

**7 March 2019****Agenda Item:14****REPORT OF THE SERVICE DIRECTOR, PLACE AND COMMUNITIES****UPDATE ON KEY TRADING STANDARDS AND COMMUNITIES MATTERS****Purpose of the Report**

1. To approve the Service Pricing Structure for 2019/20, the cessation of work to explore the viability of an Alternative Service Delivery model, the Food and Feed Enforcement Plan for 2019/20, the Nominated Neighbour Scheme expansion plan, the Communities Strategy 2019-2021, and the use of appropriate media opportunities. Further, to update the Committee on key Trading Standards and Communities matters.

**Information****Trading Standards**

2. **Pricing Structure for 2019-20** – the Service provides a range of paid for services to businesses, other local authorities', and government agencies. The Authority has the discretion to set charges for these services.
3. At the Community Safety Committee on the 10 January 2017, approval was given to the Service to adopt a flexible and market-based charging approach to act in a more commercial and flexible manner. The Committee approved moving away from an hourly charge model, to a more customer focused pricing structure.
4. The approval allowed product specific, flexible pricing, and the scope to make price offers to businesses based on relevant market conditions. Given its continued success this year, it is proposed that the similar model, as set out below, is used for all fees and charged from 1 April 2019 onwards.
5. It is proposed that charges levied would be authorised by the Group Manager, Trading Standards and Communities, using the full cost recovery rate as the foundation for building charges. The final rates would be decided using a pricing model suitable for the market in which the service is operating, and prices varied in accordance with market conditions.
6. To decide on appropriate charges, it is proposed the following principles are once again utilised:
  - The maximum average hourly charge should never exceed the Full Cost Recovery rate.

- Pricing models that can be utilised can include, but not restricted to:
    - Hourly rate;
    - Day Rate;
    - Project Cost; or
    - Specified Activity Cost.
7. Regarding charges to other External Enforcement Bodies, the Service receives requests to deliver one-off projects, for example a programme of inspections. Because of the one-off/specialist nature, and they often bring other tangible benefits. It is proposed that in line with existing arrangements, the fee to be charged should be agreed by the Group Manager, Trading Standards and Communities on a case-by-case basis.
  8. It is further proposed that that any fee agreed in such a way should not be below a rate equivalent to full cost recovery of the direct staff time spent delivering the activity.
  9. **Alternative Service Delivery Model (ASDM)** – as part of ongoing work to identify ways to minimise the net cost of the Service, officers identified that the use of an Alternative Delivery Model with regard to commercial operations may provide some level of additional income and/or cost reduction.
  10. Since the idea was proposed, the need to develop a more comprehensive one-stop advice offer was identified as a more pressing and fruitful piece of development work. The additional freedoms explored as part of the Commercial Development Unit work with regards to charging models has now mitigated much of the need for an ASDM. As such, it is proposed that work to explore the ASDM is ceased.
  11. **Food & Feed Law Enforcement Service Plan 2019-20** - Section 6 of the Food Safety Act 1990, and section 76 of the Agriculture Act, places a duty on the Authority to enforce certain provisions of those Acts regarding food for human consumption and feeding stuffs for animals.
  12. The Food Standards Agency (FSA) is the central competent authority for overseeing official feed and food controls. It works closely with authorities to set and monitor standards, coordinate activity, and audit authorities' delivery of official controls, to ensure enforcement is effective, risk based, proportionate and consistent.
  13. The Service delivers food and animal feed standards work, which includes labelling and quality controls. Responsibility for (human) food hygiene controls falls to District Council Environmental Health Services.
  14. The FSA requires the completion of annual Service Plans, regarding them as important tools to ensure that national priorities and standards are delivered locally. It requires the Authority's key decision makers to be fully engaged in official food and feed controls work, and as such, the proposed plan for 2019-20 is attached as **Appendix 1** for the Committee to consider and approve.
  15. **Food Safety** – The Service continues to deliver on the 2018/19 Food Plan, working with Environment Health colleagues, with allergen and food labelling being a current high priority.
  16. Recent work includes:
    - Officers tracking down residual supplements being offered for sale, following the prosecution of an unsafe food supplement business. A major international online retailer has ensured that all the identified supplements have now been removed from it's website;

- Working with a major supermarket's head office, when incomplete allergen information was found on the instore bakery products. Officers ensured that the correct information was immediately provided nationally to all stores;
- Advice was given to a new food business regarding the lack of allergen information being provided to customers. The business operator co-operated & officers gave advice to ensure the matter was quickly resolved;
- Labelling advice given to a food manufacturer on a new product, to ensure compliance pre-production, saving the company money and preventing safety concerns.
- Detailed advice on food colours in imported food was given to a food importer and distributor (imported colours are often not permitted and are unsafe). Officers also ensured that the food packaging was food appropriate and safe.
- Written warning issued to a takeaway business. Numerous food safety issues were uncovered, including food labelled not in English, incorrect and misleading menu descriptions, and a failure to declare allergens. The warning letter issued to the company detailed immediate corrective. A re-inspection confirmed actions had been taken; and
- Joint targeting by food officers and Illicit Tobacco Team officers of businesses that use food supply as a 'front' for selling illicit tobacco. Not only can Food Officers use their powers to prevent the supply of out of date food, this tactic is proving an important tool to disrupt the supply of illicit tobacco.

17. **Trading Standards Approved "Checktrade" Trader Scheme** – Following concerns raised by a member of the public, officers have been considering whether "Trading Standards" approval might give residents a false sense of security when dealing with traders and their workers.
18. Whilst using the scheme does provide higher levels of safeguards than using non-approved traders, it does not stop the need for residents to still exercise caution, particularly around verifying the identity of workers before allowing them into their home.
19. This issue hasn't been previously raised – it was therefore discussed at the recent steering group meeting between Checktrade and its Trading Standards partner authorities. It was agreed that partner authorities could add additional caveats to their local marketing of the scheme.
20. In Nottinghamshire, a note has been added to information provided about the Checktrade scheme on the County Council's website, and the Nott's Help Yourself website. This reminds consumers to always be vigilant, and to always ask for proof of identity before letting any tradesperson into their home.
21. Further advice is also given about how to independently verify the identity of tradespeople, by calling the number listed in the phone book or online. Trading Standards Officers referring residents to the scheme have also been asked to remind residents of this need to verify the caller's identity.
22. **Fraud Against the Vulnerable - Mass Marketing Scams** – at the January committee meeting, the Leader sought reassurance regarding how scam awareness messages are communicated to the public, particularly via the Authority's website.
23. An action in the Council's Financial Abuse and Scams Action Plan in 2018 saw Trading Standards and Communication colleagues working together to improve the scams content on the Authority's website. An additional page was added: [www.nottinghamshire.gov.uk/scams](http://www.nottinghamshire.gov.uk/scams).

