Birmingham City Council Licensing and Public Protection Committee 14 May 2024



Subject: Regulation and Enforcement Business Plan 2024/25

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Does the report contain confidential or exempt information?	☐ Yes	⊠ No
If relevant, state which appendix is exempt, and provide exenumber or reason if confidential :	empt informati	ion paragraph

1.0 **Executive Summary**

- 1.1 This report details the business planning process for the Regulation and Enforcement Division in terms of the Coroner and Mortuary, Environmental Health, Licensing, Private Rented Sector, Property Licensing, Markets Service, Bereavement Services, Registrars and Trading Standards services.
- 1.2 This report and the attached business plan delivery activities document form Regulation and Enforcement's Business Plan for the period 2024/25.
- 1.3 This business plan is a strategic document and as such reflects our response to corporate, national, regional and local priorities for Regulation and Enforcement Division including those services that report to your Committee as well as key delivery activities for those services.

2.0 Recommendation(s)

2.1 That the Committee note the Regulation and Enforcement' Business Plan for 2024/25.

3.0 Background - Operating Context

- 3.1 The purpose of this business plan is to set out how corporate, national, regional and local priorities identified for Regulation and Enforcement, together with stakeholders' requirements are to be achieved at a strategic level as well as identifying key delivery activities for those services.
- 3.2 The plan also provides information on the contextual background to Regulation and Enforcement.
- 3.3 In September 2023, Birmingham City Council issued two Section 114 notices as part of the plans to meet the council's financial liabilities relating to equal pay claims and an in-year financial gap within its budget.
- 3.4 Michael Gove, Secretary of State for the Department of Levelling Up, Housing and Communities appointed commissioners to exercise certain functions of the council as required and begin the improvement journey for Birmingham City Council.
- 3.5 The Council needs to deliver over £150 million worth of savings over the next 12 months and there will be considerable changes to services as a result.
- 3.6 Challenging decisions lie ahead, the Council need to ensure finances are brought back on track to a healthy position and implement a programme of improvement. This commences with the 2024/25 budget.
- 3.7 The Council has already implemented financial controls on spending. These controls mean the Council is prevented, without explicit agreement of the Section 151 Officer, from entering into any new agreement or commitment for expenditure until Full Council has met to consider the Section 114 report. All Regulation and Enforcement spend will be approved via the City Operations Section 151 Board and the Corporate Section 151 Board.
- 3.8 The improvement journey has begun on the path to become a financially sustainable and well-run council. The Improvement and Recovery Plan was approved by Cabinet on 16 April 2024.
- 3.9 In 2024/25 we operate within the context of the Section 114 notices, the Improvement and Recovery Plan and the following opportunities and challenges.

Opportunities

- Birmingham is a unique area (Birmingham's diversity, Commonwealth Games legacy, size, and population growth). Operating as the largest council in Europe and in a unique space as a young diverse city with unique strengths and issues must come unique solutions.
- Organisational transformation (better partnership working and co-design, improved co-ordination of Council resources across service areas, responding to diversity in the workforce and residents, reshape workforce to manage skills gap)
- Technology: Recognising that as a division that technology will enable better customer service and efficiencies.

- Better use of data in establishing what we need to do and what we are achieving. Using available data tools to inform decision making.
- Capitalise on the impact of the Commonwealth Games across the areas of pride, participation, attracting new events and ensuring the ambitions of Birmingham are realised.
- Review People processes that enable us to adapt so they are fit for purpose, including how we recruit to posts.
- Reset, Reshape Restart we will consider how best to transform our services within the Improvement and Recovery Plan produced as a response to the issuing of the two Section 114 notices.

Challenges

- Operating within the budget constraints of the two Section 114 notices.
- Cost of Living Crisis for residents and staff (increased need, reduced income, fuel poverty, increased industrial action across the public sector, potential recession).
 This makes it difficult to predict need and budget effectively.
- Potential evolving strategic scope of services over time. Do we have the right people in the right places to deliver our vison and activities?
- Budget management challenges creates an impetus to deliver more for less through better use of contracts and closer working across the organisation to ensure that we get all the outcomes we need, first time.
- Increased responsibility due to legislative changes and innovation in use of powers
- Increased fuel/energy costs affect us particularly in terms of fleet, premises and cost of contracts.
- Any significant political issues (changes in national policy, war in Ukraine, crisis in the Middle East, impact of Brexit, upcoming elections)
- Difficulties in recruiting and maintaining a skilled work force due to lack of availability of qualified/specialist officers, a competitive market and impacts of an ageing workforce.
- Economic deprivation impacting the health and wellbeing of residents disproportionally in already deprived areas.
- A diverse group of regional agencies that BCC must work better with to get better outcomes for residents.
- Organisations we work with, rely on and support do not match city boundaries and therefore relationship management is more time consuming and less effective.

