

Foreword – Executive Member for Crime and Community Safety

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INTRODUCTION - HELPING WHERE WE CAN AND BEING TOUGHER WHEN WE NEED TO BE

Keeping Haringey clean and safe is a priority for the Council. Our Community Strategy, developed in consultation with other public bodies, local businesses, community groups and residents, highlights the strong link between the overall quality of the environment and people's health, safety and quality of life.

The impact of dirty streets and open spaces, unsafe and unregulated development, criminal and anti social behaviour all create a negative impact on people's safety, health and their sense of well being.

The Enforcement Service has a key role to play in helping to deliver the objectives set out in the Community Strategy. It underpins its vision for Haringey to be 'a place people talk about proudly and where they want to be', and strongly reflects its key priorities to be sustainable, economically vibrant, safe, healthy and people focused.

Achieving our objectives requires that we seek to strengthen the role of those that live and work in Haringey in promoting compliance. Peer pressure, community intelligence, responsible citizenship and fair trading are all essential elements of a compliance strategy. In addition it is important to ensure that enforcements solutions are developed to meet local needs and to engage with local stakeholders in the development of local action planning.

The service seeks to ensure that advice and information is available to individuals and local businesses about their responsibilities and duties and, when appropriate, uses its powers to make sure that those who disregard the law are held to account for their behaviour. Our approach to enforcement and the decisions that we make are set out within our enforcement policy which is included as an appendix to this strategy. See Appendix A..

Recent national legislation gives local authorities strengthened powers to improve the safety and quality of our private sector housing, trading, local environment and public spaces. Enforcement resources have also been strengthened in Haringey including the development of street enforcement and street warden teams, safer neighbourhood policing teams and tactical enforcement officers to target out most persistent and prolific offending. These resources and our established trading standards, environmental health and planning enforcement staff work alongside each and our other enforcement partners.

This strategy sets out how the Council's Enforcement service, with its partners, will use these resources and powers available to promote a safe, clean and healthy local environment for everyone. We will aim to achieve this by helping where we can and being tougher when we need to be.

BOROUGH PROFILE

Haringey's diverse communities make the borough an interesting and challenging place to live and work.

Haringey has a population of approximately 224,500 with 40% of these residents living in wards that are amongst the 10% most deprived in the U.K. Unemployment locally exceeds both the national and regional averages with 7.7% of the population claiming job seekers allowance (Oct 06). In contrast to this the west side of the borough is predominantly affluent promoting wealth, stability and good educational attainment.

Haringey recognises over 160 community languages. It has the third highest proportion of 'other' white residents in London (16%). Other large black and minority ethnic (BME) communities are black Caribbean (10%) and black African (10%). This ethnic and cultural diversity has led to the development of a cosmopolitan borough which boasts a thriving and vibrant business economy.

There are about 8000 business in total in Haringey, 92% of these are small employing less than 24 people. There are around 2,000 registered food businesses with a high concentration involving food and drink. In terms of food manufacture, there are no national companies, but a number of local and regional businesses. Meat processing and kebab manufacture is present on trading estates around the borough. Within the retail and wholesale sector imported food is a significant issue.

Almost two thirds of Haringey population live in private sector dwellings providing homes to over 70,000 households. 22% of households are living in overcrowded conditions the private rented sector makes up 20.1% of the housing market with Houses in Multiple Occupation Accounting 1.5%. The 2001 census highlighted an increase in the number of one person households living within the borough. This increase could account for the number in Illegal planning conversions which has given rise to the need to introduce to the service a team solely dedicated to investigating planning enforcement issues. Complaints relating to house conversions make up to 20% of the overall planning complaints made by the Haringey public.

The borough has approx 2500 empty properties with over 1200 long-term empty properties which continue to harbour undesirable activity and blight our neighbourhoods (April 06).

The enforcement service is committed to ensuring that we contribute towards producing a safer, healthier community which can enjoy a thriving local business economy. Our Enforcement strategy along with its supporting enforcement policy outlines the direction through which we aim to achieve this ambition.

THE ENFORCEMENT CHALLENGE IN HARINGEY

“Environment and crime continue to be uppermost priorities for residents living in the borough”. “Improving the quality of the natural and built environment and reducing the level of crime are key priorities for the partnership. This is because a clean, well maintained and attractive environment not only makes people feel happier with where they live but it also helps make them feel safer” (Haringey Strategic Partnership, Local Area Agreement January 2007.)

Environmental factors and stressors affecting quality of life for Haringey can be considered under three main headings. Environmental crimes that affect our pride in our public realm as well as our sense of safety and community; the trading environment as a source of employment, essential services, recreation, and economic well being; and our housing as a source of security, health and social stability.

Environmental Crime

Fly –Tipping and Dumping

Fly tipping is the illegal dumping of waste ranging from old washing machines to lorry loads of building material or abandoned piles of black refuse sacks containing trade waste. Despite increases in enforcement and improvements to waste collection services, overall reports of dumping within the borough have continued to increase. Whilst much of this reflects the increased levels of reporting undertaken by Council officers tasked with the role of spotting dumping, it is clear that the dumping of small items and black bags on the street for collection is a significant problem.

Data reports on dumping and street cleansing have been used to identify borough hot spots, with 40% of all complaints relating to the locations in the North East of the borough in N17.

Littering

Litter can be something as small as a sweet wrapper or as large as a bag of rubbish, and includes discarded cigarettes, and chewing gum. Shopping areas, transport hubs, and industrial areas are all hotspots for littering with 15% of sweeping complaints for the borough coming from the N15 postal area of the borough.

Graffiti and Fly Posting

A neighbourhood blighted by graffiti and fly posting can be visually intimidating for the community and visitors to the area. In the first six months of 2006 9,000m² of graffiti was removed as well 100m² of fly posting and 1 m² of paint spillage. Around two thirds of this work carried out was reactive in response to reports from council staff and the public.

Public Eyesores and Nuisance Premises

One of the problems experienced is that significant locations and local landmarks such as abandoned sites, empty properties, Network Rail land and trading Estates, for example, can often suffer from neglect resulting in a concentration of environmental crime issues in one place. Currently around 80 such locations are being investigated and action taken where necessary to remove these locations as eyesores.

In addition a number of premises and traders operate with a disregard for legal requirements such as planning permission and licensing. Problem garages and social clubs can often cause significant public concern and be a magnet for other criminal behaviour.

Illegal advertising hoardings, for sale and to let boards and other unauthorised structures can also impact the appearance of our streets and open places degrading the environment. Such careless or deliberate offending can create an cluttered and ugly environment.

The Trading Environment

Haringey's has a vibrant business community dominated by small business. There are about 8,200 businesses in total in Haringey, 92% of these are small employing less than 24 people. There is a relatively high concentration of businesses involving food and drink with a total of around 2,000 registered food businesses. Overall employment as of September 2006 was 75% but only 58% among our ethnic minorities.

Whilst most business show strongly compliant behaviour some rogue traders operate. Problem social clubs operate in the borough and can be a magnet for criminal behaviour including, sale of stolen and counterfeit goods, illegal drinking gambling and other criminal behaviour.

Food Safety

The Borough is characterised by its restaurants and other caterers. In addition, as the population diversifies, there is an increasing amount of imported food coming into the borough to supply local requirements both for Haringey and the North London area generally. Businesses reflect the diverse & multicultural profile of the Borough which has a high number of proprietors whose first language is not English. There are currently 2,172 registered food businesses in Haringey. Although these frequently change ownership the total number is expected to remain the same or increase slightly. Half of all food premises are restaurants or catering premises which often carry the highest levels of risk if there is poor food hygiene.

The importation of food from non EC countries for a diverse community also introduces a risk for food safety. Unfit meat and bush meat has been found in the borough and demand for products not considered fit for human consumption does exist in the borough.

Although not often considered a food, Khat which is chewed as a recreational drug, but does not currently have a drug status, is widely used within the borough by mainly the Somalian community. Its impact on health has been established causing psychological and dental problems and adding to problems of worklessness and family breakdown. Our work in protecting food safety needs closely follow such dietary variations in our communities.

Trading Standards

The illegal sale of age restricted products can result in criminal activity, anti-social behaviour, solvent and alcohol abuse all of which have an adverse impact on society. Trading Standards focus safety resources on age-restricted products to protect the health of the young and reduce anti-social behaviour, particularly in relation to cigarettes and alcohol.