24. The webpage is regularly updated and links to [www.friendsagainstscams.org.uk](http://www.friendsagainstscams.org.uk), a comprehensive and useful resource regularly updated by the National Trading Standards (NTS) Scams team.
25. New information on our scams page relates to the revised Scam Marshall scheme - a Scam Marshal is a resident who has been targeted by a scam, and now wants to fight back. They do this by sharing their experiences, helping others to report and recognise scams and sending any scam mail to the NTS Scams Team to be used as intelligence. Residents can now sign up to the scheme directly at [www.friendsagainstscams.org.uk](http://www.friendsagainstscams.org.uk).
26. Officers are working with Nott's Watch to encourage Neighbourhood Watch co-ordinators to register as Scam Champions, and to recruit new "Friends" and Scam Marshalls. Similarly, we are meeting Meals at Home colleagues, with the aim of delivering Friends Against Scams training to their staff.
27. Further, the Neighbourhood Alert system is used to provide targeted information about scams impacting particular areas or communities. We encourage residents, colleagues and partners agencies to sign up to receive the Neighbour Alert updates. Press releases and social media messages are also regularly used to raise awareness of particular scams or promote sign up to the Friends Against Scams scheme.

28. Officers continue to intervene in relevant cases. Recent examples include:

- Officers visited an elderly widow, that intelligence showed was being targeted by scammers. Registering her for the telephone preference service and the installation of a call-blocker phone significantly reduced unwanted calls. Having served in the Armed Forces, she was helped to obtain her service number to access veteran services. Of benefit was the Royal British Legion Handyman Service, as she was struggling to do the jobs her late husband had previously dealt with, leaving her more susceptible to doorstep crime.

We were also able to advise her of the Death Notification Service, as she was struggling to notify all the financial institutions of her husband's death. Our intervention succeeded in reducing the resident's vulnerability at this time of recent bereavement.

- An elderly vulnerable resident received support having lost money to a telephone scam. The company claimed that for a small fee they would get the resident back Council Tax overpayments. He was also receiving many nuisance scam calls from other companies.

Officers installed a call blocker to screen calls and block unwanted ones – since installation, 8 international scam calls and 6 other nuisance callers who were repeatedly calling the resident to scam them have been blocked. The system allows the 'trusted' numbers of family and friends to be added to the 'safe' calls list.

**29. Fraud Against the Vulnerable - Doorstep Crime** – Officers continue to intervene in relevant cases. Recent examples include:

- Interventions were made on behalf of an elderly consumer who had paid for poor roofing that had caused a leak and property damage. The trader co-operated with Trading Standards Officers to remedy the complaint and a £1,000 partial refund was given to the consumer.
- Officers immediately responded to a report of a doorstep crime incident involving an elderly vulnerable resident who was house-bound and had restricted mobility. Bogus traders had cold called the resident and offered various works to the property. £20,000 had been paid into the criminal's bank account for sub-standard work. Officers worked with the resident's bank to stop and refund the £20,000 payment. 'Target hardening' support was delivered, and the criminals are aware of our involvement. Investigations continue.

30. **Fraud Against the Vulnerable - Nominated Neighbour Scheme** – following the last report to Committee, officers have been exploring different areas where the scheme could be implemented to the most effect. The following outline plan was designed and is being implemented: -

DATE	ACTION
December 2018	Contact District Council Housing Officers with introduction to scheme with offer of meeting to develop scheme within area
December 2018	Contact and meet with NottsWatch as an introduction to scheme
January 2019	Meet with Newark and Sherwood Homes to identify potential supported living complexes within the district to implement scheme
January 2019	Utilise Neighbourhood Alert to advertise the scheme to residents
February & March 2019	Identify all other supported living complexes within the County
March 2019	Publish an article in NottsWatch newsletter regarding the scheme
March & April 2019	Write to all identified supported living complexes to introduce the scheme and increase awareness with Housing Support Managers
Ongoing	Work with media colleagues to report on developments of the scheme along with positive news stories to encourage new members.

31. The December meetings have already taken place. Officers are already working with Rushcliffe Borough Council regarding expansion of the scheme which could potentially be introduced to a second supported living complex in March 2019.
32. **Animal Health: Fly Grazing** – Trading Standards and Communities colleagues continue to work closely regarding the response to fly grazed equines on both Council and privately-owned land. Trading Standards can advise on the legal aspects of both fly grazing and animal welfare.
33. With regards to the question raised by Committee regarding the microchipping of equines, this can only be done by the legal owner or keeper of the animal. A horse passport must also be produced at the same time. In relation to fly-grazed equine, the County Council must have gone through the legal process to place those animals in its custody before being able to have it microchipped, and a passport applied for.
34. **Illicit Tobacco** – Officers continue to apprehend sellers and distributors illicit tobacco products. The dedicated Illicit Tobacco Team, which includes a Nottinghamshire Police Officer, share intelligence with other agencies and authorities as well as Public Health colleagues. This intelligence picture is crucial to maximise the impact of our work.
35. A warrant was executed at a residential address in Mansfield in November 2018 where 1,500 packs of counterfeit cigarettes and 61 pouches of counterfeit hand rolling tobacco were seized, with a retail value of £15,890. 2 males were arrested and interviewed. Investigations continue.

36. During October, November and December 2018 a total of 2,537 packs of illicit tobacco were seized along with 93 pouches of hand rolling tobacco, with a total retail value of £27,700. Enquiries and legal processes continue regarding several premises and individuals.
37. **Regional Investigations Team (RIT)** The Team continue to investigate complex frauds that impact upon not only Nottinghamshire consumers but further afield.
38. Members will recall that the team are 'tasked' investigations, either by the tasking groups of Trading Standards East Midlands or the National Trading Standards Board. Operations are largely initiated by Trading Standards Services but will reach a point where the consumer detriment is discovered to be cross border and complex and require significant and specialist resource.
39. The team currently has 6 live investigations. With a core team of only 5 permanently employed staff, demand is such that additional officers are required. The team is wholly grant funded by the National Trading Standards Board and employs a flexible model to bring in agency officers to supplement the permanent staff.
40. During 2018/19, the team received a core budget of £320,000. This was supplemented by a further £595,600 across 3 specific operations.
41. One of the operations involves an alleged national energy tariff fraud listed for a 10-week trial at Nottingham Crown Court, commencing the 25<sup>th</sup> March 2019.
42. **Legal Update – Counterfeit Product - Justin Marriott** – Marriott appeared in the Crown Court on the 18<sup>th</sup> January, charged with the possession of counterfeit electrical items and clothing. He pleaded guilty to the charges. He was sentenced to 7 months in prison (suspended for 2 years) and ordered to undertake 150 hours unpaid work. A proceeds of crime investigation is continuing.
43. **Illicit tobacco – Alans Newsagents** – A trial was listed in the Nottingham Crown Court on the 5<sup>th</sup> March 2018 for 3 defendants who have been charged with offences for supplying counterfeit and dangerous cigarettes from the shop in Beeston. Due to lack of court time, the trial has been put back until March 2019.
44. **Fake jewellery seller – Ka Man Lam** - two online sellers appeared in the Nottingham Crown Court in June charged with offences of selling mis-described platinum and diamond rings and ear rings. They were due to appear for trial on the 7<sup>th</sup> January 2019. On the morning of trial, Ka Man Lam pleaded guilty to the offences, and the charges against a second defendant were dropped. Lam was fined £3000 and ordered to pay £26,526, this being the benefit of her crime. Compensation of £899 is to be paid from this amount to the victims in this case.
45. **Allergens – Nicola Brownson-Smith** - appeared in the Mansfield Magistrates court on the 14<sup>th</sup> December 2018 and pleaded guilty to food labelling offences. She was selling food supplements that did not have the correct declaration of allergens, and she was also making unauthorised health claims on her products. She was fined £660.
46. **Doorstep Criminal – James Eaton** - the defendant appeared at an initial hearing in the Nottingham Crown Court on the 19<sup>th</sup> June 2018, at which time he entered not guilty pleas. At the trial date of 21<sup>st</sup> January 2019, Eaton pleaded guilty to 7 counts of fraud, and is scheduled to be sentenced in April.
47. **Doorstep Crime** - In a separate case, another defendant has also been charged with fraud offences for making false representations to customers about building work he was undertaking. He appeared in the Nottingham Crown Court on the 7<sup>th</sup> November 2018 and pleaded not guilty to 8 counts of fraud. He is listed for trial on the 3<sup>rd</sup> June 2019.

