

Scrutiny & Overview Committee Agenda



To: Councillors Rowenna Davis (Chair), Richard Chatterjee (Vice-Chair), Leila Ben-Hassel (Deputy-Chair), Jade Appleton, Sean Fitzsimons and Simon Fox

Reserve Members: Sue Bennett, Sherwan Chowdhury, Amy Foster, Gayle Gander, Mohammed Islam and Lee

A meeting of the **Scrutiny & Overview Committee** which you are hereby summoned to attend, will be held on **Tuesday, 6 September 2022 at 6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**.

Katherine Kerswell
Chief Executive
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

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www.croydon.gov.uk/meetings
Friday, 26 August 2022

Members of the public are welcome to attend this meeting, or you can view the webcast both live and after the meeting has completed at <http://webcasting.croydon.gov.uk>

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If you require any assistance, please contact Simon Trevaskis as detailed above.

AGENDA – PART A

1. **Apologies for Absence**

To receive any apologies for absence from any members of the Committee.

2. **Minutes of the Previous Meeting** (Pages 5 - 12)

To approve the minutes of the meeting held on 21 July 2022 as an accurate record.

3. **Disclosure of Interests**

Members and co-opted Members of the Council are reminded that, in accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, they are required to consider **in advance of each meeting** whether they have a disclosable pecuniary interest (DPI), an other registrable interest (ORI) or a non-registrable interest (NRI) in relation to any matter on the agenda. If advice is needed, Members should contact the Monitoring Officer **in good time before the meeting**.

If any Member or co-opted Member of the Council identifies a DPI or ORI which they have not already registered on the Council's register of interests or which requires updating, they should complete the disclosure form which can be obtained from Democratic Services at any time, copies of which will be available at the meeting for return to the Monitoring Officer.

Members and co-opted Members are required to disclose any DPIs and ORIs at the meeting: -

- Where the matter relates to a DPI they may not participate in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation.
- Where the matter relates to an ORI they may not vote on the matter unless granted a dispensation.
- Where a Member or co-opted Member has an NRI which directly relates to their financial interest or wellbeing, or that of a relative or close associate, they must disclose the interest at the meeting, may not take part in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation. Where a matter affects the NRI of a Member or co-opted Member, section 9 of Appendix B of the Code of Conduct sets out the test which must be applied by the Member to decide whether disclosure is required.

The Chair will invite Members to make their disclosure orally at the commencement of Agenda item 3, to be recorded in the minutes.

4. Urgent Business (if any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

5. Safer Croydon Partnership (Pages 13 - 116)

The purpose of this report is to enable the Scrutiny & Overview Committee to review the performance of the Community Safety Partnership with a view to seeking reassurance on the effectiveness of the partnership.

6. Council Tax Collection, Recovery & Enforcement (Pages 117 - 168)

The purpose of this report is inform the Scrutiny & Overview Committee on Council Tax collection, recovery and enforcement.

7. Budget Monitoring - Period 4

The Committee is asked to review the latest Budget Monitoring report for Period 4 (July 2022) and consider whether it is reassured by the progress made in delivering the budget or whether there are any concerns it wishes to flag. (To follow)

8. Scrutiny Work Programme 2022-23 (Pages 169 - 182)

The Scrutiny & Overview Committee is asked to: -

1. Note the most recent version of the Scrutiny Work Programme presented in the report.
2. Consider whether there are any other items that should be provisionally added to the work programme as a result of the discussions held during the meeting.

9. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

PART B

Scrutiny & Overview Committee

Meeting held on Thursday, 21 July 2022 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillors Rowenna Davis (Chair), Richard Chatterjee (Vice-Chair), Leila Ben-Hassel (Deputy-Chair), Jade Appleton, Sean Fitzsimons and Simon Fox

Also Present: Councillor Jason Cummings

PART A

37/22 **Minutes of the Previous Meeting**

The minutes of the meeting held on 27 June 2022 were agreed as an accurate record.

38/22 **Disclosure of Interests**

There were no disclosures of interest declared at the meeting.

39/22 **Urgent Business (if any)**

There were no items of urgent business.

40/22 **Opening the Books - Returning the Council to Financial Sustainability**

The Committee considered the 'Opening the Books – Returning the Council to Financial Stability' report, the recommendations of which had been agreed by the Executive Mayor at the Cabinet meeting on 6 July 2022. The report set out the rationale for the decision taken by the Executive Mayor to allocate a budget of up to £500,000 to undertake a review of the Council's finances, including bringing in external consultants. The purpose of the Committee scrutinising this report was to review the proposals as well as taking a wider look at the Council's finances.

The Cabinet Member for Finance, Councillor Jason Cummings, attended the meeting and introduced the report. It was highlighted that the Council's finances had received significant attention over the past two years due to both the Council's own actions and external pressures creating a perfect storm. There had been unforeseen issues that had arisen in the past two years that were still hanging over the Council's budget including continued uncertainty over the past three year's accounts, which still needed to be signed off. To continue the financial recovery of the Council, the new Administration had identified the Opening the Books review as a means of discovering any further issues within the Council's budget to ensure that going forward it was on a firm financial footing.

It was recognised that there was not sufficient capacity within the Council's existing workforce to deliver this review, therefore it was necessary to bring in additional external resource. As part of the process, Council staff would receive training to ensure they the right skills were in place to manage their respective budgets going forward.

The Council's Chief Executive, Katherine Kerswell, advised the Committee that the approach would mirror the approach used by the Rapid Review in November 2020. It would also complement the review undertaken by PWC on the Council's liabilities and companies. A member of the Improvement & Assurance Panel had agreed that any such review should be seen as good practice, as it would increase the Council's understanding of its balance sheet.

Following the introduction, the Committee was given the opportunity to question the information provided in the report. The first question sought further information on the plan to upskill staff as part of the process. It was confirmed that the external consultancy firm delivering the project was working on a brief for the training based upon a needs analysis. Once this work was complete, a training programme based upon this would be delivered. Training would be provided to all budget managers and finance officers, to ensure that all involved knew what best practice was and understood the expected financial culture. Once this initial training had been completed, an assessment would be provided by the consultant to outline whether further training was required. At this stage, another assessment of the Council's financial maturity would be made, to judge the progress made since the previous assessment in 2021.

In addition to training, the importance of creating a culture of financial discipline across the Council was emphasised, with an update on the progress made in changing the organisational culture requested. It was agreed that instilling a culture of financial discipline was vital to the transformation of Croydon. Although the training would help to provide budget holders with the right tools to manage their budgets, an organisational culture of sticking to budgets where possible and escalating concerns when a budget started to go off track was essential.

An update was requested on the progress made with signing off the previous three years accounts, with it questioned whether this would affect the scope of the review. It was confirmed that work continued towards signing off the outstanding accounts, and there was an expectation that all three would be signed off over the course of the year. Once this work had been completed, it would be important to get the finance staff back into a normal routine of annual accounting processes.

In response to a question about what a successful outcome from the review would look like, it was advised that by the end of the programme the Council should, with a reasonable degree of confidence, know what to expect in its budget. The review should lead to improved processes for signing off the accounts and help to increase the experience of internal staff, which would reduce the need to employ external consultants in the future.

It was questioned whether the review would be informed by best practice at other local authorities. It was advised that a lot of guidance had been provided by CIPFA, who provided a national overview as they worked with councils across the country. One of the purposes of the review was to bring experienced people from outside the Council to review current processes against best practice.

It was confirmed that there had not been a full competitive tender process used to commission the review, as there was only a limited number of specialists able to deliver the work required. Although up to £500,000 had been allocated for the cost of the work, the cost of the initial review was approximately £30,000. Should further work be identified following the initial review, it would be paid for from the total £500,000 budget and would require a separate commissioning process.

Regarding timescales, it was confirmed that the initial review was intended to be a short, diagnostic process. People had been appointed to carry out the work, with the initial outcome expected by the end of October. At the present time, a report was scheduled to come to the Cabinet meeting in January 2023 to outline what further work was needed. Any significant issues highlighted by the process would also be picked up through monthly budget monitoring.

In response to a question about whether the review would include the Council's finance software, it was advised that the system used by the Council, Fusion Oracle, was known to be sound as it was widely used elsewhere. There was an existing project underway to ensure that its functionality was maximised to best support the budget monitoring process.

Given there were a number of examples of the Council's budget being thrown off track by financial errors in the recent past, it was questioned whether progress had been made on ensuring there was greater control of the budget. It was acknowledged that historically financial forecasting had not been accurate enough, which had resulted in a significant deficit which needed to be recovered in this year's budget. The training delivered to staff as part of the Opening the Books review and work to integrate the financial software would help to improve the quality of budget forecasting going forward. There were also monthly performance assurance meetings with each Corporate Director and their Directors to review their forecasts, which was leading to greater accuracy.

It was suggested that the past culture of the Council when setting its budgets may have veered towards optimism bias, with overconfidence on the probability of delivery. As such it was questioned whether the approach of the new Administration would differ and whether there was a robust system in place to flag issues at an early stage. It was confirmed that the new Administration's approach was to start budget discussions from a position of the worst-case scenario. The budget monitoring process reports continued to be refined to ensure issues were flagged at the earliest possible. There needed to be additional flags built into the Fusion Oracle system which would be picked up as part of the project looking at the system. It was

acknowledged that in general the local government sector needed to improve its programme management, financial planning and projecting.

In response to a question about the potential impact of inflation upon the budget, it was highlighted that the Council had been quite prudent in its accounting for inflation when setting the budget in March. Allowance had been made for a 5% inflationary increase which was higher than many local authorities. However, with the inflation rate currently closer to 10% it was likely to feed through into the budget if the rate continued at this level for an extended period of time. In particular, the rising fuel and food costs were likely to have an impact. The Council continued to lobby the Government for additional support to mitigate against the cost of inflation.

Regarding the management of contracts held by the Council with external providers, reassurance was given that work was underway to create a forward plan of contracts. This would enable the Council to make an informed decision when approaching the end of a contract rather than allowing them to automatically renew.

An update was requested on the work to identify savings for 2023-24. It was confirmed that to identify the £42.9m savings required was a huge piece of work and was likely to require a balance of tough short-term decisions and longer-term transformation. The process had already started with the initial outcome from this work likely to be available for consultation in October & November. A shortfall of £8.9m had also been identified in the current year's budget, with work ongoing to bridge this gap. The Committee requested that it be kept informed on the outcome of the work to address the budget shortfall.

In response to a question about the approach to identifying savings, it was confirmed that the Star Chamber process would be used again as it was tried and tested. As part of the process to identify savings, the Council was benchmarking its services against those delivered in other boroughs to identify best practice. Given the amount to be saved, the key questions to answer were whether the Council was able to deliver the range of services it currently did and whether the ones that it had to provide were being delivered in the right way.

It was confirmed that the new Administration was liaising with the Government appointed Assurance and Improvement Panel, to test their proposals. It was also confirmed that the Panel was seen as an excellent resource who were supportive, but also provided a robust challenge, with a focus on the pace of change and delivery.

It was questioned whether there had been any changes made to the 2022-23 budget from delivering manifesto promises. It was confirmed that there had not been any changes as of time of the meeting. Work continued on the delivery of the Low Traffic Neighbourhood projects agreed by the previous Administration, although delivery had been delayed resulting in a £5.1m budget risk.

Following the conclusion of its questioning the Committee considered whether there were any recommendations they wished to make based on the information provided.

Conclusions and Recommendations

Following a thorough review of the Opening the Books Review report, the Scrutiny & Overview Committee agreed that commissioning a diagnostic review of the Council's finances was a reasonable action for the new Administration to take and took reassurance from the confirmation that there would be an emphasis on delivering value for money in the outcomes of the review.

Given there had been repeated instances of past Council budgets being destabilised by unforeseen costs, it was agreed that this would have been mitigated to some extent with more robust forecasting and budget monitoring processes. As such, the Committee welcomed provision of training for budget managers and finance officers as part of the Opening the Books review, which would help to improve and standardise the forecasting and budget monitoring processes used across the Council.

Reassurance was taken from the confirmation provided by the Cabinet Member for Finance that the Administration would be taking a 'worst case scenario' approach to setting the budget. which contrasted with the process for setting previous budgets that may have been influenced by an 'optimism bias'. The emphasis on changing the financial culture of the Council towards an organisation that openly reported issues at an early stage was commended by the Committee.

It was noted that Council's financial software, Fusion Oracle had been successfully used at other local authorities and that there was a separate project underway to full embed the Fusion Oracle finance system across the Council. The Committee agreed that this work should be a priority, as it would be part of the bedrock for delivering robust financial monitoring systems, that could allow the identification of issues at an early stage. If the outcome from this project was less than optimal there was a significant risk that the budgeting errors of the past could be repeated.

Recommendation 1: That the project to maximise the functionality of the Fusion Oracle financial software was treated as a priority and resourced accordingly, given the potential high level of risk in the Council budget.

It was recognised that it was very likely some extremely difficult choices would need to be made to deliver the level of savings required by the Council. It was highlighted that Scrutiny could be used by the Administration as a resource to test any significant service changes to or the discontinuation of services.

Recommendation 2: That the Administration engages in pre-decision scrutiny at an early stage in the budget setting process to consult on significant changes to service provision.

Given there had been a significant influx of new Councillors following the election in May, there was a need to provide training for all Members on the budget setting process and should include the production of a guide mapping out the process.

Recommendation 3: It is recommended that a robust training plan is prepared on the budget setting process for Members to ensure all have the requisite skills and knowledge to make an informed judgement on the budget at the Budget Council meeting.

41/22 **Cost of Living Crisis Review**

The Committee considered a report set out in both the agenda and the accompanying supplement, summarising the feedback received from two meetings it had held to investigate the impact of the cost of living crisis upon the borough. The first meeting had invited local community leaders and representatives from the community and voluntary sector to share their experience of the impact from the rising cost of living. The second meeting was with council officers whose services had direct contact with residents.

Feedback from the meeting with community and voluntary sector groups found a number of common issues for residents around engaging with the Council, such as digital exclusion financial literacy and general illiteracy. There was also concern from the organisation about their own ability to continue to provide support given rising costs and agreed that a greater level of communication between themselves and the Council was needed to maximise the support provided to residents in the borough. A fully summary of both meetings can be found in the agenda for this meeting.

The Cabinet Member for Finance, Councillor Jason Cummings, agreed that the cost of living crisis was impacting upon everyone and highlighted that it was those with the least options who were being hit hardest. Although the Council had a role to play in supporting residents, particularly through connecting people to support, the scale of the issue was such that further intervention from the national Government was required. The Council needed to ensure it was delivering the best outcomes it could as efficiently as possible.

Members of the Corporate Management Team were also in attendance at the meeting and provided their initial feedback to the findings of the Committee. It was acknowledged that digital exclusion was a big issue, and the contact centre was being reviewed to make it easier for residents to get in contact with the Council. The library service provided free access to computers and printing, with 3,800 hours available per week. Library staff were also able to provide practical support such as help with setting up email addresses, preparing job applications and assisting with other applications. Croydon Adult Learning and Training (CALAT) also worked to promote digital literacy and exclusion including providing laptops for those who were unable to afford them.

It was highlighted that the Council's website had been updated to ensure that information about the support available was easily located from the frontpage of the site. This page also signposted to other organisations that may be able to provide support. It was agreed that this webpage was both useful and comprehensive.

It was noted that the Household Support Fund was available online, however concern was raised, based on anecdotal reports, about the Council's use of enforcement to collect Council Tax arrears. Assurance was provided to the Committee that the use of enforcement was on hold, with support provided instead wherever possible.

It was acknowledged that there were always more ways in which the Council could engage with the voluntary sector, and the new administration had been clear that it wanted to see improvement in this area. The Community Fund only made up 10% of the funding invested into the sector by the Council, with the vast majority delivered through outcomes-based commissioning. The level of support provided to organisations with the bidding process was an area that would be improved.

In concluding this item, the Committee agreed that the scale of the cost of living crisis was such that it would be impossible for them to be able to scrutinise it in one meeting. Instead, it was agreed that specific areas highlighted, such as digital exclusion, the Council's relationship with the voluntary sector and the rising cost of fuel would be scheduled into the work programme throughout the year.

Resolved: That items related to the cost of living crisis would be added to the Scrutiny Work Programme for review throughout the year.

42/22 **Scrutiny Work Programme 2022-23**

The Committee considered a report set out on pages 35 to 42 of the agenda, which set out a range of potential items for consideration by Scrutiny as part of its work programme in the year ahead. It was confirmed that the Scrutiny Chairs would work to refine this list before the next meeting by scoping items for possible scheduling in the work programme.

It was also confirmed that discussions continued about the possibility of splitting the workload of the Streets, Environment & Homes Sub-Committee by setting up a new Homes Sub-Committee. A further update on the outcome of these discussions should be available for the next meeting.

Resolved: That the draft work programme is noted.

43/22 **Exclusion of the Press and Public**

This motion was not required.

The meeting ended at 9.10 pm

Signed:

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Date:

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REPORT TO:	SCRUTINY & OVERVIEW COMMITTEE 6 th September 2022
SUBJECT:	SAFER CROYDON PARTNERSHIP
LEAD OFFICER:	Nick Hibberd Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Kristian Aspinall Interim Director, Culture and Community Safety
CABINET MEMBER:	Councillor Ola Kolade Cabinet Member for Community Safety
PERSON LEADING AT SCRUTINY COMMITTEE MEETING:	Councillor Ola Kolade Cabinet Member for Community Safety
PUBLIC/EXEMPT:	Public

ORIGIN OF ITEM:	The Scrutiny & Overview Committee has a statutory duty to review community safety arrangements in the borough.
BRIEF FOR THE COMMITTEE:	The Scrutiny & Overview Committee is asked to review the performance of the Community Safety Partnership with a view to seeking reassurance on the effectiveness of the partnership.

1. EXECUTIVE SUMMARY

- 1.1. This report provides a strategic overview of the progress and challenges of the Community Safety Partnership.

2. SAFER CROYDON PARTNERSHIP

- 2.1 The Safer Croydon Partnership is the statutory partnership that brings together the Police, Council, Health, Probation, and Fire Brigade to tackle crime and disorder in Croydon. The Partnership uses data and intelligence to identify the key issues facing the borough and then commits resources through a partnership plan and strategy to tackle those issues.

3. COMMUNITY SAFETY STRATEGY

- 3.1 In January 2022, following consultation with key partners and members of the public, the Safer Croydon Partnership produced the Community Safety Strategy. The Community Safety Strategy lists the strategic priorities as:

- Tackle domestic abuse
- Protect young people from violence and exploitation

- Tackle disproportionality in the criminal justice system
- Strengthen community resilience, offer trauma-informed services, focusing on Hate Crime, and build trust in the partnership
- Focus on high priority neighbourhood

3.2 Please refer to Appendix A for a copy of the Community Safety Strategy

4. DATA DRIVEN: STRATEGIC ASSESSMENT

4.1 The Strategic Assessment is a yearly analytical product, which gives an overview of the current and long-term issues affecting or likely to affect a specific area or borough.

4.2 The yearly Strategic Assessment was used as the main evidence base for the Community Safety Strategy as it highlighted the key issues we as a partnership need to respond to.

4.3 It is used to make inferences and provide recommendations for prevention, intelligence, enforcement and reassurance priorities as well as the future partnership strategy. It provides direction for the partnership in deploying resources efficiently to reduce crime and ASB in the borough.

4.4 The Strategic Assessment will assist with providing an overall monitoring framework of the crime data and being able to evidence if what we are doing in a specific location is having an impact on crime trends.

4.5 Please refer to Appendix B for the Strategic Assessment 2022

5 REVIEWING THE PARTNERSHIP

5.1 The Safer Croydon Partnership is the statutory crime reduction partnership that brings together the Police, Council, Health, Probation, and Fire Brigade to tackle crime and disorder in Croydon. Crime Reduction Partnerships were first established in 1997 in the Crime and Disorder act, and since then have had additional legal duties placed on them such as the delivery of domestic homicide reviews. Domestic Homicide Reviews (DHRs) are statutory reviews of cases where one person has been murdered by a family member or partner. They can include family members as well as intimate partners.

5.2 The partnership has met 3 times over the last twelve months, and the primary focus of the work has been the oversight of the six domestic violence homicide reviews currently taking place in Croydon. This number is atypically high for the Borough, and partly a reflection of the inability to conduct reviews during 2020/21 due to Covid.

5.3 In 2022 we will carry out a review of the partnership. This aims to:

- Refocus the board on the goals of the partnership as outlined in the community safety strategy and enable effective decision making at a strategic level
- Ensure the membership of the board is appropriate and fit for purpose to deliver on the goals of the community safety strategy
- Streamline the sub-groups that sit below the executive to ensure operational delivery is effective
- Refresh the performance framework for the partnership so we can monitor and manage performance against the five priorities of the community safety partnership
- Give greater means for the community and residents to feed into the work of the partnership through establishing a dedicated “voluntary sector” forum

5.4 This review will be conducted by the chair of the Croydon Safer Partnership and the Director of Culture & Community Safety, who will have individual meetings with the statutory members of the Croydon Safer Partnership to discuss the current state of the board and how they see it developing and changing in the future.

5.5 Following those interviews, we will then draft new terms of reference and proposed membership of the Executive. There is potential that this could create new sub boards for the Community Safety Partnership as outlined in 5.3.

6. KEY UPDATES:

a) YOUTH SAFETY STRATEGY

6.1 Significant amounts of work have taken place over the last three years since the publication of the Vulnerable Adolescents Review (VAR) in 2019. However, Croydon continues to suffer from high levels of violence against young people and high numbers of homicides of young people. Predominantly the victims and the perpetrators are from Black African, Black British and African-Caribbean families, and these crimes have an extremely disproportionate effect on these communities. The root causes of this violence tie into the wider work the borough has been delivering on systemic racism and racial equality as well as contextual safeguarding

6.2 As a result of the five homicides in 2021 of young men under 20, a rapid desktop review was undertaken of the services and processes in place to safeguard young people currently at risk and the work being delivered to protect the next generation from being victims of violence.

6.3 The next steps on the back of the Vulnerable Adolescent Review and the work completed subsequently is to develop a longer term, “whole borough” strategy

that takes a holistic, whole system approach adopting public health principles to prevent longer term violence against young people. This will include the role of residents, communities and the third sector as well as statutory partners. Although significant activity has taken place in this area, through ongoing maternity support work including maternal mental health, the developing Early Years strategy, the Community Safety strategy, the review of Fair Access processes and improved data sharing, alongside strengthening early intervention for our vulnerable CYP, the Violence against Women and girl work and others, the next step is to develop this dedicated strategy for reducing violence against young people. This is the next stage of our work that will tie all the ongoing work into a single strategic framework, and including key elements such as the community leadership, role of housing and public space design and other elements.

6.4 This strategy is currently in development, and we are currently working to four key themes:

- Prevention – stopping the next generation becoming victims of violence
- Intervention – helping the young people currently at risk
- Disruption – tackling the criminal gangs exploiting our young people
- Diversion – our positive offer for young people

6.5 Please note these themes are purely initial drafts to organise and review our work and may change as we develop the strategy. We have included them here for scrutiny comment and feedback at the initial stages of this strategy development.

b) VIOLENCE AGAINST WOMEN AND GIRLS (VAWG)

6.6 As highlighted in the Strategic Assessment (Appendix B), Domestic Abuse is a key issue in Croydon and continues to be a priority for the partnership. This was also confirmed through our women and girls survey in 2021 (please refer to Appendix A for the results) where we highlighted areas where residents did not feel safe and what would be needed to improve safety.

6.7 As a result, we want to develop a detailed three-year plan to tackle Violence Against Women and Girls (VAWG), to align with with the Pan-London VAWG Strategy. The strategy would seek to set out a clear multi-agency, preventative approach to tackling and preventing VAWG and to take the network to the next level by actively involving a greater number of people and partners in our solutions to reduce violence against women and girls. We will seek to reach out and include the views and ideas from the full range of our residents, communities, and partners.

- 6.8 A 'Violence Against Women and Girls (VAWG)' Statement of Intent is being taken to September Cabinet to confirm the Mayor's commitment to reducing and tackling Violence Against Women and Girls in our borough.

SCP PARTNERSHIP UPDATE: VIOLENCE REDUCTION NETWORK (VRN)

- 6.9 The councils Violence Reduction Network is made up of five key elements:

- CCTV
- Performance and Intelligence
- Anti-social Behaviour
- Prevent
- Domestic and sexual abuse support (the Family Justice Centre)

- 6.10 The CCTV Control Room (Intelligence Hub) is based at Strand House, Thornton Heath and staffed 24/7, 365 days a year. The CCTV team monitor 94 permanent networked colour CCTV cameras, deployable cameras as well as cameras on Housing land of various designs with Pan, Tilt & Zoom facility. The team have helped the Police to identify knife crime perpetrators as well as identify a fire at a property before emergency services were informed. The CCTV suite was significantly involved in the recent Owami Davies missing person case, providing substantial support to police efforts. Currently the team are refreshing the CCTV system, moving from an analogue system to a digital.

- 6.11 The Performance and Intelligence team carry out the Statutory Requirements for the Safer Croydon Partnership such as: producing and monitoring the partnership plan that has regard for MOPAC's policing plan priorities, engaging and consulting with the community about their priorities and progress achieving them and produce an annual strategic assessment. The team also supports the council and wider partnership with intelligence and data to provide effective decision making around crime reduction. The team have recently secured additional funds to assist with Croydon's response to serious violence from the London Violence Reduction Unit.