Counterfeiting is a huge problem globally, with millions of counterfeit goods being produced and sold every year. Custom and Excise are seizing well in excess of 100m items a year and last year the EU seized about £2bn worth of counterfeit goods. Buying counterfeit goods can also have much greater consequences than people realise, with members of the public unwittingly giving money to organised crime and terrorist organisations. Counterfeiters also have a huge impact on legitimate businesses, which causes them to lose millions of pounds of revenue a year. Smuggling and buying counterfeit goods also funds organised crime and terrorist organisations. Criminals who produce counterfeit goods have a huge effect on legitimate companies forcing them to close down.

Health and Safety

Haringey has approximately 8,200 businesses providing employment for over 59,000 people with a mixture of offices, factories, retail shops and food businesses. Approximately 7,000 businesses fall within the enforcement responsibility of the Local Authority. Factories and certain types of businesses are enforced by the Health and Safety Executive. It is estimated that there are approximately 5,000 non-food business that fall within Haringey' enforcement responsibility for Health and Safety.

There are a number of areas within Haringey that have a high concentration of retail shops. Haringey also has 17 industrial estates, which are mainly located to the east of the Borough. The Borough also has a sizeable consumer service-type industry that includes over 40 Launderettes, over 40 Hairdressers and Barbers and nearly 60 licensed Special Treatment Establishments of various descriptions.

We have three significant land sites, Finsbury Park and Alexandra Palace both of which cater for large events that attract people from all over the country including large Pop Music Events, Firework Displays and the Tottenham Hotspurs Football Club on the Tottenham High Road. Here, a minimum of 19 games would be played during the season, each game attracting over 30,000 people and up to a maximum capacity of over 36,000.

Housing and Health

Empty Property Enforcement

There are a substantial number of privately owned empty properties in Haringey, which is both a wasted resource for the owner and the community. With over 2,400 empty properties Haringey was rated as having the 13th highest proportion of empty properties in London (June 2005), this figure has now increased to 2700 (Feb 07). Empty properties continue to present a range of issues and can impact on neighbourhoods, communities and residents in a number of ways including:

- Devaluation of neighbouring properties leading to a loss of equity for homeowners and a disincentive to maintain their properties.
- Blight on neighbourhood - dumping ground for rubbish etc.
- Vandalism, graffiti and other crimes including anti-social behaviour activities.
- A potential for arson
- Pest infestation.

An empty property may represent a wasted opportunity to providing housing in an area of high demand. The fact however remains that empty homes exist within communities, these vacant properties attract crime and vandalism and are an eyesore for neighbours. There is extensive public support in Haringey in favour of more action on empty homes and in order to support the better Haringey initiative in building sustainable communities it is imperative that the enforcement service introduce effective enforcement methods for dealing with the boroughs long-term vacant properties.

Houses in Multiple Occupation (HMO)

HMOs form an important source of low cost accommodation and the Council realises that they will continue to provide accommodation for certain households choosing to reside with in the borough. Many people need access to cheap flexible accommodation and in most areas HMOs meet this need. HMOs play a valuable role In Haringey by providing affordable accommodation in areas of high housing demand where rents are high.

The physical conditions and management standards in HMOs are often worse than in other types of accommodation. Occupants are at a far greater risk of death or injury than in any other type of residential accommodation. Facilities in HMOs are often very poor and below statutory standards and in some cases fire escape arrangements are unsatisfactory or unsafe. The impact that badly managed HMOs have on the community include increased crime, antisocial behaviour and a destabilised community destabilisation.

It estimated that 3,077 dwellings acted as HMOs at the time of the survey (2001). It is very likely that due to the dynamics of the borough that this is an under estimation and the more likely level is in the region of 6,000. This lack of accuracy highlights the need for proactive measures to be introduced to accurately identify the number of HMOs in the borough. The survey found unfitness levels at 27.5% of all

bedsit HMOs, 19.3% are in substantial disrepair and 70.5% do not have provision for escape from fire. (*Private sector stock condition survey 2001*)

Unauthorised Housing Development and Planning Enforcement

Based on 2002-2005 approximately 900 complaints of planning breaches are registered for investigation each year. Of these cases Harringay ward has the largest number of cases followed by Highgate and Noel Park. In total these 3 wards represent over 30% of all cases investigated. Examination of cases closed however also show that approximately three quarters of all cases closed could not proceed to formal planning enforcement. Nearly 40% of closed cases had no enforceable planning breach, and for a quarter of cases planning enforcement action was not the most expedient next action.

Complaints relating to house conversion, unauthorised structures and departure from approved plans reflect more than half of complaints.

An analysis of legal instructions issued for planning breaches in 2005 and 2006, show that there was an increase of more than 600% between the two years, and an increase of more than 500% for prosecutions alone. These increases reflect increasing levels of activity and efficiency within the enforcement service, rather than an increased in offending.

Domestic Noise

Noise can have a significant impact on the wellbeing of residents. The development of a late night economy, the mixing of housing tenure, the increased use of outdoor spaces, fireworks and intruder alarms are all contributing to the overall level of noise complaints for the borough. The service expects to receive over 5,000 complaints each year with significant peaks during festivals, major sporting events, and in the summer months. Our housing estates can also be a major source of reported noise nuisance.

ENFORCEMENT STRATEGIC PRIORITIES

Haringey Community Strategy – A sustainable way forward

Haringey's 2016 vision is for a place for diverse communities that people are proud to belong to. This strategy establishes a clear direction for the development of our enforcement priorities.

We need to ensure that our communities have pride in their neighbourhoods and environment. To achieve this we need to continue to improve the public realm, ensuring that neighbourhoods are cleaner, tidier more attractive and welcoming. Air quality should be improved. Communities need to feel safe and therefore we need to continue with our partners to reduce crime by focussing on crime hotspots and repeat offending.

We need to safe guard our buildings of heritage, whilst ensuring that new and developed housing is built to high standards. Housing can be a major factor in health inequality. Our homes should be energy efficient, affordable, settled and safe. We need to make the most of our housing to ensure we have a sufficient supply of affordable private sector housing, and reduce overcrowding.

Food and drink and our cultural industries are part of Haringey's 'unique selling point'. We need to support these strengths and our businesses as successful employers and providers of economic wellbeing.

Six priorities have been established for the strategy.