## COMMUNITIES

48. The Team, established April 2018, brings together the Council's community, voluntary sector and community safety work to more effectively deliver its ambitions for supporting communities.
49. The Team continues to develop its specialist resource to support the delivery of the Local Improvement Scheme, its responsibility for facilitating the Safer Nottinghamshire Board (SNB), and delivering the outcomes needed to support communities.
50. Officers have been working with key stakeholders and partners, externally and internally, to develop new approaches to deliver significant contributions to making communities stronger, vibrant and more resilient.
51. The Team's remit is broad, the work complex, and the demands and aspirations for it, in common with many public services, are greater than available resource. This calls for careful prioritisation to maximise the return on investment for our communities.
52. The Communities Strategy attached as **Appendix 2**, sets out the proposed priorities and measures for the team for 2019 - 2021, for consideration and approval by Committee.
53. **Knife Crime Strategy** - The Team is working with partners in the County, and as also as part of SNB programme management to develop and co-ordinate our response to knife crime. The proposed strategy includes work with the third sector, and building resilient and cohesive communities, that reflect commitments made in the Place Strategy and Communities Strategy.
54. Work includes:
- Promoting community safety through the early identification of those at risk of committing or becoming a victim of knife crime;
  - Work with public health and associated health care providers to tackle knife crime and associated violence as a public health issue; and
  - Increasing the confidence of communities affected by anti-social behaviour, youth violence and gang-related crime that the problem is being properly addressed.
55. **Modern Day Slavery** - The Team has a co-ordinating responsibility for ensuring that the Council has a Modern-Day Slavery statement which is reviewed and renewed annually, and that appropriate initiatives are driven forward to tackle modern slavery.
56. The statement for 2019 will be considered at an upcoming Policy Committee. The Council is committed to understanding the threat presented by slavery and ensuring that there is no slavery or victims of human trafficking working within the Council, within commissioned organisations or our supply chain.
57. During 2018, the Team supported Nottingham Trent University to evaluate and minimise any potential risk within Adult Social Care supply chains, commissioning of care, and the use of direct payment providers.

## Other Options Considered

58. **Charging approach for 2019/20** - costing models were appraised as part of developing the commercial plan as part of the Commercial Development Unit process. All have been reviewed during 2018/19.
59. **Alternative Service Delivery Model** - consideration has been given to continuing to explore the idea however this would divert resource away from higher priority matters.
60. **Food and Feed Plan** – The plan is a requirement of the Food Standards Agency. As such, the Trading Standards Service proposed plan for 2019-20 is attached as **Appendix 1** to this report for the Committee to consider and approve.

## Reason/s for Recommendation/s

61. **Charging approach for 2019/20** - All costing options and models were appraised as part of developing the commercial plan for the Service as part of the Commercial Development Unit process. The proposal passed the scrutiny test of the Chief Executive panel and was subsequently approved by Policy Committee on 16th November.
62. **Alternative Service Delivery Model** - suspension of the exploratory work allows staff to focus on higher priority developmental areas.
63. **Food and Feed Plan 2019/20** – There are no other options. The FSA places a great deal of importance on ensuring that the Authority's key decision makers are fully engaged in official food and feed controls work. As such, the Trading Standards Service proposed plan for 2019-20 is attached as **Appendix 1** to this report for the Committee to consider and approve.
64. **Nominated Neighbour Scheme** – the proposal is an important vehicle by which the Authority can support those communities susceptible to scams and frauds. The scheme mobilises more appropriate resource external to the Authority to reduce crime.
65. **Communities Strategy** – the proposed strategy sets out how the Authority will maximise the impact of the Communities Team on priority areas.

## Statutory and Policy Implications

66. This report has been compiled after consideration of implications in respect of crime and disorder, data protection and information governance finance, human resources, human rights, the NHS Constitution (public health services), the public sector equality duty, safeguarding of children and adults at risk, service users, smarter working, sustainability and the environment and where such implications are material they are described below. Appropriate consultation has been undertaken and advice sought on these issues as required.

## Crime and Disorder Implications

67. The Service makes significant contributions to reducing crime and disorder as outlined in the information provided in the body.

## Human Resource Implications

68. **Food and Feed Plan** – the proposed plan requires the investment of approximately £150k in staffing costs into delivery of the plan, equivalent to 2.6FTE of existing resource. This is lower than the Food Standards Agency would ideally like.



69. The report contains no additional human resource implications, with all activity proposed being delivered from the existing staffing resource.

### **Financial Implications**

70. **Charging approach for 2019/20** - All costing models were appraised for the commercial plan developed as part of the Commercial Development Unit process. A flexible, market-based approach is key to achieving the additional income target of £132k agreed at Committee on 7 December 2017.

71. **Food and Feed Plan** – the proposed plan requires the investment of approximately £150k in staffing costs into delivery of the plan.

72. The report contains no additional financial implications, with all activity proposed being funded from within the existing service budget.

## **RECOMMENDATION/S**

That the Committee:

- 1) Ratifies the updates given regarding key Trading Standards and Communities matters;
- 2) Approves the proposals to adopt the charging approach and principles contained in the report for 2019-20;
- 3) Approves the cessation of work to explore the use of an Alternative Service Delivery model for commercial operations in the Service;
- 4) Approves the Authority's 2019-20 Food & Feed Law Enforcement Service Plan as set out in the Appendix 1 to this report;
- 5) Approves the approach outlined for expanding the Nominated Neighbour Scheme;
- 6) Approves the Communities Strategy as set out in Appendix 2 to this report; and
- 7) Approves the use of appropriate media opportunities to promote services offered by the Service, and to assist in the prevention of the crime and disorder matters as detailed in the report.