4.0 Vision and Objectives

- 4.1 The Regulation and Enforcement Division is within the City Operations Directorate of the City Council. Within the City Operations Directorate we seek to achieve a positive look and feel for our city that all residents can be proud of.
- 4.2 Within Regulation and Enforcement our mission statement is locally accountable and responsive fair regulation for all achieving a safe, healthy, clean, green and fair trading city for residents, business and visitors.
- 4.3 Regulation and Enforcement has aligned it's delivery activities (appendix 1) to Birmingham City Council's corporate objectives of:

- A Prosperous Birmingham: through a focus on inclusive economic growth, tackling unemployment, attracting inward investment, and maximising the benefits of the Commonwealth Games.
- An Inclusive Birmingham: through a focus on tackling poverty and inequality, empowering citizens, promoting diversity and civic pride, and supporting and enabling all children and young people to thrive.
- A Safe Birmingham: through a focus on making the city safer, safeguarding vulnerable citizens, increasing affordable housing, and tackling homelessness.
- A Healthy Birmingham: through a focus on tackling health inequalities, encouraging physical activity and healthy living, supporting mental health, and improving outcomes for adults with disabilities and older people.
- A Green Birmingham: through a focus on street cleanliness, improving air quality, continuing the route to net zero, and becoming a city of nature.
- 4.4 Regulation and Enforcement provides an integrated range of services, a 'golden thread', throughout peoples' lives from cradle to grave, for example:
 - The Registrar's Service provides efficient registration of births.
 - Trading Standards ensure that the toys our children play with are safe.
 - Environmental Health and Health and Safety regulate standards in children's nurseries.
 - Trading Standards ensure that young people are protected from underage sales of tobacco, alcohol, fireworks, knives and solvents.
 - All services work through advice and assistance to members of the public and businesses which provide the conditions for economic growth in the business sector to ensure a fair and well-regulated trading environment. This enables local and national economic growth.
 - All services, through firm, fair and proportionate enforcement, ensure that
 members of the public and businesses are protected from those who seek
 to make profit at their expense be it by removing counterfeit goods from
 the marketplace, prosecuting unlicensed 'taxis' or by tackling those who do
 not adequately protect people in the workplace.
 - Environmental Health ensures that everyone's wellbeing is protected, for example, through inspection of food premises, monitoring air pollution levels and acting against those that threaten health.
 - The Licensing Service ensures that premises selling alcohol or where regulated entertainment is carried on are properly licensed as are hackney carriage, private hire drivers and those operating such businesses in the city assuring public safety throughout.
 - The Registrar's Service enables marriages and civil partnerships to take place in the city and welcome new citizens through regular citizenship ceremonies.
 - The vulnerable, for example, older citizens are protected from rogue builders and those in care homes are protected from identified hazards including scalding and accidents.
 - At the end of life, the Coroners and Mortuary and Registrars services provide valued caring, empathetic and efficient services to help provide closure for bereaved families assuring that dignity is maintained throughout for the deceased.

- 4.5 Regulation and Enforcement's impacts are felt nationally, regionally, locally and individually, for example:
 - At a national level, our services are represented on Government and national bodies to influence the direction of legislation to protect our citizens and economic interests. We also host the England Illegal Money Lending Team.
 - Regionally services work with other local authorities to address cross boundary issues. We support the work of the Greater Birmingham and Solihull Local Enterprise Partnership (LEP) to assist in the economic growth of the region and our services also work within the Central England Trading Standards Authorities (CENTSA) on joint activity across the seven West Midlands local authorities and the seven adjoining County authorities. We host the CENTSA Regional Investigations Team
 - We work to deliver our services at a local level in a manner responsive to the needs of the community, working with partners such as West Midlands Police and West Midlands Fire Service
 - Regulation and Enforcement work in partnership at a local level with many organisations in the private, public and voluntary sectors, contributing significantly to enable those organisations to achieve their respective strategic objectives, this includes the Police and Fire Service through to Business Improvement Districts and local volunteering groups.
 - Much of our service provision is driven by the needs of individuals who approach us for assistance, either in the form of requests for assistance (complaints), service requests or licence applications.
 - We are an important partner in the delivery and promotion of the health agenda working closely with Public Health colleagues.