People at the heart of change

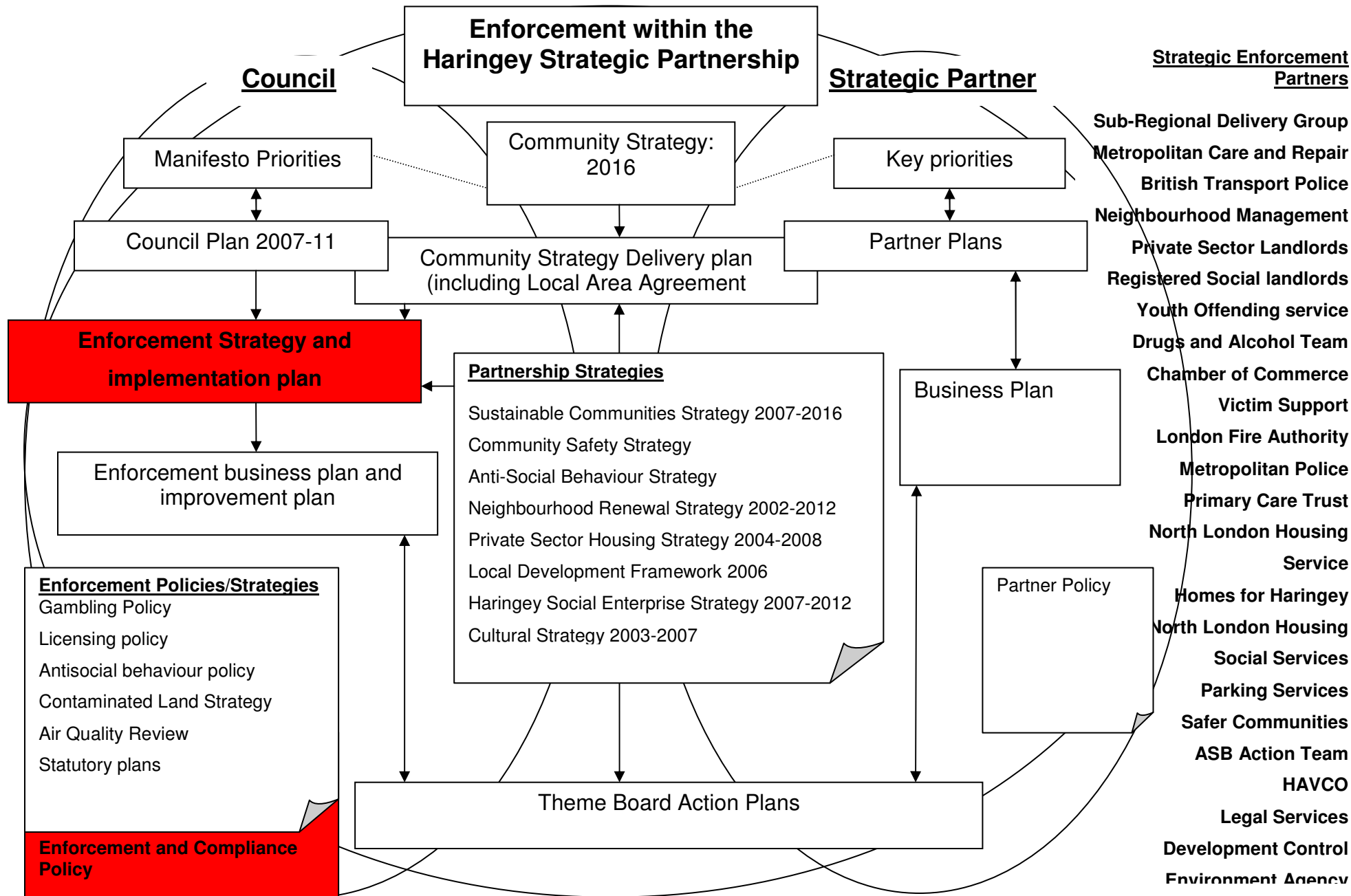
An environmentally sustainable future

Economic vitality and prosperity shared by all

Safer for all

Healthier people with a better quality of life

These priorities of the Haringey Strategic Partnership's Community Strategy determine and feed into individual partnership delivery strategies and Haringey Council's four year Council Plan. This enforcement strategy for the Council's Enforcement service will be delivered by an implementation plan which in turn will feed into the services annual business planning and improvement planning, as shown over page.



Enforcement Strategic Priorities

The enforcement service has developed four key priorities for driving and delivering the enforcement contribution to our Community Strategy.

A Safer, Cleaner and Sustainable Environment

Healthier Communities

Supporting Business Improvement

Effective and valued enforcement

PRIORITY ONE - A Safer, Cleaner and Sustainable Environment

Aims:

- To reverse and prevent unauthorised use and non permitted development
- To implement an enforcement tool for targeting unscrupulous, failing landlords
- To promote good citizenship and reduce the fear of crime
- To stop environmental crimes and the abuse of public spaces
- To act against landowners that neglect properties and create public eyesores

Examples of Good Practice in Haringey

Junior Wardens

Junior Wardens is delivered by the Street Warden Team and involves members of the Community Safety Partnership such as the police, fire-service and other council and outside agencies to deliver a package covering a range of subjects to children aged 5-11 years. The programme has involved working with teachers, parents and pupils to educate and inform young people about the local street environment.

Operation Tailgate

A series of joint operations known as “Tailgate” has been built on joint planning and high visibility in some of the boroughs crime hotspots. Tactical Enforcement Officers are responsible for investigating, co-ordinating and targeting enforcement action on those perpetrators who continuously choose to flout the law and pose the greatest environmental risk to our communities. By working together and utilising all respective powers, operational partners and resources the heavy enforcement and environmental response team can strive to successfully target the boroughs repeat offenders and facilitate other partnerships and strategies in meeting their objectives.

Operation Stop it

This is an Enforcement operation which works along side Police officers from the Safer Neighbourhood Teams to identify and stop on the road vehicles carrying waste and check that they are appropriately licensed. We target location and routes associated with our known dumping hotspots and utilise new £300 fixed penalty notices to those caught offending. We also undertake mystery shopping inviting those that advertise removal of rubbish as a service to visit us at a location and catch those operating illegally.

PRIORITY TWO - Healthier Communities**Aims:**

- To enforce the standards set for Houses in Multiple Occupation through the use of available licensing powers.
- To remove hazards identified within private rented dwelling which pose the greatest risk to the vulnerable occupants and increase the percentage of vulnerable people living in decent homes in the private sector
- To control the supply of illegal and dangerous goods and products. This will include the supply of age restricted products to children – e.g. alcohol, knives, tobacco
- To intervene to protect health at work; and to ensure the supply of safe food, products and services
- To reduce the health impact of pollution and nuisances, including noise, contaminated land, tobacco and other air pollutants.

Examples of Good Practice in Haringey

Helping to achieve decent homes.

Thermal comfort measures are currently offered to vulnerable residents living in non decent homes. 'here to HELP' a partnership initiative managed by British Gas was implemented in 2004. The initiative provides a holistic approach to support vulnerable households by offering energy efficiency measures, home security upgrades links to charity partners and a free benefit health check. Since 2004 – May 2006 the scheme has been responsible for delivering improved energy efficiency measures to over 2000 homes.

Licensing Houses in Multiple Occupation.

Mandatory licensing of HMOs has been successfully introduced and the council is a leading example in this area. The success is built upon strong publicity, engagement with landlords and tenants and discounts for early applications and accredited landlords. In the first year of implementation over 200 property applications were received.

Underage Sales

We operate a rolling programme of underage sales test purchasing. This programme ensures that every month we will target shops selling products which cannot be sold to children. Our programme includes alcohol, tobacco knives, solvents, fireworks and aerosol spray paints. Thirteen traders were prosecuted in 2006 for selling age restricted goods to underage test purchasers.

PRIORITY THREE - Supporting Successful Business

Aims

- To promote Haringey as a good borough to do business and to protect our vibrant and diverse business community.
- To encourage and support good landlords
- To support businesses and traders to achieve compliance with the regulations affecting them.
- To target organised criminal activity such as counterfeiting and illegal street trading which undermines legitimate business

Examples of Good Practice in Haringey

Landlord Accreditation and forums

Haringey's Enforcement service works together with other London boroughs in partnership to support the London Landlord Accreditation scheme. Training courses are run in the borough and the borough has over 200 accredited landlords which is in the top three of all London boroughs.

Safer Food Better Business.

Safer Food Better Business (SFBB) is an innovative and practical approach to food safety management. The Food Safety Team (FST) are part of a London wide initiative to provide over 100 Food Business's within the Borough with face-to-face support on the implementation of SFBB. Between May 2006 and February 2007 the Food Safety Team held 7 SFBB Workshops for 99 delegates.. One of the workshops solely targeted Turkish speaking Owners. All attendees are in the process of receiving a 1-2-1 coaching visit by a Haringey Food Safety Officer.

On line services

The Enforcement service extensively uses the Council website as an important media for information giving. The Enforcement Service website can now be used to access a range of online services for making a complaint to completing a licensing application form making the service readily accessible and up to date.

PRIORITY FOUR - Effective and valued service

Aims:

- To support area improvement and local action planning with communities
- To develop services through feedback and consultation
- To provide value for money, ensuring that our priorities for enforcement are matched by our use of available resources
- To produce highly trained and motivated staff who can provide a flexible approach to enforcement activity
- To improve our communication of enforcement outcomes and performance

Examples of Good Practice in Haringey

Environmental Crime - Promotional DVD

The Enforcement Service has produced a promotional film which describes the work of our Environmental Crime Teams. The film shows how we are tackling environmental crimes and has been widely circulated and used to demonstrate what we do and why we do it at promotional events and as an educational tool for our work in schools.

Innovation in information technology

Haringey Council were one of the first five boroughs to share trading standards data nationally. Haringey is one of the 16 London Boroughs to have successfully transferred from the Consumer Direct post office system to direct connectivity to enable for efficient and effective data sharing.

Green Lanes Strategy Group – Operation Tripod

Green Lanes is a dynamic commercial centre with residential roads running from the central shopping street. Around 30,000 residents include established Greek and Turkish-speaking immigrants and, more recently, Poles, Russians and Albanians. Businesses owned and managed by Turks or Kurds include shops and member-only clubs operating 24/7, reflecting their cultural heritage. Tensions grew between residents and traders, particularly concerning the 24-hour culture with key issues being waste, traffic and parking and unlicensed clubs. Operation Tripod was one part of the Council's response and was developed in participation with key decision-makers to tackle the issues where enforcement could work. In 2005, Haringey Council received beacon status for its work with local communities. A major factor in this recognition has been the success of the Green Lanes Strategy Group

ENFORCEMENT RESOURCES

The Enforcement Service

The Enforcement service consists of 4 operational service groups supported by an Enforcement Support Group providing business support and administrative support.

Commercial Services Group

The Commercial Services group consists of two Enforcement Teams covering Environmental Health and Trading Standards. The service has also developed a business liaison post to build our engagement with businesses

Commercial Environmental Health includes the functions of Pollution Control, Health and Safety at Work and Food Safety. Inspections for Food safety and Health & Safety at Work are operated through risk based programmes and supplemented by sampling a food programme. Response work includes the investigation of complaints and formal notification of incidents and accidents. Pollution control includes the implementation of a Contaminated Land Strategy and Air Quality Action Plan.