**Derek Higton,**  
**Service Director, Place and Communities**

**For any enquiries about this report please contact:** Mark Walker, Group Manager Trading Standards & Communities, Tel: 0115 977 2173

### **Constitutional Comments [KK 31/01/2019]**

73. The proposals in this report are within the remit of the Communities and Place Committee.

### **Financial Comments [RWK 28/01/2019]**

74. The financial implications are set out in paragraphs 70, 71 and 72 of the report.

### **Background Papers and Published Documents**

- None

### **Electoral Division(s) and Member(s) Affected**

- All

***TRADING STANDARDS &  
COMMUNITIES SERVICE***

***FOOD & FEED LAW ENFORCEMENT  
SERVICE PLAN 2019-20***

## **1. SERVICE AIMS & OBJECTIVES**

### **1.1 Aims and Objectives**

Our Purpose is to:

***To give Nottinghamshire a better Trading Environment***

What Matters to our Customers:

***Help me solve my problem quickly and stop problems happening to others***

Our key strategic aims are:

- ***Tackle the areas of most consumer detriment***
- ***Target the most serious rogue traders***
- ***Protect the most vulnerable consumers***
- ***Help legitimate businesses to trade well***
- ***Tackle the area's most compromising consumer safety***
- ***Maintain healthy and disease-free livestock***
- ***Seek opportunities to generate income to achieve our overall purpose***

### **1.2 Links to Corporate Objectives & Plan**

In 2017, the County Council underwent a reorganisation in which the Trading Standards Service moved into the newly created Place Department. The Place Department brings together many council provided services whose aim is to create places (The best environment and conditions) so people and businesses want to be in Nottinghamshire.

In 2012, the Authority moved from a Cabinet to a Committee System in respect of political governance. Food and feeding stuffs work is now the direct responsibility of the Communities and Place Committee who receive and review all reports in relation to food and feeding stuffs work as appropriate. The current Committee Chair is Councillor John Cottee

The key policies and drivers for the County Council are set-out in the Corporate Business Plan. Food and Feeding Stuffs activity links to this through the Place Department Strategy

## **2. BACKGROUND**

### **2.1 Profile of Nottinghamshire**

Nottinghamshire is a shire county and covers an area of **2,085 sq. km** (805 sq. miles). It has a population of **805,848 people** and a workforce of **375,195**. The largest concentration of people is found in the conurbation of Nottingham, with 114,500 people in Bassetlaw, 112,200 in Broxtowe, 115,900 in Gedling 106,600 in the Mansfield district, and 118,600 in Newark and Sherwood.

## 2.2 Organisational Structure

See **Annex 1** attached.

## 2.3 Scope of the Feed and Food Service

Nottinghamshire County Council is part of the two-tier system of local government in the County which divides responsibilities between the County Council and seven District Councils. As part of this division, Food Standards work is the responsibility of the County Council's Trading Standards Service, whilst Food Hygiene work is the responsibility of the District Councils.

The County Council's Trading Standards Service has sole responsibility for carrying out the official controls in relation to animal feeds. These controls cover areas such as storage, transportation, composition, labelling, and contamination.

The Service adopts an intelligence led approach to enforcement in line with our purpose and key strategic aims. We also give a commitment to conduct annual enforcement visits at all our high-risk premises.

Analytical services are provided by an external Public and Agricultural analyst service.

## 2.4 Demands on the Food and Feed Service

As of January 2019, there were 6419 known registered food businesses in Nottinghamshire, 3 approved feed hygiene premises, and 1700 Feed Hygiene Registered Premises categorised as shown in the tables below.

	<b>High Risk</b>	<b>Upper Medium Risk</b>	<b>Lower Medium Risk</b>	<b>Low Risk</b>	<b>Total</b>
<b>Registered Food Businesses 2018 2019</b>	14	142	5647	616	<b>6419</b>

	<b>High Risk</b>	<b>Upper Medium Risk</b>	<b>Lower Medium Risk</b>	<b>Low Risk</b>	<b>Total</b>
<b>Approved Feed Hygiene Premises 2018</b>	n/a	n/a	3	0	<b>3</b>
<b>Feed Hygiene Registered Premises 2018</b>	3	29	97	1571	<b>1700</b>

Our Service delivery contacts are as follows:

**Trading Standards & Community Safety Service**  
**County House**  
**100 Chesterfield Road South**  
**Mansfield**  
**Nottinghamshire**  
**NG19 7AQ**

(Opening hours: Mon-Thurs 8.30am-5.00pm, Friday 8.30am-4.30pm)

**Tel: 0115 804 1147 or 0300 500 8080 (Businesses and Enforcement Agencies)**  
**03454 040506 (Citizens Advice Consumer Services for Consumers)**

**Fax: 0115 804 0620**

**Website: [www.nottinghamshire.gov.uk](http://www.nottinghamshire.gov.uk)**

**Email: [trading.standards@nottscc.gov.uk](mailto:trading.standards@nottscc.gov.uk)**

## **2.5 Enforcement Policy**

Where we find problems, we will consider all formal action options, including prosecution. All enforcement action is taken in accordance with the Service's documented Enforcement Policy. The service is continuing to explore the option of using alternative enforcement strategies as an alternative to formal enforcement.

The service is now using the provisions set out in Section 43 of the Official Feed and Food Controls (England) Regulations 2009 which permit official control bodies such as this service to recoup any additional expenses incurred, where additional work or expenditure is required as a result of non-compliances and the resources required to deal with the non-compliances fall outside the authorities planned activities.

## **3. SERVICE DELIVERY**

### **3.1 Interventions at Food and Feeding Stuffs Premises**

In 2019/20 the Service will;

- Carry out programmed inspections in accordance with a risk-based approach;
- Conduct an inspection during the year at all food and feed premises rated as *high risk* at the start of the financial year;
- Verify that the risk rating of other premises is appropriate, by undertaking a sample of inspections to check compliance at low and medium risk rated premises;
- Target businesses as a result of appropriate intelligence from complaints received, local and national food audits, food alerts and advice from the Food Standards Agency (FSA);

- Conduct inspections in accordance with the Code of Practice issued under Section 40 of the Food Safety Act 1990, and the FSA Feed Law Code of Practice;
- Carry out any appropriate revisits to ensure compliance following problems identified in first inspections;
- Follow up on the results of the takeaway allergen samples (see details below)

Where difficulties in interpretation of legislation occur, our officers can seek assistance from a number of internal and external sources, as detailed in our procedures relating to food and feed interventions (OP521 and OP527).

The Food Information Regulations 2014 (FIR) are now fully in force and the service continues to support businesses to comply with these regulations. Basic advice is available to business by signposting to online resources, with more detailed or bespoke advice being provided only on a cost recovery basis.

One of the significant changes introduced by the FIR was the requirement to provide information to consumers in relation to allergens present in non-prepacked food. This provision was intended to provide consumers who suffered from food allergies, with the information they needed about allergens to give them more confidence in their safety than they had previously, when eating out, or from takeaways.

To maximise limited resources, this service is working with our colleagues from district council Environmental Health departments, to provide advice to catering premises such as takeaways, who provide non-prepacked foods. We have a joint agreement in place whereby Environmental Health officers provide limited advice and signposting to sources of advice while carrying out their own inspections of food premises, in relation to some labelling requirements of the Food Information Regulations 2014 including allergen labelling. The aim is to reduce the burden on business and to avoid duplication in the deployment of resources.

There have been several high-profile cases in the media recently that have highlighted issues with the allergen information provided by premises that sell non-prepacked food to the ultimate consumer, such as restaurants, takeaways and sandwich bars. To understand the current level of compliance with the allergen information requirements a project is being undertaken, in conjunction with Environmental Health Officers by taking samples from a representative group of establishments selling food in this manner, to check for undeclared allergens.

