



Worcester
CITY COUNCIL

ENVIRONMENTAL Enforcement Policy



February 2018

Contents

1	Background	3
2	Scope and Meaning of Enforcement	5
3	What is the Objective of the Enforcement Policy?	6
4	What guides The Environmental Enforcement Approach?	6
5	Which Worcester City Council services operate in accordance with this Environmental Enforcement Policy?	9
6	Who does this Enforcement Policy affect?	10
7	Evidence Gathering during an investigation	11
8	What does Environmental Enforcement look like/ Enforcement Options	13
9	How is the most appropriate Environmental Enforcement action determined?	19
10	What can be expected from Enforcing Officers/ The Council?	22
11	Which other agencies might we work with?	24
12	Equality and Diversity	25
13	Related Policies	26

1 Background

Worcester City Council is committed to providing for the benefit of both residents and visitors to the City alike, a clean, green and safe place in which to live, work, study and play. The delivery of an effective Environmental Enforcement Policy supports the delivery of the Council's City Plan specifically Sustaining and Improving our Assets and creating a Healthy and Active City in terms of developing a quality environment that will contribute to the overall look and feel of the City. The policy sets out the approach that Worcester City Council will take when deciding how, where and when enforcement action may be taken.

1.2

This policy aims to provide clarity about what may be expected if Council rules are breached, and subsequent enforcement action, as well as clarity for victims where it is someone else breaching the rules.

1.3

It is accepted that there are times when help may be needed about what the rules are and how they are applied and what is expected. So along with our tough stance on enforcement, advice and assistance are provided, it is recognised in this Policy that it is frequently better to encourage compliance through more informal approaches. Indeed, influencing behaviour change has been used in relation to litter and street scene in an around the city through campaigns such as the 'Feed the bins, not the gulls' initiative. An evidence based approach is to be used to target areas that are most in need whilst upholding a commitment to the protection of residents and businesses from harm wherever possible.





1.4

Worcester City Council has a separate Enforcement Policy for planning that was approved in March 2015. In addition enforcement activity is also undertaken on behalf of the City Council by Worcestershire Regulatory Services (a shared service established in 2010; governed by an approved service level agreement). This new Policy for Environmental Enforcement provides policy basis for the undertaking of relevant activities, and takes into account changes that have occurred in relation to regulatory activity; this includes updated statutory requirements of an enforcement policy, new regulatory sanctions available for specific issues of non-compliance and also changes to the staffing and service structures within Worcester City Council itself.

1.5

This policy does not aim to provide a 'one size fits all' approach to environmental enforcement across the wide range of regulatory services, but is an overarching view of how Worcester City and its officers will undertake regulatory and enforcement action as part of day to day work.

1.6

It also takes into account the subtle differences in regulatory approach between the various service areas and appropriate legislation by providing a framework for specific local environmental enforcement procedures which will be useful for business and individuals.

2 Scope and Meaning of Enforcement

This Policy applies to all the legislation enforced by Officers with delegated enforcement powers employed by the Council. Enforcement action includes any action taken by officers aimed at ensuring that individuals or businesses comply with the law and goes beyond just formal enforcement action such as prosecution.

'Enforcement' includes any criminal or civil action taken by Enforcement or Investigation Officers aimed at ensuring that individuals or businesses comply with the law. This policy excludes enforcement actions associated with parking in Worcester City Council car parks and on the public highways; these are covered in a separate policy.

The term 'enforcement action'¹ has been given a general statutory definition, which is:

- (a) Action to secure compliance with a restriction, requirement or condition in relation to a breach or supposed breach;
- (b) Action taken in connection with imposing a sanction for an act or omission; and
- (c) Action taken in connection with a statutory remedy for an act or omission.

'Enforcement Officer' includes any individual who has been duly authorised by the authority under the terms of the Worcester City Council Constitution and/or scheme of officer delegations to undertake 'Enforcement' and 'Enforcement Action' in accordance with paragraphs (a)-(c) above.



¹ The Co-ordination of Regulatory Enforcement Regulations 2017 No. 835

3 What is the objective of the Enforcement Policy?

The key objective of the policy relates to prevention and compliance, and is to prevent breaches of the various acts and associated legislation relating to those matters that Worcester City Council is responsible for regulating. This is achieved through a robust approach to deploy the policy principles by staff teams.