- 6.12 The Anti-Social Behaviour (ASB) team investigate reports of ASB such as excessive household noise, drunk and disorderly behaviour, drug using and taking in properties, loud music, verbal and racial abuse, cuckooing (where a vulnerable person's flat is taken over by drug dealers), harassment and intimidation, ASB caused by people vulnerable due to substance and alcohol abuse and mental health, threats of violence and actual violence. The team acts as the "escalation point" for ASB issues within the partnership – they take on and handle the hardest and most challenging cases passed to them by other frontline teams. The team recently obtained a Criminal Behaviour Order (CB) against a resident who was causing significant issues within the Town Centre.

6.13 The Prevent team are responsible for implementing the UK Government's Prevent strand of Counter Terrorism (CONTEST). Prevent is a statutory duty on the public sector and revolves around three main objectives:

- *Ideology*: Responding to the ideological challenge of terrorism and the threat we face from it
- *Individuals*: Prevent people from being drawn into terrorism and given appropriate advice and support
- *Institutions*: Work with sectors and institutions where there are risks of radicalisation which we need to address

The team have been recognised for their work on linking Domestic Abuse and the Prevention to Terrorism.

6.14 The FJC is a centrally located resource offering a multi-disciplinary approach to services for victims of domestic abuse and sexual violence and their children. The centre seeks to offer victims wrap around support and to prevent individuals having to go from agency to agency, telling their story repeatedly, in order to access the support they need. The FJC also lead on the statutory requirement of commissioning domestic violence homicide reviews (DHRs). As outlined in 5.2 we currently have six DHRs to conduct.

CONTACT OFFICER: *Chris Rowney, Head of the Violence Reduction Network*

APPENDICES TO THIS REPORT

Appendix A: Community Safety Strategy
Appendix B: Strategic Assessment 2022

BACKGROUND DOCUMENTS: *None*

Community Safety Strategy

2022 to 2024

Delivering for Croydon

CROYDON
www.croydon.gov.uk

Foreword

The Safer Croydon Partnership (SCP) acts as the statutory Community Safety Partnership for Croydon, as stipulated by the Crime and Disorder Act 1998.

The SCP is responsible for co-ordinating the development and implementation of Croydon's Community Safety Strategy. The partnership comprises the police, council, fire, probation and health agencies, as well as businesses, and community and voluntary sector organisations. It works with other boards on Croydon's Local Strategic Partnership on crime and safety matters, in particular the Safeguarding Children Partnership and the Adults Safeguarding Board.

Croydon is geographically the fifth largest borough in London covering 86 square kilometres. At 388,563 people, Croydon has the second largest population in London. Almost a fifth of the population is aged 60 or above. However, Croydon has the highest number of residents aged 0 to 19 years of age and the highest number of looked after children in the capital, which has implications for the types of services we need to provide for young people

Croydon ranks as the 17th least deprived out of the 33 London boroughs. However, this average hides the pockets of high deprivation within Croydon. One small area of Croydon is the third most deprived area in London (out of 4,642 small areas) and some 8,950 people live in areas that are amongst the 10% most deprived areas in the country.

In 2020, there was a 1.7% decrease in crime in Croydon compared to the year before. This may be compared with reductions of 14.2% in London and 8% nationally. These falls can be linked to the restrictions imposed on society during the Covid-19 pandemic. However, the lockdowns also brought about new challenges.

Violence represents around a third of all crime in the borough. In 2020, there was an 11% increase in the number of violent offences in Croydon, the highest total in the capital. London saw a 1% decrease in violence in the same period. This significant rise is largely attributable to an increase in domestic abuse, fuelled by lockdowns.

Croydon is a diverse, friendly and vibrant borough full of people living busy lives and helping to create supportive communities. However, we have seen violent incidents in our borough, across London as well as nationally, with the tragic loss of young people killed on our streets, women and young girls targeted in public places as well as experiencing violence at home, and public figures killed while carrying out their civic duties. We are working together as a partnership to ensure that people from all of our communities feel safe in their homes and neighbourhoods

We have sought to develop a collaborative strategy with all parts of Croydon's partnership and communities.

This strategy supports the priorities of the Mayor's Office for Policing and Crime (MOPAC) as set out in the [Police and Crime Plan for London 2017 to 2021](#): a better police service for London; a better criminal justice service for London; keeping children

and young people safe; tackling violence against women and girls; and standing together against hatred and violence.

Croydon adopted a public health approach to reducing violence in June 2019 and has since started work to create a violence reduction network in order to implement it. A number of themes and principles were developed:

Theme One - **Using Data to drive our approach**- Building a strong evidence base and a common screening tool that can be used across organisations to predict who, where and why individuals and families are more likely to be involved in violent or aggressive behaviours and identifying the interventions that will have the maximum impact.

Theme Two - **Preventing Violence before It Occurs** - Looks at the periods and key influences in a person's life journey, from pre-birth to adulthood which can increase the risks of becoming involved in violent behaviour and the opportunities when interventions can be most effective.

Theme Three - **Community Based Support** – Recognises the strength of the Community and Voluntary Sector in Croydon and places them at the heart of Croydon's public health approach to violence reduction. It promotes combining skills and enabling voluntary and community organisations to support people and families collaboratively.

Theme Four - **Targeted Interventions** - It uses the principles of a family centred approach aimed at addressing violence, by looking at the wider family and connected family dynamics, based on clear safeguarding, case management approaches.

Theme Five – **Intensive Interventions and Enforcement** – Sets out an intention to offer personalised support for those who are motivated to step away from a life of violence, whilst using the full range of enforcement across all agencies, against those whose behaviour places themselves, those around them, or the wider community at risk of harm.

The principles set out in the Framework for The Public Health Approach to Violence Reduction in Croydon are issues that have been consistently voiced at community meetings, with young people and by those directly affected by violence, offenders, victims and families.

- Every person understands the role they can play in reducing violence –Embedding trauma informed practice across local authority, health, schools, colleges, community and voluntary agencies, business sector and criminal justice agencies.
- Developing community-based networks to help those impacted by violence navigate the challenges they face – Identifying and training individuals who have influence in their local area to provide support for young people and families who are at risk of or affected by violence and guide them into support services.
- Focusing on the vocabulary of INCLUSION – Supported by the evidence from the Croydon Vulnerable Adolescent Review published by the Croydon Safeguarding Children Board in February 2019, to build a collaborative, partnership approach to

inclusion, including the development of an 'Inclusion Intervention Offer' in schools and colleges, or as part of a work readiness programme.

- Recognition of the importance of culture and identity for families and young people - The challenges of culture and identity within families are becoming increasingly relevant in terms of violence prevention. This priority proposes embedding an understanding of culture and identity within the family dynamics within contextual safeguarding and trauma awareness training for the Borough and as part of the screening and assessment process for families and vulnerable young people.
- Social media and violence – Sets out a series of Prevention and Intervention steps to improve the awareness of the impact of exposure to violent social media content for families, guardians and those working with young people

The above inform the four elements of this new Community Safety Strategy:

1. **Curtail** violent acts at source, pursuing perpetrators and enforcing action.
2. **Treat** those who have been exposed to violence to control the spread.
3. **Support** those susceptible to violence due to their exposure risk factors.
4. **Strengthen** community resilience through a universal approach.

This new Community Safety Strategy focuses on all of the above and seeks to strengthen it by actively involving a greater number of people and partners in our solutions to reduce violence in the borough. We have worked with a wide range of institutions represented on the Safer Croydon Partnership Board to develop the new strategy. We have involved our voluntary sector partners who participate directly in violence and safety work. Our strategy has also been informed by the views of residents and communities, particularly through surveys of young people and women and girls.

Engagement with the local communities is important both in order to contribute to our understanding of the causes and impact of crime, but also in order to work with them to tackle the underlying causes. We also need to provide reassurance of our determination to reduce crime and our progress in doing so. We will continue to learn from partners about the methods of communication and engagement that are working well for them.

Taking account of the evidence from the 2021 Strategic Crime Assessment, the views of stakeholders and findings from public engagement, our strategic priorities for the next three years will be:

1. **Tackle domestic abuse**
2. **Protect young people from violence and exploitation**
3. **Tackle disproportionality in the criminal justice system**
4. **Strengthen community resilience, offer trauma-informed services, focusing on Hate Crime, and build trust in the partnership**
5. **Focus on high priority neighbourhoods**

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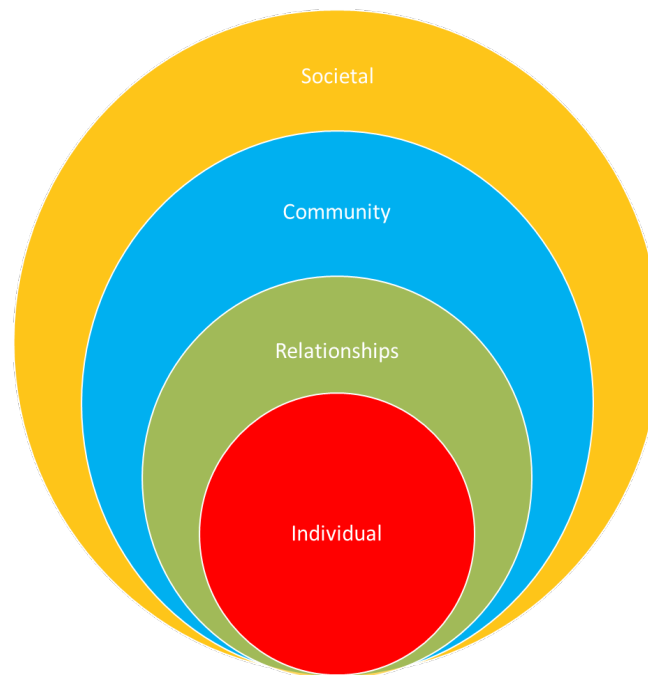
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1. Our Approach

The public health model

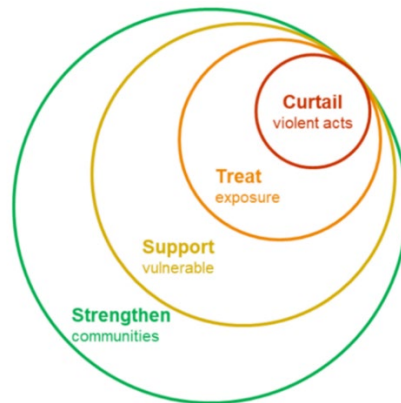
Croydon's Violence Reduction Network (VRN) has adopted the public health approach in reducing violence. This strategy details how we will implement it.

The approach takes a holistic view of both violence and coercion, based on evidence that no single factor can explain why some people or groups are at higher risk of interpersonal violence, while others are more protected from it. This framework views interpersonal violence as the outcome of interaction among many factors at four levels:



- **Community:** the contexts where social relationships occur (such as school, neighbourhoods and workplaces) also influence violence. Risk factors may include the level of unemployment, population density, mobility and existence of a local drug or gun trade
- **Relationships:** influence the likelihood of an individual becoming a victim or perpetrator of violence (family, friends, intimate partners and peers – e.g. violent friends)
- **Individual:** personal history and biological factors increase the likelihood of an individual becoming a victim or a perpetrator of violence (including being a victim of child maltreatment, psychological or personality disorders, alcohol or substance misuse)

The core actions of a public health approach to reduce violence are summarised in the figure below, as used by Waltham Forest's Violence Reduction Partnership:



- **Treat** those who have been exposed to violence to control the spread.
- **Support** those susceptible to violence due to their exposure to risk factors.
- **Strengthen** community resilience through a universal approach.

To achieve this there must be a holistic networked approach to tackling violence involving a wide range of relevant partners. It is also vital that data and lived experience are at the heart of how the VRN and the partnership operate.

Problem-oriented approach

We regard crime in an area as a problem, not an individual incident. For a crime to occur, three components are needed: a likely offender, a victim or target, and the absence of a guardian.

We focus on the underlying causes of those problems and how to tackle them. We assess places (where and when crime happens), victims and offenders and their respective potential controllers: the manager (e.g. a guard or security door), the guardian and the handler (e.g. parent, teacher or mentor) as shown below. Cross-cutting issues are identified, for addressing through a collaborative strategic plan.



Crime harm, the 'Felonious Few', high priority victims and hotspots

We use the Cambridge Crime Harm Index to calculate how harmful a crime is relative to other crimes as a tool for focussing resources. The index multiplies each offence by the number of days in prison that crime would attract if an offender were to be convicted of committing it, based on no previous offending history.

Most crime, specifically crime harm, is committed by a small fraction of offenders against a small fraction of victims in a small fraction of locations. The Partnership will refocus its limited resources on, respectively, the 'Felonious Few', high priority victims and hotspots, to increase the chance of crime reduction, particularly concerning those targets which give rise to serious harm.

Evidenced-based action

Any new method or approach we adopt to reduce crime must be based on evidence to avoid wasting time and resources on ineffective or less efficacious measures. The VRN ensures this through what is known as the "Triple-T Strategy" - targeting, testing and tracking:

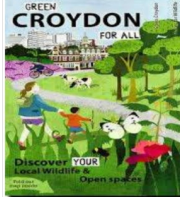



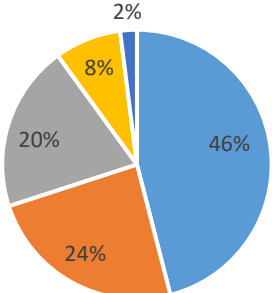
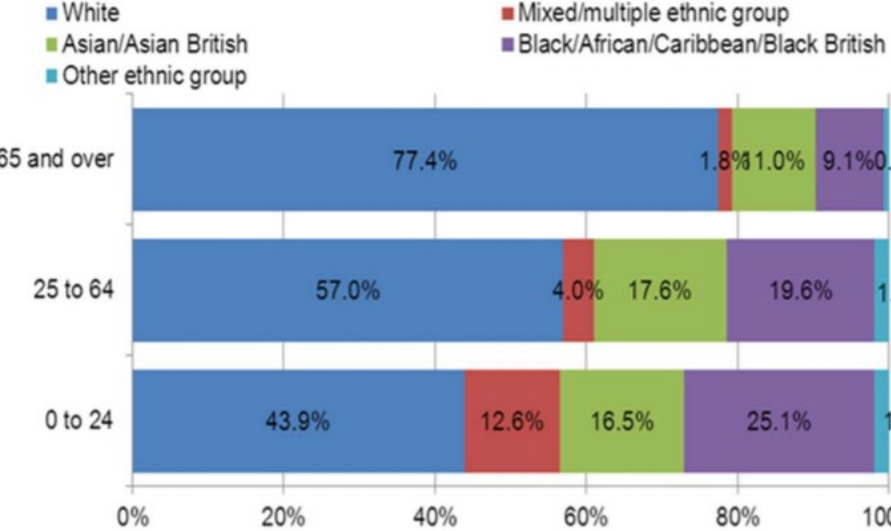
Targeting: It systematically identifies, ranks and compares the levels of harm linked to various crime "units", whether they be places, times or people.







Testing: Having identified the high harm target areas, the VRN reviews and tests methods to identify which is the most effective at reducing the harm.

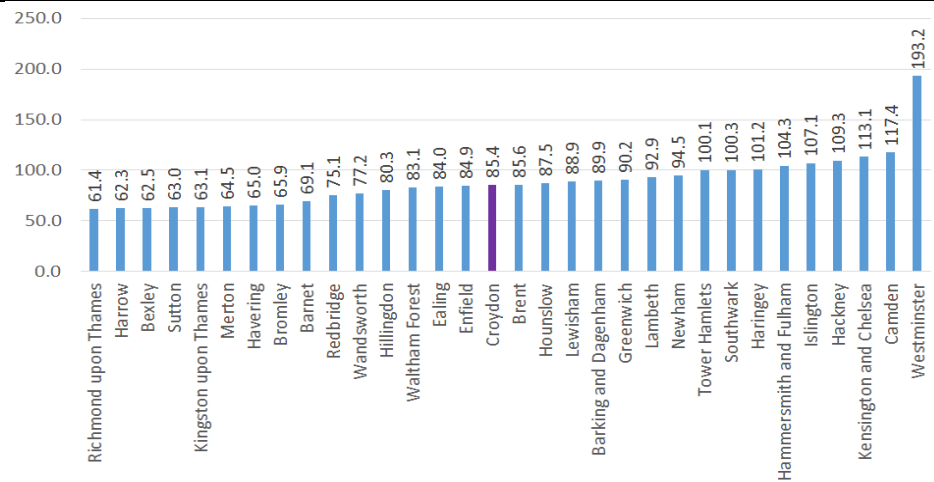
Tracking: It then generates and uses internal evidence to track the delivery and evaluate the effectiveness of the approach. The new tracking data forms the basis of new research and more reliable evidence of "what works".

For more information on the Partnership's approach, see the Strategic Assessment 2021 (pages 3-5).

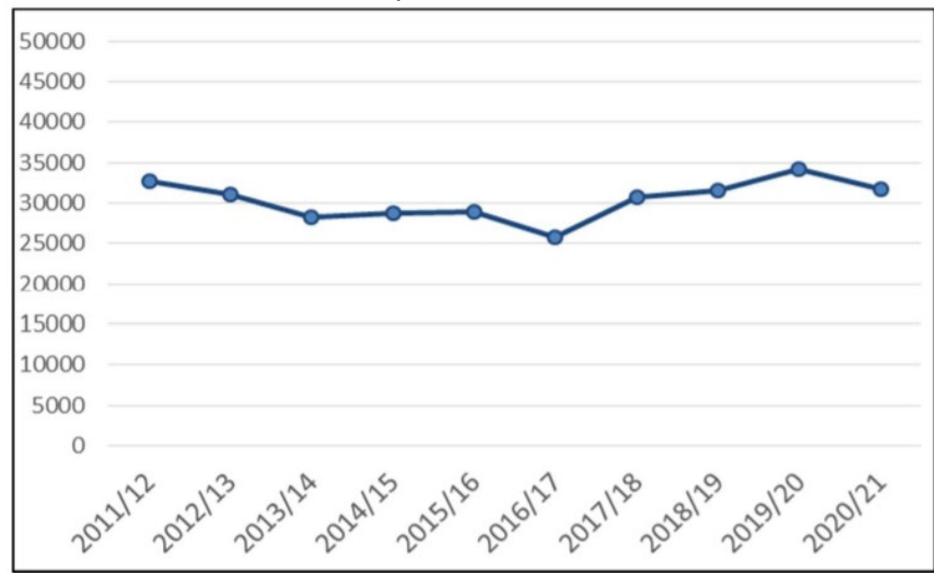
2. Croydon Facts

	<p>Croydon is London's southern-most borough and covers an area of 34 square miles (87km²). It is one of London's biggest local retail and commercial centres, with good rail, tram and road links, more than 120 parks and open spaces and some of London's most expensive housing.</p>																																				
	<p>Home to around 388,600 people, Croydon is the second largest London borough in terms of population and is continuing to grow. It is projected to grow by another 20,000 by 2043.</p>																																				
	<p>Croydon has the largest population of 0-19 year olds in London at 103,300 residents (Estimate ONS 2020), who make up 27% of the borough's total population.</p>																																				
	<p>Croydon Ethnic Group Profile in 2021 (GLA 2016 housing-led projections by ethnicity):</p> <div data-bbox="459 853 1396 1391" style="border: 1px solid #ccc; padding: 10px; margin: 10px 0;"> <p style="text-align: center;">Croydon Ethnic Group Profile 2021</p>  <table border="1" style="margin: 10px auto; border-collapse: collapse;"> <thead> <tr> <th>Ethnicity</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>46%</td> </tr> <tr> <td>Black</td> <td>24%</td> </tr> <tr> <td>Asian</td> <td>20%</td> </tr> <tr> <td>Mixed</td> <td>8%</td> </tr> <tr> <td>Other</td> <td>2%</td> </tr> </tbody> </table> </div> <p>There was more diversity in the younger age group population in Croydon (Census 2011)</p> <div data-bbox="459 1480 1396 2031" style="border: 1px solid #ccc; padding: 10px; margin: 10px 0;">  <table border="1" style="margin: 10px auto; border-collapse: collapse;"> <thead> <tr> <th>Age Group</th> <th>White</th> <th>Mixed/multiple ethnic group</th> <th>Asian/Asian British</th> <th>Black/African/Caribbean/Black British</th> <th>Other ethnic group</th> </tr> </thead> <tbody> <tr> <td>65 and over</td> <td>77.4%</td> <td>1.8%</td> <td>1.0%</td> <td>9.1%</td> <td>0.7%</td> </tr> <tr> <td>25 to 64</td> <td>57.0%</td> <td>4.0%</td> <td>17.6%</td> <td>19.6%</td> <td>1.9%</td> </tr> <tr> <td>0 to 24</td> <td>43.9%</td> <td>12.6%</td> <td>16.5%</td> <td>25.1%</td> <td>1.9%</td> </tr> </tbody> </table> </div>	Ethnicity	Percentage	White	46%	Black	24%	Asian	20%	Mixed	8%	Other	2%	Age Group	White	Mixed/multiple ethnic group	Asian/Asian British	Black/African/Caribbean/Black British	Other ethnic group	65 and over	77.4%	1.8%	1.0%	9.1%	0.7%	25 to 64	57.0%	4.0%	17.6%	19.6%	1.9%	0 to 24	43.9%	12.6%	16.5%	25.1%	1.9%
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	<p>Croydon has become relatively less deprived compared to other local authorities in England between 2015 and 2019. There are pockets of deprivation and one small area of Croydon is the third most deprived area in London (out of 4,642 small areas) and some 8,950 people live in areas that are amongst the 10% most deprived areas in the country.</p>
	<p>Levels of permanent exclusions from primary and secondary schools in Croydon are lower than both the national and regional average rates (2019). Permanent exclusions were 0.06% in 2017/18, compared with 0.08% in London and 0.1% in England.</p> <p>The proportion of 16 and 17 year olds in education or training in Croydon (94.0% in 2019) has been in line with both regional and national averages for the past 3 years.</p>
	<p>The proportion of out of work claimants has risen by around 3% since March 2020 – directly as a result of the impact of the Covid-19 pandemic on the economy.</p> <p>The claimant count (not all unemployed) in July 2021 was 8.3% of the resident population of working age (up 3.9 percentage points from 4.4% in March 2020, but down 1.2 percentage points since the peak in March 2021). Croydon has a higher proportion of claimants compared to the region and national figure.</p>
	<p>The number of looked after children in Croydon is the highest in London (791 in March 2020)</p>
	<p>For 2020, the rates of children in need referrals and child protection referrals (563.0) per 10,000 children are much higher than the rates in London and England</p>
	<p>The number of homeless households in temporary accommodation on March 2021 was 2,029, of which 1,475 included children (Q4 2021 MHCLG)</p>
	<p>Rate of total notifiable offences per '000 resident population (year to 31 December 2020) was 85.4. Source MPS, Borough Volume and Trends dashboard</p>



After a downward trend, the number of offences increased from 2016/2017. However, the year since the start of the pandemic in March 2020 has seen a drop in numbers. Source: MPS



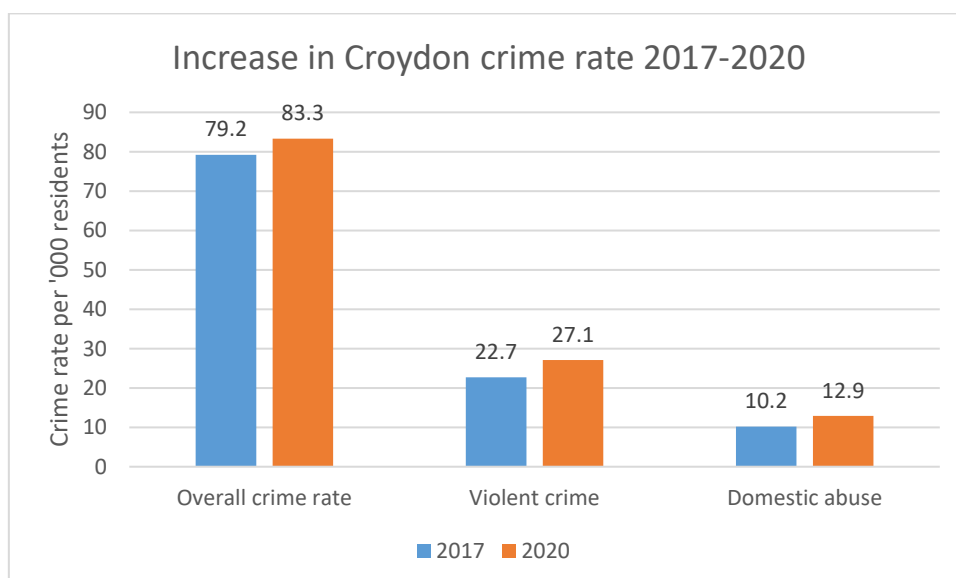
3. Key Outcomes 2017-21

The Covid-19 pandemic has caused fluctuations in crime and anti-social behaviour on a global, national and local scale. Government-imposed restrictions on society throughout 2020 had the effect of suppressing many types of crime. However, they were also a catalyst for other types of crime to increase. The overall effect is reflected in statistics that show a fall in crime in Croydon of only 2% in 2020, compared to the year before. Though some types of crime have been police driven – like drugs offences – it is violence that remains the main contributor to high crime in the borough.