The results of this work will form the basis of a review by this Service and Environmental Health to formulate whatever work may be required on this issue for 2019-20 within the resources available. The aim will be to maximise the effectiveness of and strengthen the collaborative approach to ensuring business compliance and protecting consumers within Nottinghamshire.

### **3.2 Food and Feeding Stuffs Complaints**

In 2019/20 the Service will;

- Consider complaints as part of the Service's intelligence-led approach to enforcement in line with our purpose and key strategic aims; and

- Where a complaint is regarding foreign bodies or food safety, officers will promptly refer the complaint to the relevant Environmental Health Department.

From April 2018 until January 2019 the Service had received 58 Food Standards complaints and 4 feeding stuffs complaints. The service also dealt with 13 Primary Authority Food Standards referrals, and 35 requests for advice from Food traders, 3 Primary Authority feeding stuffs referrals, and 2 requests for advice from a Feed Trader.

Complaints received during 2018/19 have included issues such as, incorrect allergen information being provided, and other incorrect labelling. Issues in relation to food being on sale beyond its durability marking (both Best Before and Use By), have featured again with complaints being made against businesses including supermarkets and smaller stores. There have also been complaints about food products being either mis-described or substituted for other foods.

No complaints relating to feed quality were received.

### **3.3 *Primary Authority Scheme***

The Service no longer offers Home Authority relationships but offers Primary Authority Partnerships.

The Authority currently has entered into Primary Authority Partnerships that cover food matters with 18 businesses, whilst 5 partnerships also cover feeding stuffs.

In 2019-20 we will;

- Request enforcement colleagues inform us of any relevant issues relating to Nottinghamshire businesses to discharge our duties either as an enforcing authority or to provide basic advice under the Regulator's Compliance Code where appropriate; and
- Inform the originating authority of our actions, and where it is inappropriate for this Authority to act, will provide relevant information to colleagues to assist them in resolving the matter themselves.

From April 2018 until January 2019 the Service dealt with enquiries from both Primary Authority Companies and other Nottinghamshire based businesses regarding a wide range of technical issues. Issues included allergen labelling advice, advice in relation to nutrition labelling and health claims, general food labelling advice etc.'

The Service also dealt with enquiries from feed businesses in areas including labelling requirements and in relation to permitted suppliers of feed additives.

### **3.4 *Advice to Business***

In 2019-20, the Service will:

- Provide Nottinghamshire businesses with free basic legal compliance advice, either verbally, by email or by way of signposting to web-based business advice;

- Offer businesses more in-depth bespoke support, charged for on a cost recovery basis.

From April 2018 until January 2019 the Service provided a range of advice to several businesses in relation to general food labelling for products such as snack foods, food supplements, spirit-based drinks, soft drinks, assorted bakery products, and prepared meals for home delivery to vulnerable consumers. There was also advice provided to feed businesses on treat labels, relabelling of feed and permitted use of additives.

### **3.5 *Feed and Food Sampling***

In 2019/20, the Service will;

- Ensure that all sampling activity is intelligence-led, based on an assessment of most harm, and in line with the Service's purpose and key strategic aims;
- Sample products for analysis where officers have concerns in relation to the product compliance and analysis is appropriate.
- Follow documented procedures for all food standards and animal feeding stuffs sampling; and
- Continue to source analytical services by the Authority's appointed external Public and Agricultural analyst;

#### ***Worcestershire Scientific Services, Worcester WR4 9FA.***

In 2018/19, the Service sampled a range of food and feed materials. Some samples arose because of complaints or taken during inspections.

Samples were also taken following nationally agreed priorities identified by the FSA based on known and emerging intelligence and based on the national priorities. These included

- Food supplements examined for compliance
- Compound feed tested for Vitamin A, D and copper tolerance levels.
- Non-prepacked food tested for undeclared allergens

### **3.6 *Control and Investigation of Outbreaks and Food Related Infectious Disease***

This function is the responsibility of District Councils within Nottinghamshire.

### **3.7 *Feed/Food Safety Incidents***

In 2019/20, the Service will:

- Follow its documented procedures for any feed and food safety incidents and feed and food hazard warnings;
- Allocate sufficient resources to effectively deal with such incidents; and
- Take any action in accordance with the relevant Codes of Practice.

The Service receives all appropriate food and feed safety alerts, and action those that directly impact on Nottinghamshire Food and Feed Business Operators.

### **3.8 *Liaison with Other Organisations***



In 2019/20, the Service will:

- Ensure that enforcement action is consistent with that of its neighbouring authorities; and
- Liaise with a range of organisations to appropriate levels in carrying out its food and feed law enforcement function. These include:
  - **Food Standards Agency;**
  - **Public Analyst - Worcestershire Scientific Services;**
  - **District Authorities' Environmental Health Services;**
  - **Environmental Health Food Group;**
  - **Trading Standards East Midlands (TSEM), the TSEM Food Group and the TSEM Feed Group;**
  - **Medicines and Healthcare Products Regulatory Agency;**
  - **HM Revenue and Customs;**
  - **Department of Environment, Food and Rural Affairs (DEFRA);**
  - **Animal and Plant Health Agency (APHA);**
  - **Veterinary Medicines Directorate;**
  - **Health Protection Agency (East Midlands);**
  - **International Federation of Spirits Producers Ltd (IFSP);**
  - **Animal Health - Egg Inspectorate;**
  - **Nottinghamshire Police; and**
  - **Port Health inspectors**

In 2018-19 this Service received referrals from the Food Standards Agency in relation to Apricot Kernels containing higher levels of hydrocyanic acid than permitted and in relation to labelling of stock cubes for infants.

The service regularly passes information to the Environmental Health Services within the county including complaints about issues such as hygiene and foreign bodies and arranges joint inspections where this may be beneficial.

### **3.9 *Food and Feeding Stuffs Safety and Standards Promotion***

In 2019/20, the Service will:

- Ensure all promotional work supports the intelligence-led approach to enforcement;
- Ensure it effectively raises awareness of key issues;
- Employ a variety of channels, including;
  - Content on our website (information for businesses and consumers etc.);
  - Media campaigns and press releases;
  - Use of social networking media;
  - Expansion of our Nottinghamshire web-based Neighbourhood Alert system.

The service continues to use the website, [tscommercial@nottsc.gov.uk](mailto:tscommercial@nottsc.gov.uk), that was developed to showcase the range of chargeable services which are available to both local and national businesses to support them with their legal requirements.

## **4. RESOURCES**

### **4.1 *Financial Allocation***

In 2019-20, the Service will:

- Invest approximately £150k in food and feeding stuffs enforcement; and
- Vary this level according to a dynamic analysis of emerging needs during the year.

In 2018-19, a similar investment was made.

### **4.2 *Staffing Allocation***

In 2019-20, the Service will:

- Authorise its officers for Feed and Food enforcement following a documented procedure, OP520; and
- Bring in appropriately qualified staff from other agencies or authorities to plug any short-term staff resource pressures.

The Service currently employs the following officers:

- 3.92 FTE both food & feed qualified;
- 7.72 FTE food only qualified; and
- 0.8 FTE feed only qualified.