4 What guides The Environmental Enforcement Approach?

4.1 The Principles of Good Regulation

Prevention is a key part of the approach which involves active work to provide access to advice and information to assist with achieving compliance. The Legislative and Regulatory Reform Act 2006 requires every local authority to have regard to the five **Principles of Good Regulation** when carrying out specific regulatory functions. These are:

1. Proportionate

Enforcement activities will reflect the level of risk to the public and enforcement action will relate to the seriousness of the offence.

2. Accountable

Enforcement activities will be open to public scrutiny, with clear and accessible policies, and a fair and efficient complaints procedure.

3. Consistent

Enforcement advice to those individuals and businesses that are regulated will be robust and reliable and advice provided by others will be respected. Where circumstances are similar, endeavours will be made to act in similar ways to other local authorities.

4. Transparent

Worcester City Council will ensure that those subject to regulation are able to understand what is expected of them and what they can anticipate in return.

5. Targeted

Resources will be focussed on higher risk enterprises and activities, reflecting both local need, priorities and national priorities.



4.2 The Regulators Code²

Worcester City Council has had regard to the Regulators' Code in the preparation of this policy. This provides for an efficient and effective approach to all council regulatory inspection and enforcement functions to improve compliance with legislation whilst minimising the burden on businesses, individuals, organisations and upon Worcester City Council itself.

In certain instances we may however conclude that a provision of the Code is either not relevant or is outweighed by another provision. We will ensure that any decision to depart from the Code will be properly reasoned, documented and based on material evidence.

4.3 Human Rights Act 1998

Worcester City Council is a public authority for the purposes of the Human Rights Act 1998.

Therefore the principles of the European Convention for Human Rights and Fundamental Freedoms are applied. The Policy and all associated enforcement decisions take account of the provisions of the Human Rights Act 1998. In particular, due regard is paid to the right to a fair trial and the right to respect for private and family life, home and correspondence.

4.4 Data Protection Act 1998

Where there is a need for Worcester City Council to share enforcement information with other agencies, such as Worcestershire Regulatory Services, we will follow the provisions of the Data Protection Act 1998.

² The Regulators' Code came into statutory effect on 6 April 2014 under the Legislative and Regulatory Reform Act 2006 and provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate.

4.5 The Code for Crown Prosecutors

When deciding whether to prosecute, Worcester City Council will have regard to the provisions of The Code for Crown Prosecutors as issued by the Director of Public Prosecutions.

The Code for Crown Prosecutors is a public document that sets out the general principles to follow when decisions are made in respect of prosecuting cases. The code sets out two tests that must be satisfied, commonly referred to as the 'Evidential Test' and the 'Public Interest Test'.

a. Evidential Test: Is there enough evidence against the defendant?

When deciding whether there is enough evidence to prosecute, Worcester City Council will consider what evidence can be used in court and is reliable. We must be satisfied there is sufficient evidence to provide a realistic prospect of conviction against each suspect on each charge.

b. Public Interest Test: Is it in the public interest for the case to be brought to court?

Worcester City Council will balance factors for and against prosecution carefully and fairly, considering each case on its merits. The following public interest criteria will normally be taken into account when deciding on the relevance of legal proceedings, although this list is not exhaustive.

- **How serious is the offence committed?**
- **What is the level of culpability of the suspect?**
- **What are the circumstances of and the harm caused to the victim?**
- **Was the suspect under the age of 18 at the time of the offence?**
- **What is the impact on the community?**
- **Is prosecution a proportionate response?**
- **Do sources of information require protecting?**



4.6 Regulatory Enforcement and Sanctions Act 2008

The Regulatory Enforcement and Sanctions Act 2008, as amended, established the Primary Authority scheme. Worcester City Council will comply with the requirements of the Act when enforcement action is considered against any business or organisation that has a Primary Authority relationship and in those circumstances will have regard to guidance issued by the secretary of State in relation to Primary Authority.

