

## ENVIRO-CRIME ACTION PLAN

1. Fly Tipping				
Action	Target Date	Task Owner	Status	Comments
Develop a toolkit of all available enforcement actions such as fixed penalty notices and simple cautions to deal with fly tipping.	Completed	EH Manager / PEHO	✓	Toolkit has been developed and put in place. This will continue to be added to and adapted in order to meet the requirements of GDPR and reflect current legislation and best practice.
Prosecute offenders of fly tipping and advertise results in local media a	Ongoing	EH Team	😊	In 2017/18 6 Enviro-crime prosecutions were taken. This resulted in £5052 of fines and costs being issued. These prosecutions were publicised through local media and social media.
Prepare a fixed penalty procedure & policy	Completed	PEHO	✓	Policy will continue to be kept under reviewed to ensure meets the requirements of GDP.  In 2017/18 a total of 24 fixed penalty notices were issued.


<b>1. Fly Tipping</b>				
<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
Undertake a joint working initiative with Gloucestershire Police	Completed	PEHO	✓	Stop and Search Initiative took place with Police and Environment Agency in October 2017. Initiative proved successful although no direct enforcement action was taken as a direct result. Lessons learned from this event will be incorporated into operational orders for next event. A joint meeting has been held with Environment Agency and Police to plan events for 2018/19. Three joint events are initially planned, exact dates and scope are currently being confirmed. Opportunities to carry out joint working on a more regular basis such as regular joint patrols, joint inspections and rolling out the ability to serve fixed penalty notices on behalf of the Borough Council is also being explored.

**1. Fly Tipping**

<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
<p>Review the Borough signage with regard to enviro-crime and deploy to areas which are known hot spots</p>	<p>March 2019</p>	<p>PEHO</p>	<p>☹</p>	<p>Signage is reviewed regularly and moved to the most appropriate location. Concerns have been raised by the manager of Morrison's regarding the signage at the recycling area. Subsequently this recycling centre has been closed.</p> <p>Due to the implementation of the PSPO some of the "no dog fouling" signs may require to be changed to reflect the increased fixed penalty fine and requirement to provide a means of picking up after your dog. A review of these signs is currently being undertaken with a view to producing a replacement program to be completed by end of March 2019. Consideration will also be given to applying signs to litter bins highlighting that they can be used for appropriately wrapped dog waste.</p>

<b>1. Fly Tipping</b>				
<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
Work with TBC property department to establish whether an engineered solutions can reduce fly-tipping	Completed	EH Manager / PEHO	✓	Discussions have been had with property services to discuss Environmental Health's role in relation to Enviro-Crime and how they can assist Property Services with areas of land that are commonly blighted by recurring littering and fly tipping.
Continue to deploy covert CCTV in our known hotspots.	March 2019	PEHO / EH Team	☹	<p>The current CCTV cameras that we have will not meet GDPR requirements as the data they store is not encrypted. As the cameras are generally sited where the public have access the lack of encryption poses a data management risk.</p> <p>Purchase of GDPR compliant CCTV will need to come from Council finances.</p>

**1. Fly Tipping**

<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
Work closely with the National Farmers Union and other partners in rural communities.	July 2018	HoCS / EH Manager		Representative from NFU will be attending next Countywide Enviro-Crime working Group. Will attend and give presentation at Joint Rural Crime forum 24 June.

## 2. Abandoned Vehicles

Action	Target Date	Task Owner	Status	Comments
Continue partnership working with Gloucestershire Police and district authorities in order to achieve a co-ordinated approach across Gloucestershire.	Completed	EH Manager / PEHO	✓	<p>Meetings have been held with Police to discuss ongoing joint working practices. Currently exploring possibility of PCSO issuing fixed penalty notices, regular joint patrols and initiatives.</p> <p>There is a County Wide Managers Pollution Group that is now meeting every quarter. Through this Group good practice is shared and it is the intention going forward to introduce an element of training. Ideas for a training session are currently being considered with a view to holding a training session Sep/Oct 2018.</p>

## 2. Abandoned Vehicles

Action	Target Date	Task Owner	Status	Comments
Achieve an increase in the use of fixed penalty notices in connection with abandoned vehicle investigations.	Completed	PEHO	✓	Fixed Penalty notices are issued where evidence of who abandoned the vehicle exists. This is not necessarily the registered keeper of the vehicle so additional corroborative evidence will be required. Historically this has restricted the opportunity for serving fixed penalties in relation to abandoned vehicles, however where that opportunity exists then fixed penalty notices are being served. The new powers referred in the body of the report should make this considerably easier.

### 3. Dog fouling / Control

Action	Target Date	Task Owner	Status	Comments
Introduce Public Space Protection Order (PSPO)	Completed	HoCS / EH Manager / PEHO	✓	Consultation completed, positive response, PSPO approved at Executive Committee in March and full Council in April 2018.
Gather data on dog fouling hot spots.	Completed	PEHO	✓	All reports of dog fouling are used to build up a picture of the hotspots across the Borough.
Consult with the Council's Executive Committee recommending the introduction of Public Space Protection Orders for dog fouling.	September 2017	HoCS / EH Manager	✓	Completed on 14 March 2018
Implement PSPO & Advertise	January 2018	HoCS / EH Manager	☹	Approval gained from Council on 17/04. Full implementation in progress.
Finalise governance and HR arrangements for employing the environmental warden	August 2017.	EH Manager	☹	Insufficient contributions from Town & Parish Councils to progress at this stage.