Officers are multifunctional, and therefore deal with other areas of trading standards work based on an assessment of relative risk, threat and harm.

The current total annual commitment to food and feed work is 2.6 FTE. This includes inspectional work, officer competency training, complaint investigations and business enquiries, providing data to the FSA etc.

The FSA Framework Agreement and Codes of Practice require the Service to inspect all of its feed and food premises on a frequency based on the assessed risk level of the business.

Feed premises are now risked using the new National Trading Standards Board modelling, which considers the nature of the business, their level of compliance and earned recognition.

Food premises are presently risked using the National Trading Standards Board risking system, which is different to the FSA food risking system, and gives different visit frequencies for certain premises

The current frequencies would mean that:

- For food premises all high-risk premises are visited every year, upper medium risk premises inspected every 2 years, and lower medium and low risk premises are inspected every 5 years; and
- For feed premises there are similar frequency levels in that for high risk it is every year, upper medium risk every 2 years, lower medium every 3 to 4 years and low risk every 5 years. The frequency can be extended if the premises have earned recognition.

The Service is currently committed to inspecting all high-risk premises, and to inspect some medium and low risk premises. This is below the level required by the FSA's inspection regime for food premises. For Feed premises, the Service will commit to inspecting the agreed level of inspections following a profiling of feed premises using the risk system allotted by the FSA (including taking into account FSA recognised assurance schemes).

If the FSA's requirements for Food and Feed visits frequency was followed, a total of 6.75FTE would be required as opposed to the 2.6FTE required to deliver this plan.

#### **4.3 Staff Development Plan**

In 2019-20, the Service will:

- Undertake an individual assessment of officer's competence against the Food Standards Agency Code of Practice to establish development needs.
- Maintain lead specialists for Food and Feed who will be tasked with dynamically identifying training needs arising from legislative or enforcement practices changes.

The Service has a career scheme based around the national Trading Standards Qualification Framework. Officers are supported to complete relevant modules within the framework.

## **5. QUALITY ASSESSMENT**

In 2019-20, the Service will:

- Follow its documented procedure OP401 to ensure a programme of internal audits of our Food & Feed delivery are undertaken;
- Support the principle of peer review with neighbouring authorities within Trading Standards East Midlands?

## **6. REVIEW**

### **6.1 Review against the Service Plan**

In 2019-20 the Authority will;

- Monitor progress against the plan

- Ensure the plan is regularly reviewed by Trading Standards Managers;
- Report food and feeding stuffs matters to the Communities and Place Committee as appropriate for political scrutiny.

In 2018-19, information reports were provided as appropriate to Communities & Place Committee Meetings outlining relevant food and feeding stuffs work. Copies of these public reports can be viewed at [www.nottinghamshire.gov.uk](http://www.nottinghamshire.gov.uk).

## **6.2 Identification of any variation from the Service Plan**

In 2019-20 the Service will;

- Identify variations from the plan;
- Analyse the reasons for the variations;
- Develop corrective actions;
- Review the content of the plan to ensure it continues to meet the needs of our stakeholders.

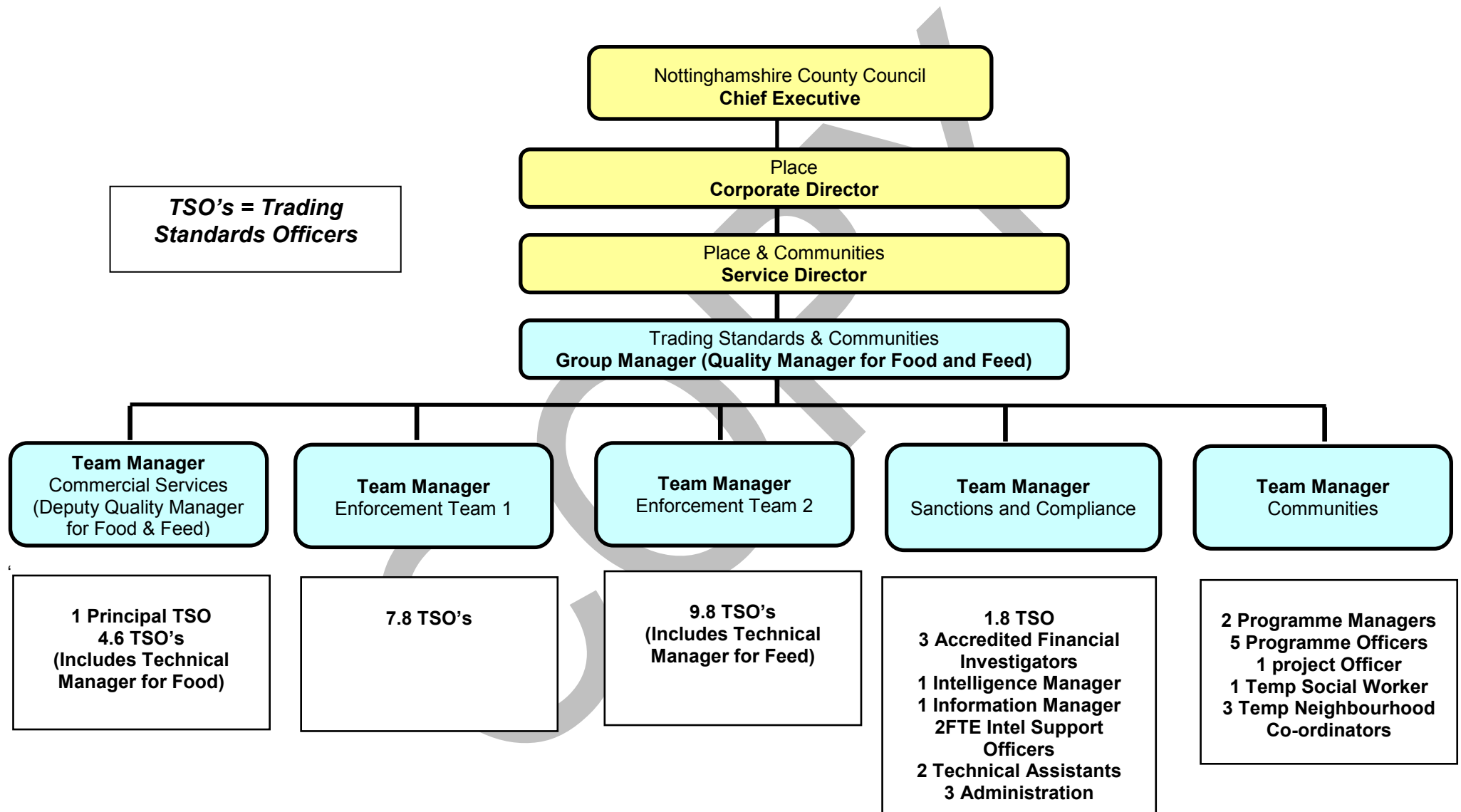
## **6.3 Areas of Improvement**

In 2019-20, the Service will;

- Identify areas for improvement; and
- Incorporate in the 2020-2021 food and feed law enforcement plan if appropriate, or deal with immediately if required.