5 Which Worcester City Council services operate in accordance with this Environmental Enforcement Policy³?

This policy relates to Environmental Enforcement services that operate a regulatory function within the Council.

The areas listed below are those that are subject to enforcement within this service area, in line with legislation:

- **Waste and Litter**
- **Dog Fouling**
- **Graffiti**
- **Fly-Tipping**
- **Fly-Posting**
- **Abandoned and Nuisance vehicles**
- **The control of 'A' Boards on the Highway**
- **Presentation of Trade Waste**



Worcestershire Regulatory Services works in accordance with its County-wide enforcement policy, to carry out enforcement activities on behalf of Worcester City Council in relation to the services below, please note this is not an exhaustive list:

- **Environmental Health (food safety, health and safety, environmental protection, public health)**
- **Licensing (alcohol, hackney carriage and private hire, street trading)**
- **Animal Health and Welfare (farmed animal health, animal boarders and breeders, zoos, riding schools)**
- **Trading Standards (doorstep crime, fraud, counterfeiting, under age sales, weights and measures, labelling)**



6 Who does this Enforcement Policy affect?

Although this policy provides a framework for Council employees and contractors whilst they are carrying out their day to day duties it is also designed to provide an overview of the Council's approach and general operating principals to those who might be affected by its use; this would include members of the public, commercial businesses and voluntary organisations.

6.1

This policy is also applicable where the Council is the Enforcing Authority for its own premises. In such instances steps are taken to ensure that enforcement decisions are free from any conflict of interest. In particular, any serious breaches of legislation would be brought to the attention of the Head of Service and Chief Executive without delay.



7 Evidence gathering during an Investigation

Regulatory bodies are empowered to gather evidence by various means and as part of any ongoing investigation. This can include overt methods where the subject is aware of the investigation or, where appropriate, covert methods where the subject is unaware.

7.1

Where the Council undertakes to gather information covertly then they will have regard to the procedures and protocols laid down within the Regulatory Investigation Powers Act 2000 (RIPA) as applicable. The Council has a corporate application and authorisation process for the use of these specific methods which is monitored by senior officers.

7.2

During an investigation the type of evidence or intelligence gathered can be wide ranging and may include one or more of the following:

- **Photographs**
- **Computer Records and open source investigations including information from social media websites**
- **Communications data**
- **CCTV images including body camera footage**
- **Paper Records**
- **Samples (food, water, environmental, counterfeit goods)**
- **Equipment**
- **Plans or sketches made at the scene**
- **Noise recording records**
- **Invoices**
- **Witness Statements**
- **Expert reports**
- **Forensics (including forensic examination of electronic devices)**
- **Information from other agencies such as those listed in section 11**

7.3

This list is not exhaustive and will depend upon the circumstances of the investigation. Evidence may be retained indefinitely and in certain circumstances the Council may seek to destroy equipment that has been seized as part of an investigation, for example where there is a potential risk to health.





7.4

In gathering evidence the Council may undertake recorded investigative interviews. These are carried out in accordance with the Police and Criminal Evidence Act 1984 and associated Codes of Practice and seek to provide an individual or business with the opportunity to provide their version of events as part of an ongoing investigation.

7.5

Attendance in person at an interview under caution is expected on the grounds of gathering complete evidence and to maximise the efficiency of the investigation process. Failure to assist an investigation or the act of obstructing an officer is an offence under many pieces of legislation used by enforcement agencies. The Council expects cooperation and will take action where this is not forthcoming.

7.6

In order to take enforcement action there needs to be sufficient supporting evidence to prove that there is a breach of legislation upon which enforcement action can be taken. In relation to anonymous complaints or cases where there is no independent witness, corroborating independent evidence or evidence exists that undermines a case the Council will take a view as to whether they can take any further action or whether to retain the details purely for intelligence purposes.



All investigations will be carried out lawfully having regard to the following legislation and in accordance with any associated guidance or codes of practice, in so far as they relate to Worcester City Council:

- **Police and Criminal Evidence Act 1984**
- **Criminal Procedure and Investigations Act 1996**
- **Criminal Justice and Police Act 2001**
- **Human Rights Act 1998**

These Acts and associated guidance control how evidence is collected and used and give a range of protections to citizens and potential defendants.