Some of the outcomes achieved over the last four years are set out under each theme of the 2017-20 strategy:

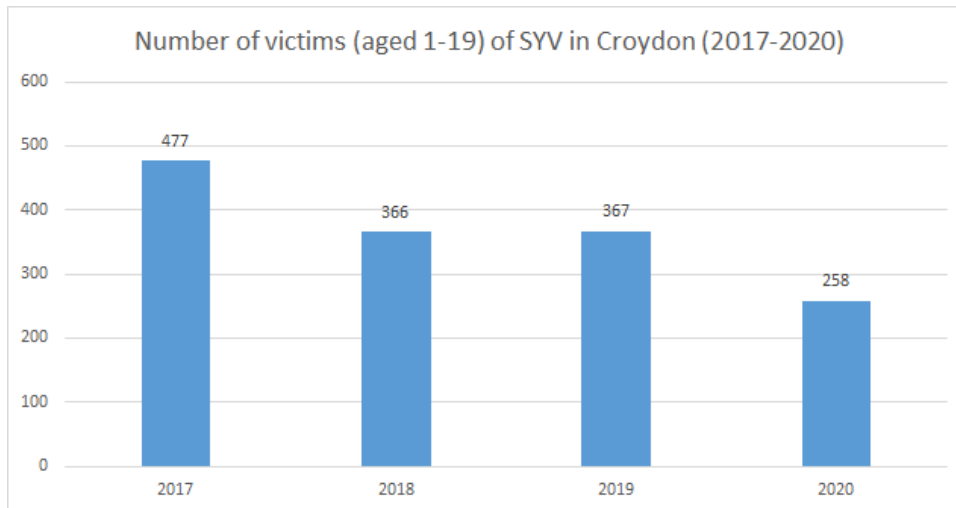
1. **Reduce the overall crime rate in Croydon with a focus on violent crime, and domestic and sexual violence.**

- Croydon adopted a public health approach to violence reduction in 2019. The Council appointed the first director of the violence reduction network and restructured the community safety team to give a strategic and operational focus to violence reduction work. It secured significant external funding and committed council resources to implement the public health approach and reduce violence in Croydon.
- Even though there has been a decrease in *crime volume* in 2020 compared to 2019, by comparing 2020 to 2017 the overall *crime rate* in Croydon rose by 5%. Also during the same period the violent crime rate increased by 19% and the domestic abuse rate (DA) by 26%.
- Most DV and abuse is hidden, as in the rest of London. The Family Justice Centre (FJC) continues to perform at close to capacity with an average of 67 Multi Agency Risk Assessment Conference cases per month in the year to August 2021. This includes new victims and people who have been referred before.



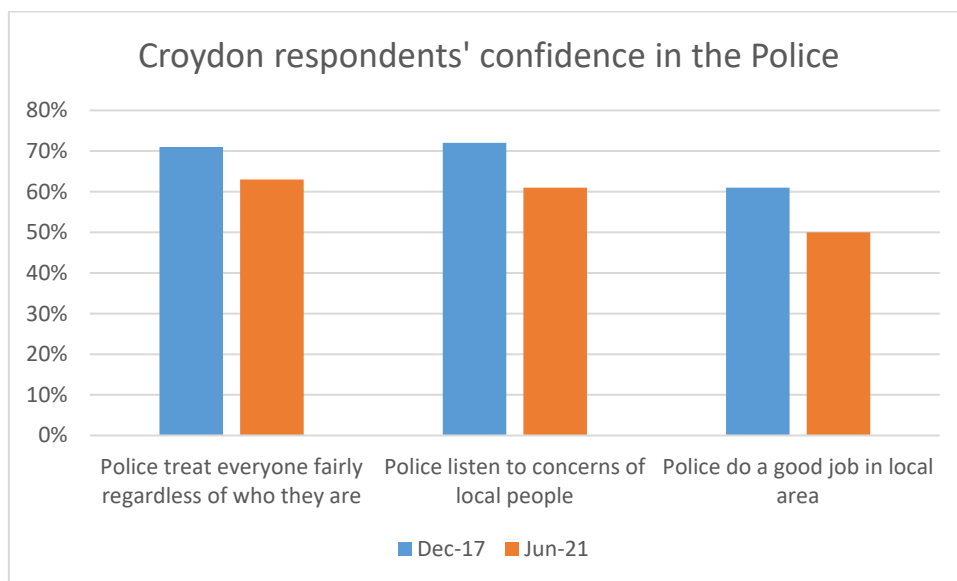
2. Safety of children and young people.

- The rate of serious youth violence has fallen since the 2016 peak (even before the Covid lockdown reduced the opportunities for such crimes), but it remained a serious issue for young people.
- Challenges relate both to safety of children and children's perceptions of their safety – many young people carry weapons because they feel threatened.
- The number of young people entering the criminal justice system for the first time has fallen for four consecutive years.



3. Improving public confidence and community engagement.

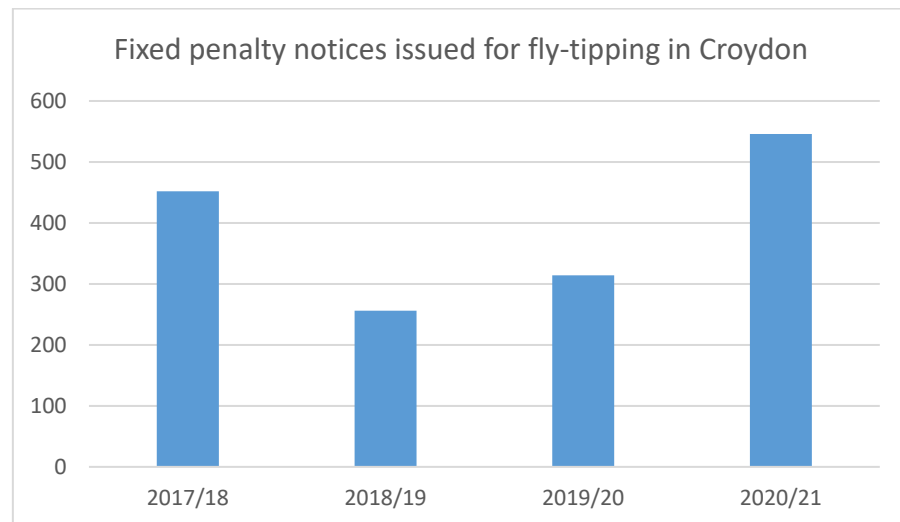
- Croydon residents' confidence in the police is higher than the London average, but has declined since 2017, according to MOPAC's Public Voice Dashboard. However, in the Violence Reduction Network's survey of safety of women and girls in the borough 79% of respondents stated that they would report a crime to the authorities.



- Other parts of regulatory services contributed to this work including Trading Standards who are doing nationally recognised work on illegal knife sales to children both on and off-line.

4. Anti-social behaviour and environmental crime.

- ASB-related calls to the Police in Croydon increased by 5% between 2017 and 2019. A further increase of 85% in 2020 is mostly attributed to Covid-19 where all related calls (e.g. social distancing and mask wearing) were recorded as anti-social behaviour.
- There were however a number of high profile successes, including business closures in Portland Road following a major undercover police operation.
- Fly-tipping incidents in Croydon increased by 3% to 25,532 between 2016/17 and 2019/20. In 2019/20 the number of fixed penalty notices (FPNs) issued by the council represented 1.2% of incidents, though some recipients may have been responsible for multiple incidents. The number of FPNs issued in 2020/21 increased by 74%.



5. Improve support and reduce vulnerability for all victims of crime, focusing on hate crime.

- Tackling hate crime has been a key area of success. Since it was launched in 2019, Croydon's hate crime pledge has been signed by 24,000 individuals and organisations.
- The Prevent and community outreach teams have worked with community organisations to equip them with the tools and knowledge to tackle hate crime and to support people to report it.
- The number of recorded hate crime offences increased by 35% from 698 in 2017 to 944 in 2020. However, the percentage of borough residents regarding hate crime as a problem in their area fell slightly from 14% in 2017/18 to 12% in 2019/20.

4 Strategic Assessment 2021

The Strategic Assessment provides the main evidence base for this strategy. It has highlighted the key issues for the Safer Croydon Partnership to address in order to reduce crime and anti-social behaviour (ASB) in the borough. Conducted annually, it will help to evidence the impact of the strategy on crime trends.

Statistics

Although crime in Croydon fell slightly (by 1.7%) overall in 2020, there were large falls in crimes including burglary (-17%), robbery (-17%) and theft (-22%). This drop can be linked to societal restrictions implemented as a result of Covid-19. However, there were increases in other crimes, particularly drugs (+12%) and violence against the person (+11%). A rise in domestic abuse and hate crime contributed to this increase as well as a rise in harm in non-domestic violence with injury, specifically knife crime and, to a lesser extent, gun crime. The increase of arson offences, which show a link to domestic incidents, are also a cause for concern.

Both crime count and crime harm show a decrease in crimes involving young people. However, this is most likely linked to the Covid-19 restrictions and the VRN still recognises young people and their involvement in crime, particularly violence, to be a strategic priority.

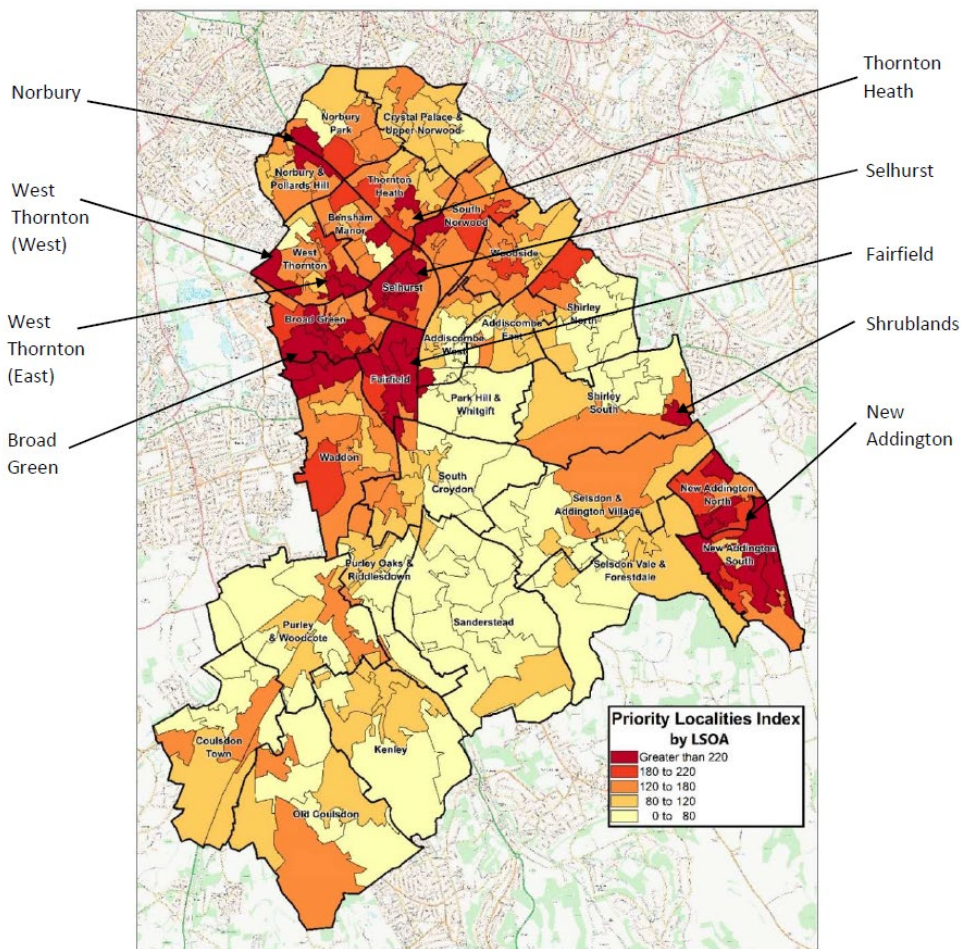
The table provides a breakdown of crime harm levels in Croydon by major crime type. It shows that where for some crime types there has been an increase in the count of offences, there has actually been a reduction in harm of this crime type.

Crime Harm				
Crime Type	2019	2020	+/-	% +/-
Arson and Criminal Damage	49,645.25	57,169.00	7,523.75	15.2%
Burglary	69,130.00	55,550.00	-13,580.00	-19.6%
Drug Offences	41,503.50	32,565.50	-8,938.00	-21.5%
Misc. Crimes Against Society	59,411.75	49,928.25	-9,483.50	-16.0%
Possession of Weapons	92,613.50	64,467.75	-28,145.75	-30.4%
Public Order Offences	24,781.25	25,658.00	876.75	3.5%
Robbery	397,850.00	330,325.00	-67,525.00	-17.0%
Sexual Offences	644,378.00	470,670.25	-173,707.75	-27.0%
Theft	43,104.00	36,366.00	-6,738.00	-15.6%
Vehicle Offences	19,899.00	18,611.50	-1,287.50	-6.5%
Violence Against the Person	528,368.50	578,093.00	49,724.50	9.4%
Total Notifiable Offences	1,970,684.75	1,719,404.25	-251,280.50	-12.8%

In line with our problem-oriented approach, we have focussed our assessment on Place, Offenders and Victims.

Place

Given the shifts in crime owing to conditions under the pandemic, we have used data on crime, deprivation and demography to design a Priority Localities Index for the borough. This has helped us to identify neighbourhoods where cross-cutting issues causing crime and ASB need prioritised action by the partnership. The priority areas are highlighted on the next page.



Offenders

Repeat offenders represent 20% of all suspects but commit more than 40% of crime in Croydon. For specific types of violence including domestic abuse, knife crime and serious youth violence, this rises to about half of all offences and harm committed. They also contribute significantly to hate crime offences. The homes of suspects and repeat suspects are highly concentrated in the Priority Localities Index areas.

A focus on high harm suspects will provide a more manageable, resource-focused and intensive approach to reducing serious crime in the borough. The number of individuals who commit 50% of harm in Croydon is less than 10% of the number of those who commit 50% of the volume of offences. They include the most high-risk individuals who have committed serious violence, sexual offences, robbery and arson, rather than more minor crimes of theft and criminal damage. They also commit a significant proportion of serious harm in the borough including domestic abuse, serious youth violence and non-domestic violence with injury.

Analysis of repeat offenders, high count and high harm offenders shows several cross-cutting issues which are likely to influence criminal behaviour, namely drugs, mental health and alcohol. In addition, most high count and high harm offenders are unemployed.

Victims

Most adult victims of crime are aged between 18 and 45. Large percentages of victims of specific crimes, especially domestic violence (DV), are in this age-group. However, those aged 10 to 17 years old experience almost one fifth of all crime harm; this is closely associated with knife crime.

Repeat victims (9% of all victims) are victims of 20% of the crime count and 31% of crime harm where victims have been identified. They figure strongly in cases of:

- Domestic violence - more than a third of all DV offences and harm are committed on repeat victims
- Hate crime – 60% of repeat crimes are between neighbours (a consequence of increased interaction during lockdown)
- Alcohol related crime.

Identifying and supporting victims of 50% of crime harm, rather than of 50% of crime count in Croydon, would enable the partnership to maximise the use of its limited resources, as the cohort is 95% smaller.

High harm victims have experienced violence (including domestic abuse, non-domestic violence with injury and serious youth violence), sexual offences and arson, as well as alcohol-related crime. They are not, however, typically victims of hate crime.

Strategic Assessment recommendations for the strategy are:

1. Focus on the neighbourhoods identified from the Priority Localities Index to collaboratively address the underlying issues linked to crime and ASB.
2. Establish ways to improve neighbourhood cohesion in areas identified by the Priority Localities Index where this may have deteriorated.
3. Expand micro-patrols to the crime hotspot areas of the borough. This is to be done not just by the Metropolitan Police Service (MPS) but by other uniformed enforcement strands of the partnership too.
4. Invite and form a partnership with key agencies who can heavily contribute to addressing the underlying issues of crime in the borough and enforcement. One should be involved in providing opportunities to residents; the other should be the British Transport Police.
5. Use crime harm as a measure to identify suspects and victims of serious crimes in order to focus intensive resources to reduce further serious risk in the borough.
6. Increase information sharing by partners to reduce offending in the borough, specifically on mental health, employment, and alcohol and substance misuse.
7. Provide better guidance to 10 to 17 year olds on the risks and consequences of capturing and sharing explicit material online.

8. Write a problem profile on domestic abuse in the borough in order to provide a detailed strategic document to focus resources efficiently.
9. Build and implement a performance framework for the whole network so that the responses based on these recommendations are monitored and measured closely.

5. Public Engagement Summary

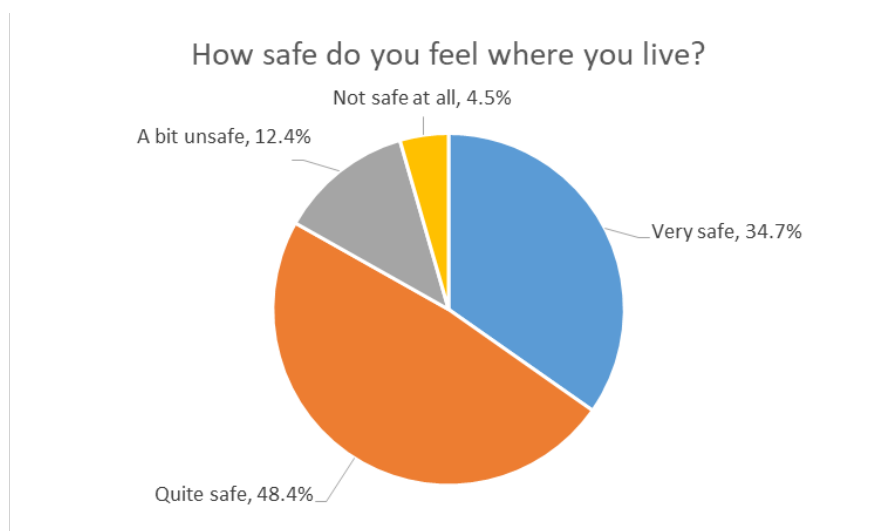
The Safer Croydon Partnership undertook two surveys in 2021 to improve our understanding of crime and safety from the point of view of young people and women and girls.

Survey of young residents

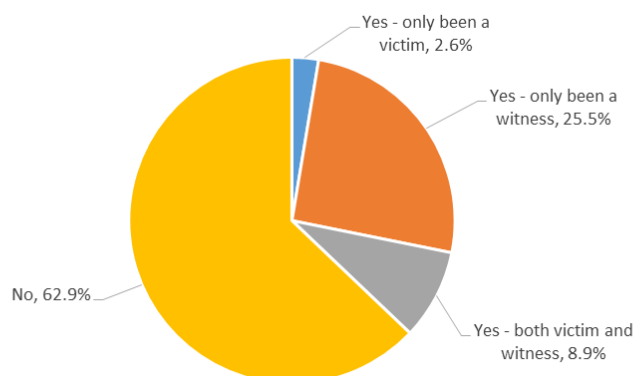
The survey was completed by young residents aged up to 25. Its purpose was to identify where people felt unsafe and how we could improve safety there. There were 451 respondents, of which 380 were used for the analysis after data cleansing.

While the vast majority of respondents felt safe, one sixth felt a bit unsafe or not at all safe where they lived, mainly because of knife crime, violence and gangs. However, one third had experienced or seen crime.

Larger district centres in the north and east, such as West Croydon and Thornton Heath, were most frequently mentioned as areas they would avoid.

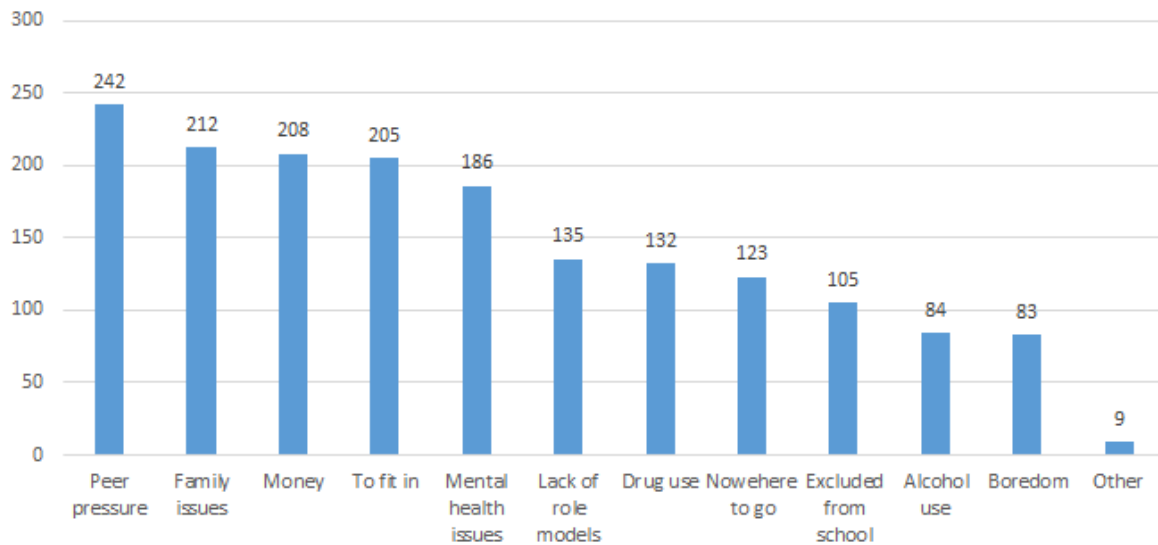


Have you ever been a victim and/or witnessed a violent crime?



The top five reasons why young people committed violent crime were given as peer pressure, to fit in, family issues, money and mental health issues.

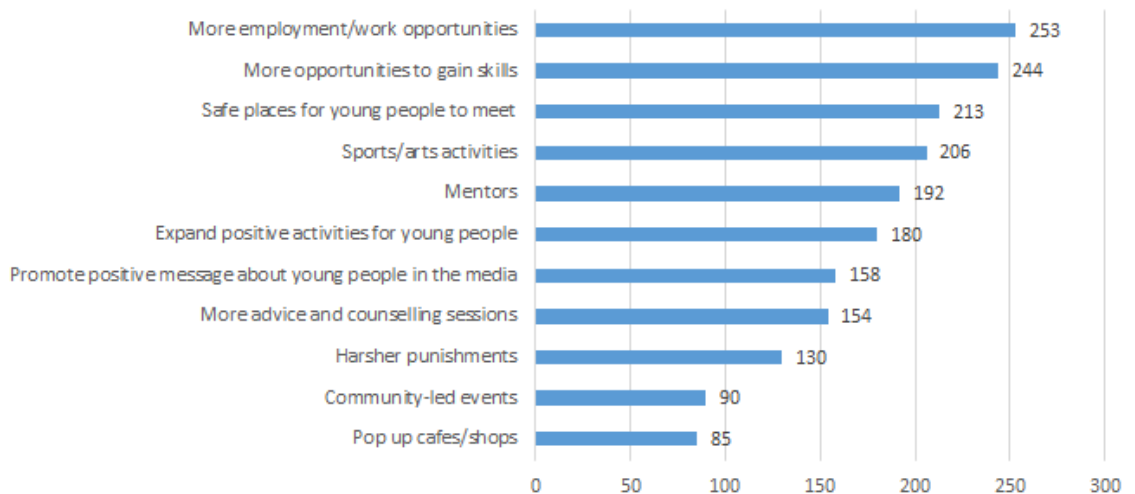
Why do you think young people commit violence crime (multiple answers optional)?



Undetected crimes included knife carrying, drug dealing, child neglect, grooming and DV. However, a third of respondents would not report an incident, mainly for fear of being seen as a ‘snitch’ and because of a lack of trust in the authorities.

The most helpful ways to help young people at risk of violent crime included: more opportunities for gaining skills and jobs; safe places to meet, more sports, arts and other positive activities, and mentoring. Young people also believe that increasing CCTV, visible enforcement on patrol, family support, educational and community activities would also help reduce crime in their area.

What do you think would be the most effective ways to help young people at risk of violent crime (multiple answers optional)?

