

Finding	Recommendation	Priority Rating	Management Response	Responsible Officer	Implementation Date	Follow Up Response
<p>Objective: Streetscene enforcement helps deliver and maintain a safe, clean, green and pleasing environment for the public of South Somerset and its visitors.</p>						
<p>1. Streetscene enforcement is not applied fairly and consistently due to lack of strategy, policy and procedure.</p>						
<p>1.1a An approved Enforcement Strategy is not in operation.</p>	<p>I recommend the Principal Environmental Health Officer ensures an Enforcement Strategy is produced and that it receives member approval.</p> <p style="text-align: right;"><i>SWAP Ref: 25262</i></p>	3	<p>Principal Environmental Protection Officer (PEPO) will draft a strategy and get agreement as necessary. This may be combined with the Enforcement Policy in recommendation 2</p>	Principal Environmental Health Officer	31/03/15	<p>Enforcement specific policy has not yet been written as wanted to wait for General Policy first to enable dovetailing. This will now be progressed following production of Somerset wide policy in recommendation 2. Target Sept 2015</p>
<p>1.2a The Streetscene Enforcement Policy has not been reviewed since December 2005. There is no reference within this policy that in deciding the appropriate disposal of a case mitigating factors will be taken into consideration and where prosecution is to be</p>	<p>I recommend the Principal Environmental Health Officer ensures the Environmental Health Enforcement Policy reflects the up-to-date conditions in relation to Streetscene offences and has the document approved by members.</p>	3	<p>Environmental health Enforcement Policy is being reviewed by EH Manager in partnership with other Somerset authorities. PEPO will contribute to ensure enforcement team offences are included. This may be combined with the Enforcement Strategy in</p>	Environmental Health Manager/ Principal Environmental Health Officer	31/03/15	<p>Partially complete A Somerset wide Environmental Health enforcement policy has been produced and will be adopted by SSDC</p>

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considered the evidential and public interest must be satisfied.	SWAP Ref: 25263		recommendation 1			
1.3a Although the procedure for Abandoned vehicles was reviewed in 2012, those within the Enforcement Policy have not been updated since 2005.	<p>I recommend the Principal Environmental Health Officer ensures:</p> <ul style="list-style-type: none"> all Streetscene operational procedures are reviewed and updated where appropriate; all procedures include the fields for author; approval date; reviewer; review date; version number; table of contents; table of amendments; page numbers. the Regulatory Information and Management System is used as a repository storing all the procedures and made accessible to all Streetscene Enforcement staff. 	3	Relevant modules of the Regulatory Information and Management Systems (RIAMs) will be purchased to provide up to date and controlled operational procedures	Principal Environmental Health Officer	31/12/14	<p>Completed</p> <p>Enforcement modules of RIAMs have been purchased, relevant officers trained and procedures now in use.</p>

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	<i>SWAP Ref: 25264</i>					
1.4a The job description for a Streetscene Enforcement Officer is not up-to-date.	I recommend the Principal Environmental Health Officer ensures the Streetscene Enforcement Officer's job description is updated to reflect the current aspects of this role. <i>SWAP Ref: 25715</i>	3	Job description will be reviewed	Principal Environmental Health Officer	31/12/14	Partially complete Job description has been reviewed but has yet to be formally re-issued Target Aug 2015
1.5a Streetscene Enforcement Officers have not received sufficient training to perform their role effectively.	I recommend the Principal Environmental Health Officer addresses the points raised by Legal Services in order to ensure that all investigations are performed to the required professional standard. <i>SWAP Ref: 25716</i>	4	PEPO will review operational procedures and training regarding investigation practices	Principal Environmental Health Officer	31/12/14	Completed Operational procedures and training have been reviewed. Officers now have access to procedures and paperwork in RIAMs. Recent cases also been discussed with legal services to ensure required standards being met.