8 What does Environmental Enforcement look like/ Enforcement Options?

Worcester City Council is committed to working with its local residents, business and volunteer communities to provide a safe, healthy and fair living, working and trading environment. Where it can the Council will provide practical and proactive help and advice to all parties to help them achieve compliance with the law. However there remains the expectation that individuals and business will make every effort to comply with the law in their day to day business and social lives.

8.1

The Council expects residents and businesses to act on its officer's advice when given. If a resident or business operator chooses not to act on this advice, an enforcement intervention should be expected. Similarly Worcester City Council is committed to taking firm action against those that deliberately or persistently fail to comply with legislation and where this is considered appropriate.

8.2

Where non-compliance is identified then the Council will seek compliance through a combination of Promotion, Compliance Advice, Guidance and Support, Informal Warning and Formal Enforcement action.

The options available include:

- **No Action**
- **Informal warning or advice**
- **Written formal warning or Community Protection Notice**
- **Service of a Fixed Penalty Notice for some contraventions**
- **Formal Statutory Notice**
- **Works in Default**
- **Revocation / variation of a licence or authorisation**
- **Formal Caution**
- **Prosecution through the Magistrates Courts**



8.2.1 Promotion

This typically will be generic information, and involves a push of information to residents and businesses about specific matters of legislation. This is usually achieved by methods such as direct correspondence, press releases, face to face contact and website information.

8.2.2 Compliance Advice, Guidance and Support

The Council uses compliance advice, guidance and support as a first response in the case of many breaches of legislation that are identified to support individuals and businesses where awareness of the generic promotion and information in 8.2.1 is low. Advice is provided, sometimes in the form of a warning letter, to assist individuals and businesses in rectifying breaches as quickly and efficiently as possible, avoiding the need for further enforcement action. If a similar breach is identified in the future, this advice will be persuasive in considering the most appropriate enforcement action to take on that occasion. Such advice cannot be cited in court as a previous conviction but it may be presented in evidence. The Council recognises that where a business has entered into a partnership with a Primary Authority, the Primary Authority will provide compliance advice and support, and the Council will take such advice into account when considering the most appropriate enforcement action for it to take. It may discuss any need for compliance advice and support with the Primary Authority in accordance with the Regulatory Enforcement and Sanctions Act 2008.

8.2.3 Informal Warnings

This method is used in circumstances where there has been a breach of legislation, usually minor, and where it was not thought appropriate to take more formal action. In these cases the remedy may be simple and easily achieved following a written or oral warning. Such warnings can be challenged by the recipient and a review by a senior officer can be requested.

8.2.4 Formal Enforcement

This includes a wide variety of sanctions including statutory (legal) notices, written undertakings, the refusal to grant or the revocation of an existing licence or registration, fixed penalty notices, powers of seizure and detention, cautions and prosecution. Formal enforcement action is taken in line with corporate procedures and having regard to Codes of Practice and professional guidance notes. Every offence of this nature is a criminal act, and has a criminal penalty potentially, formal enforcement action also extends beyond the prosecution process as the Council may apply for further post-conviction sanctions.





8.3 Statutory (legal) Notices

Many pieces of legislation enforced by the Council provide for the service of statutory notices to seek compliance with legal requirements. A statutory notice will require a person, business or organisation to comply with specific legal requirements within a specified time period. A notice shall explain what legislation has been breached, how to comply with the notice and the consequences of not complying with a notice. Notices will be accompanied by any relevant appeal information. In general, failure to comply with a notice makes the person or business named in the notice liable for prosecution action. Further, the Council may, in some cases carry out the works identified within the notice and recover costs from the recipient of the original notice. Prosecution and Works in Default may run in parallel.

8.4 Written Undertakings (Voluntary and Formal)

Where an individual or organisation persistently fails to comply with the law, the Council may seek a written undertaking from that person that they will cease the action causing the breach. If appropriate and proportionate, this action may preclude the need for further formal action whilst the agreement is met. Failure by an individual or business to agree to a written undertaking or, in the case where an agreement is breached, can lead to further formal action being taken by the council in accordance with the relevant legal provisions.