Trading Standards includes the enforcement of fair trading and consumer protection, together with the administration of the Licensing Authority role. Inspections for Trading Standards are operated through a risk based programme and supplemented by a test purchasing programme aimed at enforcing age restricted sales. Response work includes the investigation of complaints and formal notification of product reports.

Environmental Crime

The Environmental Crime group includes a team of Street Wardens service covering 3 scheme areas for Seven Sisters, Northumberland Park and West Green, Bowes Park and Noel Park. The service also operates finite deployments to other locations where there are crime or antisocial behaviour issues arising. The service seeks to provide a highly visible uniformed presence and works closely within scheme areas to develop close contacts with community groups and other bodies. Wardens develop local intelligence to support enforcement work and some wardens have been trained and authorised to undertake enforcement work. Wardens also undertake youth diversion projects to remove offending opportunities and develop skills and self esteem.

The Street Enforcement team includes uniformed officers undertaking full time enforcement. These officers operate across the borough provide a rapid response to reported incidents such as fly tipping and patrolling areas including known environmental crime hotspots. The service uses a broad range of enforcement powers including fixed penalty notices.

The service enforces the following

- Street Trading
- Highways – permissions, obstructions and abuse of the highway
- Litter and fouling
- Trade Waste and carriers licensing
- Fly tipping
- Fly posting, graffiti and criminal damage
- Planning Enforcement – advertising hoardings, for sale /to let boards, satellite dishes and eyesores.

Housing and Health

A private sector housing enforcement team of officers delivers interventions according to the Private Sector Housing Strategy including health based interventions to remedy and remove housing risks in the private sector; the enforcement of HMO standards through licensing; and the return of empty properties through enforced sales and compulsory purchase powers. These officers also carry a case load of planning enforcement of unauthorised housing development including unauthorised HMOs and conversions.

Additionally the service provides specialist support to landlords in developing affordable and safe private sector housing.

Enforcement Response

Enforcement Response includes two operational groups. A team of area based officers and a team of officers focussed on out of hours offending and primarily on domestic noise nuisance.

Area Based officers are responsible for maintaining the business unit links with area groups, enforcement partners such as SNT teams and other area based stakeholders. They will negotiate and commit resources for the Business unit for area based action plans. They will also carry a case load of response enforcement work according to the priorities of an area including planning enforcement investigations.

Out of Office services provide a level of cover for all response work outside of normal working hours and provide additional backup to our daytime operations. The service provides a lead response on Noise and Licensing investigations but is commissioned to undertake other surveillance and interventions in support of daytime services. Services here are configured to provide a rapid response to noise nuisance and providing immediate relief and sanctions through the use of abatement and fixed penalty notice powers.

Enforcement Budget

The overall cost of the Enforcement business unit for 2007/8 is £6.6m with a contribution from Council resources of approximately £4.7m. The remainder is made up from income from our paid for services such as pest control, mortuary and coroners service, together with contributions from the Neighbourhood Renewal Fund, New Deal for Communities and Planning Delivery Grant. The payment of fixed penalty notices for environmental crimes is expected to be in the region of £75,000 for 2007/8.

Our budget for enforcement is aligned priorities, and has been increased for services delivering our priorities noise control, planning enforcement, empty properties action and environmental crime. However, increasing levels of enforcement being delivered also requires us to prioritise the formal action we take through the courts. To maximise our value for money our enforcement policy focuses on compliance without intervention, intelligence led tactical enforcement on rogue traders, partnership working and the use of alternative methods of disposing of offences, including the extended use of formal cautions and fixed penalty notices.

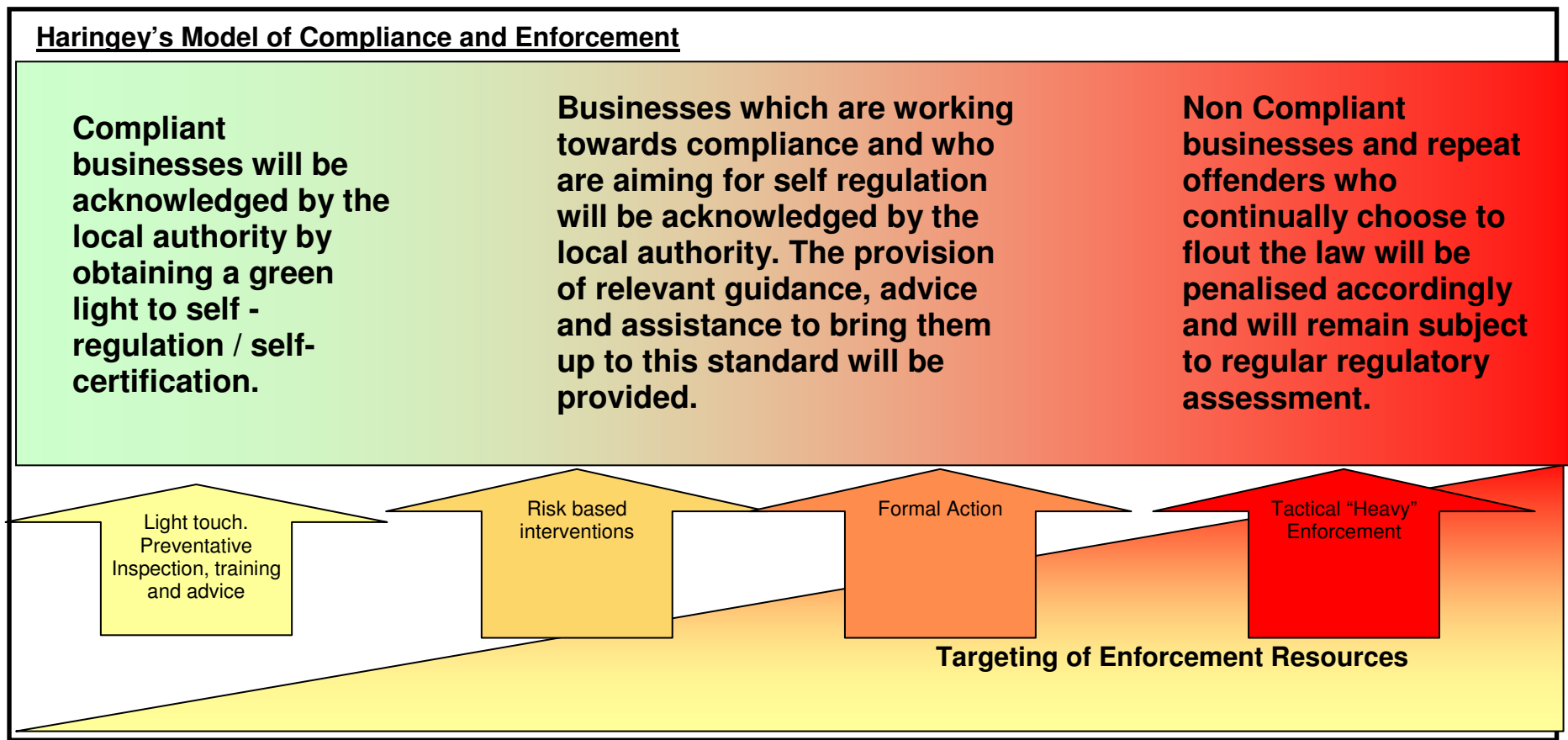
From our total expenditure, approximately £5m will be spent on salary related costs for enforcement as follows:-

Enforcement Resource	Principal Links to Enforcement Priorities	Percentage of total resource
Environmental Crime including street enforcement and street wardens	Priority One – Environmental crime, citizenship and fear of crime Priority Two – Tackling Organised Crime	29%
Commercial enforcement – including trading standards and environmental health	Priority Two – Controlling illegal supply of products; implementing smoking controls and air quality improvement Priority Three – Supporting business and tackling organised crime	29%
Enforcement Response - Out of hour enforcement including noise and licensing	Priority Two – Stopping nuisance Priority Three – Supporting business Priority Four – Area based local action planning	13%
Planning Enforcement	Priority One - Unauthorised development, environmental crime combating eyesores	6%
Housing and Health/private sector housing enforcement	Priority One – Combating problem landlords and empty properties Priority Two – Control of Houses in Multiple Occupation. Priority Three – Supporting Landlords	23%

DELIVERING OUR ENFORCEMENT STRATEGY

It is our aim to provide an enforcement service that ensures that businesses and individuals are encouraged and supported in compliant behaviour with targeted use of enforcement powers to prevent re-offending.. To do this we will:-

- Establish initiatives that raise awareness of offending, good practice and which builds self assessment and regulation for business
- We will use with risk based assessments to ensure that it we provide targeted and proportionate enforcement.
- We will, with our enforcement partners take the toughest possible action on priority crimes for Haringey, repeat and deliberate criminal behaviour.