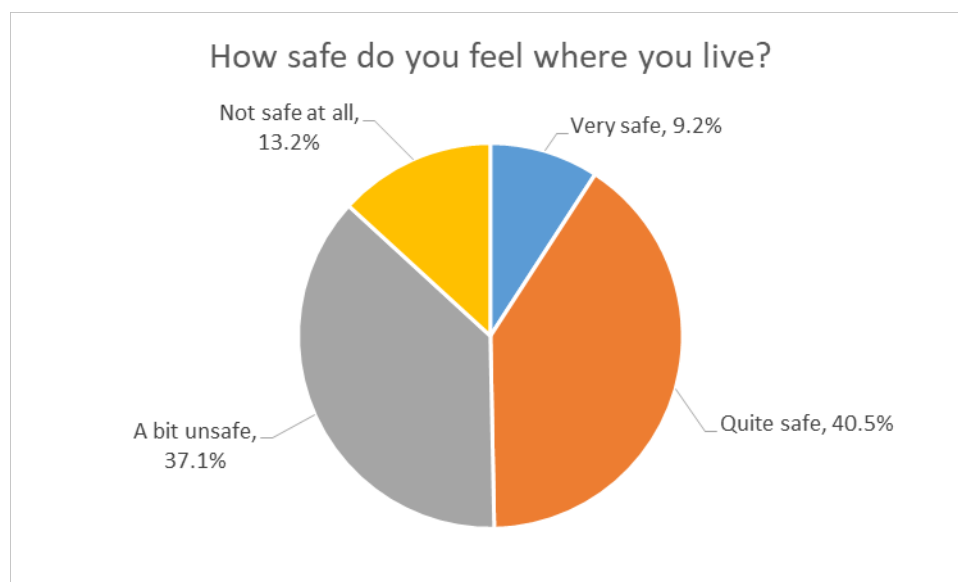


Survey of women and girls

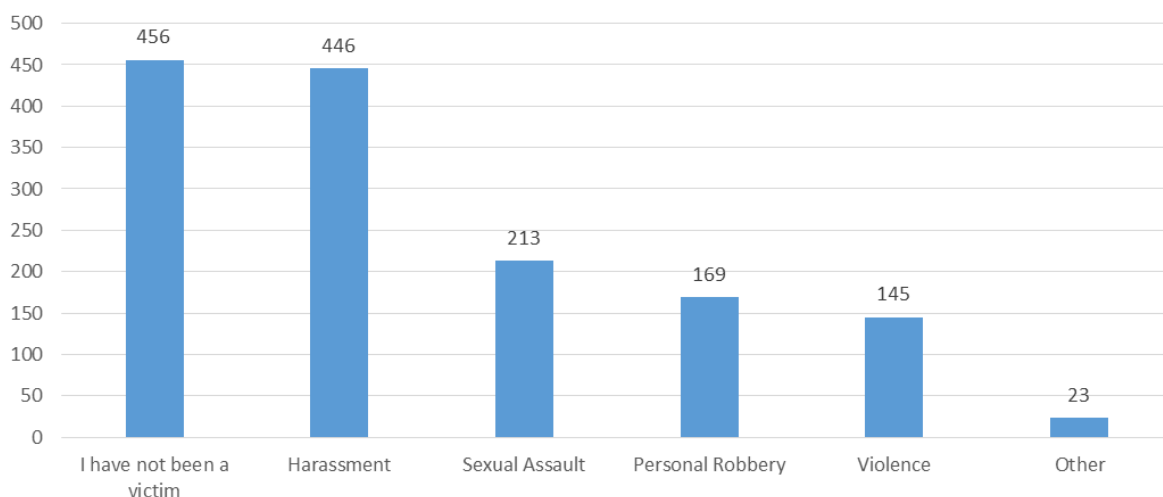
This survey focused on safety for women and girls, and identified areas where residents did not feel safe and what would need to take place in order to improve their safety. There were 1,245 responses, of which 1,113 were used for analysis after data cleansing.

Half of women and girls felt a bit unsafe or not at all safe where they lived (in contrast with one sixth of young residents); this was mainly because of harassment, sexual assault and personal robbery. 59% had experienced crime and three quarters had witnessed crime.

Larger district centres in the north and east, such as West Croydon, Thornton Heath, South Norwood and New Addington, as well as Croydon Town Centre, were most frequently mentioned as areas they would avoid.



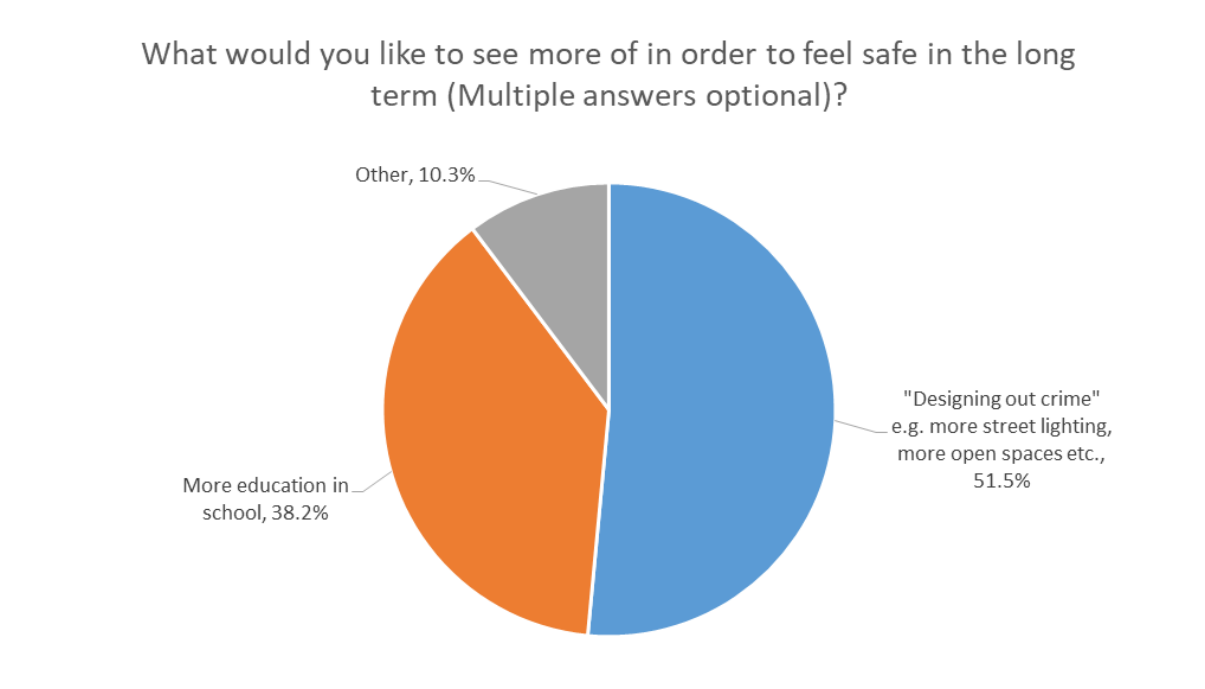
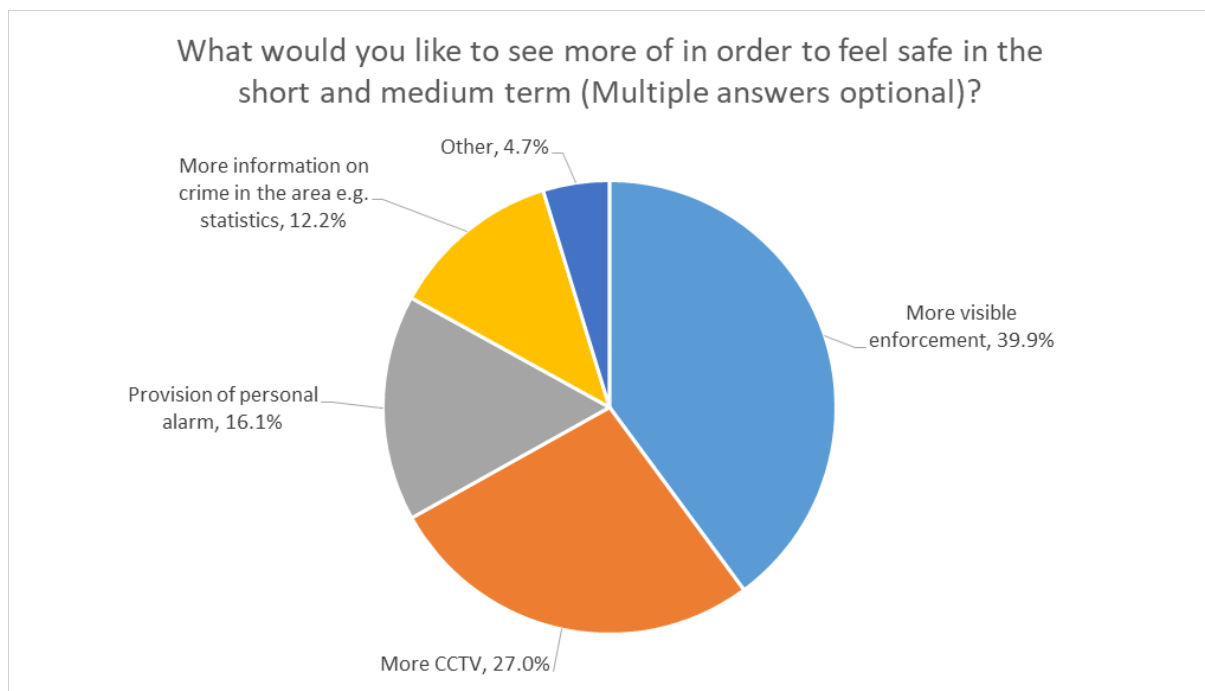
Excluding in your home, school and workplace, have you ever been a victim of the following:



Respondents did not feel safe while travelling or waiting for public transport, in parks, shopping centres and high streets, as well as in pubs, bars and clubs.

A fifth of respondents would not report an incident, mainly because it was a long process or for fear of reprisals, or of not being believed, and because of a lack of trust in the authorities.

In the short and medium term, more visible enforcement, more CCTV and personal alarms would make most people feel safe, as well as provision of personal alarms. In the long-term respondents wanted more education in schools and crime designed out of the public realm.



6. Conclusion

The Safer Croydon Partnership has considered the findings and recommendations in the Strategic Assessment. It has also taken account of feedback from engagement with young people and women and girls. It has decided on the following priorities for the Community Safety Strategy for 2022-2024:

1. **Tackle domestic abuse**
2. **Protect young people from violence and exploitation**
3. **Tackle disproportionality in the criminal justice system**
4. **Strengthen community resilience, offer trauma-informed services, focusing on Hate Crime, and build trust in the partnership**
5. **Focus on high priority neighbourhoods**

This strategy implements the Public Health approach to violence reduction. All actions within each priority are therefore designed to address the four elements of this model:

1. **Curtail** violent acts at source, pursuing perpetrators and enforcing action.
2. **Treat** those who have been exposed to violence to control the spread.
3. **Support** those susceptible to violence due to their exposure risk factors.
4. **Strengthen** community resilience through a universal approach.

Consistent with the problem-oriented approach, the partnership will focus on the underlying causes of those problems and how to tackle them. Mindful of the limited resources available, interventions will target the 'Felonious Few', high priority victims and hotspots to increase the chance reducing crime, particularly crime harm. The strategy's evidence-based approach will target, test and track its actions.

It is essential that the Safer Croydon Partnership has the confidence of people who live and work in the borough. The Partnership will build and implement a performance framework so that the responses to the recommendations in the strategic assessment are monitored and measured closely. The evaluation of the outcomes achieved by this strategy will include the views of residents, obtained through regular engagement during its three-year period.

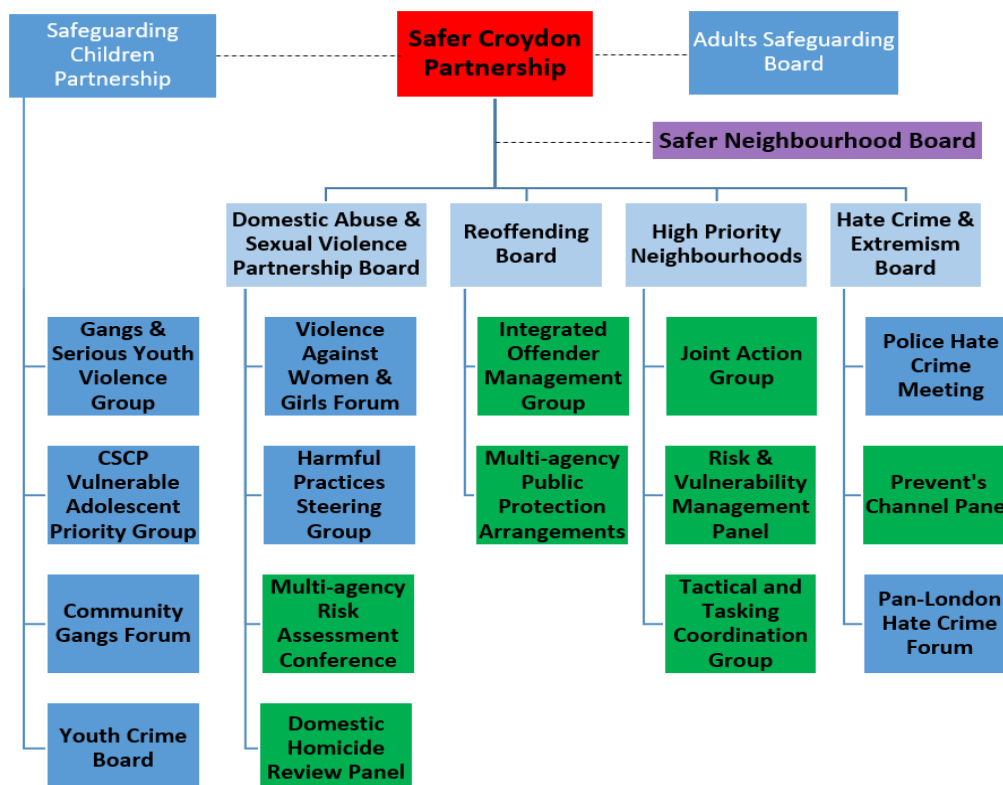
7. Delivery Framework

The Safer Croydon Partnership Board is responsible for all community safety matters across the borough. It provides strategic leadership and makes decisions regarding resources, performance management and future developments. It works with other boards on Croydon's Local Strategic Partnership on crime and safety matters, in particular the Safeguarding Children Partnership and the Adults Safeguarding Board.

Key responsible authorities on the Board include the council, police, and health, probation and fire services. The voluntary sector and residents are also represented. Organisations instrumental in delivering strategy priorities may also be invited to join.

The boards and meetings in the chart below are accountable to the Board (see Glossary for details). Those dealing with youth crime are directly accountable to the Safeguarding Children Partnership, which works closely with the Safer Croydon Partnership. Case management forums, in green, tailor plans for specific individuals to reduce offending or vulnerability. Where there is demand, specific working groups are also set up to tackle crime and ASB in a specific area, which last for a minimum of six months.

The SCP will continue to work closely with the Safeguarding Boards with the intention of building stronger partnerships. This will include the SCP providing them with information and updates on work programmes as well as action plans.



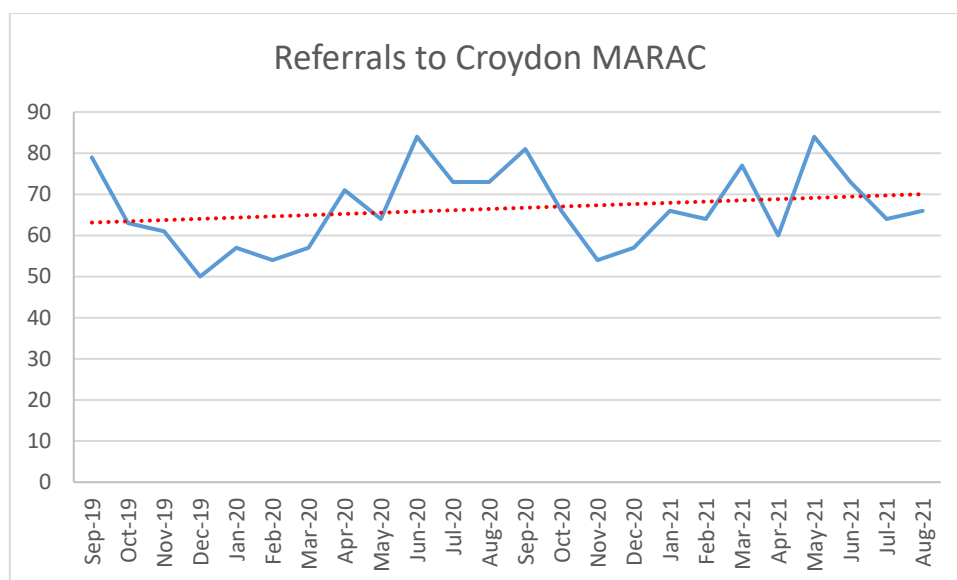
8.1 Priority 1 Tackle domestic abuse

What we want to achieve

Tackling domestic abuse remains a priority for the Partnership. We also want to support victims better, challenge perpetrators and support them to change, and help people to thrive once they have left abusive relationships.

Level of need

The rate of domestic abuse incidents and offences per 1,000 population has been increasing year on year in Croydon, which had the 3rd highest rate in London in 2020. There were 5,154 reported incidents of domestic abuse, an increase of 17.9%, compared to the previous year. In the year to August 2021 there was a 3.3% increase in the average level of cases with a high risk of severe harm referred to the Multi-Agency Risk Assessment Conference (MARAC).



Lockdown restrictions during the Covid pandemic forced intimate partners and family members of the same household to stay indoors together, putting themselves at greater risk of harm from an abusive partner or relative. In addition, better awareness of services for victims and of what constitutes domestic abuse increased the likelihood of people coming forward to report it.

What we are doing

Support victims

The Partnership works through the police, council, including the Family Justice Centre (FJC), and voluntary and community organisations to mobilise the professional and community network through raising awareness and training frontline staff. It will use the measures introduced by the Domestic Abuse Act 2021 to protect and support victims.

FJC brings together several agencies to provide a single, multi-agency assessment of victims' risk and harm, obviating the need for victims to repeat their history, and refers victims for specialist support including accommodation and legal services. It

coordinates volunteers who provide emotional support and practical help. Its freedom programme supports survivors who have left abusive relationships.

Independent Domestic Violence Advisors at the FJC, police stations, and Croydon University Hospital provide specialist support, which extends to victims who are homeless, experiencing modern slavery or radicalisation, and those with no recourse to public funds. An independent sexual violence advisor is also available. Several local voluntary and community organisations support BAME women experiencing domestic abuse and sexual violence and work to improve their relations with the criminal justice system to encourage engagement and trust.

The Police use the Domestic Violence Disclosures Scheme (Claire's Law) to reduce serial perpetrators and give more control to women.

People with learning disabilities are at high risk of suffering domestic abuse due to factors including difficulties in recognising abuse, fear or lack of knowledge of how to report this, emotional vulnerability and communication difficulties. All staff working with people with learning disabilities need to be alert to the possibility of domestic abuse and know how to address this and where to make referrals for support.

Challenge perpetrators and support them to change

The police arrest perpetrators at the scene wherever possible, and otherwise within 24 hours. They will use and enforce bail conditions and compliance with Domestic Violence Protection Notices (DVPNs) to protect victims. After arresting perpetrators, the police will refer them to support groups, to the Domestic Abuse Perpetrator's Panel (DAPP) where appropriate, and to the rehabilitative DRIVE programme, which makes interventions to change the behaviour of perpetrators.

Several themed forums coordinate activity among practitioners in Croydon and exchange good practice, including the Violence Against Women and Girls (VAWG) coordinators meeting (Pan London), the VAWG Forum, Domestic Abuse and Sexual Violence Partnership Board, and Multi-Agency Safeguarding Hub (MASH) Operational Management Group.

Relevant case management meetings include the Adults Safeguarding Board Multi-Agency Risk Assessment Conference (MARAC), and Domestic Abuse Perpetrators Programme (DAPP) Meeting.

What we will do

We will continue to apply a multi-agency approach to tackle domestic abuse and sexual violence (DASV) within Croydon and provide multi-agency service provision for victims. DASV must be understood as part of the wider context of violence against women and girls (VAWG). This is the case, for example, with how young people experience domestic abuse. VAWG is dealt with under Priority 4. We will update Croydon's DASV Strategy and will:

Curtail violent acts at source, pursuing perpetrators and enforcing action

1. Use recommendations and learning from domestic homicide reviews to improve partnership practice and actions to tackle domestic abuse and sexual violence.

2. Produce an evidence-based profile of domestic abuse in Croydon and engage with service users and the VCS to develop actions to tackle this crime in hotspot areas.

Treat those who have been exposed to violence to control the spread

3. Continue to provide and arrange refuge and other safe accommodation to victims of domestic abuse and sexual violence.
4. Work with perpetrators through the rehabilitative [Croydon DRIVE Project](#) programme to end their abusive behaviour.
5. Train partners to develop appropriate trauma-informed responses to victims of domestic abuse and sexual violence.
6. Croydon Health Services NHS Trust to appoint a qualified member of staff to support the Independent Domestic Violence Advisor.
7. Develop a domestic abuse specialism in Croydon Health Services NHS Trust's safeguarding team to develop practitioners' knowledge and skills across the organisation

Support those susceptible to violence due to their exposure to risk factors

8. Raise awareness of domestic abuse and sexual violence and train Safer Neighbourhood Policing Teams to support victims and monitor and enforce perpetrators' compliance with bail conditions and Domestic Violence Protection Orders (DVPOs).
9. Strengthen partnership work and make services available to support parents involved in conflict and the children and young people exposed to it.
10. All staff in Croydon Health Services NHS Trust working with people with learning disabilities will be trained in understanding and responding to domestic abuse, complete training in safeguarding adults level 3, and develop links with the FJC.

Strengthen community resilience through a universal approach

11. Provide training for organisations working with victims of domestic abuse and sexual violence, and raise awareness to increase understanding of this crime and ensure that it remains everyone's business.
12. Ensure that all schools and GP practices in hotspot areas receive training to identify signs of violence against women and girls, including domestic abuse and sexual violence, and arrange appropriate responses.

How we will we know our actions have been effective

- Statistics on number of domestic abuse incidents, offences and sexual violence offences recorded by the Police. The volume of cases reported per '000 of women and girls resident in Croydon. This rate is likely to increase, as more victims come forward following implementation of the Domestic Abuse Act 2021.
- Number of cases at the Multi-Agency Risk Assessment Conference (MARAC)
- Number of cases recorded by the Family Justice Centre
- Level of engagement with and outcomes from [Croydon DRIVE Project](#)
- Feedback from voluntary and community sector partners
- Feedback from Family Justice Centre service users

- Sufficient independent domestic violence advisors are available to provide a safe level of support for victims of domestic abuse and sexual violence in Croydon.

8.2 Priority 2 Protect young people from violence and exploitation

What we want to achieve

We want to protect young people at risk of becoming victims of crime. We want to reduce serious youth violence in Croydon, including knife enabled violence and robbery, and involvement in gangs. We want to reduce the number of children and young people involved in exploitation, in particular county lines which involves using children and vulnerable people to traffic drugs from location to location.

This strategy takes a more holistic view, addressing both violence and the safety of young people. It has been informed by the views of young people in Croydon, their concerns and what they think would reduce youth violence.

Identifying adverse childhood experiences as early and quickly as possible is crucial for planning effective interventions to prevent violence. These include domestic abuse, child neglect, older siblings involved in crime and anti-social behaviour, school behaviour and exclusions, and cannabis use.

What we are doing

The Safer Croydon Partnership (SCP) covers the direct and indirect criminality and victimisation of children. This includes county lines, sexual and criminal exploitation and grooming. The SCP coordinates and leads on several meetings designed specifically in protecting young people from violence.

The Gangs and Serious Youth Violence (SYV) Board oversees the multi-agency approach to reducing SYV and gang activity in the borough at a strategic level. The Community Partnership ensures appropriate interventions are made for young people be they diversion, disruption or enforcement. The council runs workshops in schools on harm and safety, as well as events for staff on SYV and exploitation.

The Youth Crime Board is responsible for the work of the multi-agency Youth Offending Service to coordinate the delivery of actions to prevent and reduce re-offending and manage risk to safeguard children and young people within the borough in accordance with the Youth Justice Plan 2021/22.

Whereas the SCP is focussed on the risk of criminal exploitation of children, the [Croydon Safeguarding Children Partnership](#) (CSCP) focusses on raising awareness of safeguarding risk and supporting the wider partnership to recognise and respond appropriately to safeguarding concerns involving children up to 18 years of age. It supports the SCP by building awareness of child exploitation and providing training and quality assurance of safeguarding practice. Together, they provide a holistic approach to safeguarding children in the borough.

The CSCP provides for effective joint working with the SCP on matters of young people's safety through the Vulnerable Adolescents Priority Group, which uses a public health approach in reducing violence amongst young people.

The council leads working groups in areas where SYV is an issue. CVA and Croydon BME Forum deliver the 'My Ends' project to divert young people from crime through mentoring, support for parents, training youth work organisations on trauma and mental health, and establishing community partnerships. The Partnership also encourages young people to participate in decision-making on the issue of violence and exploitation through Croydon Youth Forum.

Other themed forums, including the Early Help Partnership Board, collaborate on funding bids, co-ordinate activity among practitioners and exchange good practice. Case management meetings include PREVENT's Channel Panel, Gangs Weekly Tasking Group, Risk Management and Vulnerability Panel and the Complex Adolescents Panel (CAP).

What we will do

Curtail violent acts at source, pursuing perpetrators and enforcing action

1. Provide more visible enforcement on patrol where possible in areas of high harm towards young people.
2. Apply for Criminal Behaviour Orders (CBOs), Knife Crime Prevention Orders and Gangs Injunctions when disruption is appropriate.
3. Develop an agreed joint programme of actions to remove weapons and provide reassurance including Trading Standards initiatives (e.g. knife or corrosive substance test purchases)
4. Weapons sweeps by staff of partner agencies, e.g. London Fire Brigade, housing providers/estate managers and refuse collectors.
5. Sign up businesses to responsible retailer agreements and train them on knife sales issues and take appropriate enforcement action on the sale of knives to young people.
6. Use London Information Sharing to Tackle Violence programme and wider public health data, social media intelligence, local drugs markets and local rescue and response county lines analysis, and other relevant local authority data to inform the strategic assessment analysis.