5.0 Regulation and Enforcement – Legislative Framework

As an enforcement body Regulation and Enforcement is itself regulated both in terms of the legislation that is enforced on behalf of your Committee (over 130 Acts of Parliament and many more regulations and orders) and through specific legislation which governs all investigative activities such as the Police and Criminal Evidence 1984 Act (PACE) and the Regulation of Investigatory Powers 2000 Act (RIPA).

The complex requirements on Regulation and Enforcement in relation to investigating offences, gathering evidence, preparing, and presenting cases at Magistrates and Crown Courts are the same as those applied to the Police. This requires our officers to be suitably qualified and competent to investigate offences and prepare prosecution reports to ensure that at Court the required burden of proof (beyond all reasonable doubt) is met, and offenders successfully prosecuted. Any failure of our prosecutions would leave us open to accusations of wasting resources, adverse publicity, and the possibility of paying compensation.

Prosecution is used where appropriate in dealing with non-compliance and in line with our published Enforcement Policy. The Policy ensures we comply with the Code for Crown Prosecutors and Regulators Compliance Code when making decisions about enforcement actions. We utilise a range of enforcement tools

including advice, statutory notices, cautions, prosecutions and civil actions or penalties. We also use prevention methods to protect businesses' economic interests. The removal of counterfeit goods prevents losses to legitimate businesses, promotes real economic growth and deter future offences.

We operate within the legislative framework that applies to all public bodies including freedom of information legislation, the duty to involve and legislation dealing with equality, diversity, and discrimination.

To ensure that we achieve the high standards that are required to meet this level of excellence in enforcement, Regulation and Enforcement operates a robust set of policies and procedures.

Intelligence led enforcement leading to well-regulated manufacturing, retail and service sectors creates the environment to benefit the city's economic prosperity and its citizens' wellbeing.

Regulation and Enforcement will continue to maximise the impact of our powers as delegated and build upon the opportunities associated to general power of competence in the Localism Act 2011.

The Registration Service is governed by the Registrar General's Regulations and Instructions, and we are committed to delivering our services to the highest standards consistent with the requirements of the City Council and the Registrar General.

6. Workforce Planning

- 6.1 Regulation and Enforcement will focus on the following five key priorities within workforce planning:
 - Best in class
 - Resourcing, recruitment, attraction
 - Talent, succession, development, retention
 - Inclusion, belonging and wellbeing
 - Culture

6.2 We will seek to achieve:

- Improvement in our sickness absence rates and reduction in costs associated with covering absences.
- Reduction in number of employment relationship cases and time taken to resolve issues.
- A high in number of applicants from diverse background
- Reduction in time taken from 'Application to Induction'.
- Improved quality and consistency in recruitment and selection that makes the City Council an attractive employer for those in qualified professions (e.g. environmental health) with regard to the attraction, retention and internal progression of staff.
- All new entrants go through robust induction and have a sound understanding of the work of the directorate and wider Council.

- A diverse workforce at all levels
- Ann increase in the number of Black, Asian, Minority Ethnic applicants and postholders in roles Grade 6 and 7
- Equality, Diversity and Inclusivity (EDI) practices embedded in everything we do.
- Wider Leadership Team completed Conscious Inclusive Recruitment workshop.
- Encourage staff to complete employee EDI data.
- Improved customer experience and reduction in complaints
- Increase in the number of graduates and apprentices joining the Directorate and the number of apprentices completing their apprenticeship and obtaining permanent roles increased.
- Data used to drive performance and challenge inefficiencies.
- Overall reduction in use of contingency worker