We will seek to maximise the effectiveness of enforcement through

- the use community and partnership intelligence to identify criminal behaviour,
- the deployment of covert and overt surveillance including the use of highly visible activity
- the use problem solving and scanning techniques
- joint working and operations with our enforcement partners
- an increase or out of hours activity and operations in response to a developing 24 hour society and late night economy.
- early interventions to stop offending when it happens
- using the most effective powers available and where possible developing local byelaws where powers need to be strengthened.

Enforcement Policy and Priority Crimes

The Council recognises the importance of ensuring that all enforcement decisions are clearly explained, consistent and proportionate, in order to protect the public. Our Enforcement Policy (Appendix A) sets out the principles that will guide all of our enforcement activity and establish a clear basis for the enforcement interventions we make. Our policy provides a hierarchy of enforcement actions available the service and through the use of gravity factors establishes a basis for taking tough enforcement action on priority crimes for Haringey.

Our policy will also ensure that staff will work to the Council's Customer Care standards to ensure that everyone is treated fairly, regardless of their age, religion, sex, disability, sexuality or ethnic background.

Tactical Enforcement

All service groups within Enforcement contain a Tactical Enforcement resource for deployment on the highest priority enforcement issues. Some, but not all, tactical enforcement targets will reflect organised criminal behaviour and demonstrate prolific offending across crime areas. Tactical Enforcement themes currently include -

- Nuisance garages – dealing with motor vehicle trade offences, abuse of highway, and control of waste and nuisance behaviour.
- Problem Social Clubs – dealing with licensing, planning, nuisance and illegal trading activities. Premises can become a magnet for other criminal activities.
- Public Eyesores – a programme of hotspot locations in the borough which have a detrimental impact on an area. Issues can include planning, environmental crime offences.

- Problem Landlords – dealing with landlords and letting agents that consistently flout housing standards, planning controls and which allow nuisance behaviour to exist in badly managed premises.
- Organised Crime - Traders operating in the informal economy are also often prominent and prolific offenders. They can be engaged in product counterfeiting, the introduction of illegal goods or the reintroduction of stolen goods to the market place, criminal deceptions, food adulteration, substitution and fraud or supply chain or long form frauds.
- Empty properties - persistently empty properties can become a magnet for environmental crime and antisocial behaviour. Enforcement action provides a route for bringing such premises back into use.

Tactical Enforcement officers will operate from within the service groups but will also operate collectively on joint operations to establish cross service communications on enforcement targets. This will ensure that we prioritise our resources on our highest priority targets and ensure that will maximise the involvement of other enforcement partners. This tactical to approach is also called “heavy enforcement”. A Tactical Response Planning Group coordinates the use of intelligence to plan joint enforcement operations. The flow of information through the service and which is used to plan tactical enforcement targets is shown in the chart below. See Appendix B.

Working with Neighbourhoods and Area Based interventions

Haringey Council as part of its community involvement plan declared seven area assemblies across the borough. Neighborhood Managers work through the council’s seven area assemblies bringing the council and other agencies together with local people to tackle local problems. Area based working through joint partnerships with the community, police and other agencies allows for targeted, evidence based, tactical enforcement work specific to the concerns of that community group.

Partnership Working

Partnerships are key to the delivery of services across the local authority as a whole, the development and use of effective partnership can be seen through the work of the HSP and the Community Strategy and the work being carried out through the Local Area Agreement. The Enforcement Service has developed very successful partnerships with both internal service providers and external stakeholders. These partnerships have enabled the enforcement service to carryout successful targeted and tactical joint operations, which have been highly organised and intelligence led.

A varied and expanding programme of joint operations has been developed over the past three years between the Environmental Crime Group our internal and external partners such as the Police, DAAT, Safer, stronger Communities Team, Housing and ASBAT.

Strategic Implementation and Action Plan

The Enforcement Strategy will be delivered through the Enforcement Strategy Implementation Plan. This will be developed through consultation. See Appendix C.

Haringey Enforcement and Compliance Policy

1. Introduction

- 1.1. Haringey Council has a responsibility to promote economic wellbeing as well as a number statutory duties to investigate a range of offending activities and powers to enforce standards and prosecute offending where necessary.
- 1.2. The primary purpose of this policy is to provide a framework for effective decision making on enforcement and actions to promote compliance by authorised officers of the London Borough of Haringey. Use of the policy will ensure that action taken is consistent with the priorities of Haringey.

2. Haringey Community Strategy – A sustainable forward

- 2.1. Haringey's 2016 vision is for a place for diverse communities that people are proud to belong to. Six priorities have been established for the strategy.
 - People at the heart of change
 - An environmentally sustainable future
 - Economic vitality and prosperity shared by all
 - Safer for all
 - Healthier people with a better quality of life.
- 2.2. Our Enforcement and Compliance policy will support these priorities by
 - Supporting compliant businesses and behaviour
 - Providing effective enforcement interventions that can resolve offending behaviour when it occurs.
 - Demonstrating that the reporting of offending behaviour will have a proportionate consequence.
 - Targeting priority crimes for Haringey
 - Protecting the young and the vulnerable from exploitation and harm.

3. Enforcement in Haringey and Policy Scope

- 3.1. Enforcement is provided through a number of business units but mainly through the Enforcement Service. Haringey Council's Constitution and in its delegation schedules under Part F 'Decision-making' and Part F.7 Schemes of Delegation Schedule identifies the relevant delegated officers for the discharge of enforcement powers.
- 3.2. Where enforcement powers are used we will ensure that it is targeted so that those that persistently offend; or have a disregard for safety; or who target or exploit the young or vulnerable; or that abuse our public spaces will receive the toughest penalties.

4. Good Enforcement and Compliance principles

- 4.1. As signatories to the Enforcement Concordat, Haringey Council is committed to applying the principles that it sets out and these have also been incorporated into this Enforcement Policy.
- 4.2. The Hampton Review, 'Reducing administrative burdens; Effective Inspection and Enforcement' has established a further set of principles for enforcement. These principles and the published "principles "and "characteristics" for enforcement sanctions from the Macrory report of November 2006 have been built into this policy.
- 4.3. Following the introduction of the Legislative and Regulatory Reform Act 2006 a new Regulatory Compliance Code will be published which will supersede all or part of the Enforcement Concordat. The draft contents of the code have been incorporated into this Policy.

5. Haringey's Enforcement Principles

- 5.1. The following principles are those that will be applied by enforcement services in the London Borough of Haringey.
- 5.2. **Standards**
 - 5.2.1. We will consult widely with the community, businesses and other stakeholders to draw up clear standards setting out the level of service and performance we expect to provide. We will publish these standards and our performance against them.
 - 5.2.2. We recognise that it is important that we ensure the competency and quality of our enforcement staff. All those authorised to take delegated enforcement decisions will be able to demonstrate that they have been trained, have undergone robust peer review and hold qualifications where required. We will have in place monitoring systems that will demonstrate that all enforcement decisions taken are traceable to this policy.
 - 5.2.3. In cases where we investigate alleged offences our enquiries will be completed promptly regardless of legal time limits for Court action.
- 5.3. **Targeting**
 - 5.3.1. No inspection will take place without a reason. We will use risk assessment to target our planned inspection programs and to prioritise our activities. Our greatest effort will be directed where a compliance breach would have serious consequences; and the individual business is at high risk of a compliance breach. Where the risk of an adverse outcome is low we will not automatically inspect.
 - 5.3.2. Risk assessment will
 - assess and balance the likelihood of compliance failure, the seriousness of compliance failure, the business's past performance and its current practice;
 - Use all relevant, good-quality data that can be readily obtained, including that available from third parties such as independent accreditation schemes

- Not use any irrelevant, inaccurate or unreliable data
- 5.3.3. Our response times and inspection intervals will be traceable to an assessment of risk and seriousness of offence. We will take account of local needs including those of business owners, employees and the public in setting targets and priorities. However, our inspections intervals will not be predictable.
- 5.3.4. Inspection programs and information will be coordinated across agencies to ensure the burdens on business are minimised.
- 5.3.5. We will use problem solving techniques to develop strategies for resolving problems and ensure that available intelligence is use to inform these strategies and our tactical enforcement operations.
- 5.3.6. We will use information from area based groups and stakeholders to ensure that our enforcement response to problem locations is informed by local intelligence.