Treat those who have been exposed to violence to control the spread

7. Provide violent crime offenders with bespoke community service interventions before court and after conviction that protect the public.
8. Reduce harm to direct and indirect victims of offending
9. The Gangs Team to deliver on bespoke actions plans for gang members.
10. Refer offenders from police custody to providers of education, employment and training through the DIVERT programme.
11. YOS to ensure that Interventions take account of adverse childhood experiences and are trauma informed in recognition that those carrying out SYV have often been victims themselves
12. YOS to ensure victim(s) and potential victims are at the core of its work by offering restorative justice interventions by contacting identified victims of serious youth violence to offer the opportunity to engage in direct or indirect restorative interventions

13. Provide young victims of violence with a trauma informed needs assessment, with referral to the Emotional Health and Wellbeing service where appropriate and work effectively with partners for a fast track access to support for young people affected by serious youth violence.
14. Place a commissioned third sector organisation such as RedThread in Croydon University Hospital A&E to provide immediate support and space for young people injured through serious youth violence and ensuring information is shared with relevant agencies in a timely way.
15. To strengthen work on parents and families of those affected by knife crime.
16. Ensure that offenders (aged 18+) who meet the criteria for the MOPAC Knife crime GPS Pilot be considered and the relevant licence condition added. Consider also those already in the community who it is identified may pose a risk, as an alternative to recall or when re-released from recall.

Support those susceptible to violence due to their exposure to risk factors

17. Minimise school exclusions (and managed moves in place of exclusions), create inclusive settings and support young people back into education, employment and training.
18. Work with parents and carers, especially those who are vulnerable, to engage young people in diversionary activities and education and prevent harm.
19. Ensure services are deployed to known hotspots
20. The Youth Engagement Team to continue their delivery of the 'Safe and Well' programme in schools
21. YOS to offer bespoke services that support young people back into education and employment.
22. Ensure young victims of violence, are identified and given support to access diversionary services, including education, training and employment
23. Deliver universal and targeted programmes in schools (including as part of Sex and Relationships Education), based on Croydon safeguarding issues and trends, and support schools to assess quality and impact.
24. Safeguarding Children Partnership to ensure local Early Help processes and referral pathways, and everyone's role within them, are clear and easily accessible to parents, carers, schools, Pupil Referral Units and college staff.
25. Create more opportunities for gaining skills and jobs.
26. Develop more sports, arts and other positive activities, youth engagement, counselling and mentoring.
27. Develop resources for workshops in youth community settings and train partners to run them.
28. To develop communication methods to young people and families.
29. All staff in Croydon Health Services NHS Trust Learning Disability Team to complete PREVENT training

Strengthen community resilience through a universal approach

30. Where possible, to improve design of areas to remove opportunities for storing weapons.

31. Work to ensure places of education are safe and inclusive, build young people's resilience and have a trauma-informed approach.
32. To encourage schools to include knife crime and youth violence within their safeguarding plans.
33. Hold educational and community activities.
34. All partner agencies to adopt a trauma informed approach and commission training accordingly.
35. Co-design communication materials with YP in engagement stages to increase awareness of services by getting the language right and engage with families at a human level.
36. To explore the extension of the social workers in schools programme in partnership with education providers beyond March 2022

How we will know our actions have been effective

- Reduction in the number of young people who are victims of Youth Violence, Serious Youth Violence, CSE and Knife Crime with Injury where the victim is aged 1 to 24, recorded by the Police (MPS).
- Regular surveys of young residents find that a greater percentage of respondents report that they feel safe in Croydon.
- Reduction in the number of young people treated by London Ambulance Service for violent injuries inflicted in Croydon.
- Reduction in the number of people treated by Accident & Emergency at Croydon University Hospital for violent injuries received in Croydon.
- The number of young people being worked with by the Gangs Team.
- The number of PREVENT referrals of young people.
- A reduction in number of young people entering the criminal justice system for the first time.
- A reduction in re-offending.
- An increase in the number of young people in Education and Employment particularly for those 16+.
- Reduction in school exclusions.

8.3 Priority 3 Tackle disproportionality in the criminal justice system

What we want to achieve

Some people are treated differently by a range of public institutions, and this can have an impact on how they experience violence. This chapter shapes a multi-agency response to reduce the disproportionality of outcomes people from Black, Asian and minority ethnic (BAME) backgrounds in the Criminal Justice System.

The problem

People from a BAME background were over-represented as defendants in the criminal justice system in 2019, according to [Ministry of Justice \(MoJ\) data](#). This was largely because people from these ethnic groups made up a disproportionate share of people arrested, and this carried through to the prosecution, conviction, and imprisonment stages. Evidence also suggests that offenders from BAME backgrounds receive longer custodial sentences, which could be partly due to the higher rate of 'not guilty' pleading among defendants from these ethnic groups.

Discriminatory treatment of young people from BAME backgrounds can have significantly adverse impacts on young persons' views of themselves, their health and life chances. In Croydon young black males are significantly overrepresented in the youth justice system, more likely to enter it at a higher level, and more likely to receive stiffer sentences, including custodial sentences. This group are also more likely to be stopped and searched. Additionally, Black Caribbean pupils in Croydon, as in England as a whole, have the greatest level of disproportionately when it comes to exclusion from school.

When considering discrimination we must consider race, disability, gender, religion, sexuality and take into account the fact that discrimination can occur not just amongst individuals but also systemically.

What we are doing

Croydon Youth Offending Service has developed a Disproportionality Action Plan for 2021/22 to monitor services with regard to diversity and address oppressive practice and inequality proactively, informing local practice and strategic planning, working collaboratively with Croydon BME Forum and strategic partners such as the police, courts and the NHS. Inspirational black male professionals and police are invited to speak to the young males group on the Criminal Justice System and aspirations. The service also closely monitors under-14 year olds entering the system and strives to divert them from re-offending.

Croydon BME Forum conducts training sessions for professionals on cultural sensitivity, addressing bias, prejudice, and discrimination and how to overcome this in practice. It advises the Partnership and the Gangs Matrix Board on local issues and partnership work to reduce disproportionality in the criminal justice system.

Police are conducting ongoing research in response to critical incidents, stop and search and criminal justice outcomes with a disproportionality focus and continue to

evolve their response to the systematic and institutional racism that influences the overrepresentation of young black males in the criminal justice system.

Although several agencies have made progress, currently the partnership lacks comprehensive and accurate equalities data of the cohorts of people affected in Croydon. This is needed to understand disproportionality fully and tackle it effectively. The CSCP has asked its member agencies to be more robust in their recording of ethnicity and disability of young people.

The Vulnerable Adolescent Priority Group (VAPG) reviews data on disproportionality and champions the need for accurate data recording. VAPG's Schools Curriculum and Change Group shares resources, strategies and information. It has begun a work programme that will examine racial harassment; teacher recruitment, retention and promotion; governor recruitment; exclusions; and pupil achievement.

The Probation Service inputs equalities data on their cases to inform the services they commission for particular groups. It has introduced the Effective Proposal Framework helping to reduce disproportionality by taking account of offending history and producing suitable proposals and disposals to use in court reports.

What we will we do

Understanding the problem

1. All agencies to record equality and inclusion information about their cases, including the Probation Service and Police research on critical incidents, stop and search and criminal justice outcomes with a disproportionality focus.
2. Produce data to understand the impact of disproportionality at every stage of the Criminal Justice System, from policing ('stop and search'), sentencing trends, custody rates and rates of reoffending, and numbers of young people entering the criminal justice system for the first time.
3. Once available, analyse data by ethnicity, gender, sexuality, disability, religion and geographic information to inform the planning of interventions and commissioning of services.
4. Analyse and review BAME groups at risk of gang affiliation and criminal exploitation through county lines in order to establish a baseline.
5. Share data, patterns, needs and learning across the partnership, including education (exclusions data), health and police, and hold discussions to better understand disproportionality across the criminal justice system and define actions required
6. Working and exchanging learning with other London Authorities
7. The Partnership will use relevant forums to formally raise the Partnership concerns and recommendations.

TREAT those who have been exposed to violence/crime to control the spread

8. Youth Offending Service interventions are tailored to meet the individual needs of young people and address overrepresentation, paying particular attention to young people's self-assessments and learning styles

9. Youth Offending Service Officers to attend regular reflective practice to discuss needs of staff and offenders and plan actions to tackle overrepresentation, disproportionality and oppressive practice
10. Probation Service to use the equality and inclusion analysis of their caseload to ensure that services commissioned are tailored for certain groups.
11. Ensure the physical and mental health needs of individuals are quickly identified and actioned, promoting accessibility to health provision for disadvantaged groups
12. Ensure the Youth Offending Service and police identify young people suitable for diversion from the criminal justice system to achieve a fair application of alternatives to prosecution
13. Maintain dialogue with the judiciary and court users group on overrepresentation, involving young people, and compare similar offences and sentencing outcomes for young people by ethnic groups.
14. Probation will continue to use the Effective Proposal Framework Tool to produce a list of suitable proposals and disposals, before court reports are written, to ensure there are better sentencing outcomes for all groups, reducing disproportionality amongst those going through the criminal justice system and extend use of tool to those coming out of prison on licence.
15. Officers are being trained to ask safeguarding questions of all juveniles in custody and involve social services to help manage risk and offer diversions.

SUPPORT *those susceptible to violence due to their exposure risk factors.*

16. Identify individuals who are potentially experiencing systemic discrimination within the education system, and advocate accordingly.
17. Ensure that all young people, particularly those who are NEET, are offered opportunities for education, training and employment that are in line with their individuality and personal need.
18. Develop joint working between the Youth Offending Service and social care to develop a trauma-informed and culturally aware approach to meet the needs of unaccompanied minors.
19. Work with specialist voluntary organisations, and community and grass-roots projects that target the prevention and reduction of crime within overrepresented groups in the Criminal Justice System
20. Set up DIVERT programme to promote universal services with partners, including the community sector, for those arrested where no further action is taken.
21. Croydon Health Services NHS Trust Learning Disability Team will develop links with neighbourhood policing to ensure crisis plans are in place.
22. Police schools officers to offer early engagement to divert individuals from involvement in the Criminal Justice System.
23. Police Child Sexual Exploitation and Child Criminal Exploitation teams to divert those exploited who may also be involved in criminality themselves through the Complex Adolescents Panel.

STRENGTHEN *community resilience through a universal approach*

24. Arrange and encourage training in cultural competency, unconscious bias and disproportionality awareness for members of partnership organisations as well as programme boards
25. Strengthen and support schools to reduce fixed and permanent exclusions of BAME children. Continue monitoring exclusion rates and taking action to address over-representation, by working with schools, local health services, and the community to reduce the need to exclude pupils
26. Continue monitoring exclusion rates and taking action to address over-representation, by working with schools, local health services, and the community to reduce the need to exclude pupils

How we will we know our actions have been effective

- Reduction in the number of young people from BAME backgrounds who enter the criminal justice system for the first time
- Reduction in the number of young people from BAME backgrounds who reoffend
- Improved identification and support of people from BAME backgrounds involved in gang activity so they are provided opportunities and support to exit gangs
- Increase in the numbers of people from BAME backgrounds in the Criminal Justice System who gain access to education, employment and training
- Reduction in school exclusions and truancy
- Feedback from the Youth Offending Service, Police, and Courts
- Staff are fully trained in cultural competency and have full awareness of anti-discriminatory practice
- Services/interventions are culturally in tune with service users.

8.4 Priority 4 Strengthen community resilience, offer trauma-informed services, focusing on Hate Crime, and build trust in the partnership

What we want to achieve

Individuals benefit from different protective factors, ranging from personal resilience to trust in other people and organisations. We need to understand how to foster the protective factors in individuals and communities.

We will look at how the whole community safety system in Croydon and our services are organised and delivered and consider what steps we should take to help traumatised service users to heal and to avoid, or minimise, adding new stress or reminding them of their past traumas. 'Trauma-informed approaches' are ways of supporting people that recognise specific needs they may have as a result of past or ongoing trauma. A traumatic event is an event, a series of events or a set of circumstances that is experienced by an individual as physically or emotionally harmful or life threatening (Substance Abuse Mental Health Services Administration 2014).

Croydon residents' confidence in the police is higher than the London average, but has declined since 2017, according to MOPAC's Public Voice Dashboard. However, in the Violence Reduction Network's recent surveys in Croydon, 79% of women and girls responding, and 66% of young people, stated that they would report a crime to the authorities.

What we are doing

The Council coordinates and takes part in a wide range of regular meetings of relevant partners to strengthen community resilience, offer trauma-informed services and build trust in the authorities. Multi Agency Public Protection Arrangements (MAPPA) meetings manage the most serious offenders and Integrated Offender Management (IOM) meetings manage prolific reoffenders. At the Risk and Vulnerability Management Panel, organisations jointly develop coordinated plans to protect vulnerable residents who are victims, witnesses or perpetrators of crime and ASB. Agencies at the Community Gangs Forum discuss individuals involved or at risk of being involved in gangs to plan a holistic approach to divert them away from gangs.

Through the Young Londoners Fund, the Council coordinates trauma-informed services for young people, including mental health professional and a range of diversionary activities.

Members of the community may use a community trigger to ask the Council, Police or a relevant housing association to review the work they are doing to tackle persistent anti-social behaviour (ASB) after reporting three separate incidents of ASB in the previous six months. When residents in a particular area report concerns about a rise in crime or ASB, the Council may set up a working group to plan a multi-agency response. Using data and community feedback, it tasks appropriate services and monitors progress, amending actions where necessary.

The Croydon Resilience Forum (CRF) ensures an integrated approach to emergency response and management for the borough. It involves emergency planning officers and representatives of sectors with a role in emergency preparedness and response, including local authority, health, police, fire, utility, environment, business, voluntary, community, faith and transport.

There is no place for hatred and intolerance in Croydon's communities: since 2019, 24,000 individuals and organisations have signed Croydon's hate crime pledge. It helps us to identify whether communities understand hate crime issues and the reporting mechanisms in place. We engage signatories about events and training by VCS partners on tackling hate crime. The partnership is committed to targeting offenders, monitoring community tensions, increasing awareness of action to combat hate crime, reducing tolerance of it and undermining any social acceptability of it.

We will develop the work of our partnership to provide an effective response across the borough to tackle violence against women and girls (VAWG). This will include developing a detailed three-year strategy for 2022-2024 to focus the partnership's resources effectively on ending violence against women and girls. It will involve partnership work across national, regional and local boundaries to help victims and provide an effective first response to violence and abuse. It will cover ensuring streets are safer for all women and girls, as well as sex work, trafficking, female genital mutilation and other harmful practices. We are also preparing a more detailed strategy on the Partnership's approach to tackling harmful practices. Croydon's strategy will be in conformity with the government's new VAWG strategy and the Mayor's forthcoming Pan-London VAWG Strategy. Further actions will be developed in Croydon's new VAWG strategy.

The Council's [statement](#) in May 2019 details its approach across all council activity to raise awareness of and identify modern day slavery and respond accordingly.

What we will do

Curtailed violent acts at source, pursuing perpetrators and enforcing action.

1. Develop a detailed three-year strategy to tackle violence against women and girls (VAWG), in conformity with the forthcoming Pan-London VAWG Strategy.
2. Increase the visibility of enforcement and support services, such as the Family Justice Centre, enforcement teams and police, on the street, in bars, and brothels (also supports Priority 5).
3. Develop Croydon's partnership response for addressing modern slavery through a multi-agency case conference to share intelligence, identify victims, offenders and hotspots and coordinate focussed action.
4. Expand partnership working groups across other areas of need in the borough and develop plans involving all agencies.

Treat those who have been exposed to violence, and their trauma, to control the spread

5. Provide frontline staff in partner organisations with trauma and attachment training, enabling them to adopt a trauma-informed approach
6. Increase information sharing by partners to reduce offending in the borough, specifically on mental health, employment, and alcohol and substance misuse.
7. Continue providing trauma-informed support and advocacy to women involved in the criminal justice system to aid their resettlement
8. Deliver training to partners on identifying and responding to modern slavery and supporting victims.
9. Croydon BME Forum's Health and Well-being Space will see a range of trauma-informed services support people with mental health issues and ensure they can access mental health support in their local communities.
10. Improve support and reduce vulnerability for victims of hate crime.

Support those susceptible to violence due to their exposure to risk factors, taking account of their trauma

11. Invite and form a partnership with key agencies who can contribute to addressing the underlying issues of crime in the borough and enforcement through providing opportunities to residents to contribute to addressing the underlying issues of crime and enforcement (Strategic Assessment Recommendation 4)
12. A qualified psychologist will be based in Croydon BME Forum's hub to provide free therapeutic support.
13. Hold a quarterly forum on violence against women and girls to exchange intelligence, share good practice and address challenges and barriers to help VCS partners in delivering support services within their communities.
14. Croydon Health Services NHS Trust Learning Disability Team to re-establish the 'Risk Assessment Forum' to identify and mitigate risks posed more robustly.

Strengthen community resilience through a universal approach and build trust

15. Challenge the deep-rooted social norms, attitudes and behaviours that discriminate against and limit women and girls across all communities by working directly with grassroots organisations in raising awareness
16. Build strong stakeholder relationships and reduce silo working across the Safer Croydon Partnership and Croydon Resilience Forum
17. Facilitate community involvement in Police monitoring of the impact of section 60 'no suspicion' stop and searches for offensive weapons

18. Launch police encounter panels as part of MOPAC promise to improve transparency and accountability of police tactics which are identified by the public as of particular concern (e.g. viral videos on social media)
19. Improve access to Police through ward panels, Safer Neighbourhood Boards and community meetings, focussing on areas of risk with a priority to improve community cooperation, involvement and legitimacy.
20. Develop a Safer Croydon communications plan to increase awareness of the work being done by the council, police and other partners to combat crime; specific communications for local communities to focus on what is being done in specific areas of crime such as:
 - Domestic abuse and sexual violence
 - Serious youth violence
 - local statistical information for community organisations on violence against women and girls
 - Hate Crime
 - PREVENT work
 - Other areas of concern highlighted by the community
21. Engage with the community through surveys on a more regular basis to gauge their concerns in their area.
22. Run programmes of community involvement, capacity building and regular engagement involving Croydon BME Forum and CVA
23. Partnership to support and inform the Police's assessment of community tensions monitoring
24. London Fire Brigade will provide easier community access to local fire stations and build trust and confidence with all stakeholder groups.
25. Develop a Modern-Day Slavery (MDS) action plan which will be implemented by the MDS Forum.

How we will we know our actions have been effective

- Feedback from the voluntary and community sector
- Public Dashboard of the Mayor's Office of Policing and Crime
- Regular surveys, including trust and confidence in services.
- The number of staff receiving trauma training
- We are developing our method for collecting and understanding community feedback. We wish to assess whether there is an increase in people responding to surveys (women, young people and BAME residents in particular) who say that they would report an incident or crime to the authorities.

8.5 Priority 5 Focus on high priority neighbourhoods

What we want to achieve

The strategic assessment identified nine priority areas in the borough which the Safer Croydon Partnership should focus on because they score highly in our 'Priority Localities Index' with regard to crime, anti-social behaviour and the causes of crime.

By focussing our resources on these areas, we will tackle the underlying causes of crime so that these persistent high harm targets no longer generate such serious crimes, reducing overall crime rates and costs in the medium to longer term.

What we are doing

The Council coordinates and participates in multi-agency meetings to reduce crime and ASB in specific areas. Several apply a problem-solving approach, analysing the issues, developing a tailored response, and finally assessing the outcomes. The monthly Joint Action Group (JAG) tackles any crime and ASB problems in the borough requiring a multi-agency approach. Lately, a specific multi-agency working group is set up when a neighbourhood of concern raised at the JAG requires a more intensive partnership approach in the medium-to-long term.

The Council contributes to the local Police Tactical and Tasking Coordination Group (TTCG), where crime and ASB in the previous month is analysed and actions are allocated to officers and partners based on the findings and recommendations. With Probation, it participates in the local Police's daily partnership violence meetings where seriously violent incidents in the previous 24 hours are discussed and appropriate partnership actions agreed in order to reduce harm, safeguard those involved, and reassure the community.

What we will do

Curtail violent acts at source, pursuing perpetrators and enforcing action

1. Focus on the neighbourhoods identified from the Priority Localities Index to collaboratively address the underlying issues linked to crime and ASB
2. Expand the use of data from MPS, London Ambulance Service, London Fire Brigade and A&E and other relevant agencies to identify specific hotspots within those neighbourhoods.
3. Increase micro-patrols focussing on areas with concentrations of high harm crimes involving violence. Other uniformed enforcement strands of the partnership will support this action.
4. Use enforcement resources to target areas of high crime and ASB and offenders, including CCTV, Rapid Deployment Cameras and Enforcement Officers
5. Invite and form a partnership with the British Transport Police to address the underlying issues of crime and enforcement in relevant high priority neighbourhoods.
6. Where possible, conduct Randomised Controlled Trials (RCTs) to determine "what works" in regards to interventions.

Treat those who have been exposed to violence to control the spread

7. Use crime harm as a measure to identify suspects and victims of serious crimes in order to focus resources intensively to reduce further serious risk in the borough.
8. Develop and expand fortnightly working groups to organise a partnership approach in high priority neighbourhoods for tackling issues highlighted by partners' intelligence.

Support those susceptible to violence due to their exposure to risk factors

9. Develop and implement crime and safety prevention initiatives to minimise the frequency and impact of critical and major incidents that require a coordinated emergency response as required by the Civil Contingencies Act 2004 and London Emergency Services Liaison Panel Procedures
10. Focus and maintain the Change Grow Live service for those neighbourhoods that have high rates of alcohol and substance misuse

Strengthen community resilience through a universal approach

11. Engage communities in targeted neighbourhoods with messages that inform them of services that will protect them, help them feel safer, and promote civic pride.
12. Establish ways to improve neighbourhood cohesion in areas identified by the Priority Localities Index where this may have deteriorated.
13. Engage with VCS partners who are delivering programmes in the areas identified

How we will we know our actions have been effective

- Statistics on crime, ASB and other indicators.
- Where working groups have been active in a specific neighbourhood, a comprehensive assessment including a before/after comparison of the treatment area compared to a control area.
- An annual survey provided to the community on crime and ASB and other related issues.

Glossary

Adults Safeguarding Board

The Croydon Safeguarding Adults Board (CSAB) following the Care Act is now a statutory body with the following functions:

- Assure itself that local safeguarding arrangements are in place as defined by the Care Act
- Prevent abuse and neglect where possible
- Provide a timely and proportionate response when abuse or neglect has occurred.
- The SAB must take the lead for adult safeguarding across its locality and oversee and co-ordinate the effectiveness of the safeguarding work of its member and partner agencies. It must also concern itself with a range of matters which can contribute to the prevention of abuse and neglect such as the:
 - Safety of patients in local health services
 - Quality of local care and support services
 - Effectiveness of prisons in safeguarding offenders

The Board fully supports work on such priorities as hate crime and domestic abuse and is a part of the cross-cutting domestic abuse group. Other areas of importance to the Board include work on the Prevent programme, a national counter-radicalisation strategy.

Channel Panel

Channel is an early intervention multi-agency panel designed to safeguard vulnerable individuals from being drawn into extremist or terrorist behaviour.

The Croydon Resilience Forum (CRF)

The Council runs the CRF in order to have an integrated approach to emergency response and management for the borough. Membership includes emergency planning officers and representatives of sectors with a role in emergency preparedness and response, including local authority, health, police, fire, utility, environment, voluntary, community, faith, business, and transport.

Community Trigger

This is a process used by members of the community to ask the Council, the Police or a relevant housing association to tackle persistent anti-social behaviour (ASB). They may do this after reporting three separate incidents of ASB to the Council, the Police or the housing association in the previous six months.

Croydon Safeguarding Children Partnership (CSCP)

The CSCP is responsible for scrutinising safeguarding arrangements across the borough. The CSCP is an independent body and challenges and holds to account the organisations working with children and young people in Croydon. The Children and Families Partnership and the CSCP work together to ensure that children and young people in Croydon are safe.

Complex Adolescents Panel (CAP)

The CAP is a multi-agency panel (incorporating MACE) which hears individual cases for children and young people who have been assessed as having a child exploitation episode to enable practitioners to share information, gather intelligence and help to determine the best way to manage the risk presented.

Domestic Abuse and Sexual Violence Group (DASV)

This group exists to have a strategic oversight of multi-agency responses to domestic abuse within Croydon, working in partnership to provide scrutiny to progress on the delivery of the DASV strategy and ensure the multi-agency management of domestic abuse is victim focused, efficient and effective.

The group brings together managers from key agencies and services whose remit has a direct impact on the domestic abuse and sexual violence strategy. Members are committed to effective partnership working based on trust and open communication and are aware of and understand the organisational frameworks within which colleagues in different agencies work.

Gangs and Serious Youth Violence Group

Oversees the strategic delivery of the multi-agency response to tackling Serious Youth Violence and Gangs. This group also led on the VRU's Local Violence and Vulnerability Action Plans.

Integrated Offender Management Group

A multi-agency response to reduce re-offending; by targeting the most problematic offenders in the borough. The IOM framework helps to address the problems behind an offender's behaviour by effective information sharing across a range of partner agencies and jointly providing the right intervention at the right time.

Joint Action Group (JAG)

The JAG is a multi-agency problem solving group tackling anti-social behaviour. Member agencies include, Police Neighbourhood Cluster Inspectors, Youth Offending Services, Youth Outreach, Substance Misuse Outreach Services (for individuals displaying anti-social behaviour linked to alcohol and/or substance misuse) Croydon Connected (multi-agency gang team) Environmental Health

Teams, Council and Police ASB Team, Safer Transport Teams, Fire Service, UK Border Agency and Neighbourhood Watch.

