
Repair and Renewal Fund	(0.040)	(0.040)	0.000
Road Safety Reserve	(0.150)	(0.102)	0.048
Unspent Grants and Contributions Reserve	(1.883)	(1.948)	(0.066)



<b>Director Public Health Total</b>	<b>(2.073)</b>	<b>(2.090)</b>	<b>(0.017)</b>
Registrars - Repair and renewal fund	(0.228)	(0.181)	0.047
<b>Community and Consultation</b>			
Organisational Change and redundancy reserve	(0.075)	(0.075)	
IT reserve	(0.008)	(0.008)	
<b>Community and Consultation Total</b>	<b>(0.083)</b>	<b>(0.083)</b>	<b>0.000</b>
<b>Grand Total</b>	<b>(7.466)</b>	<b>(6.335)</b>	<b>1.131</b>

#### 4.6. Use of reserves

- 4.7. The department will continue to review the delivery of projects and planned use of reserves and will be updated to members as part of this monitoring report.
- 4.8. The current forecast use of reserves is mainly the release of external funding to support the delivery of projects which are delivered over financial years or where funding has been set aside for specific projects.

### 5. Financial Implications

- 5.1. There are no decisions arising from this report and all relevant financial implications are set out in this report

### 6. Issues, risks and innovation

- 6.1. This report provides financial performance information on a wide range of services in respect of this committee.

### Officer Contact

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

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# Communities Committee

<b>Report title:</b>	<b>Forward Plan and update on decisions taken under delegated authority</b>
<b>Date of meeting:</b>	<b>10 October 2018</b>
<b>Responsible Chief Officer:</b>	<b>Tom McCabe – Executive Director, Community and Environmental Services</b>
<b>Strategic impact</b> Providing regular information about key service issues and activities supports the Council's transparency agenda and enables Members to keep updated on services within their remit. It is important that there is transparency in decision making processes to enable Members and the public to hold the Council to account.	

## **Executive summary**

This report sets out the Forward Plan for Communities Committee. The Forward Plan is a key document for this committee to use to shape future meeting agendas and items for consideration, in relation to delivering communities issues in Norfolk. Each of the Council's committees has its own Forward Plan, and these are published monthly on the County Council's website. The Forward Plan for this Committee (as at 13 September) is included at Appendix A.

This report is also used to update the Committee on relevant decisions taken under delegated powers by the Executive Director (or his team), within the Terms of Reference of this Committee. There are no relevant delegated decisions to report to this meeting.

### **Recommendations:**

- 1. To review the Forward Plan at Appendix A and identify any additions, deletions or changes to reflect key issues and priorities the Committee wishes to consider.**

## **1. Forward Plan**

- 1.1. The Forward Plan is a key document for this committee in terms of considering and programming its future business, in relation to communities issues in Norfolk.
- 1.2. The current version of the Forward Plan (as at 13 September) is attached at Appendix A.
- 1.3. The Forward Plan is published monthly on the County Council's website to enable service users and stakeholders to understand the planning business for this Committee. As this is a key document in terms of planning for this Committee, a live working copy is also maintained to capture any changes/additions/amendments identified outside the monthly publishing schedule. Therefore, the Forward Plan attached at Appendix A may differ slightly from the version published on the website. If any further changes are made to the programme in advance of this meeting they will be reported verbally to the Committee.

## **2. Delegated decisions**

- 2.1. The report is also used to update on any delegated decisions within the Terms of Reference of this Committee that are reported by the Executive Director as being of public interest, financially material or contentious. There are no relevant delegated decisions to report to this meeting.

### **3. Financial Implications**

- 3.1. There are no financial implications arising from this report.

### **4. Issues, risks and innovation**

- 4.1. There are no other relevant implications to be considered by Members.

### **5. Background**

- 5.1. N/A

### **Officer Contact**

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

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# Forward Plan for Communities Committee

## Appendix A

Issue/decision	Implications for other service committees?	Requested committee action (if known)	Lead officer
<b>Meeting : Wednesday 7 November 2018</b>			
Norfolk Armed Forces Community Covenant Strategy and Action Plan	None	Review progress made on the Norfolk Armed Forces Covenant Action Plan and identify areas where Communities might like to receive further information	Armed Forces Community Covenant Senior Officer (Merry Halliday)
Norfolk Community Learning Services	None	To receive an update on the service, including latest performance and development activity.	Assistant Director, Community, Information and Learning (Ceri Sumner)
Smarter Information and Advice	This is one of the Norfolk Futures workstreams and work will relate to all council services.	To consider the progress made to progress the Smarter Information and Advice workstream as part of the Norfolk Future programme.	Assistant Director, Community, Information and Learning (Ceri Sumner)
Annual review of public health strategy	None	To review progress during 2018 and agree our strategic priorities and commissioning intentions for 2019.	Public health Business Manager (Sally Newby)
Recommendations from the Casualty Reduction Member Task and Finish Group	None	To receive and consider feedback and recommendations from the Member Task and Finish Group for Casualty Reduction.	Public Health Commissioning Manager (Nadia Jones)
Finance Monitoring	None	To review the service's financial	Finance Business Partner