<b>4. Littering</b>				
<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
Co-ordinate, promote and support the work of the volunteer litter pickers.	Completed	PEHO / EH Assistant	✓	Continues to be a healthy interest in volunteering as a litter picker, continue to get enquiries from volunteers. Currently at approximately 200 volunteers
Continue to provide induction training and equipment as required by the volunteer litter pickers. Continue to support the scheme and encourage uptake.	Completed	PEHO / EH Assistant	✓	Presentation held in 2017/18. Beginning to consider options for 2018/19 event.
The Environmental Health Department will continue to investigate complaints of litter and will take appropriate action where sufficient evidence exists.	July 2018	EH Team	😊	New powers relating to litter from vehicles introduce ability to serve fixed penalty on "Keeper" of a vehicle if litter was been thrown from it. These new powers have just come into force and work is being carried out to include them in the Enviro-crime toolkit

<b>4. Littering</b>				
<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
Introduce PSPO for littering.	Following review of dog fouling PSPO – Mid 2018	HoCS / EH Manager	☹	<p>No suitable areas have at present been identified</p> <p>Areas where PSPO may be appropriate are being explored. As first part of the process an assessment of the area will be made and communication targeted at those responsible for litter.</p>
<b>5. General</b>				
<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
Review the enforcement policy to ensure that it is robust and includes all enforcement option for enviro-crime.	Completed	HoCS	✓	The EH Enforcement Policy was reviewed and revised and approved by the Executive Committee in August 2017. This will be kept under review to ensure that it reflects current legislative requirements.

5. General				
Action	Target Date	Task Owner	Status	Comments
Review all of the available resources Council wide for dealing with enviro-crime and where appropriate multi-skill and train officers to take relevant enforcement activities.	July 2018	HoCS	☹	Discussions regarding opportunities for more integrated working are occurring between departments. Once the PSPO for dog fouling has been confirmed, fixed penalty notice books will be printed. These can be issued to those within Council who are likely to encounter Enviro-Crime once they have been suitably trained.
When employing Council officers where appropriate ensure that enviro-crime is included within their remit.	Completed	HoCS / EH Manager / PEHO	✓	Envirocrime requirement included within job descriptions. Ongoing discussions will be held with other Managers to identify as broad a range of appropriate officers as possible.

<b>5. General</b>				
<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
Individual officer performance and training needs in respect of enviro-crimes will be discussed and reviewed as part of the Personal Professional Development (PPD) process.	Completed	EH Manager / PEHO	✓	All appropriate Officers within EH have been trained. Now looking to cascade this training to other officers within the Council and to external partners such as the police.
Consider possibilities of working with the Counter Fraud unit to work more closely to target enviro crime including using powers to seize vehicles and apply for proceeds of crime in larger cases.	Completed	HoCS / EH Manager	✓	Presentation given by Counter Fraud advising of their remit. Individual cases will now be considered with possible support from Counter Fraud in mind
Review and where appropriate improve reporting mechanisms for members of the public wishing to report enviro-crime.	Completed	HoCS / EH Manager	✓	Current reporting mechanisms are appropriate.

## 6. Communications

Action	Target Date	Task Owner	Status	Comments
<p>Develop a communications strategy around enviro-crime utilising all of our usual media channels including Borough News, press and other media, websites and social media etc including:</p> <ul style="list-style-type: none"> <li>• Fly tipping</li> <li>• Littering</li> <li>• Abandoned Vehicles</li> <li>• Dog fouling</li> </ul>	June 2018	HoCS / EH Manager / PEHO	☹️	<p>Borough News contains articles on enviro-crime.</p> <p>All prosecutions are publicised to maximise deterrent effect.</p> <p>Communications plan is currently being drawn up in order to publicise PSPO.</p>
<p>Develop an information sharing agreement with other Council's within Gloucestershire to ensure that information on fly tipping events and offenders are shared.</p>	Completed	HoCS	✓	<p>Information sharing agreements in place. These will be kept under review to ensure they comply with the GDPR</p>

## 6. Communications

Action	Target Date	Task Owner	Status	Comments
Develop a network of communities to report enviro-crime enabling them to act as eyes and ears for the council in particular with existing community groups, Town & Parish Councils, and volunteer litter pickers.	Sept 2018	HoCS / EH Manager / PEHO	☹️	As part of revised communications strategy points of contact within local communities will be identified and the most effective way of engaging with them considered. A subsequent communication plan will be produced setting out the messaging and methods of communication. This will be an ongoing process kept under review.
Develop case studies to highlight the impact of fly tipping and other enviro-crimes on the community and economy of the borough (i.e. costs to the tax payer)	March 2019	HoCS / EH Manager / PEHO	😊	It is proposed to produce an annual Enviro-Crime report for 2018/19 which will not only include a summary of Enviro-Crime actions taken throughout the year but also highlight specific cases, the impact on local communities, and how they were investigated and resolved.

**6. Communications**

<b>Action</b>	<b>Target Date</b>	<b>Task Owner</b>	<b>Status</b>	<b>Comments</b>
Pool intelligence on prolific offenders and use robust enforcement powers to target these offenders.	Completed	PEHO / EH Team	✓	Developing closer working relationships with Environment Agency and Police, sharing intelligence and carrying out joint inspections.