Each problem location identified is dealt with by a dedicated team responsible for pulling together short term action plans based on problem solving techniques. These are monitored by the JAG and the Police Borough Tasking Group. On-going hot spot areas, for example the Town Centre, remain as core agenda items.

Multi Agency Public Protection Arrangements (MAPPA)

A Multi-agency meeting to manage the most serious offenders

PREVENT Strategy

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The Home Office works with local authorities and a wide range of government departments, and community organisations to deliver the Prevent Strategy.

The Prevent Strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
- provides practical help to prevent individuals from being drawn into terrorism and ensure they are given appropriate advice and support
- works with a wide range of institutions (including education, statutory services charities, online and health) where there are risks of radicalisation that we need to deal with.

You can [read the Prevent Duty Guidance for England and Wales on GOV.UK](#).

The Prevent team delivers work including:

- training for frontline staff in recognising, referring and responding to radicalisation
- projects to build capacity, increase resilience and improve understanding of extremism and radicalisation with partners such as schools, colleges, frontline staff, community groups, venues and parents
- Channel, a referral service for concerns, which acts as an early intervention service to safeguard vulnerable individuals from radicalisation.

PREVENT Board

To act as a strategic group in the identification of priorities which are in-line with the national priorities as outlined in the Prevent Strategy:

1. Working with vulnerable individuals,
2. Working with vulnerable institutions;
3. Challenging extremist ideology. This includes being responsible for the governance and scrutiny of Prevent's Channel panel.

Risk and Vulnerability Management Panel (RVMP)

The RVMP is a meeting where information is shared on complex/high risk cases between various stakeholders. The purpose of the meeting is to work together to take appropriate action to prevent people with vulnerabilities being a victim and or perpetrator of crime and or ASB.

Violence against Women and Girls Forum

Quarterly forums to support VCS and grassroots organisations that provide support for victim/survivors of domestic abuse. Support with access to funding, share practice/trends. Organisations: Anos, BCWA, Lioness Circle, ARC, Hersana, Anima Youth, Cassandra Learning Centre, BME Forum, Encouraging Her, Walk With Me, Hestia

Youth Crime Board

The Youth Crime and Safety Board has a dual role in acting as the statutory governance board for the Youth Offending Service as well as the strategic board overseeing the delivery of the Youth Crime prevention Plan requires a partnership approach to ensure preventative measures are put into place across all partner agencies. It includes key statutory partners with a number of different council teams involved as well as representation from the voluntary and community sector.



Violence Reduction Network

Strategic Assessment 2022

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Executive Summary

Year-on-year comparison

In the aftermath of the Covid-19 pandemic and the removal of government-imposed restrictions placed on society as a result, it should be of no surprise that there has been a 7% increase in crime in the borough in 2021/22 compared to the year before (2020/21). The London average* saw a 12% increase. However, the number of offences committed in the borough for that year (2021/22) is the second highest over the last five years. Violence remains to be the main contributor to this increase in crime volume, representing a third of all offences this year.

Crime harm (refer to page 6 for definition) is also of concern in the borough with an 8% increase in 2021/22 compared to the year before (2020/21) and it also reaching its second highest level over the last five years (2017-2022). Not only is this because of the rise in sexual harm but the significant continual increase in violent harm in the borough over the last three years (2019-2022). This has resulted in violent crime going from representing a quarter to just under a third of all harm – almost as equal to sexual offences which on average represents a third of all harm each year but a relatively lower proportion of all crime volume at around 3%.

Crime Types

There has also been a significant increase in hate crime (refer to page 13), which requires greater in-depth analysis. In regards to knife crime, there has been continual reduction in knife injuries but knife crime volume is being driven by a considerable rise in knife-enabled robbery.

Both violence with injury (VWI) and violence without injury (VWol) have substantially increased in the borough. This is due to an increase in both domestic-related and non-domestic-related violence. For VWol offences, there have been significant increases in malicious communications with intent to cause distress and anxiety, especially during the Covid-19 pandemic. However, there has also been notable increases in relatively “low volume” crime types including threats to kill, stalking and cruelty to and neglect of children.

The continual increase in violent harm is mainly due to the increase in VWI both domestically and non-domestically. The analysis done specifically on “street-based” violence shows that this type of violence was at its highest in 2021/22 over the last five years.

*This is the average London borough out of all 32 boroughs.

Executive Summary

Area-based

Violence is highly concentrated in specific “micro-areas” in the borough, with 2% of the borough containing/responsible for over a third of all violent crime volume and over three quarters of all violent harm. The occurrence of violence in most of these areas is stable over a long period. It is these areas the Safer Croydon Partnership should focus on to effectively reduce violence as stated in the Community Safety Strategy.

Victims

Even though almost 60% of victims of violence were less than a mile from their home, the number of victims travelling from outside of the borough is growing. The average miles travelled by victims, especially those aged 10 to 17, is also growing where in 2021/22 those in this age group also suffered the highest amount of harm compared to what they suffered the four years before. This is due to both a rise in both domestic and street-based harm towards this age group.

Using a specific “2 x 2” model to identify and prioritise victims of violence (refer to page 34), it shows that it is a small proportion of victims of violent crime who suffer the majority of harm. The rise of violent harm, especially towards females, is of significant concern where it is increasing by almost a fifth on average each year over the last four years. This is due to the rise in domestic violence and the rise of street-based violence towards females.

Offenders

Using the 2 x 2 model shows that violent offenders are more random compared to victims. However, this could be because of a number of factors including the reluctance of the victim to cooperate in order to charge the offender, this is not just limited to domestic violence but the fear of reprisals from victims in regards to street-based violence too. Even though males continue to make up the overwhelming majority of offenders as well as the amount of harm committed, there are significant increases in both volume and harm committed by female offenders.

Victim-Offenders

The analysis demonstrated on the effectiveness of targeting the “victim-offender” is also hugely beneficial to the borough (refer to page 42). These individuals make up 4% of all individuals compared to 84% of victims and 16% of offenders but are involved in almost three times the number of offences per person. On top of this, they are involved in almost five times the amount of harm as victims and almost three times the amount of harm as offenders. It is the victim-offenders that have a predominant role in all crime in the borough.

Executive Summary

The Underlying Causes of Violence

To tackle the underlying causes of violence, the borough's Priority Localities Index identifying the nine priority neighbourhoods in Croydon (refer to page 45), continues to be of vital importance. On top of this, the recent implementation of Risk Terrain Modelling in the VRN (refer to page 46) to evaluate the features of the environment of particular areas which contain a high concentration of violence is to be expanded to priority areas of violence. This is to ensure there is a balance of focusing on places as well as people.

Public Transport

Analysis done by using RTM showed bus stops being the top "risk factor" in street-based violence in the borough. This is in accordance with public surveys conducted last year, especially on women and girls and their safety in the borough which highlighted bus stops to be the place they felt most unsafe. Young people also listed "public transport" as the third highest place they feel unsafe on.

Alcohol and Substance Misuse

The analysis conducted using RTM also identified alcohol and substance misuse related factors as high risk in regards to fuelling violence in the borough.

Executive Summary

From the analysis conducted in this document, the following recommendations are:

1. To write a **problem profile on Violence Against Women and Girls (VAWG)** in the borough which will feed into the VAWG strategy. This is not only to cover both domestic and non-domestic violence and sexual offences but other specific offences which have seen notable increases including stalking, threats to kill and malicious communications.
2. To evaluate and target **“high volume high harm” micro-areas** of violence using Risk Terrain Modelling so appropriate short, medium and long-term interventions can be implemented.
3. To investigate further into the **rise in victims travelling from outside of the borough** and to work with the relevant authorities in those areas to protect potential victims who are travelling from there.
To explore and utilise the “2 x 2” model to **prioritise appropriate interventions for individuals involved in violence.**
4. To further explore the concept of **“victim-offenders”** so that intensive long-term provision can be provided to significantly reduce all crime in the borough, not just violence.
6. To further utilise **alcohol and substance misuse service provision.**
7. To have a greater focus on **public transport in the borough**, especially around bus stops which have been identified as a high risk factor for violence.
8. To further investigate **cruelty and neglect of children**, which has seen a small but significant increase in the borough.
9. With the increase in knife crime being driven by **knife-enabled robbery**, this is to be a priority for the next 12 months.

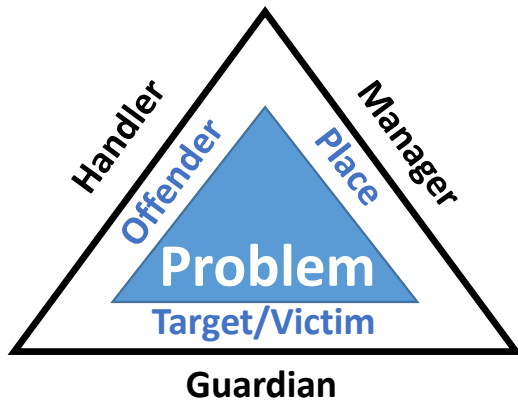
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Introduction

- The Strategic Assessment is an analytical product, which gives an overview of the current and long-term issues affecting or likely to affect a specific area in regards to crime and anti-social behaviour (ASB)*.
 - It is used to make inferences and provide recommendations for prevention, intelligence, enforcement and reassurance priorities as well as the future partnership strategy.
 - It provides direction for the Safer Croydon Partnership in deploying resources efficiently to reduce crime and ASB in the borough.
 - The analysis is based on the **problem-oriented approach**, highlighted below, which views crime as a “problem” and not an individual incident and, therefore, the focus should be on the underlying causes of those problems and how to tackle them.
 - The problem-oriented approach is based on the routine activity theory that in order for crime to occur, three components are required: an offender to be present, a victim or target to be present and the absence of a suitable guardian. As well as this there is also the absence of two other “controllers” – for offenders these are known “handlers” (e.g. parents or teachers) and for the place this is known as the manager or place management which can be a person (e.g. a police officer) or better place management approaches (e.g. CCTV installation).
- To ensure the analysis is conducted thoroughly, it is done in accordance with what is known as the “5WH”, highlighted below.
The crime data in this document covers the last five financial years up to the end of 2021/22.

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A “problem-oriented” approach



The “5WH”

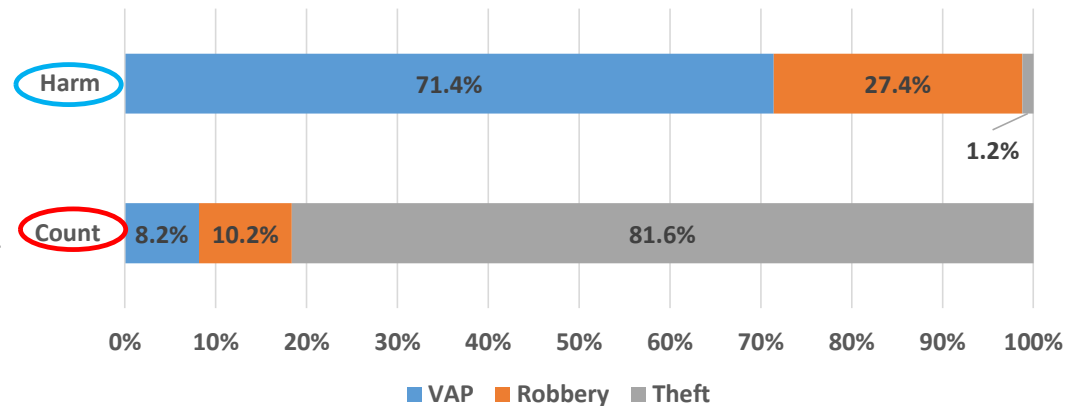
What is the Problem?	
Who is involved?	
When is it happening?	
Where is it happening?	
Why is it happening?	
How is it happening?	

*This year’s strategic assessment does not have a greater focus on ASB compared to previous ones for two main reasons. Firstly, the majority of covid-19 related calls (e.g. lack of social distancing, mask-wearing etc.) were recorded by the police as ASB calls so they have significantly distorted the statistics. Secondly, the analysis conducted in this document on hotspots etc. largely reflects ASB in the borough.

Measuring by Crime Harm

- Along with measuring by the count of offences (also known as the “volume” of offences), the Violence Reduction Network (VRN) also measures crime by harm using the Cambridge Crime Harm Index (CCHI).
- The CCHI is based on the principle that not all crimes are equal.
- Summing up all crimes by the count of offences only and measuring performance this way can be very misleading.
- Crime count means 1x shoplifting offence is as serious as 1x Grievous Bodily Harm (GBH).
- This leaves a demand for a meaningful measure of how harmful a crime is relative to other crimes.
- Multiplying each crime event in each crime category by the number of days in prison that crime of that category would attract if one offender were to be convicted of committing (not taking into account criminal history).
- This provides a weighted score which greater reflects the severity of the different types of crime.

Violence Against the Person (VAP)	Count	Harm Score
1x GBH with Intent	1	1460
1x Attempted Murder	1	3285
1x ABH	1	10
1x Common Assault	1	1
Total	4	4756
Robbery	Count	Harm Score
3x Personal Robbery	3	1095
2x Business Robbery	2	730
Total	5	1825
Theft	Count	Harm Score
40x Shoplifting	40	80
Total	40	80



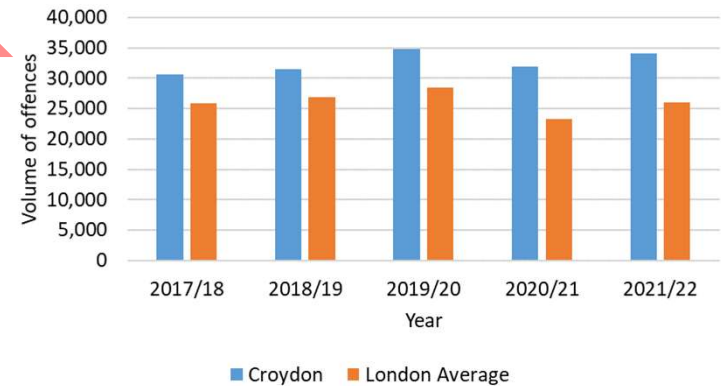
What is the problem?

The volume of crime in Croydon

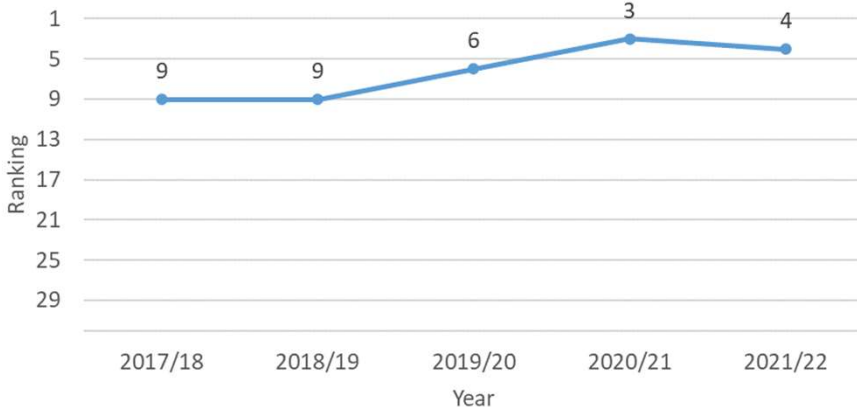
- In 2021/22 there were 34,043 offences committed in Croydon. This is a 7% increase in crime compared to the year before. The London average* saw a 12% increase.
- However, the increases are partly due to in the year before (2020/21), where there was a national and city-wide decrease in crime which is due to the Covid-19 pandemic and the subsequent government-imposed restrictions on people's everyday lives.
- 2021/22 was the second highest year in the last five years for the volume of offences in Croydon, whereas for the London average it was the third highest.

7%
Increase
in crime
volume in
Croydon
in
2021/22

Crime volume in Croydon and the London Average in the last five years



Croydon ranking for crime volume out of 32 London boroughs in the last five years



- Comparing 2021/22 to the pre-covid year (2019/20)** the last full year without imposed restrictions, there was a 2% decrease in crime in Croydon compared to 9% decrease in London.
- Over the last five years, 2020/21 Croydon was ranked third highest borough in London for volume of offences in London, which was its highest ranking over the last five years.
- In 2021/22, the borough reached its second highest ranking in the last five years by being the borough with the fourth highest volume of offences in London.

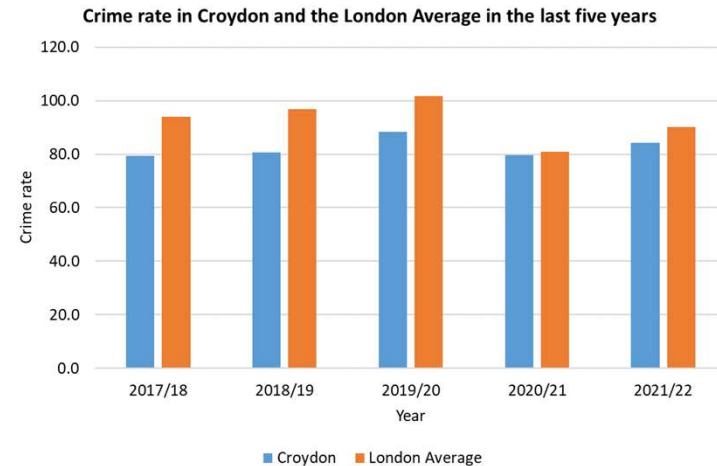
*This is the average London borough out of all 32 boroughs.

**The first lockdown was announced on 23rd March 2020 but as this was the last week of the financial year, 2019/20 is still referred to as the "pre-covid year".

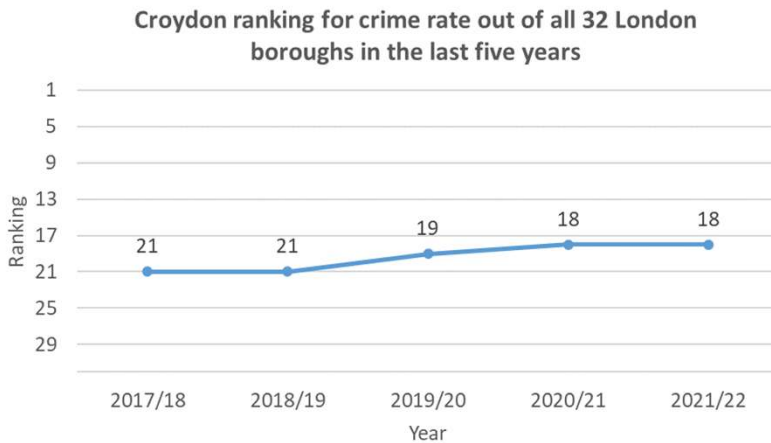
The crime rate in Croydon

- According to housing-led projection by the Greater London Authority*, in 2022 Croydon has the highest resident population in London. Therefore, it is more accurate to look at the crime rate (volume of offences per 1,000 of the population) in the borough.
- In 2021/22 the crime rate in Croydon was 84.4, which was a 6% increase in the crime rate on the previous year compared to a crime rate of 90.2 for the London average, which was an 11% increase on the previous year.
- 2021/22 was the second highest year in the last five years for the crime rate in Croydon, whereas for the London average it was the fourth highest.

6%
Increase in the crime rate in Croydon in 2021/22



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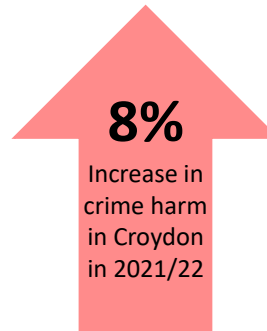


- Comparing 2021/22 to the pre-covid year (2019/20), there was a 4% decrease in crime compared to an 11% decrease in London.
- Croydon's crime rate ranking is significantly lower than its volume ranking, where it has been ranked 18th highest in the last two years. However, this is still the highest crime rate ranking in the last five years.
- The crime rate in Croydon is getting closer to the London average in the last two years. In the first three years of the five year period, the gap between the two rates was at 18%. However, in the last two years this has reduced to 4%.

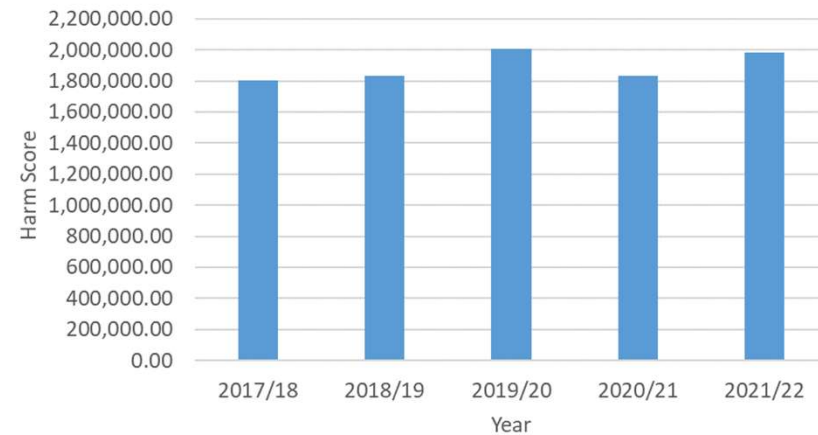
*Housing-led resident population projections can be found here: [GLA Population Projections \(london.gov.uk\)](https://www.london.gov.uk/what-we-do/our-services/population)

Crime harm in Croydon

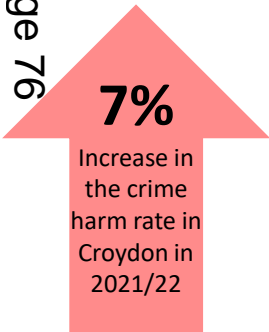
- Due to data collection restrictions, crime harm can only be calculated for Croydon.
- In 2021/22, crime harm was at its second highest it has been in the last five years in the borough.
- By comparing 2021/22 to the year before, crime harm has increased by 8%.
- However, by comparing 2021/22 to the pre-covid year (2019/20), crime harm has reduced by 1%.



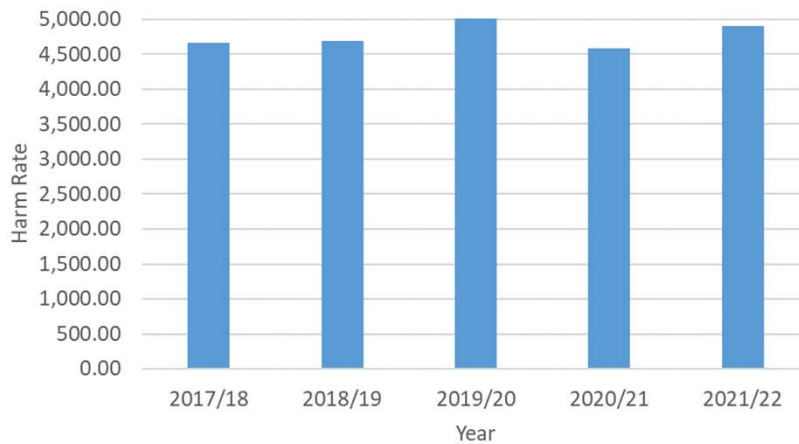
Crime harm in Croydon in the last five years



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Crime harm rate in Croydon in the last five years

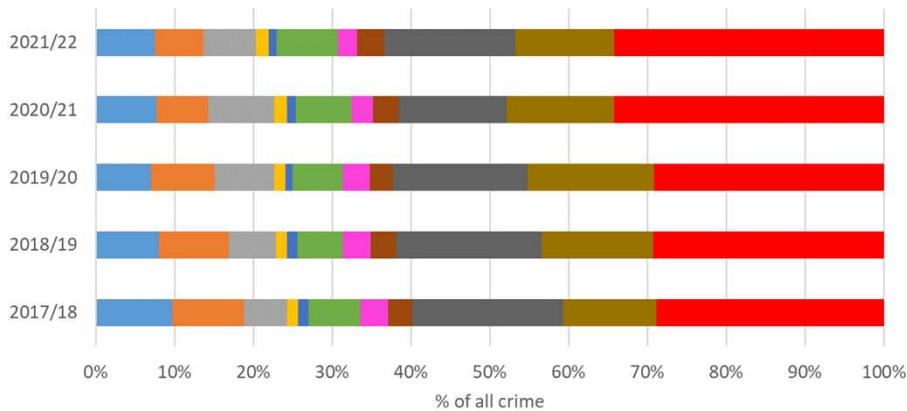


- The pattern of the crime harm rate in the borough closely reflects the volume of crime harm with 2021/22 being the second highest year in the last five years.
- By comparing 2021/22 to the year before, the crime harm rate has increased by 7%.
- However, by comparing 2021/22 to the pre-covid year (2019/20) the crime harm rate has reduced by 4%.

What is driving up crime volume in Croydon?