5.4. **Openness**

- 5.4.1. We will publish information and advice about the rules that we apply and the further policies that influence decision making.
- 5.4.2. Where formal action is taken or under consideration, we will ensure that our reasons are clear and that any appeals procedures available are explained.
- 5.4.3. Where copies of notices are required to be kept on public registers we will ensure that we do this and that there is easy access to the registers.
- 5.4.4. Where we have undertaken a risk assessment we will be open about the methodologies we use.

5.5. **Helpfulness**

- 5.5.1. We will provide a courteous and efficient service. Our staff will identify themselves by name and provide a contact point and telephone number for further dealings with us.
- 5.5.2. We will ensure that, wherever practicable, our enforcement services are effectively coordinated to minimise unnecessary overlaps and time delays. Where possible information collected by a Council enforcement team will be shared to avoid that business having to give the same information twice.
- 5.5.3. We believe that prevention is better than cure. We will advise on and assist with compliance and will work particularly actively with small and medium sized businesses.
- 5.5.4. We will provide information in different community languages for businesses and individuals where appropriate.
- 5.5.5. We will provide responses to requests made under the Freedom of Information Act 2000 and Environment Information Regulations 2004. We will provide advice or assistance where help is requested according to our published standards.

5.5.6. We will aim to feedback to those that use and support our services with timely and appropriate information on the key milestones in the investigation of a case.

5.6. **Fairness, Risk and Proportionality**

5.6.1. We will seek to advise and inform on potential offences and help individuals to avoid offending behavior.

5.6.2. We will work constructively with businesses that are honestly trying to comply with the law, and help them towards compliance.

5.6.3. We will provide an opportunity to resolve non compliance without formal action, but, we will not hesitate to use powers of direct action designed to tackle offending where there is a clear and current unacceptable breach or an imminent risk. This includes the use of powers to seize, close or stop and operation, or the use of fixed penalty notices.

5.6.4. We will always consider whether it is expedient to take planning enforcement in the case of unauthorised development. We will normally take enforcement action only when it is essential to protect the amenity of the area, public or highway safety, and the integrity of the development control process. We will not issue a formal notice solely to remedy the absence of a valid permission and will normally suspend enforcement proceedings whilst considering a valid formal application to remedy the matter or where there is an appeal pending, unless the breach is considered to be particularly serious.

5.6.5. Haringey Council believes that certain offences are unacceptable in any circumstance and will apply a “Gravity Factor” to priority crimes for Haringey. The areas where gravity factors are applied will be determined by Executive Member decision following appropriate consultation. Where such gravity factors apply the Council will seek to take the highest available action available, including action for first offences. We will publish our priority crimes as an appendix to this policy.

5.6.6. We will minimise the cost of compliance by ensuring that any action we require is proportionate to the risks and seriousness of the breach.

5.6.7. We will develop joint tactical enforcement responses with our colleagues in other enforcement agencies and use these to ensure that our most persistent and prolific offenders receive the toughest outcomes.

5.6.8. As far as the law allows, we will take account of the circumstances and attitude of alleged offenders when considering action.

5.6.9. We will take into consideration the views of anyone who is alleged to have been injured or suffered loss. Where possible and where prosecution is successful, we will seek a court order to achieve compensation.

5.6.10. We will take particular care to work with small businesses, voluntary and community organisations.

- 5.6.11. Where the Council has to execute works in default, because a responsible person has failed to, we will recover our full economic costs either by agreement or through the courts.
- 5.6.12. We will seek to recover the cost of enforcement. Where we are successful in Court we will always apply for the full costs of that investigation and prosecution. No matter will be taken to formal action simply to elicit a fee, penalty charge or similar payment
- 5.6.13. Where we are successful in taking prosecution cases, we will publicise these results so that we inform others about the consequences of failing to comply with legal requirements.
- 5.7. Feedback about our services and complaints**
 - 5.7.1. We will actively seek the views of those who receive our services about how we can improve. In particular we will establish arrangements for engagement with community and business groups.
 - 5.7.2. We will provide easy access to the Council's public complaints procedure to anyone who is unhappy about our service. In cases where disputes cannot be resolved, we will explain any right of complaint or appeal, with details of the process and the likely time-scales involved.
- 5.8. Human Rights**
 - 5.8.1. We will always respect the rights and freedoms of individuals as set out in the Human Rights Act 1998 and we will comply with the protocols described in the Act.
- 5.9. Monitoring**
 - 5.9.1. We will monitor the outcomes of enforcement and compliance with this Policy.
 - 5.9.2. We will monitor our compliance with the Council's equalities policies and best practice.
 - 5.9.3. We will publish reports on our compliance with this enforcement policy and any variations will be addressed in our published business plans.
- 5.10. Consistency**
 - 5.10.1. When deciding on an enforcement decision, we will consult with enforcement authorities with special responsibility for the decision making base of a company or the source of an offending product or service.
 - 5.10.2. We will promote consistency, and make effective arrangements for liaison with other authorities and enforcement bodies. The Council supports the 'Home Authority Principle' developed by the Local Authorities Coordinators of Regulatory Services ('LACORS').

5.10.3. We will monitor the outcomes of enforcement, audit the competence of our staff and run regular training to ensure that our authorised officers are qualified and competent.

5.10.4. The Council has established information sharing protocols to ensure that it and its partners have access to accurate and appropriate information when taking enforcement decisions.

6. Enforcement Processes

6.1. Our delivery of enforcement will be based on four methods of intervention:

- Education - we will promote good practice, support training initiatives and provide advice where it is practicable to do so.
- Planned Inspection – we will operate a number of risk based inspection programs for trading regulation
- Responding to complaints and information - we will prioritise our response to complaints and other notifications by an assessment of risk.
- Intelligence led – We will monitor trends in enforcement and non-compliance and carry out targeted and tactical enforcement projects

7. Enforcement Decisions

7.1. The Council will often have a number of enforcement options for most matters ranging from verbal advice on compliance through to prosecution. The following will be used to help us determine the correct level of action in any particular case:

7.2. How serious is the matter?

- Was there disregard for the law or a published policy of the Council.
- Was there significant gain, dishonesty or intention to deceive?
- Has there been reckless disregard for safety?
- Has there been serious injury, loss or public alarm?
- Are there multiple offences?

7.3. What is the previous history?

- Is it a repeat offence?
- Has previous advice or advice made available on how to comply with the law been ignored?

7.4. What steps have been taken to get information about compliance?

7.5. Is the action proposed likely to be effective in preventing recurrence of the offence?

7.6. Will serious or irreversible consequences result from a failure to comply with a legal requirement?

7.7. Is it a Priority Crime in Haringey - This will relate to issues of major area of local concern and will be subject to review by the relevant Executive Member.

8. Enforcement Options

- 8.1. In summary the options available fall under the following hierarchy. Each enforcement area will publish specific process information to show the detailed framework for enforcement action that it uses.
- 8.2. Informal action will be taken in the first instance where the matter is not serious, the past history shows no similar problems, there is no risk to health or fraud and we have confidence that compliance will be achieved. Voluntary organisations will normally be dealt with at this level.
- 8.3. Advice from Officers will be put clearly and simply. It will be confirmed in writing, explaining why any remedial work is necessary and over what time-scale. We will make sure that legal requirements are clearly distinguished from best practice advice.
- 8.4. Where advice has been given and repeat offences are found, formal action is likely to follow.
- 8.5. Agreements and Undertakings
- 8.6. Agreements and undertakings are informal procedures, aimed at stopping problem behaviour or continuing offending. Rather than punishing the offender these can be signed and agreed by an offender to record acceptable improvements that will prevent future offending. The will form a record that can be used as a record should further action be required.
- 8.7. Notices Requiring Improvement or Works will be used where there are recurring matters not resolved informally; or significant contraventions; or risks to health or the environment.
- 8.8. Once we have served a notice requiring improvement or works to be undertaken, we will continue to provide advice and support to ensure that the recipient understands it and is able to comply with it fully. We will regard failure to comply with a notice as a serious matter which will normally result in either a formal caution (for example in the case of a first offence) or prosecution.
- 8.9. Before formal enforcement action is taken, officers will provide an opportunity to discuss the circumstances of the case and, if possible, resolve points of difference and agree time scales for compliance. In the case of vulnerable groups we will consult with any appropriate representative bodies.
- 8.10. Fixed Penalty Notices are an alternative to a prosecution. They will be used where an offence committed does not warrant prosecution in the first instance and where the cost of prosecution and any likely fine arising makes prosecution not in the public interest.
- 8.11. Fixed penalty notices will be used as an effective warning that a matter is an offence and will result in prosecution if they are not paid and no appeal is upheld.
- 8.12. Notices Requiring Information - These will be used to help identify responsibility for matters we are investigating. Failure to comply with a notice will normally result in a