**Annex 1:**

## NOTTINGHAMSHIRE TRADING STANDARDS & COMMUNITIES SERVICE STRUCTURE



## **APPENDIX 2**

### **COMMUNITIES STRATEGY - A FRAMEWORK FOR INVESTING IN COMMUNITIES**

#### **INTRODUCTION**

1. This framework sets out how the Communities Team will support the Council's ambition to put local people at the heart of everything it does, and to also enable the growth of vibrant and supportive communities.
2. Nottinghamshire has a large and diverse community and voluntary sector which occupies an important position between policy development, service provision and everyday life. Nottinghamshire continues to face unprecedented financial challenges for public services. The way in which issues such as budget reductions, rising costs and increased demand for services are addressed, requires transformational change.
3. Issues such as Nottinghamshire's size and rurality, an ageing population and reducing budgets, means there are many services that the Council has traditionally provided that are no longer available, or need to be delivered in a different way. The Council therefore has an important role in working in partnership to help identify and manage risk, by developing an increased focus on prevention and early intervention. The role of local government in supporting communities to be stronger, more resilient and cohesive is critical. Apart from deploying staff resource to achieve this aim, the Authority also has a long history of providing financial support.
4. The Crime and Disorder Act 1998 gave a statutory responsibility to local authorities such as the County Council, the police, and other partners to reduce crime and disorder in their communities. Anti-social behaviour (ASB), substance misuse, and reducing reoffending were subsequently added to the remit. These responsible authorities were brought together when Community Safety Partnerships (CSP's) were established. Since 2007, for two tier authorities such as Nottinghamshire, there has been an additional requirement to have a Community Safety Agreement.
5. The introduction of Police and Crime Commissioners (PCC's) in 2011 brought in a requirement for the PCC to have regard to the priorities of the CSP partner authorities, and for those authorities to also have regard to the police and crime objectives, as set out in the Police and Crime Plan. It also brought with it a mutual duty for the PCC and the responsible authorities to act in co-operation in exercising their respective functions.

6. The legislation that established the requirement for CSP's, also made it a requirement for a county-level group to be established. In Nottinghamshire, this group is the Safer Nottinghamshire Board (SNB), chaired by the County Council's Chief Executive.

## THE COMMUNITIES TEAM

7. Established in April 2018, the Team brought together the Council's community and voluntary sector work, and its community safety responsibilities, and realigned the capacity to deliver its ambitions for supporting communities. The combined function has a mix of specialist and flexible resource to support the delivery of the Local Improvement Scheme (LIS), its responsibility for the facilitation of the Safer Nottinghamshire Board, and delivering the outcomes required by the Council for supporting communities.
8. The Team is comprised of the following posts:

Team Manager	1
Programme Manager (LIS, SNB)	2
SNB Project Manager	1
Programme Officer	5
Neighbourhood Coordinator	3
Project Officer	1
Business Support	2
Apprentice	1

9. As part of the Trading Standards and Communities Service, the Team is developing new approaches to deliver significant contributions to making communities stronger, vibrant and more resilient.
10. The remit of the Team is extremely broad, the work complex, and the demand is greater than available resource. Therefore, careful prioritisation is paramount to maximise the returns for our communities while keeping within available resource. This inevitably means that there will be a number of things the Team is simply unable to do. This strategy sets out what the Communities Team priorities will be over the next 2 years.

## DRIVERS OF THE STRATEGY

11. The Team has significant roles to play in tackling the challenges facing our communities. This requires innovative ways of thinking, new approaches to problem solving, and more effective ways of partnership working and influencing stakeholders, to maximise total resource available to achieve better outcomes.
12. The drivers for this approach are built around the Council Plan '*Your Nottinghamshire, Your Future*', and also the Place Department Strategy. Working with a range of internal and external partners, the Team has expertise in helping communities and individuals. The Team will drive this approach to deliver improved contributions to the Place Department's four key commissioning programmes, which are:
  - Investing in place and community
  - Investing in opportunity areas
  - Investing in economic and social regeneration
  - Investing in skills and aspiration
13. This Communities Strategy provides a framework for more detailed plans and activities, for example the Local Improvement Scheme Strategy, which will contribute to supporting communities to be strong and resilient.
14. The Team will support people and communities to help themselves – many communities within Nottinghamshire have vibrant groups and active volunteers, who work innovatively and collectively to add to the richness of local life, and to assist more people who need additional help and support.
15. The Local Improvement Scheme is one key programme where the Authority directly supports communities to provide the range of services and activities that are important and relied upon. The Team will also support and promote the ambitions of communities to do even more, such as through upskilling themselves.
16. By more effective partnership working to protect communities from crime and anti-social behaviour, people can be more confident about their safety. The Team will bring about innovative ways of thinking and interventions to support communities. The community safety approach consists of delivery at both the primary and secondary prevention levels. In order to prevent crime and antisocial behaviour occurring, the Team will work with our partners and local communities to help people to help themselves, and each other.



17. Where issues do occur, we will adopt a problem-solving approach, with our partners, to tackling the underlying causes to prevent escalation. We will work with key voluntary and community sector organisations, and local residents, to provide a universal offer across Nottinghamshire. Underpinning this approach is the recognition that to be able to fully understand and respond in partnership to the problems that affect our communities, it is necessary to identify and address the underlying causes.
18. Many Nottinghamshire residents play an active part in their communities, for example by volunteering, joining 'Friends of' groups, coaching sports, serving as school governors, and serving on parish councils. The Team will encourage more people to become active citizens, taking responsibility for their own neighbourhoods and communities, supporting each other and helping make Nottinghamshire the welcoming, friendly place it is to live.
19. As well as empowering communities, the Team also assist in taking enforcement action where required, tackling, in particular, serious and organised crime groups involved in scams and frauds targeting the most vulnerable in our communities.
20. We will also mobilise our services and influence to drive and build civic pride.
21. In the next 2 years we will have:
- Built on our strong history of working with communities to support positive change;
  - Used our influence to help protect communities from crime and anti-social behaviour, so people can be more confident about their safety;
  - Continued to fund and support the Local Improvement Scheme across the county, helping to make Nottinghamshire a great place to live, work and relax; and
  - Sought out opportunities to contribute to securing the best service for our residents.