# Forward Plan for Communities Committee

## Appendix A

Issue/decision	Implications for other service committees?	Requested committee action (if known)	Lead officer
		position in relation to the revenue budget, capital programme and level of reserves.	(Andrew Skiggs)
Forward Plan and decisions taken under delegated authority	None	To review service updates on key issues and activities and identify any areas where the Committee would like to receive further information.	Head of Support & Development (Sarah Rhoden)
<b>Meeting : Wednesday 16 January 2019</b>			
Smarter Information and Advice	This is one of the Norfolk Futures workstreams and work which will relate to all council services	To consider and approve the Information and Advice Strategy	Assistant Director, Community, Information and Learning (Ceri Sumner)
Finance Monitoring	None	To review the service's financial position in relation to the revenue budget, capital programme and level of reserves.	Finance Business Partner (Andrew Skiggs)
Forward Plan and decisions taken under delegated authority	None	To review service updates on key issues and activities and identify any areas where the Committee would like to receive further information.	Head of Support & Development (Sarah Rhoden)
<b>Meeting : Wednesday 6 March 2019</b>			
Annual report of the Norfolk Armed Forces Community	Annual Report – March each year	Review progress made on the Norfolk Armed Forces	Senior Planning and Partnerships Officer (Merry

# Forward Plan for Communities Committee

## Appendix A

Issue/decision	Implications for other service committees?	Requested committee action (if known)	Lead officer
Covenant		Covenant Action Plan and identify areas where Communities might like to receive further information	Halliday) /
Trading Standards Service Plan including Food & Feed Law Enforcement Plan (FFLEP) and Enforcement of Age Restricted Sales & Illegal Tobacco Plan (EARSITP)	None	To review the Trading Standards Service Plan and adopt the plan, if approved.	Head of Trading Standards (Sophie Leney)
Norfolk Fire and Rescue - annual statement of assurance	None	To note and agree the Norfolk Fire and Rescue Service annual statement of assurance.	Chief Fire Officer (David Ashworth)
Norfolk Fire and Rescue – annual service plan	None	To agree the annual service plan for the coming year.	Chief Fire Officer (David Ashworth)
Risk management	None	Review and comment on the risk information and consider any areas of risk that require a more in-depth analysis	Chief Internal Auditor (Adrian Thompson) / Risk Management Officer (Thomas Osborne)
Performance management	None	Comment on performance and consider areas for further scrutiny.	Business Intelligence and Performance Analyst (Austin Goreham)
Finance Monitoring	None	To review the service's financial position in relation to the revenue budget, capital programme and level of reserves.	Finance Business Partner (Andrew Skiggs)

# Forward Plan for Communities Committee

## Appendix A

Issue/decision	Implications for other service committees?	Requested committee action (if known)	Lead officer
Forward Plan and decisions taken under delegated authority	None	To review service updates on key issues and activities and identify any areas where the Committee would like to receive further information.	Head of Support & Development (Sarah Rhoden)

Regular items	Frequency	Requested committee action (if known)	Lead officer
Forward Plan and decisions taken under delegated authority	Every meeting	To review service updates on key issues and activities and identify any areas where the Committee would like to receive further information.	Head of Support & Development (Sarah Rhoden)
Performance management	Four meetings each year – January, March, June/July, October	Comment on performance and consider areas for further scrutiny.	Business Intelligence and Performance Analyst (Austin Goreham)
Risk management	Four meetings each year – January, March, June/July, October	Review and comment on the risk information and consider any areas of risk that require a more in-depth analysis	Chief Internal Auditor (Adrian Thompson) / Risk Management Officer (Thomas Osborne)
Finance Monitoring	Every meeting	To review the service's financial position in relation to the revenue budget, capital programme and level of reserves.	Finance Business Partner (Andrew Skiggs)
Annual report of the Norfolk Armed Forces Community Covenant	Annual Report – March each year	Review progress made on the Norfolk Armed Forces Covenant Action Plan and identify areas where Communities might like to receive further information	Senior Planning and Partnerships Officer (Merry Halliday) /

Regular items	Frequency	Requested committee action (if known)	Lead officer
Norfolk Armed Forces Community Covenant Strategy and Action Plan	Annually – July each year	Review progress made on the Norfolk Armed Forces Covenant Action Plan and identify areas where Communities might like to receive further information	Armed Forces Community Covenant Senior Officer (Merry Halliday)
Annual review of the Enforcement Policy	Next meeting October/November 2019. Also to be reviewed by the EDT Committee as policy covers Highways, planning services and Trading Standards enforcement activities.	To approve the Enforcement Policy and its appendices, and to agree to the ongoing review of the Policy on an annual basis.	Head of Trading Standards (Sophie Leney)