7.0 Delivery Activities 2024/2025

- 7.1 The delivery activities within Regulation and Enforcement are shown in appendix 1.
- 7.2 Over the year ahead Regulation and Enforcement will continue to work with partners on key issues to maximise the use of our resources to deliver the best outcomes for Birmingham.
- 7.3 The Division will deliver all savings that have been agreed for 2024/25 and scope and plan for delivery of 2025/26 savings. There are several transformation projects related to Pest Control, Waste Enforcement, Consolidation of Enforcement into a Centre of Expertise, and Bereavement Services that will project managed to ensure delivery of savings and efficiencies and increase effectiveness and best value. We seek to deliver best in class models within the budgetary controls.
- 7.4 The Division is carrying out a review of all contracts to ensure we ensure compliance with financial regulations and maximise potential for procurement opportunities.
- 7.5 The Division will support the Shaping Birmingham's Future Together Commission, bringing together partners and stakeholders from all corners and all sectors of Birmingham to help shape the devolution of power agenda with our communities.

8.0 Consultation

- 8.1 This business plan reflects the decisions taken through the Business Planning Review process and our delivery activities are directly linked to the Council's corporate priorities. The Council has consulted with regard to the Corporate Plan 2022-26.
- 8.2 This report consolidates many different projects and activities. Where consultation is required or appropriate this will be undertaken separately.

9.0 <u>Financial Implications</u>

9.1 All activities will be delivered within approved budget portfolios and in compliance with Section 151 and savings requirements.

9.2 Regulation and Enforcement budget portfolio 2024/25

Service Area Name	Expenditure	Income	Net Budget 2024/25
	£	£	£
Private Sector Housing	3,391,341	(2,222,840)	1,168,501
Environmental Health	6,319,980	(1,491,332)	4,828,648
Waste Enforcement	1,466,162	(130,000)	1,336,162
Pest Control	1,179,711	(1,010,060)	169,651
Registration Services	3,557,400	(2,520,110)	1,037,290
Trading Standards	1,951,776	(147,896)	1,803,880
Licensing	5,510,389	(5,510,389)	0
IMLT and RIT (grant funded)	5,590,931	(5,590,931)	o 0
Grand Total			10,344,132

9.3 Savings – 2024/25 and 2025/26

Savings Title	Savings Description	2024/25 £000	25/26 £000
Property licensing - administrative overhead and absorption rate	Overhead and absorption (central support charges and divisional overheads) for the delivery of property licensing schemes are to be activated as per original licence fee calculations. This includes Mandatory (House in Multiple Occupation) licensing and the new Selective and Additional Licensing Schemes commenced on 5 June 2023. All schemes' fees include pre calculated overhead and absorption rates within them.	900	900
Property licensing - optimising council delivery of support, advice and administration activity of property licensing schemes	Optimising council knowledge in delivery of support, advice and administrative activity that fall within the remit of the schemes. To be delivered via internal services with costs to be recharged into the schemes. Actual costs will be transferred from the licensing schemes to the general fund at year end.	100	100
Property licensing – any financial penalty resulting from enforcement to be invested into supporting further enforcement activities	Any financial penalty resulting from enforcement of the schemes is to be invested into carrying out any enforcement function in relation to the private rented sector.	0	100
Pest control - new charge for domestic rat treatments	Introduction of new charge at £20+VAT for rat in garden and rat in house treatments.	195	195
Review income from registration of marriages	Increase income by appointing an additional postholder to increase the number of marriage ceremonies that can take place.	70	70

Total Reg & Enforcement		2,835	3,335
Consolidation of Enforcement	The consolidation of enforcement activity into a centre of expertise. Full scope needs to be defined and discussed but will be focussed on enforcement activity that affects the street scene. Likely to include, but not limited to, Litter Enforcement, Waste Enforcement, Street Intervention, Parking Enforcement, Anti-Social Behaviour, Highways enforcement. Consolidation should lead to better outputs and outcomes; however the potential saving needs to be scoped and analysed. Prudent efficiency saving proposed.	-	50
Neighbourhood Waste Enforcement Officers - self financing	The team consists of 6 FTEs, which it is proposed to reduce to 3. For the remaining team of 3, to be self-financing through fine income	291	291
Public Health funding for Environmental Health and Trading Standards - 3 years only	An additional marriage ceremony day will be offered on Thursdays (which is not currently available). Staffing expenditure will increase but costs are assumed covered by income with a net surplus of £35k. Provision of non-statutory work that protects physical health and mental wellbeing. This includes advice to businesses on allergen compliance, advice to planners to protect developing environments, attendance at night to speed up resolution and investigation of nuisances, supporting communities which experience stress for unauthorised encampment as well as delivering welfare advice to the Gypsy and Romany Traveller community, advising Safety Advisory Groups with safety advice and advice for sporting and non-sporting activities delivered for the wider community, plus contribution to back office IT support to facilitate the above. Specific work will also be carried out in relation to Illicit vaping, nicotine inhaling products and smoke free areas.	690	690