- prosecution because such a failure will often frustrate the progress of further and more serious enforcement action.
- 8.13. Notices Prohibiting or Stopping Activities will be used where an activity poses a significant risk to health, irreversible damage or the environment. Where the risk exists at the time of the action or is imminent we will immediately use powers available to close premises or parts of premises, seize or detain articles, equipment or food to remove the risk effectively.
- 8.14. Where Officers consider immediate notice action is necessary, they will give an explanation of why such action is needed at the time and confirm in writing in the notice served at that time. If requested, officers will provide further written explanation of their decision within 10 working days.
- 8.15. Work in Default - Where we have served a notice requiring works to be undertaken and there is not compliance, we will exercise powers available to us to arrange for the improvement work to be carried out at their expense. This is known as 'work in default' and we will always seek to recover our full economic costs from the person receiving the original notice.
- 8.16. Review of Licence and Registration Conditions - The Council has published a Licensing Policy and Gambling Policy that sets out its approach to the issue of licenses.
- 8.17. Formal Cautions will be issued where there is clear evidence and acceptance of an offence by the offender. Where cautions are offered as an alternative to prosecution, we will require that the costs of that investigation are met as part of the conditions for the issue of that caution. The purpose of a formal caution will be:
- to deal quickly and simply with less serious offences;
 - to avoid unnecessary appearances in criminal courts; and
 - to reduce chances of re-offending; and
 - to deal with cases where it is not in the public interest to prosecute.
- 8.18. Where a formal caution is issued the Council will expect its investigation costs to that point will be met by the offender. Failure to agree an offer of formal caution will lead to prosecution.
- 8.19. Prosecution - we will follow the Crown Prosecution Service code for prosecutions when considering enforcement action
- 8.20. Injunctions and Court Orders. – these will be used where an offender persistently offends and where a prosecution or threat of prosecution is unlikely to remedy the breach.
- 8.21. Proceeds of Crime Act 2002
- 8.22. Following conviction for an acquisitive crime, a court can be asked to issue a confiscation order: an order to the convicted defendant to pay a sum of money representing the defendant's benefit from crime. The sum will have been determined during the investigation, or at a later date.

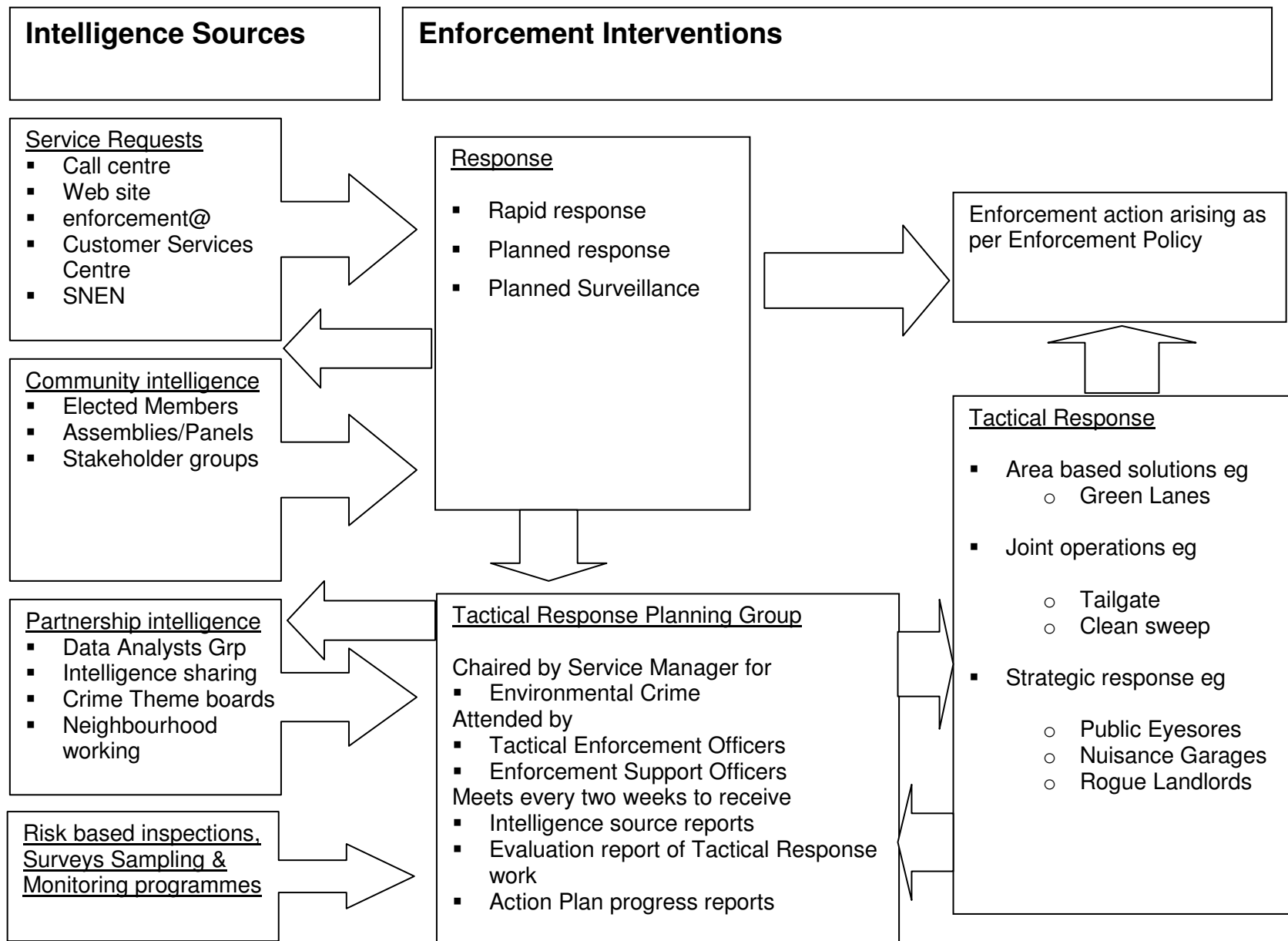
8.23. Enforcement Procedures

8.24. We will maintain written enforcement procedures designed to implement this policy.

Officers will be trained in the use of these procedures and will have authority to take enforcement actions traceable to them. Where enforcement results in a formal caution or prosecution, Officers will provide on request a copy of this policy and a justification for their action.

8.25. Review

8.26. We will review this policy and update it to reflect changes in its source documents and controlling bodies. We will also review its effectiveness in supporting the Councils and the Community's priorities and consult with stakeholders before making any significant changes to this policy.



PRIORITY ONE	A Safer, Cleaner and Sustainable Environment
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Aim:			
a. To reverse and prevent unauthorised use and non permitted development			
Task	Responsibility	Time Scale	Report back and monitoring
To remove the remaining backlog of planning enforcement cases	Enforcement Response Manager	Completes July 2007	Planning Applications Advisory Committee (PASC)
Review of Planning Enforcement and agreement on enforcement priorities	Project Sponsor AD PEPP	Completes July 2007	tbc
Implementation of Enforcement Restructure	AD Enforcement	Starts March 2007	General Purposes Committee December 2007
Reduce level of fly posting and establish fly posting and graffiti partnership.	Team Leader for Street Enforcement	Ongoing	Corporate Balanced Score card - BV199
The development of a strategy to deliver Conservation Enforcement based on Tower Gardens pilot.	Team Leader for Street Wardens	Ongoing	PASC
The removal of unauthorised advertising hoardings	Team Leader for Street Enforcement	Starts April 2007	PASC
To reverse unauthorised HMOs through licensing	Team Leader for Private Sector Housing	Ongoing	PASC Private Sector Housing Group

PRIORITY ONE	A Safer, Cleaner and Sustainable Environment
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inspection programme			
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Aim: b. To implement an enforcement tool for targeting unscrupulous, failing landlords			
Task	Responsibility	Time Scale	Report back and monitoring
Evaluate rogue landlord project and establish template for future action and criteria to target landlords.	Environmental Crime Manager/ Housing and Health Manager	Completes June 2007	TRPG Private Sector Housing Group
Establish programme for tackling rogue landlord using new tactical enforcement officer.	Housing and Health Manager	Starts July 2007	TRPG Private Sector Housing Group

Aim: c. To promote good citizenship and reduce the fear of crime			
Task	Responsibility	Time Scale	Report back and monitoring
To increase the visibility of our uniformed wardens.	Team Leader for Street Wardens	Ongoing	Antisocial Partnership Board (ASBPB)
Extend Junior wardens programme	Team Leader for Street Wardens	Ongoing	ASBPB /Acquisitive Crime partnership Board (ACPB)