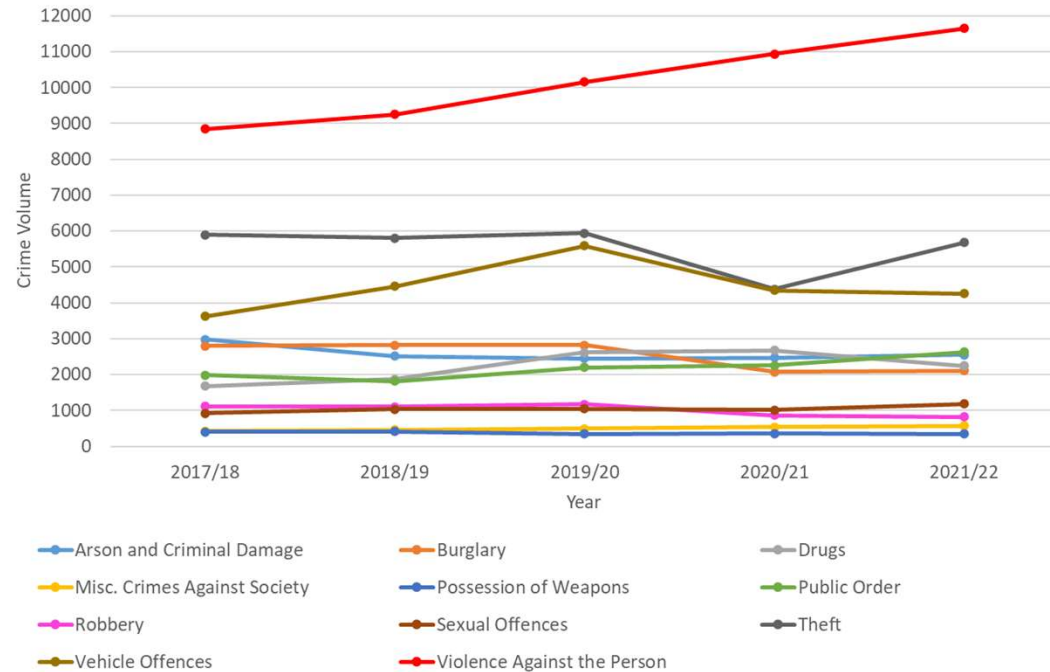
- Violence Against the Person (VAP) is the main driver for the rise in crime volume in the borough.
- Violence has increased consecutively over the last four years in Croydon.
- Over this time period, the average annual growth rate of the volume of VAP offences in the borough is 7%. For London it is 5%.

Proportion of crime volume in Croydon by type in the last five years



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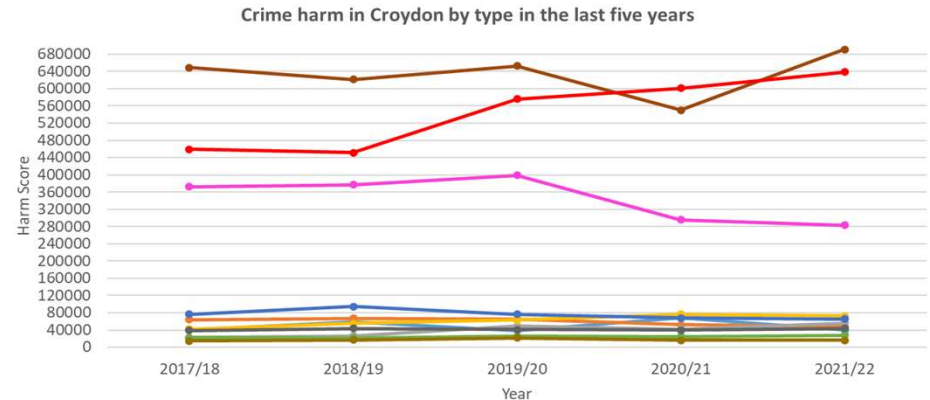
Volume of crime in Croydon by type in the last five years



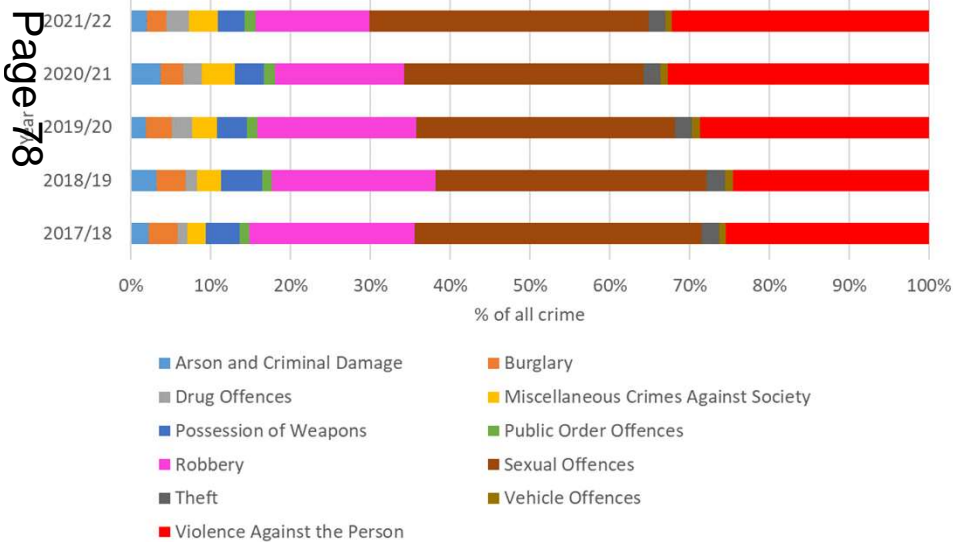
- Where the proportion of crime volume attributed to each crime type has remained stable over the last five years, VAP is the only crime type which has significantly increased its proportion over the last two years from 29% to 34%.

What is driving up crime harm in Croydon?

- Sexual offences are the main driver for crime harm in the borough closely followed by violence.
- Violent harm has increased consecutively over the last three years in Croydon.
- 2021/22 was the year where both sexual harm and violent harm was at its highest in the borough in the last five years.
- On average, sexual harm represents a third of all harm each year.



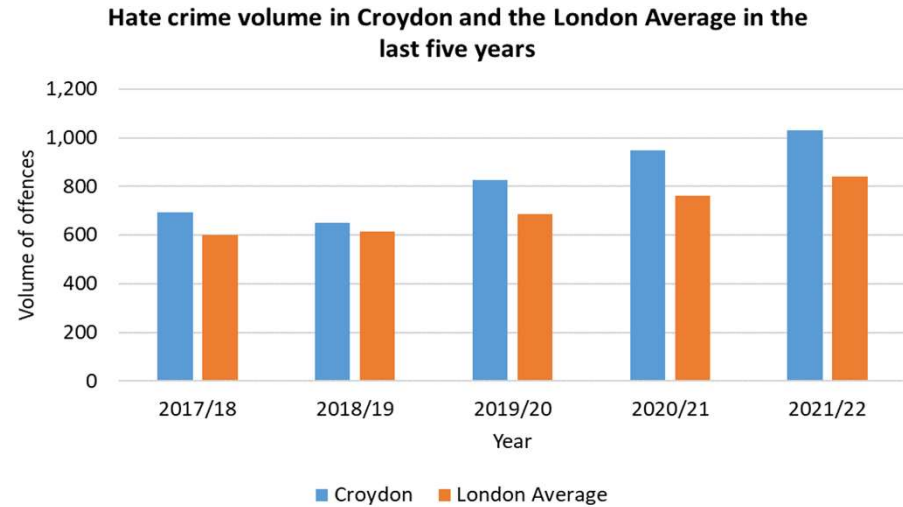
Proportion of crime harm in Croydon by type in the last five years



- Over the last five years, the proportion of all harm which is violent has increased steadily from representing a quarter to now representing just under a third of all harm.
- Due to the complex nature of the crime and separate detailed analysis being undertaken for the borough's Violence Against Women and Girls Strategy, further analysis of sexual offences will not be included in this document.

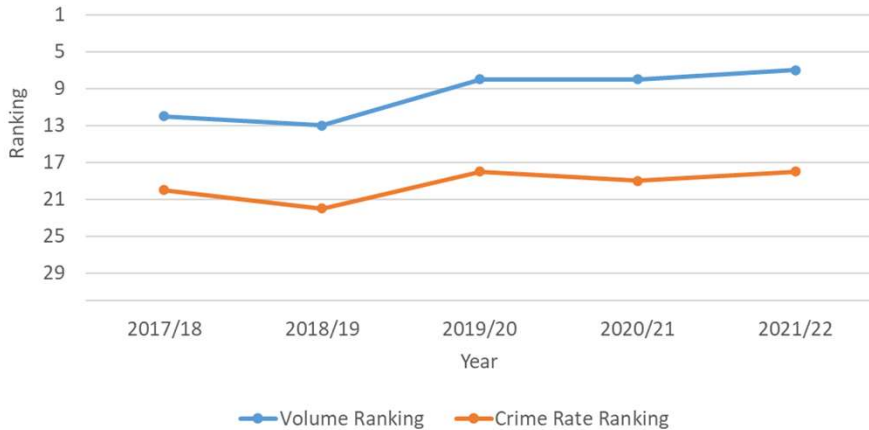
What about hate crime in Croydon?

- One of the priorities of past and present community safety strategies in Croydon is the focus on reducing hate crime, therefore, it is of vital importance to firstly identify the levels and types of hate crime in the borough.
- Hate crime has gone up both in Croydon and London for three consecutive years. In 2021/22 hate crime went up by 9% in Croydon whereas the London Average saw an increase of 11%.
- By comparing 2021/22 to the pre-covid year (2019/20), hate crime has increased by a quarter for both Croydon and the London Average.



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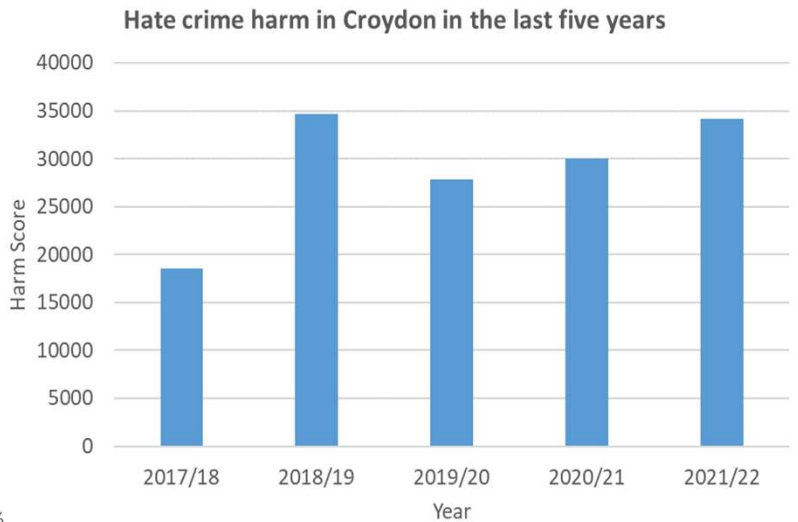
Croydon ranking for hate crime volume and crime rate out of 32 boroughs in the last five years



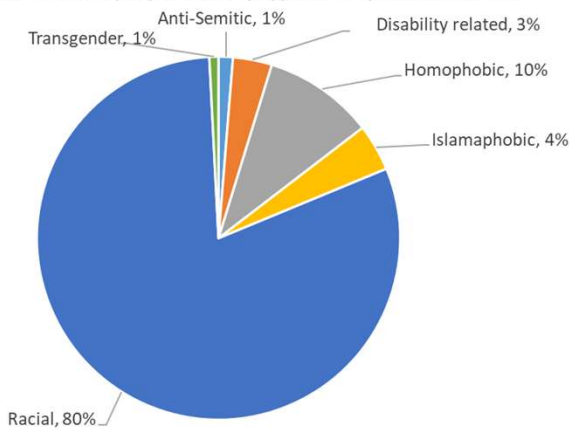
- The hate crime rate follows a similar pattern to what is shown for hate crime volume.
- In 2021/22, Croydon's hate crime volume ranking was at its highest in the last five years at 7th across London
- For the hate crime rate, Croydon's ranking was at its joint highest in 2021/22 along with the pre-covid year (2019/20) at 18th across London.

What about hate crime in Croydon (cont.)?

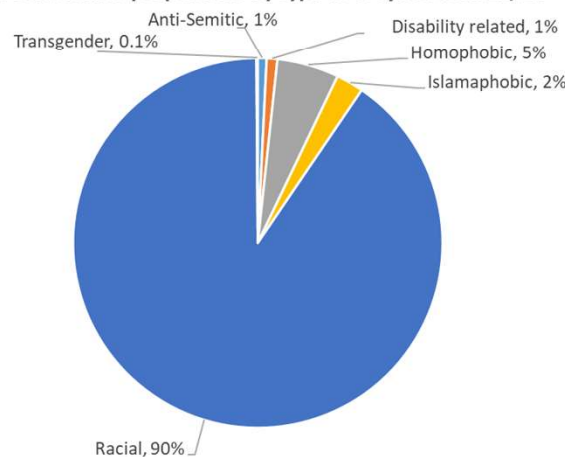
- Hate crime harm in the borough has gone up consecutively in the last three years where it has reached its second highest in the last five years.
- In 2021/22 hate crime harm went up by 14% in Croydon and compared to the pre-covid year (2019/20) it has gone up by 23%.
- On average each year, the main crime type of hate crime which is committed are public order offences with almost 60% of crimes being of this category.
- The second highest proportion are violence against the person offences which, on average each year, just over a third of offences being of this category.



Hate crime volume proportions by type in Croydon in 2021/22*



Hate crime harm proportions by type in Croydon in 2021/22



- Racial hate crime made up 80% of hate crime volume in Croydon in 2021/22. The second highest proportion is homophobic hate crime, making up 10% of all volume.
- Racial hate crime made up 90% of harm in Croydon in 2021/22, followed by homophobic hate crime with 5%.

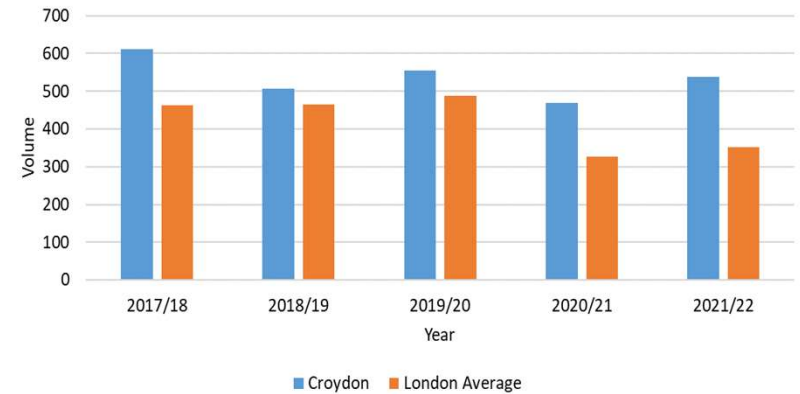
*As highlighted by the Metropolitan Police, hate crime types can “overlap”, therefore, these proportions should be treated as indicative only.

What about knife crime in Croydon?

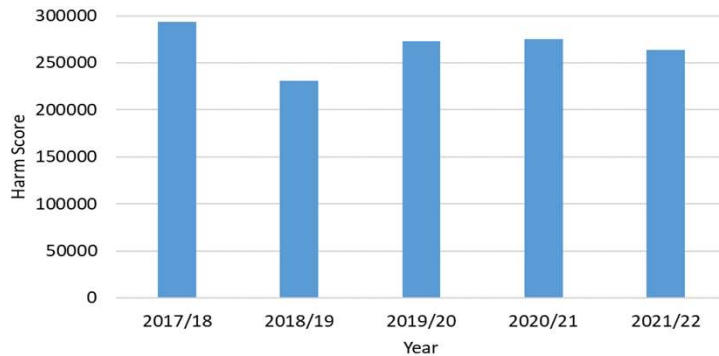
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- There is a large public focus on knife crime in London and particularly Croydon which had the highest number of teenage knife-related murders in London during 2021 (five out of 30 murders) and being referred to as “London’s knife crime capital”.
- Knife crime in Croydon went up by 14% in 2021/22 (compared to 7% for the London average). In regards to volume, Croydon it is ranked 5th highest in London – the highest it’s been in five years.
- Knife-enabled robbery (excluding domestic abuse) is predominantly driving up knife crime volume in the borough in 2021/22 with an increase of 27% compared to the year before.
- The knife crime rate shows a similar pattern but with a ranking of 12th across London in 2021/22 – still the highest rate in the last five years.
- Knife crime harm has decreased consecutively in the last two years where in 2021/22 it was at its second lowest in the last five years.
- In 2021/22 knife crime harm decreased by 4% and compared to 2019/20 it has decreased by 3%.
- Knife injuries from London Ambulance and A&E attendances for knife/sharp injuries both show a decrease for the last two consecutive years. In 2021/22 LAS callouts were the lowest in five years and the third lowest for A&E attendances.
- In 2021/22 LAS callouts fell by 26% compared to the year before and by 27% compared to 2019/20.
- In 2021/22 A&E attendances fell by 31% compared to the year before and by 41% compared to 2019/20.

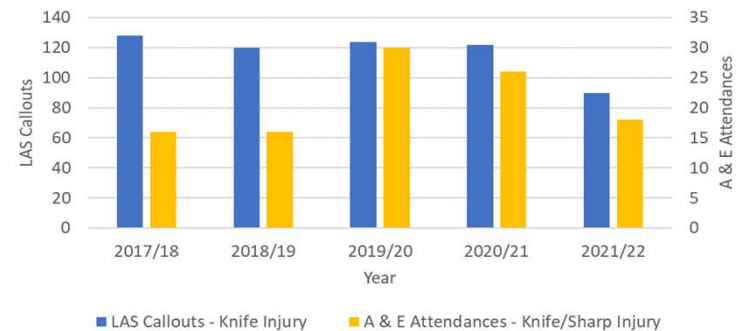
Volume of knife crime offences in Croydon and the London Average in the last five years



Knife Crime harm in Croydon in the last five years



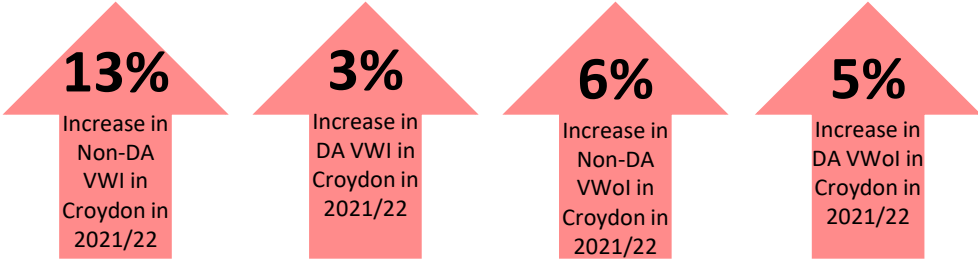
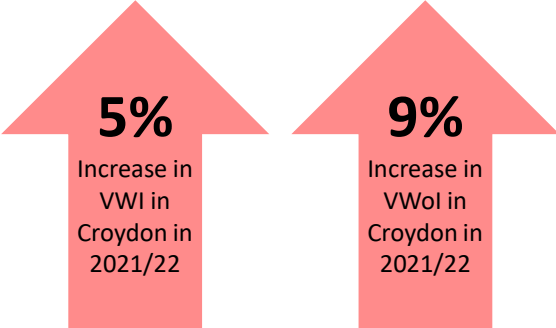
Knife-related LAS Callouts and A&E Attendances in Croydon in the last five years



How is it happening?

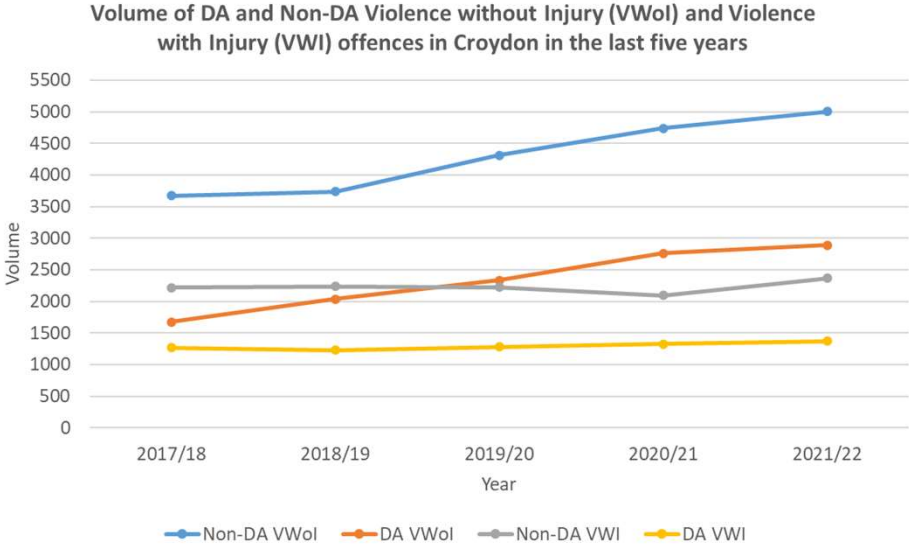
How is the volume of violence going up in Croydon?

- There are three main categories under VAP: Homicide*, Violence without Injury (VWol) and Violence with Injury (VWI).
- On average each year, around 65% of all VAP offences are VWol.
- In 2021/22, VWI increased by 5% and VWol increased by 9%. Compared to the pre-covid year (2019/20) VWI increased by 7% and VWol increased by 19%.
- Both domestic (DA) and non-domestic (non-DA) VWol offences have significantly increased over the last five years, driving the volume of violence in the borough.
- On average, each year, non-DA VWol represents around 65% of all VWol offences.



- There have been incremental increases in both domestic and non-domestic VWI offences in 2021/22.
- A relatively large 13% increase in non-DA VWI offences in 2021/22 is mainly due to a sudden dip in offences in 2020/21, predominantly due to government restrictions as a result of the Covid-19 pandemic.

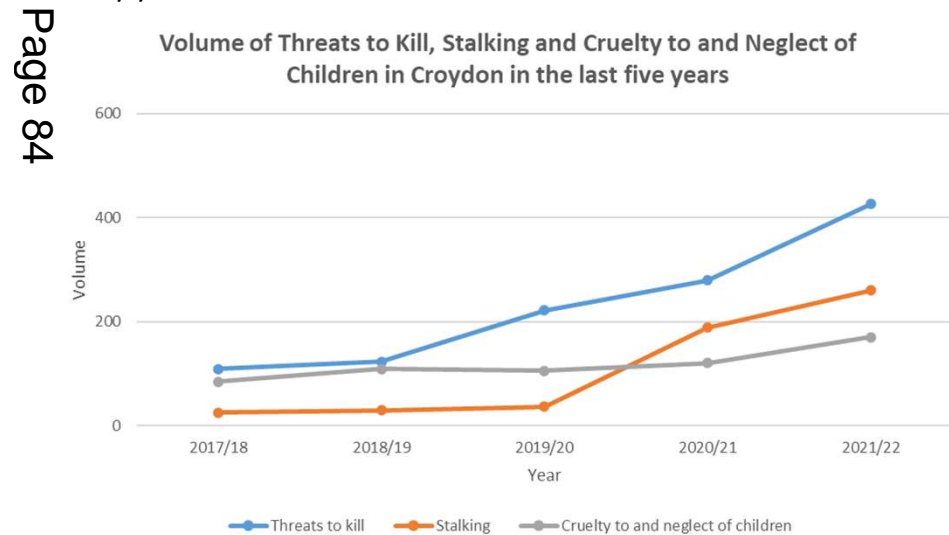
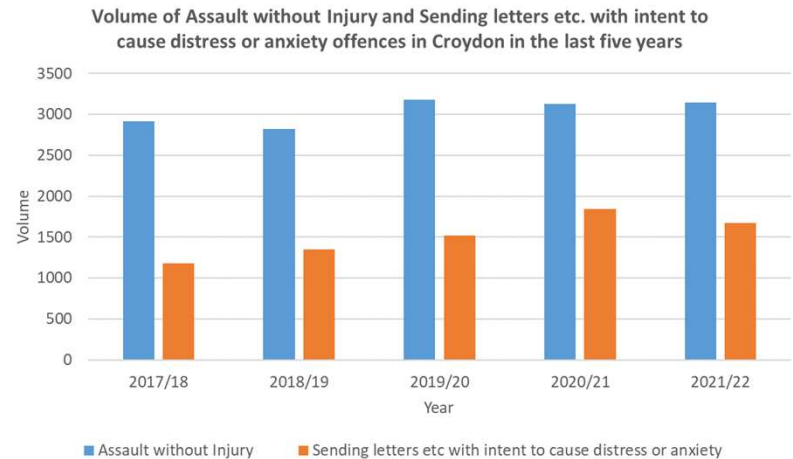
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*Homicides represent on average each year around 0.1% of all VAP offences and 6% of all violent harm in the borough, therefore, as they are relatively low figures they are not shown here.

How is the volume of violence going up in Croydon (cont.)?