- 9.4 The Regulation and Enforcement Business Plan commitments that are within the scope of your Committee are designed to be accommodated within the resources currently available to your Committee.
- 9.5 In relation to your Committee these include externally provided ring fenced funding, including:
 - The Illegal Money Lending Project is funded through the Department for Business Innovation and Skills.
 - The Regional Investigations team is funded through National Trading Standards.
 - Contaminated Land assessment and remediation works are funded by the Department for the Environmental Food and Rural Affairs.
- 9.6 The majority of the services within Licensing are funded through licence fees which are ring fenced by legislation in compliance with the EU Services Directive.

10.0 <u>Implications for Policy Priorities</u>

- 10.1 Business plans flow from the Corporate Plan 2022-26 and other national and corporate priorities.
- 10.2 In making decisions related to this Business Plan we will have due regard to the Improvement and Recovery Plan to ensure alignment and compliance.

11.0 Implications for Equality and Diversity

- 11.1 The consideration of equality and diversity is fundamental to business planning arrangements.
- 11.2 This report consolidates many different projects and activities. The need to carry out an equality impact assessment will be assessed for each one.
- 11.3 Everyone's Battle Everyone's Business the Council's strategy for tackling inequalities both across the city and within Birmingham City Council. Five objectives provide the framework for the Everyone's Battle Everyone's Business strategy. They are:
 - Understand our diverse communities and embed that understanding in how we shape policy and practice across the Council
 - Demonstrate inclusive leadership, partnership, and a clear organisational commitment to be a leader in equality, diversity, and inclusion in the city
 - Involve and enable our diverse communities to play an active role in civic society and put the citizens' voice at the heart of decision making
 - Deliver responsive services and customer care that is accessible, inclusive to individual's needs and respects faith, beliefs, and cultural differences
 - Encourage and build a skilled and diverse workforce to build a culture of equity and inclusion in everything we do
- 11.4 Regulation and Enforcement recognises that there are some short-term actions that can be taken in year to promote Everyone's Battle Everyone's Business, such as inviting the corporate leads to run workshops and discussions at team meetings.
- 11.5 The Division will support the Shaping Birmingham's Future Together Commission, bringing together partners and stakeholders from all corners and all sectors of Birmingham to help shape the devolution of power agenda with our communities
- 11.6 We will build on our work to ensure that that we deliver proactive enforcement exercises and activities that tackle and improve issues that matter to our diverse range of communities e.g. Hajj package tour fraud, non-hallmarked jewellery, registration of deaths, appropriate bereavement services.
- 11.7 We will continue to engage and promote our work with all stakeholders including faith representatives to ensure we are providing service improvements that deliver for our wide range of customers.

12.0 Background Papers

1.1 Regulation and Enforcement Business Plan 2023/24

13.0 Appendices

Appendix 1 – Regulation and Enforcement's Business Plan Delivery Activities 2024/25