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1.6a The Streetscene enforcement strategy and policy are not published on the internet and therefore the general public will be unaware of the Council's stance in relation to Streetscene offences and what action will be taken against offenders.	I recommend the Principal Environmental Health Officer ensures the Streetscene Enforcement Strategy and Streetscene Enforcement Policy are published on the Council's Environmental Health webpage. <i>SWAP Ref: 25421</i>	3	Relevant documents will be published on website when produced	Principal Environmental Health Officer	31/03/15	Partially complete The new policies are not yet published as they are still to be properly adopted by SSDC. As soon as this is done they will be published on the internet. Target Aug 2015 for generic and Oct 2015 for specific
2. The health and safety of the public and visitors, along with the environment and reputation of the Council could be damaged as Streetscene offences are not discouraged through effective enforcement.						
2.1a Insufficient benchmarking of data with neighbouring and comparable Councils.	I recommend the Principal Environmental Health Officer periodically benchmarks the performance of Streetscene enforcement against other Councils within Somerset through the Somerset Environmental Protection Managers Group. Figures benchmarked should include the numbers of	3	PEPO will explore opportunities for benchmarking with other Somerset EH departments to include suggested items	Principal Environmental Health Officer	31/10/14	Completed Discussions have been held with other Somerset EH departments. Some difficulties in benchmarking as not all undertake same functions. Comparison of figures takes place at Somerset Fly-tipping task force. PEPO will continue to benchmark as

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	written warnings; official cautions; fixed penalty notices and prosecutions administered. <i>SWAP Ref: 25712</i>					opportunities allow
2.3a Insufficient performance measures to judge the effectiveness of Streetscene enforcement.	I recommend the Principal Environmental Health ensures local performance measures are developed around: <ul style="list-style-type: none"> professionalising investigative practices; a percentage reduction in Streetscene offences over the financial year. <i>SWAP Ref: 25713</i>	3	PEPO will review performance measures with EH Manager	Principal Environmental Health Officer/ Environmental Health Manager	31/12/14	Completed Discussion held with PEPO and EH manager. At this time have agreed not to introduce any specific measures as unable to identify a useful measure. However, investigative practices will be monitored through production and success of investigation files.
2.4a Although ESG has the facility to run reports on performance, this is not being used.	I recommend the Principal Environmental Health Officer ensures, whichever database is used performance reports are run on a periodic bases to gauge the effectiveness of the Streetscene Enforcement Team. These reports	3	PEPO will work to move enforcement team functions to flare database. Once this move is complete performance reports can be set up and run routinely	Principal Environmental Health Officer/ Research and Support Assistant	30/04/15	In hand A project is underway to move enforcement functions to flare and also to integrate this with our customer first Indigo system which is an essential part of the

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	<p>should include, but not be restricted to the offences, numbers of sanctions administered and court outcomes.</p> <p><i>SWAP Ref: 25415</i></p>					<p>process. This is a combined project with other streetscene functions. A report is going to District Executive in June 2015 to seek approval for necessary funding with a target date of Dec 2015 for full implementation.</p>
<p>2.5a Cases do not meet acceptable standards in terms of presentation. There has been no sign-off from line management.</p>	<p>I recommend the Principal Environmental Health Officer ensures a file structure is defined within a procedure for all different types of sanction cases. This should include, but is not restricted to a:</p> <ul style="list-style-type: none"> • summary of evidence that lists the salient points of the case; • recommendation to management, listing the evidence, mitigation offered, the public interest and suggested method of disposal; • evidence of approval by line management 	3	<p>PEPO has a suitable file structure in place that can be rolled out to enforcement team which includes points listed</p>	Principal Environmental Health Officer	30/09/14	<p>Completed</p> <p>New file structure has been provided to all enforcement officers and is now in place and has been used for several cases. Legal services also happy with file structure and this includes a sign-off from management.</p>





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	<i>SWAP Ref: 25400</i>					
2.5b Interviews under caution are not compliant with the Police and Criminal Evidence Act 1984.	I recommend the Principal Environmental Health Officer ensures all interviews under caution are conducted on tape, disc or video and in accordance with the Police and Criminal Evidence Act 1984. <i>SWAP Ref: 25401</i>	3	The majority of PACE interviews are already conducted on CD in accordance with PACE. There are occasions where this is not possible, for instance the offender lives a long way from our district. In these cases alternative methods may be used but PEPO will ensure these are compliant with PACE	Principal Environmental Health Officer	30/09/14	Completed Interviews are being conducted in accordance with PACE with the majority being recorded on CD
2.6a Lack of documented key stage reviews on cases subject to more formal action.	I recommend the Principal Environmental Health Officer ensures key stage reviews of enforcement cases subject to formal disposal are held with the Streetscene Enforcement Officers and the outcomes of each review is noted on the investigation log. <i>SWAP Ref: 25265</i>	3	PEPO will carry out and record key stage reviews. This will be recorded on flare action diary once the system is in place for the enforcement team. Until then a review note will be kept in the hard copy file.	Principal Environmental Health Officer	30/09/14	Completed Reviews are being conducted and manually recorded in the file as flare not yet in place. Target for Flare to be in place Jan 2016
2.7a There has been no proactive action taken to feedback outcomes of	I recommend the Principal Environmental Health Officer ensures	3	PEPO will review what feedback is given to customer on case close down	Principal Environmental Health	Review by 30/12/14	Completed Customers will be