**Place  
Department  
Commissioning  
Programmes**



***“The Team will  
drive this  
approach to  
deliver  
improved  
contributions to  
the Place  
Departments  
four key  
commissioning  
programmes”***

## COMMUNITIES PRIORITIES, ACTIVITIES & WORKSTREAMS 2019 - 21

Council Plan Priority/Place Commissioning Programme	Activity	Work stream	Success Measures
<p><i>Helping people to help themselves</i></p> <p><i>Investing in place &amp; community</i></p>	Deliver the Local Improvement Scheme	<p>Manage the Council's three-year funding programme</p> <p>Monitor and review revenue funding commitments</p> <p>Deliver an annual capital funding application scheme</p> <p>Monitor and review annual capital funding commitments</p> <p>Deliver an annual talented athletes' scheme</p>	<p>Increased range of opportunities from which local communities, including parish councils, can build local improvements as a result of County Council investment</p> <p>Number of:</p> <ul style="list-style-type: none"> <li>Nottinghamshire residents benefitting from the Local Improvement Scheme per year.</li> <li>Talented athletes benefitting from the Local Improvement Scheme per year competing at national and international level.</li> <li>Volunteers per year contributing to the delivery of services and activities receiving support from the Local Improvement Scheme per year.</li> <li>Volunteer hours per year contributing to the delivery of those services or activities receiving Local Improvement Scheme support.</li> <li>Volunteer hours per year supporting schemes, and the economic value of volunteers' time contributing to community health and well-being.</li> </ul>
<p><i>Helping people to help themselves</i></p> <p><i>Promoting healthier lifestyle choices</i></p> <p><i>Investing in social and economic regeneration</i></p> <p><i>Investing in skills and aspiration</i></p>	Build community capacity	Provide packages of tailored information, advice and support to groups to improve services / activities	<p>Number of Community Groups who:</p> <ul style="list-style-type: none"> <li>Have the confidence and support to review their governance arrangements and make improvements to ensure that they are compliant with relevant legislation, regulation and operating in line with current best practice.</li> <li>Are better equipped to support and develop volunteers.</li> <li>Are provided with information about possible funding opportunities.</li> <li>Are provided with relevant information about training opportunities for voluntary staff and volunteers.</li> </ul>

Council Plan Priority/Place Commissioning Programme	Activity	Work stream	Success Measures
			<ul style="list-style-type: none"> <li>Are provided with information about possible networking opportunities (within and outside of the Council), and are encouraged to share and learn from each other.</li> <li>Can make better use of technology.</li> </ul>
<i>Helping people to help themselves</i>  <i>Investing in place &amp; community</i>  <i>Investing in skills and aspiration</i>	Increased community-led development, through promoting a community organising model and developing the Age Friendly Nottinghamshire approach	Deliver community organising training across 4 areas, and to workforce  Establish good neighbourhood and befriending schemes	Effective collaboration to deliver improved public health outcomes  Promote community cohesion by addressing loneliness, isolation, vulnerability and enhancing neighbourliness  Increased capacity built in communities  Community assets promoted  Reduced isolation levels  Increased decision making in communities  Increased social responsibility and activation, developed by drawing on good practice principles of volunteering, community organising and social prescribing.  Community organising and social action training offered for employees and communities
<i>Helping people to help themselves</i>  <i>Promoting healthier lifestyle choice</i>  <i>Investing in place &amp; community</i>	Work closely with stakeholders and partners to engage communities, enabling local people to feel more in control of work to improve their communities	Facilitation of the council's armed forces covenant.  Co-ordination of pilot project in partnership with Nottingham Forest Football Community Charity	Communities support each other through increased volunteering and involvement in local organisations  (Defence) Employee Recognition Scheme Gold Award achieved  A Defence Covenant Forum that meets at least twice a year  Elected Member Armed Forces champion appropriately supported  Officer point of contact communicated

Council Plan Priority/Place Commissioning Programme	Activity	Work stream	Success Measures
			<p>Number of events/activities supported to promote the social, economic and healthy wellbeing of veterans and their families</p> <p>Number of young people encouraged to compete in sporting activities</p>
<p><i>Protecting communities from crime and anti-social behaviour so people can be more confident about their safety</i></p> <p><i>Investing in place &amp; community</i></p>	Development of problem-solving structures with communities, supported by effective integrated working and information sharing to reduce crime in key neighbourhoods.	<p>Facilitation of the Safer Nottinghamshire Board and its work</p> <p>Management of the Police &amp; Crime Commissioners Initiatives Fund</p> <p>Maximise the reach and use of ECINs</p> <p>Targeting activity that promotes a safe culture, addresses vulnerability, promotes early intervention, prevention and community resilience</p> <p>Tackling hate crime by coordinating the Council's approach</p> <p>Work with our partners to identify community concerns and co-ordinate the Councils response to those</p>	<p>The delivery of shared priorities and an effective community safety agreement</p> <p>Community Safety Partnerships adequately supported to deliver local community safety strategies</p> <p>Effective performance management arrangements in place for SNB</p> <p>Improved confidence in local communities through effective engagement</p> <p>Communities feel part of the solution, and that they have a key role in problem solving</p> <p>Partners work effectively together to support communities to be safe and resilient</p> <p>Appropriate information sharing across partner agencies is effectively facilitated through appropriate tools such as ECIN's</p> <p>Number of tailored interventions to protect vulnerable residents</p> <p>People live in communities which support each other through volunteering and involvement in local organisations</p> <p>22. Greater capacity in local communities developed by supporting them to find day to day solutions for local challenges.</p> <p>23.</p> <p>24. Improved community cohesion by reducing levels of loneliness, isolation, vulnerability and enhancing neighbourliness.</p> <p>25.</p> <p>People feel safer (New question OPCC survey) at: (a) home, (b) work, (c) travelling and (d) online</p> <p>Residents feel that people from different backgrounds get along well with each other</p>

Council Plan Priority/Place Commissioning Programme	Activity	Work stream	Success Measures
		<p>issues/areas which have the biggest impact</p> <p>Contributing to the reduction of rural crime</p> <p>Contribute to the management of illegal encampments on Council property</p> <p>Working with and influencing our residents to build strong and cohesive communities that stigmatise harmful behaviours including knife carrying</p> <p>Co-ordinating the Council's approach to Modern Day Slavery and Human Trafficking</p> <p>Co-ordinating the Council's responsibility for 'PREVENT'</p>	<p>Residents feel there is a strong sense of belonging and community where they live</p> <p>Improved awareness of the impact of rural crime in partnership with parish and town councils, Nottswatch and good neighbour schemes</p> <p>An agreed countywide illegal encampment protocol</p> <p>An annual statement which reiterates the Councils commitment to understanding modern slavery risks; and ensuring that there is no modern slavery in its own business and supply chains</p>
<i>Protecting communities from crime and anti-social behaviour so people can be more confident about their safety</i>	Work with our communities in those areas where the nature and prevalence of crime occurrences are	Act as a link for the Council with key partners on community safety matters by:	<p>Joint working with neighbourhood policing and community safety partnerships to bring about effective responses to issues raised</p> <p>Resilient and cohesive communities built and supported to help people help each other</p>

Council Plan Priority/Place Commissioning Programme	Activity	Work stream	Success Measures
<i>Investing in place &amp; community</i>	consistently having more impact	<ul style="list-style-type: none"> <li>• Regular liaison with neighbourhood police inspectors</li> <li>• Involvement in CSP's</li> <li>• Joint working with NottsWatch</li> </ul>	
<i>Protecting communities from crime and anti-social behaviour so people can be more confident about their safety</i>  <i>Investing in place &amp; community</i>	Work with key internal and external stakeholders to improve community cohesion	<p>Develop approaches that establish and facilitates new ways of working for dealing with complex issues for vulnerability including:</p> <p>Gypsy, Roma and Travellers liaison</p> <p>Homelessness</p> <p>Migrants and Asylum Seekers</p> <p>People with learning disabilities</p> <p>Work with partners to manage issues around Junction 27 of M1</p>	<p>Engaged communities through a good neighbour focus</p> <p>Joint approaches with community and voluntary organisations developing new ways of working</p> <p>Effective initiatives developed to support the most disadvantaged groups in society</p>