APPENDIX 1

Corporate Plan Ambition Please select	Corporate Plan priority Please select	Activity	Comments / Notes	Reference number
1. Prosperous			ting a level	1.1.1.0
		Deliver Food Law Enforcement Plan and undertake Food Inspections		1.1.1.1
		Deliver Health and Safety Law Enforcement Plan		1.1.1.2
		Investigate relevant complaints of rogue traders, rogue la product safety and trademark infringements.	ndlords,	1.1.1.3
		Pursuance of compliance and enforcement activities with licensing schemes		1.1.1.4
		Provide a comprehensive Markets Management Service to Indoor, Rag and Open markets.		1.1.1.5
		In conjunction with Legal support, reduce the levels of de markets. Implement a strategy for timely interventions to build up.		1.1.1.6
		Take effective and efficient steps to process all application on the markets in accordance with agreed timescales.	ns for trading	1.1.1.7
		Work with partners and traders to facilitate any temporar a market to support the Smithfield Development.		1.1.1.8
		Work with partners to tackle organised criminality that im communities.	pacts on local	1.1.1.9
	2.Tackle unemployment	Reduce barriers to employment		1.2.1.0
		Expand the number and availability of apprenticeships an qualifications and skill levels within the Regulation and En workforce		1.2.1.1
		Effectively utilise the markets advertising levy to promote increase the uptake of new traders and provide additiona opportunities.		1.2.1.2
2. Inclusive			nequality	2.5.1.0
		Deliver the Selective Licensing Scheme that seeks to tackle and crime in 25 wards of the city.	e deprivation	2.5.1.1
		Deliver the Mandatory HMO Licensing scheme citywide to enforcement of appropriate property standards.	ensure the	2.5.1.2
		Deliver the Additional Licensing Scheme citywide to tackle social behaviour and other issues arising for smaller HMO		2.5.1.3
		Investigate and tackle rogue landlords and letting agents itenant's fees where appropriate.	in respect of	2.5.1.4
		Enforce Housing Act 2004 and associated legislations to e residents in the private rented sector can have access to accommodation that is not detrimental to their health and		2.5.1.5
		Work in partnership with West Midlands Fire Service and Regulator (DLUHC) to progress the remediation of danger and fire safety issues in hight rise (18m+) and low to medi 18m) private residential buildings in the private sector	ous cladding	2.5.1.6
Assess claims made against BCC's I		Assess claims made against BCC's Housing Department un 80-82 of the Environmental Protection Act 1990 for Statu		2.5.1.7
		Assist tenants in the private rented sector with tenancy is threatened eviction, harassment, rent increases and gene advice	sues including	2.5.1.8
		Appropriate data gathering models to be created and imp across Regulation and Enforcement in 2024/25 to enable interventions		2.5.1.9
		In partnership with West Midlands Authorities develop ar the Pathfinder project to improve inequalities in housing		2.5.1.10

2.Inclusive	6. Empower citizens and enable the citizen voice	Citizens can have local influence and involvement	2.6.1.0
		Use a variety of intelligence including complaints, requests for assistance and Member enquiries to develop targeted improvements and interventions	2.6.1.1
		Support and respond to the Muslim Bereavement Steering Group and the Bereavement Roundtable	2.6.1.2
		To meet the faith needs across all communities that require burials at short notice. Where a burial is required at short notice for religious reasons, the service aims to carry out these burials within 1 day following the registration of death.	2.6.1.3
3. Safe	9: Make the city safer	Work with citizens and partners, including West Midlands Police, so citizens feels safe in their daily lives.	3.9.1.0
		Working with the Building Safer Communities Board and local community safety partnerships to provide relevant intelligence and influence strategic and operational plans to improve safety within the city.	3.9.1.1
		Using data and intelligence we will actively engage in locality based partnership operations that deliver joint strategic objectives, with the citizen influencing focus and type of intervention e.g. illegal Ramadan Markets, Clear, Hold Build.	3.9.1.2
3. Safe	9. Make the city safer	Support events through appropriate regulation at planning and delivery	3.9.2.0
		Attendance at relevant Safety Advisory Groups	3.9.2.1
		Delivery of Safety at Sports Grounds Certificates	3.9.2.2
		Attendance at relevant events as an enforcement body to support communities and partners	3.9.2.3
3. Safe	9: Make the city safer	Protect people from financial, physical and environmental negative health impacts	3.9.3.0
		Regulation of businesses and individuals through environmental health, trading standards, waste enforcement, anti-social behaviour and licensing powers.	3.9.3.1
		Delivery of a responsive service for residents and businesses on Environmental Health concerns, complaints, EH related incidents, and statutory nuisances and infectious diseases.	3.9.3.2
		Delivery of a pest control service for rat and insect treatments carried out in line with codes of practice	3.9.3.3
		Delivery of a dog warden service to seize and detain stray dogs.	3.9.3.4
		Enforcement of the unauthorised encampments on public land service	3.9.3.5
		Undertake proportionate enforcement of the Environmental Health Public Space Protection Orders	3.9.3.6
		Support the Community Trigger Panels as requested by CSP	3.9.3.7
		Manage the procured litter enforcement contract.	3.9.3.8
		Undertake a programme of water sampling for private water supplies.	3.9.3.9
		Improve the standard of accommodation in the private rented sector through inspection and appropriate enforcement action.	3.9.3.10
		Deliver a programme of reactive and proactive interventions to tackle waste offences from residential and commercial premises.	3.9.3.11
3. Safe	9: Make the city safer	Protect people and children: age restricted products, premises licensing, hackney carriage licensing, product safety	3.9.4.0
		Utilise intelligence to tackle underage sales (e.g. alcohol, knives, tobacco and other products that may be attractive to school age children)	3.9.4.1
		Deliver pre-arranged test purchase exercises targeting rogue businesses that ignore their responsibilities	3.9.4.2