8.5 Injunctions/ Enforcement Orders

In certain circumstances the Council may consider it necessary or expedient to seek a direction from the court (in the form of an order or an injunction) to control behaviour or an activity. The court may also direct that specified activities be suspended until the breach has been rectified and/or safeguards have been put in place. Injunctions are orders of the court, breach of which are punishable as a contempt of court by imprisonment or a fine.

8.6 Seizure proceedings

Certain legislation enables authorised officers to seize goods, for example, unsafe food, sound equipment that is being used to create a statutory noise nuisance, unsafe products or any goods or documents that may be required as evidence for possible future court proceedings.

8.7 Fixed Penalty Notices

A Fixed Penalty Notice may be used as a means of dealing with an offence instead of prosecution action. Certain lower level offences such as littering, dog fouling and smoking in prohibited places are subject to Fixed Penalty Notices and they enable the offender to discharge their liability and avoid a criminal record.

The Council will comply with any current relevant guidance on the use of Fixed Penalty Notices to include;

- a) There must be sufficient evidence to give a realistic prospect of conviction;
- b) The offence is not so serious as to warrant a prosecution and is of a nature suitable for being dealt with by a Fixed Penalty Notice; and
- c) Specific guidance on issuing Fixed Penalty Notices to juveniles; including provisions for issuing a Fixed Penalty Notice to an individual aged between 10-17 years of age; cases where there is doubt over the age of a juvenile; first and second offence provisions.

Where an adult recipient does not pay the penalty offered, or is a repeat offender there will be a presumption that prosecution will follow in relation to the actual offence.

8.8 Revocation, suspension and withdrawal of licensing and permits

Where the council has issued a permit, approval, licence or other form or permission, removal of that permission in line with the relevant guidance or legislation will be considered as an enforcement remedy. This action does not preclude further parallel formal enforcement action by the authority e.g. prosecution.

When considering future licensing applications, Worcester City Council may take previous breaches and enforcement action into account.





8.9 Forfeiture Proceedings

This procedure may be used in conjunction with seizure and/or prosecution where there is a need to dispose of goods in order to prevent them re-entering the market place or being used to cause a further problem. The Council may seek an order of the court for forfeiture of goods it has seized either as part of criminal investigations or during the exercise of its enforcement functions.

8.10 Simple Caution

As an alternative to prosecution and in appropriate circumstances a simple caution may be considered as a means of formal enforcement action. A caution is not a criminal conviction but it will form part of an offenders' criminal record and may be referred to in any subsequent proceedings.

For a caution to be issued the following criteria must be met;

- a) There is sufficient evidence to provide a realistic prospect of conviction and it is in the public interest to caution;
- b) There has been a reliable admission of guilt by the offender; and
- c) The offender is over 18 years of age.

The refusal of an offender to accept a caution will not prevent the matter from being prosecuted. Consideration will be given to the Ministry of Justice - Simple Caution for Adult Offender guidance (MoJ Guidance).

8.11 Prosecutions

The Council will consider a prosecution when;

- a) It is appropriate in the circumstances, as a way to draw attention to the need for compliance with the law, especially where there would be a normal expectation of a prosecution, or where;
- b) Through conviction of offenders others may be deterred from offending; or
- c) There is potential for considerable harm arising from the breach; or
- d) The gravity of the offence, taken together with the general record and approach of the offender justifies it.

The decision to prosecute will always take into account the criteria set down in the Code for Crown Prosecutors (section 4.5). The Council will use discretion in deciding to initiate a prosecution and may do so without prior warning taking place.

8.12 Proceeds of Crime

There are some cases where an application under the provisions of the Proceeds of Crime Act 2002 is considered appropriate. This seeks to confiscate assets from an offender in order to recover the financial benefit they have gained during the course of their criminal activities.

Where such an approach is considered then the Council will seek the advice of an Accredited Financial Investigator at the earliest opportunity so that a parallel financial investigation can be undertaken.

There is a defined timescale for the application to proceed with confiscation; it must be made after conviction but prior to any sentencing.