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investigations to the customer and gauge internal and external satisfaction with regards to Streetscene enforcement.	<p>feedback is given to those people who have taken the time to report a Streetscene offence and customer satisfaction questionnaires are sent to them to gauge the team's performance.</p> <p style="text-align: right;"><i>SWAP Ref: 25266</i></p>		and if appropriate close down letters will be sent. A customer satisfaction survey will be carried out for enforcement team cases	Officer	Survey by 30/04/15	<p>contacted to give feedback on close and a template letter has been produced which can be used if required.</p> <p>In hand Survey delayed as not easy to run reports of customers until these are recorded on flare. Will carry out survey once requests recorded on flare. Target May 2016</p>
2.8a Although reports have been presented to Area Committees in relation to Streetscene enforcement, they have not been detailed enough with regards to the number of reports received and the number of sanctions administered.	I recommend the Principal Environmental Health Officer ensures periodic reports are prepared for senior management and members with regards to the performance of the Streetscene Enforcement Team. This should include, but not be restricted to the number of: reports received; sanctions administered, as well as celebrations of	3	An Environmental health report is taken to area committees each year by EH Manager. PEPO and EH Manager will ensure appropriate details for enforcement team are now included. PEPO will discuss with EH Manager what periodic reports are required and produce as agreed	Principal Environmental Health Officer/ Environmental Health Manager	31/10/14 to review information to EH Manager. 31/05/15 next annual report due to area committees.	<p>Completed Regular discussion with PEPO and EH manager. Once requests are recorded on flare more formal reporting can take place. Target for requests to be on flare end March 2016 EH manager and PEPO will ensure enforcement information is included in annual report.</p>

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	success and any planned improvements. <i>SWAP Ref: 25420</i>					

Audit Framework Definitions

Control Assurance Definitions

Substantial		I am able to offer substantial assurance as the areas reviewed were found to be adequately controlled. Internal controls are in place and operating effectively and risks against the achievement of objectives are well managed.
Reasonable		I am able to offer reasonable assurance as most of the areas reviewed were found to be adequately controlled. Generally risks are well managed but some systems require the introduction or improvement of internal controls to ensure the achievement of objectives.
Partial		I am able to offer Partial assurance in relation to the areas reviewed and the controls found to be in place. Some key risks are not well managed and systems require the introduction or improvement of internal controls to ensure the achievement of objectives.
None		I am not able to offer any assurance. The areas reviewed were found to be inadequately controlled. Risks are not well managed and systems require the introduction or improvement of internal controls to ensure the achievement of objectives.

Categorisation Of Recommendations

When making recommendations to Management it is important that they know how important the recommendation is to their service. There should be a clear distinction between how we evaluate the risks identified for the service but scored at a corporate level and the priority assigned to the recommendation. No timeframes have been applied to each Priority as implementation will depend on several factors; however, the definitions imply the importance.

- Priority 5: Findings that are fundamental to the integrity of the unit's business processes and require the immediate attention of management.
- Priority 4: Important findings that need to be resolved by management.
- Priority 3: The accuracy of records is at risk and requires attention.
- Priority 2: Minor control issues have been identified which nevertheless need to be addressed.
- Priority 1: Administrative errors identified that should be corrected. Simple, no-cost measures would serve to enhance an existing control.

Definitions of Corporate Risk

Risk	Reporting Implications
Low	Issues of a minor nature or best practice where some improvement can be made.
Medium	Issues which should be addressed by management in their areas of responsibility.
High	Issues that we consider need to be brought to the attention of senior management.
Very High	Issues that we consider need to be brought to the attention of both senior management and the Audit Committee.