		Protect children from harm through the licensing regime for licensed premises and hackney carriage and private hire vehicles	3.9.4.3
		Ensure that the Premises Licensing Policies are reviewed regularly	3.9.4.4
		Ensure relevant issues identified with Premises Licensing are managed effectively through the Sub Committee process	3.9.4.5
		Commence population and use of the National Register of Refusals and Revocations	3.9.4.6
		Deliver a street trading consent scheme and take action against illegal street trading.	3.9.4.7
3. Safe	9: Make the city safer	Support people through their life journey	3.9.5.0
		Aim to deliver the registration of deaths within statutory timeframes	3.9.5.1
		Aim to deliver the registration of births within statutory timeframes	3.9.5.2
		Delivery of registration of stillbirths within statutory timescales	3.9.5.3
		Delivery of notice of marriage /civil partnership to enable ceremony to proceed at a time and date of the customer's choice where reasonable and practical	3.9.5.4
		Delivery of citizen ceremonies within statutory timeframes	3.9.5.5
		Coroners & Mortuary Service. Section 24 Coroners & Justice Act 2009 requires provision of staffing and accommodation to support the Coroner.	3.9.5.6
		Provide a mortuary to receive & store deceased for in Birmingham and Solihull Coronial area, where the Senior Coroner orders a Post Mortem.	
3. Safe	9: Make the city safer	Utilise appropriate powers to ensure the risk from unsafe cladding on private high rise residential buildings is removed	3.9.6.0
		Work with DLUHC, LGA, WMFS and Homes England to prioritise premises for inspection and intervention	3.9.6.1
		Work with the LGA hosted Joint Investigation Team to carry out inspections of high risk premises	3.9.6.2
		Ensure that remediation of properties is accelerated through intervention by Birmingham City Council	3.9.6.3
3. Safe	10: Protect and safeguard vulnerable citizens	Tackle Illegal Money Lending and rogue traders through intelligence led interventions.	3.10.1.0
		Deliver the objectives of the Illegal Money Lending team across England. deliver the objectives of the Regional investigative team across the midlands.	3.10.1.1
		Investigate rogue traders exploiting vulnerable citizens.	3.10.1.2
3. Safe	12: Tackle homelessness	Work with partners to prevent and tackle homelessness	3.12.1.0
		Investigate all requests for assistance relating to category one hazards in private rented sector properties	3.12.1.1
		Investigate all requests for assistance in relation to illegal eviction and harassment, tackling landlords and lettings agents acting illegally.	3.12.1.2
		Continue to reduce the numbers of long term empty properties in the city to provide sought after accommodation for families.	3.12.1.3
		Property Licensing continuing to work with Housing Options to reduce illegal evictions from licensable properties	3.12.1.4
5. Green	18: Improve air quality	Address air pollution, including increased monitoring and awareness, reducing congestion, and working for a future where every neighbourhood has safe levels of air quality to breathe	5.18.1.0
		Submit the Air Quality Annual Status Report within agreed timeframes	5.18.1.1
		Deliver the Environmental permitting programme inspection regime	5.18.1.2

5. Green	19: Continue on the Route to Net Zero	Our initiatives will facilitate carbon emissions reduction and build climate resilience into policies and practice	5.19.1.0
		Investigate false claims regarding the "green" agenda and products offered for sale.	5.19.1.1
		Through working with the WMCA and other internal / external agencies encourage landlords to access grants to improve energy efficiency of PRS properties, which in turn will reduce the living costs of tenants and impact on deprivation.	5.19.1.2
5. Green	20: Be a City of Nature	We will maintain our existing and develop new green spaces across the whole of the city	5.20.1.0
		Broaden the use of the natural green cemetery and crematoria spaces to include local communities through the introduction of activities and the development of volunteer community groups	5.20.1.1