8.13 Charges

Certain enforcement activities incur a charge designed to solely recover the cost of the enforcement action taken and are recoverable from the offender or perpetrator. Some charges are set by statute whilst other are determined by the Council and must demonstrate financial transparency in how they are calculated. Charges are set annually by Committee as a part of the Worcester City Council fees and charges process.

The authority also has the power to apply interest charge rates to any expense it incurs in the course of enforcement action including works in default. Such charges will be applied with regard to advice provided by from financial services.

8.14 No Action

In certain circumstances, contravention of the law may not warrant any action. This can be where there is insufficient evidence or it is not in the public interest to proceed. Some areas of legislation only allow the Council to take action where it is expedient to do so, taking into account the level of harm caused by the contravention. In certain cases it may not be considered expedient to take enforcement action. All such decisions will be made transparently.



9 How is the most appropriate Environmental Enforcement action determined

The Council will carry out its duties in a fair and consistent manner. Whilst officers are expected to exercise judgement in individual cases the Council has formal documented arrangements in place to guide officer deployment of this policy, and to review proposed enforcement actions in the more serious cases and a published scheme of officer delegation. This could include an internal case review and discussion on whether the proposed action is the most suitable means of achieving compliance.

9.1

A risk based approach is used to target resources where they will be the most effective. When determining risk a range of factors are considered such as: compliance history; effective management systems; evidence of recognised external accreditation; management competence and willingness to comply. A complaint may also trigger a visit or some action if appropriate. Intelligence and risk assessment to inform this include:

- Data collection
- Inspection programmes
- Advice and support information provision
- Enforcement activity and sanctions



9.2

The standard approach is outlined below according to the enforcement area:

Enforcement Area	Approach
'A' Boards	Inform and educate (verbal) Written reminder of breach/CPN FPN
Fly Tipping	FPN
Fly Posting/ Advertising	Inform and educate (verbal) Written reminder of breach/CPN FPN
Litter	Inform/educate FPN
Anti-Social Behaviour	Inform and educate Written reminder of breach/CPN FPN
Failure to remove dog faeces	Inform and educate (verbal) Written reminder of breach/CPN FPN
Failure to comply with Trade Waste Presentation Policy	Inform and educate Written reminder of breach FPN
Nuisance Parking	Inform and educate Written reminder of breach FPN
Abandoned Vehicle	Inform and educate Written reminder of breach FPN
Graffiti	Inform and educate Written reminder of breach/CPN FPN



9.3

As part of its decision making process, Worcester City Council will also consider the role of supplementary decision making policies and tools that are available across the wide range of regulatory functions; this could include the use of the HSE Enforcement Manager Model, Codes of Practice or the role of Primary Authority protocols.

9.4

Where there is a shared enforcement role with other local authorities and/or enforcement agencies, the Council will ensure that effective liaison and consultation takes place to ensure that the needs of all parties are considered and to help achieve the best outcome from formal enforcement action.



10 What can be expected from Enforcing Officers/The Council?

Worcester City Council will publish this Environmental Enforcement Policy and report on environmental enforcement activity through an annual report.

10.1

All officers engaged in environmental enforcement functions are appropriately trained and authorised in line with the provisions of the Worcester City Council Scheme of Delegations to ensure the highest standards of service delivery. Officers of the Local Authority are subject to a twice yearly appraisal to identify where new or refresher training is required to help them carry out their existing and new roles.

10.2

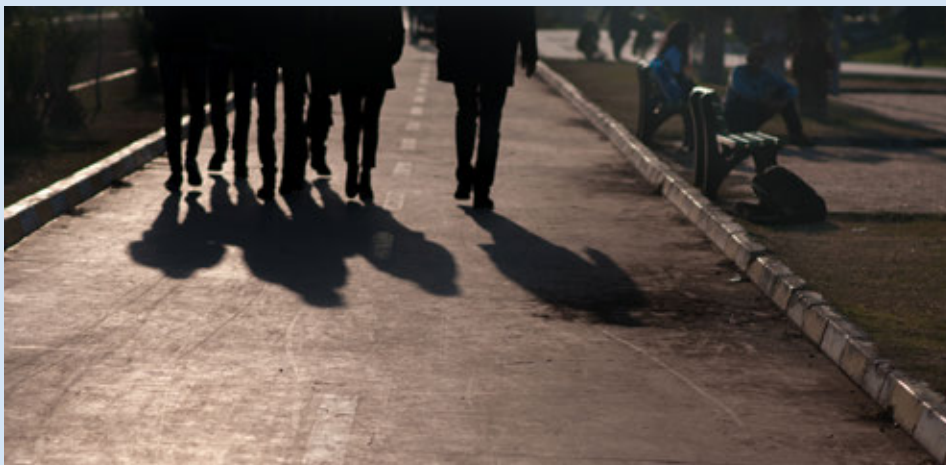
Authorised officers will carry out their environmental enforcement activities in accordance with the principles of this Policy and the requirements of the particular legislation under which they are acting and with any associated guidance or codes of practice.