PRIORITY ONE		A Safer, Cleaner and Sustainable Environment	
Target harden homes against crime, in particular HMOs	Housing and Health Manager	Ongoing	ACPB
Delivery of a Criminal Damage action plan	AD Enforcement	Starts April 2007	AQCB
Aim:			
d. To stop environmental crimes and the abuse of public spaces			
Task	Responsibility	Time Scale	Report back and monitoring
Targeted litter enforcement to reduce BV199 indicator for cleanliness	Team Leader for Street Enforcement		Better Haringey Stream Board Balanced Core Card BV199 and LAA
Increase patrolling of dog fouling and introduce increased signage and reporting	Team Leader for Street Enforcement		Better Haringey Stream Board BV199
Graffiti and Fly posting – partnership to be launched and targeted enforcement of street furniture and hotspots. Targeted enforcement to reduce BV199 indicator.	Team Leader for Street Enforcement	Ongoing with Partnership to be signed by August 2007	Better Haringey Stream Board
Fly tipping action plan to reduce BV199 indicator and LPSA indicator for reported dumps.	Team Leader for Environmental Crime	Ongoing	Better Haringey Stream Board BV199
To reduce the number of problem garages operating in	Environmental Crime Manager	Ongoing	Tactical Response Planning Group (TRPG)

PRIORITY ONE	A Safer, Cleaner and Sustainable Environment		
the borough.			
Extend family of officer able to identify and report fixed penalty notice offences.	Environmental Crime Manager	Ongoing	Better Haringey Stream Board

PRIORITY ONE	A Safer, Cleaner and Sustainable Environment
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Aim:			
e. To act against landowners that neglect properties and create public eyesores			
Task	Responsibility	Time Scale	Report back and monitoring
Public Eyesores Programme	Environmental Crime Manager and Enforcement Response Manager	Ongoing – to complete in march 2009	Better Haringey Stream Board
To develop and deliver an Enforcement Strategy for empty properties. This will include roll out of enforced sale, section 215, CPO/EDMO powers as applicable and in accordance with scrutiny recommendations.	Housing and Health Manager	Starts April 2007	Sub Regional Housing Group Overview and Scrutiny
To establish reporting of empty properties as part of the duties of our patrolling officers including wardens.			Empty Properties group

PRIORITY TWO	Healthier Communities
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Aim: a. To enforce the standards set for Houses in Multiple Occupation through the use of available licensing powers			
Task	Responsibility	Time Scale	Report back and monitoring
Complete Mandatory Licensing		Completes March 2009	
Pilot Discretionary Licensing and evaluate.		Scheduled for Adoption by April 2008	Myddleton Road Strategy Group Private Sector Housing Group
Extend discretionary licensing to target HMO groups/locations.		2009 onwards	Private Sector Housing Group

Aim: b. To remove hazards identified within private rented dwelling which pose the greatest risk to the vulnerable occupants and increase the percentage of vulnerable people living in decent homes in the private sector			
Task	Responsibility	Time Scale	Report back and monitoring
Respond to complaints from private sector housing tenants	Team Leader for private Sector Housing	Ongoing	
To deliver energy efficiency improvement to private sector housing through British Gas partnership using sub regional funding and NRF	Housing and Health Manager	Ongoing	Better Places Board

PRIORITY TWO	Healthier Communities
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Aim: c. To control the supply of illegal and dangerous goods and products. This will include the supply of age restricted products to children – e.g. alcohol, knives, tobacco			
Task	Responsibility	Time Scale	Report back and monitoring
To deliver a rolling programme of underage sales.	Team Leader for Trading Standards	Ongoing	
To promote proof of age scheme to traders and young people	Team Leader for Trading Standards	tbc	
To develop a report a trader scheme	Team Leader for Trading Standards	Tbc	

Aim: d. To intervene to protect health at work; and to ensure the supply of safe food, products and services			
Task	Responsibility	Time Scale	Report back and monitoring
Risk Based inspection programmes for commercial services	Commercial Services Manager	Ongoing	Feedback questionnaires
Implement Hampton improvements and reduce inspection programme	Commercial Services Manager	2007	Value for Money Review

PRIORITY TWO	Healthier Communities
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Aim: e. To reduce the health impact of pollution, including noise, contaminated land, tobacco and other air pollutants			
Task	Responsibility	Time Scale	Report back and monitoring
Deliver Contaminated land strategy	Commercial Services Manager	Ongoing	BV 217
Deliver Air Quality Action Plan and Review	Commercial Services Manager	Ongoing	BV216
Out of Hours response to noise complaints. Re-launch service using investment funding and to deliver Homes for Haringey Value for Money.	Enforcement Response Manager	Starts June 2007	HfH client monitoring
To develop risk based licensing inspections and investigations	Commercial Services Manager/Enforcement Response Manager	April 2007	Licensing Ctte
To deliver smoking control in public enclosed spaces.	Commercial Services Manager	April 2007	Wellbeing Stream Board

PRIORITY THREE	Supporting Business Improvement
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Aim:			
a. To promote Haringey as a good borough to do business and to protect our vibrant and diverse business community			
Task	Responsibility	Time Scale	Report back and monitoring
Review and propose extension of street trading	Group Manager for Environmental Crime	tbc	ASBPB

Aim:			
b. To encourage and support good landlords			
Task	Responsibility	Time Scale	Report back and monitoring
Delivery of Landlord Forums	Housing and Health Manager	Ongoing	
Landlord Accreditation and training	Housing and Health Manager	Ongoing	

Aim:			
c. To support businesses and traders to achieve compliance with the regulations affecting them			
Task	Responsibility	Time Scale	Report back and monitoring
To develop compliance strategy based on consultation and outcomes from the new Local Better Regulation Office	Commercial Services Manager	2007	

PRIORITY THREE	Supporting Business Improvement
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Aim:			
d. To target organised criminal activity such as counterfeiting and illegal street trading			
Task	Responsibility	Time Scale	Report back and monitoring
To reverse the development of problem social clubs and reduce the number of operating in the borough.	Environmental Crime Manager	Ongoing	Tactical Response Planning Group (TRPG) Antisocial Behaviour partnership Board (ASBPB)
To deliver four 4-5 day Tailgate partnership operations targeting rogue traders and organise crime including counterfeit crime.	Environmental Crime Manager	4 Tailgates per year	TRPG
To reduce the sale of illegally imported and unfit food through targeted enforcement.	Commercial Services manager		TRPG
To develop markets and Boots sales strategy	Commercial Services Manager		TRPG
To target measures aimed at identifying and reducing the use of dogs for fighting and criminal activity	Environmental Crime Manager		TRPG

PRIORITY FOUR	Effective and Valued Enforcement
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Aim: a. To support area improvement and local action planning with communities			
Task	Responsibility	Time Scale	Report back and monitoring
To develop or contribute to local area actions planning. To follow example Green Lanes Strategy and Myddleton Road Strategy.	Enforcement Response Manager	Ongoing	
Restructure to develop Tactical Enforcement Officers acting as local champions for area assemblies and as resource for Neighbourhood working.			
Group Repair projects subject to capital funding		Tbc	

Aim: b. To develop services through feedback and consultation			
Task	Responsibility	Time Scale	Report back and monitoring
Consult on Enforcement Strategy Action Plan with strategic partners and stakeholders.	AD Enforcement	April 2007	

PRIORITY FOUR	Effective and Valued Enforcement
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Aim: b. To develop services through feedback and consultation			
To develop the opportunity of local byelaw options to target offending behaviour of concern to communities.	Enforcement Support Manager	2008	
Develop consultation and feedback strategy	Enforcement Support Manager		
Learning outcomes from complaints and appeals to be used for service improvement	Enforcement Support Manager		

Aim: c. To provide value for money, ensuring that our priorities for enforcement are matched by our use of available resources			
Task	Responsibility	Time Scale	Report back and monitoring
Enforcement Policy and Strategy	AD Enforcement	Ongoing	
To establish and extend value for money indicators through pan London agreement	AD Enforcement	Ongoing	DMT

PRIORITY FOUR	Effective and Valued Enforcement
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Aim: d. To produce highly trained and motivated staff who can provide a flexible approach to enforcement activity			
Task	Responsibility	Time Scale	Report back and monitoring
Delivery of People plan for flexible working,		2007/8	
Restructure of enforcement and full recruitment.		Starts March 2007	

Aim: e. To improve our communication of enforcement outcomes and performance			
Task	Responsibility	Time Scale	Report back and monitoring
Develop area based information available on web site.			
Contribute to partnership newsletter on enforcement action.			
Evaluate Environmental Crime DVD and develop proposals for promotional films on service teams.			