10.3

Information and advice will be provided to support compliance which is clear, prompt and accessible in a range of formats and media. This information will cover legal requirements; local requirements as well as changes; if changes are of great significance information may be provided through newsletters; mailshots or seminars with support from local umbrella organisations if appropriate.

10.4

The Council believes that prevention is better than cure and encourages businesses and individuals to seek advice on matters that they are unsure of without fear that this will trigger direct enforcement action. In return the Council will be clear about issues that constitute direct non-compliance with legislation and those matters which are examples of good practice. Where appropriate, advice and guidance will be followed up by dedicated compliance checks or will form part of any routine inspection programme.



10.5

The Council will endeavour to provide information and advice in plain language. The Council will discuss general issues, individual compliance failures or problems with anyone experiencing difficulties should it be requested.

10.6

The Council will have regard to the challenges faced by individuals and businesses, particularly small businesses. It will ensure that any action it requires is proportionate and balanced against risk. As far as the law allows, the council will take account of the individual circumstances of each case when considering action. This includes the seriousness of the offence, past history, confidence in management, the consequences of non compliance and the likely effectiveness of the various enforcement options.

10.7

A business or individual will be notified of any intended enforcement action as soon as possible, unless this could undermine an investigation or pose a safety risk to those concerned, the environment or the general public.

10.8

In cases where there is an imminent risk to health or the environment, enforcement action may be taken before any right or challenge can be heard.

10.9

The Council will provide information on how to challenge or appeal any enforcement decision as part of the enforcement action and where a statutory appeal process exists; where no statutory appeal process exists, guidance on how to challenge or make a representation is provided at the time the action is taken. In addition the Council will also provide its formal complaints procedure for those wishing to use this approach.

10.10

The Council will make businesses and individuals aware of the current Enforcement Policy through the website, direct correspondence or as part of day to day contact. Printed copies of the Policy will be provided on request.

11 Which other agencies might we work with?

The Council will aim to maximise its effectiveness by working with other authorities and other agencies to share intelligence and resources where it is lawful to do so. Where issues are identified that extend beyond the remit of one agency and into the role of another, then joint operations will be undertaken to maximise resources and improve any enforcement outcome.



11.1

Some examples of agencies that the Council might work with include:

- Worcester Regulatory Services
- Police
- Environment Agency
- Health and Safety Executive
- Fire Service
- DEFRA
- Better Regulatory Delivery Office
- Citizens Advice
- DfT
- Other Organisations or Local Authorities (particularly where a Primary Authority relationship exists)
- Other Enforcement Agencies



12 Equality and Diversity

Worcester City Council is committed to providing high-quality, customer focussed services for all people living in, working in, or visiting the area. To promote equality and diversity, a broad approach is taken to the delivery of services including but not limited to:

- Access through variety of channels to the Council's services
- Open access employment opportunities with the Council, or its contractors who supply goods or services to the Council.
- Developing policies and plans that impact upon communities and individuals
- Training staff in equality and diversity.
- Through all our work affecting the City and partners we are committed to the principles of equality and diversity.



13 Related Policies

This policy is related to the Civil Enforcement of Parking in Worcester (to include On-Street and Off-Street) Policy (Abandoned Vehicles). Planning Enforcement Policy; Trade Waste Presentation Policy and WRS Enforcement Policy.





ENVIRONMENTAL Enforcement Policy

February 2018