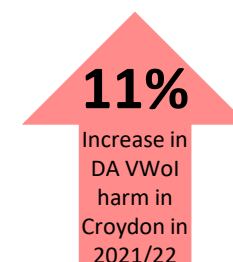
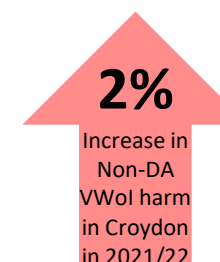
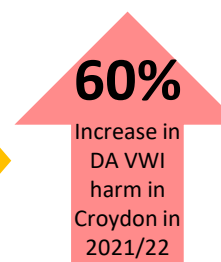
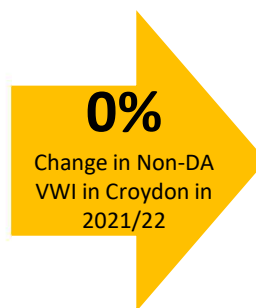
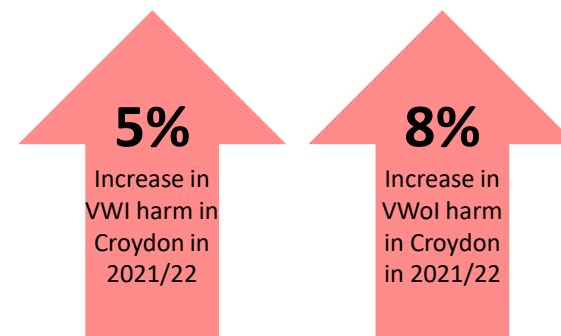
- Assault without injury (which is made up mainly of common assault and ABH) is the main crime committed under VWol, with this offence representing on average around half of all VWol offences each year.
- Assault without injury offences have remained fairly stable over the last three years. Around a third of these offences are flagged as domestic abuse (DA).
- In 2020/21 of the pandemic the crime “sending letters etc. with intent to cause distress and anxiety” (this includes electronic communications) – also referred to as “malicious communications” in this document - increased by 20%. In 2021/22 it decreased by 6% but is still the second highest in five years, representing around a quarter of all VWol offences. Almost half of these offences are domestic-flagged every year.



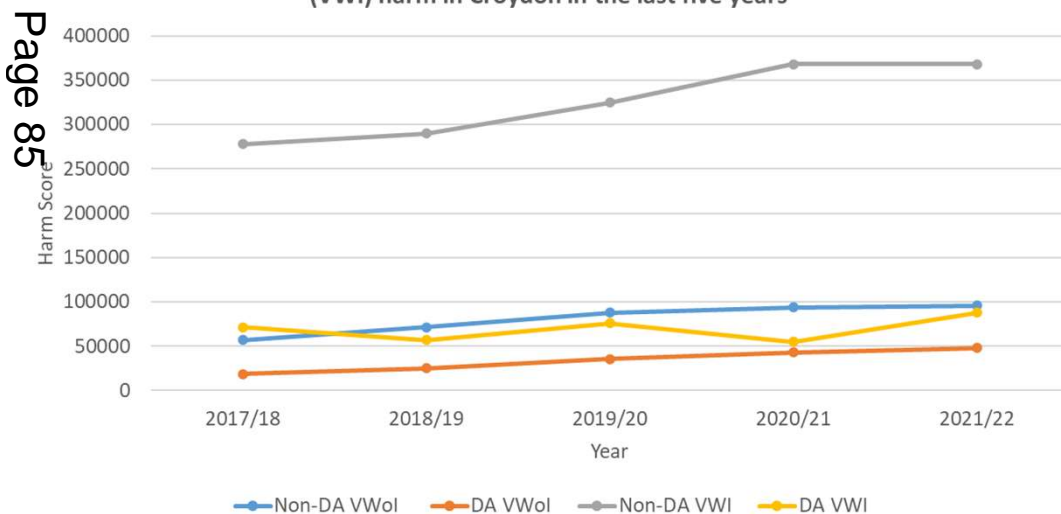
- There are also a number of relatively “low volume” crime types where there have been significant increases.
- There has been a year-on-year increase of Threats to Kill with it going up by 25% during the first year of the pandemic and a further 54% last year. In 2017/18 it represented 2% of all VWol offences where it has continually increased to represent 7% last year. Almost half of offences each year are domestic which is fairly stable.
- Stalking has also seen significant continual increases over the last two years. In the first year of the pandemic it went up over 400% compared to the year before. Last year it went up a further 38%. In 2017/18 it represented only 1% of all VWol offences but in 2021/22 this rose to 4%. In 2017/18 60% of stalking offences were domestic – this has risen to over 80% in 2021/22.
- Cruelty to and neglect of children has also seen year-on-year increases with it going up 14% in the first year of the pandemic and a further 42% in 2021/22. Although it has consistently represented 2% of all VWol offences from 2017/18 to 2019/20, this rose to 3% last year.

How is violent harm going up in Croydon?

- On average each year, around 80% of all VAP harm is VWI.
- In 2021/22, VWI increased by 5% and VWol increased by 8%. Compared to the pre-covid year (2019/20) VWI increased by 16% and VWol increased by 14%.
- On average, every year, over 60% of all violent harm is non-DA VWI.
- Non-DA VWI has significantly increased over the five year period, only stabilising in 2021/22.
- DA VWI has fluctuated over the five period but reached its highest in 2021/22. It represents around 14% of all violent harm each year.



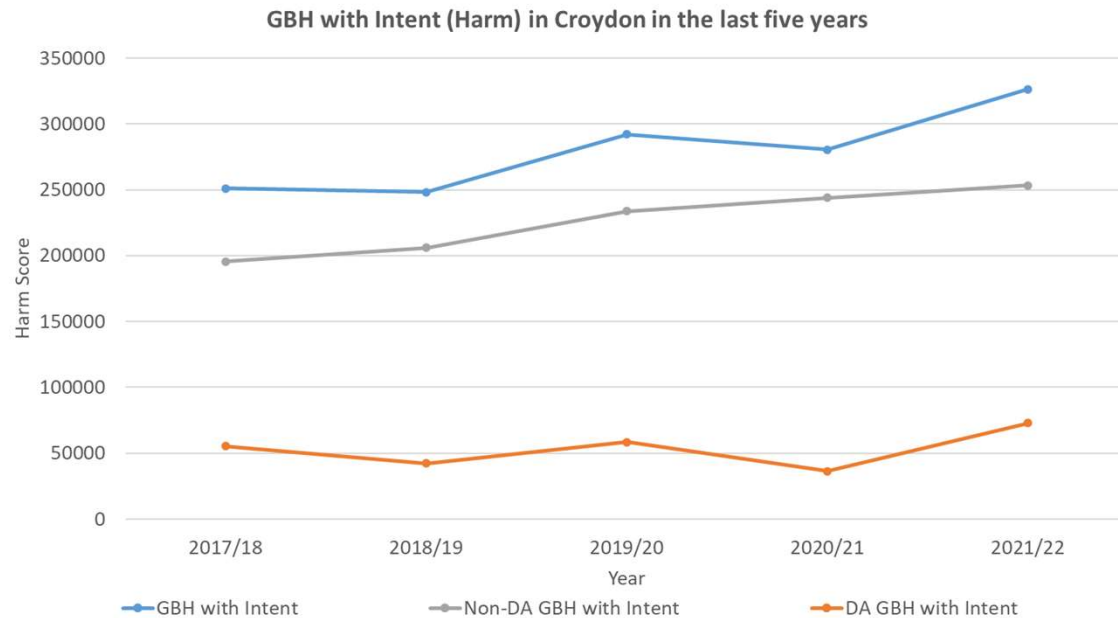
DA and Non-DA Violence without Injury (VWol) and Violence with Injury (VWI) harm in Croydon in the last five years



- Through the constant year-on-year increase in VWol offences, both non-DA and DA harm has almost doubled over the five year period.
- Non-DA VWol represents 16% and DA VWol represents 7% of all violent harm, on average, each year.

How is violent harm going up in Croydon? (cont.)

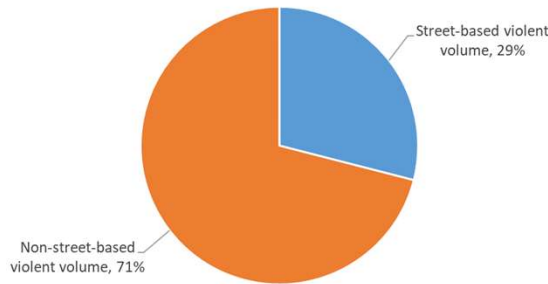
- The offence which on average each year represents just over half of all violent harm is “Grievous Bodily Harm (GBH) with Intent”.
- In 2021/22 harm from this offence increased by 16% compared to the year before. Compared to the pre-covid year (2019/20) it has gone up by 12%.
- Non-DA GBH with Intent has increased year-on-year in the last five years with it up 4% in 2021/22 compared to the year before and up 88% compared to the pre-covid year. On average, it makes up around 80% of GBH with Intent harm.
- DA GBH with Intent has been fairly stable up to 2021/22 where it reached its highest in the five year period after an increase of 100% compared to the year before. Compared to the pre-covid year it has increased by a quarter.



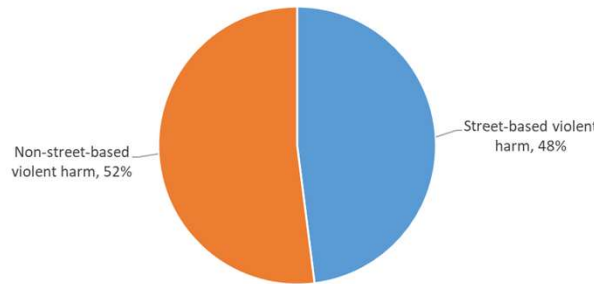
How is street-based violence going up in Croydon?

- Even though official statistics use non-domestic abuse violence with injury as a way to gauge street-based violence, they can still very much include offences which have happened in residential addresses, which still make up a significant proportion of offences.
- To accurately measure the level of street-based offences in the borough, crime data only showing violent offences which can occur in the public domain* is analysed.
- As shown in the top right, street-based violence represents almost a third of violent crime volume and almost half of all violent crime harm.
- As shown on the right, street-based violent crime volume and harm was at it's highest in 2021/22 over the last five years.
- Street-based volume and harm both increased by around a fifth in 2021/22 compared to the year before.
- Compared to the pre-covid year (2019/20), street-based violent crime volume increased by 8% and harm increased by 3%.

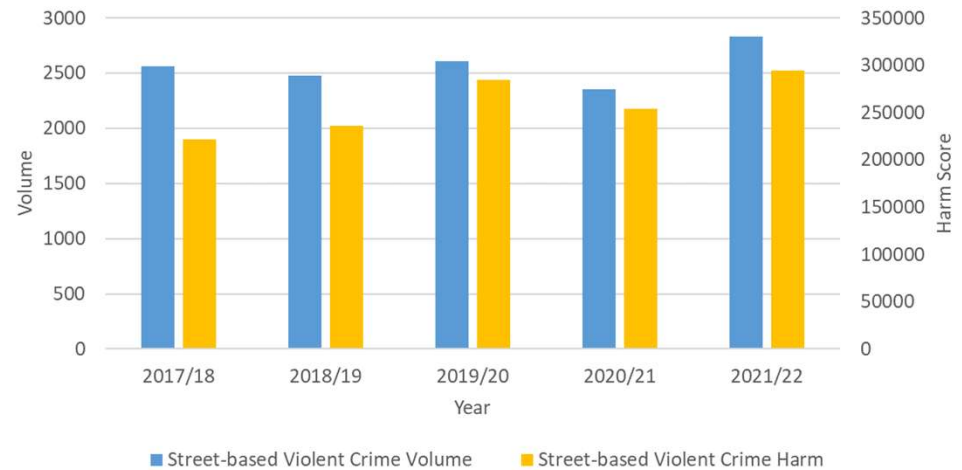
Average proportion of violent crime volume which is street-based and non-street-based each year over the last five years in Croydon



Average proportion of violent crime harm which is street-based and non-street-based each year over the last five years in Croydon



Street-based violent crime volume and harm in Croydon each year over the last five years

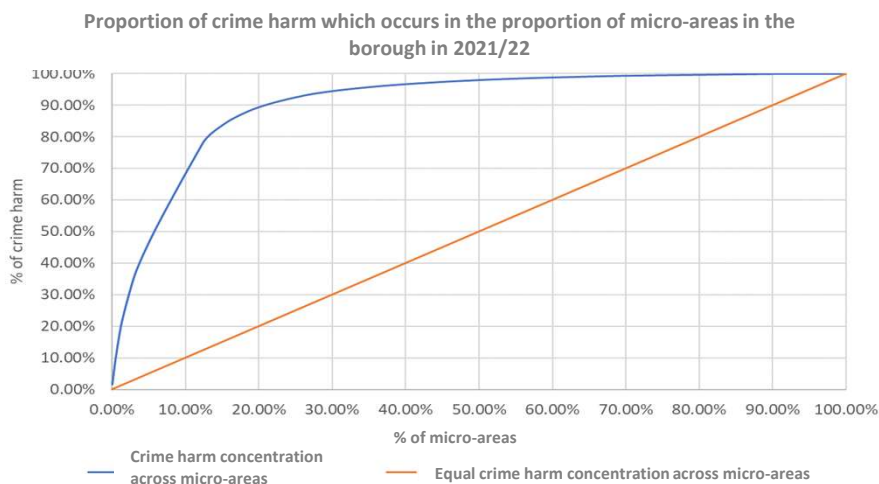
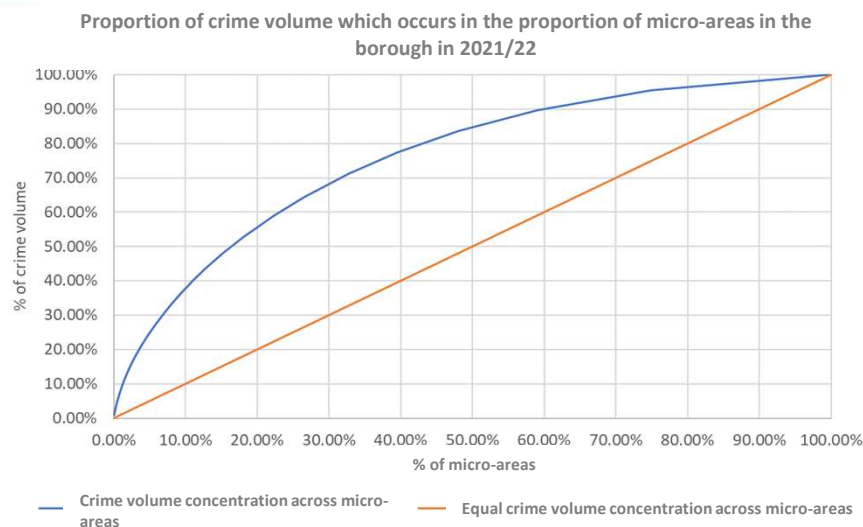


*These range from offences on the street to those in shops, parks and public transport. It must be noted that these statistics should not be used as "official" statistics but more of an indicator of the level of street-based violence in the borough.

Where is the problem?

Violent crime concentration by micro-area

- It must be emphasised that crime does not occur in random places or is evenly spread across the borough but rather it is highly concentrated in specific areas, even to a “micro” level.
- To show this, Croydon is equally divided up into micro-areas* which are around 150 metres long. A total of 3,617 micro-areas cover Croydon. Out of these, 47% had at least one violent crime committed in them in 2021/22.
- However, as shown on the right, out of those micro-areas where a crime was committed, around 10% of them contained almost 40% of the volume of crime committed.

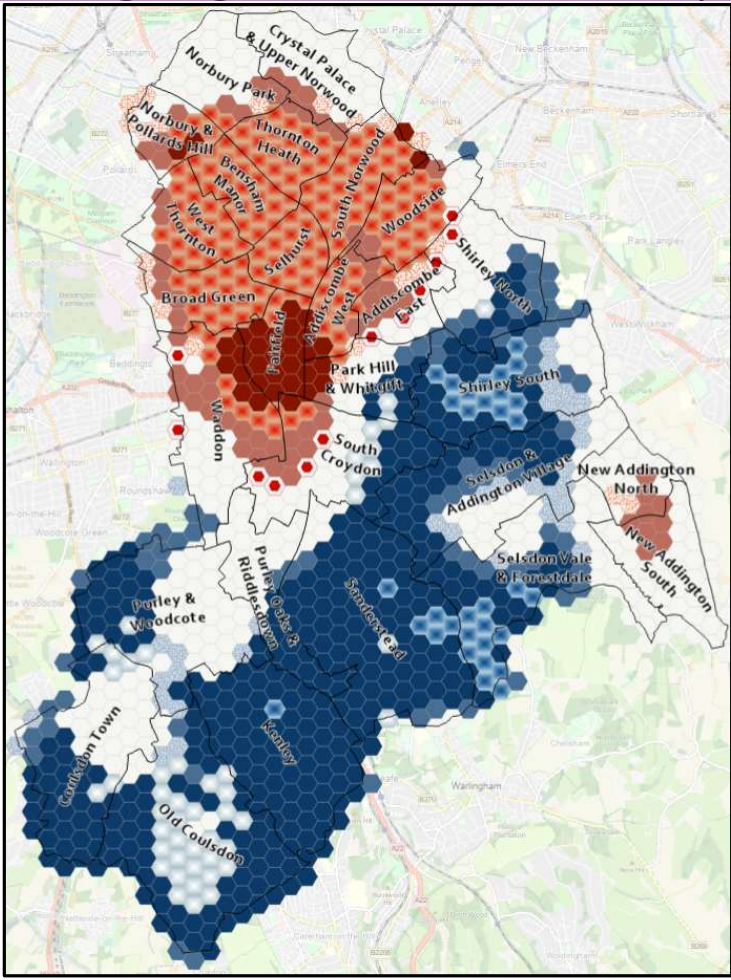


- For violent harm, as shown on the left, it is even more concentrated with 10% of micro-areas containing almost 70% of harm.
- With violent harm being significantly more concentrated than volume, it is deemed more effective to target resources in these areas, especially during times where services have been greatly reduced.

*To reduce sampling bias and represent patterns in the data more naturally, a hexagon grid is used rather than the traditional “fishnet” (or rectangular) grid.

The emerging hot and cold spots in the borough

- Analysis has been conducted to identify the areas where there are emerging hot spots and cold spots over the last five years.
- To provide an easier visual representation of this, 300m hexagons have been used.
- For each hexagon a set of ten equal “time-step intervals” of 6 months each are processed to determine the types of emerging hot and cold spots there are in the borough.
- It is clearly shown on the map on the right that violence is generally higher and intensifying in the north of the borough as opposed to the south, apart from New Addington.
- Unsurprisingly, the town centre is the primary persistent hotspot in the borough over the last five years.
- The map shows emerging hot spot and cold spots for violent crime volume but harm closely reflects the patterns shown.



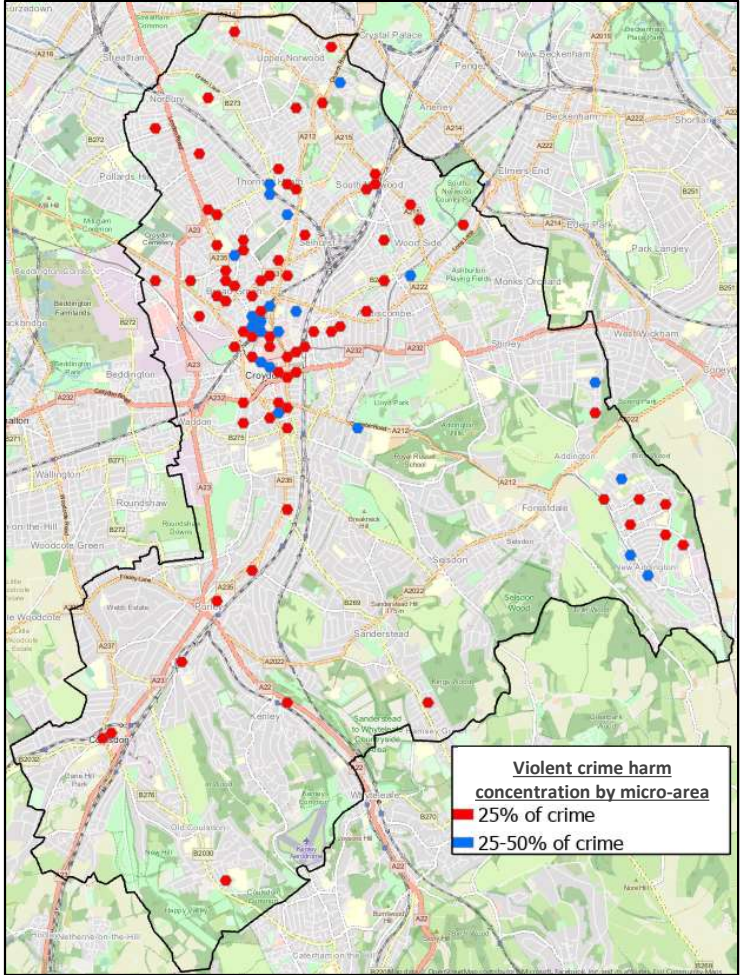
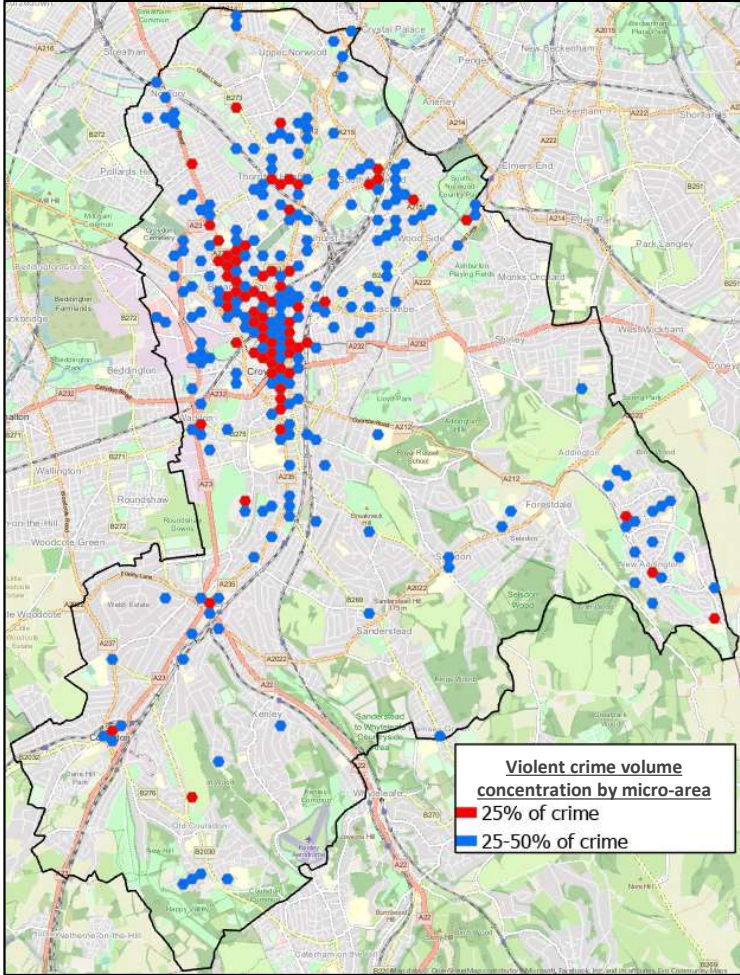
- New Hot Spot** - A location that is a statistically significant hot spot in the last 6 months and has not been statistically significant before.
- Persistent Hot Spot** - A location that is a statistically significant hot spot for 90% of the time period with no discernable trend indicating an increase or decrease in the intensity of crime clustering over time.
- Consecutive Hot Spot** - A location that is a statistically significant hot spot beyond the last 6 months but for less than 90% of the time period.
- Intensifying Hot Spot** - A location that has been a statistically significant hot spot and, in addition, the intensity of clustering of crime is increasing overall and that increase is statistically significant.
- Sporadic Hot Spot** - A location that is an on-again then off-again hot spot.
- Consecutive Cold Spot** - A location that is a statistically significant cold spot beyond the last 6 months but for less than 90% of the time period.
- Persistent Cold Spot** - A location that is a statistically significant cold spot for 90% of the time period with no discernable trend indicating an increase or decrease in the intensity of crime clustering over time.
- Diminishing Cold Spot** - A location that has been a statistically significant cold spot and, in addition, the intensity of the clustering of low crime is decreasing overall and that decrease is statistically significant.
- Intensifying Cold Spot** - A location that has been a statistically significant cold spot and, in addition, the intensity of clustering of crime is decreasing overall and that decrease is statistically significant.
- Sporadic Cold Spot** - A location that is an on-again then off-again cold spot.
- No Pattern Detected** – Does not fall into any hot or cold spot patterns.

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The micro-areas which contain half of all violence

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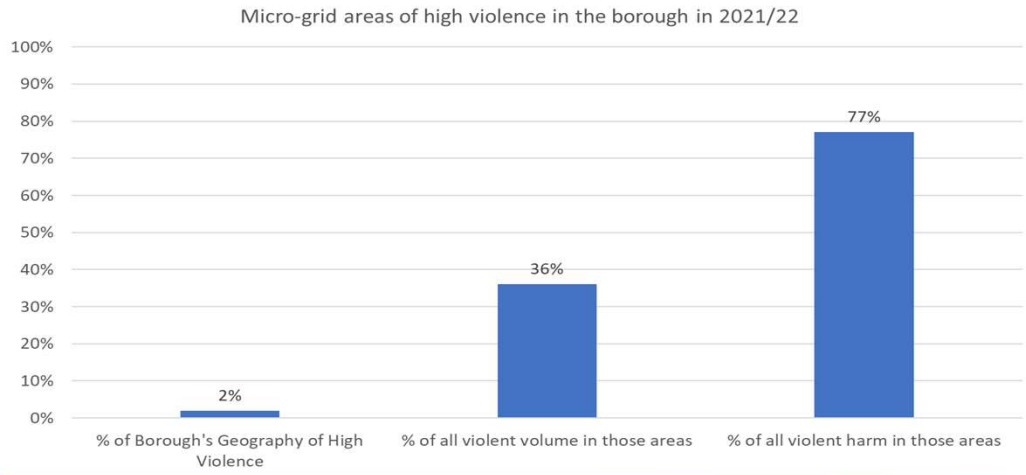
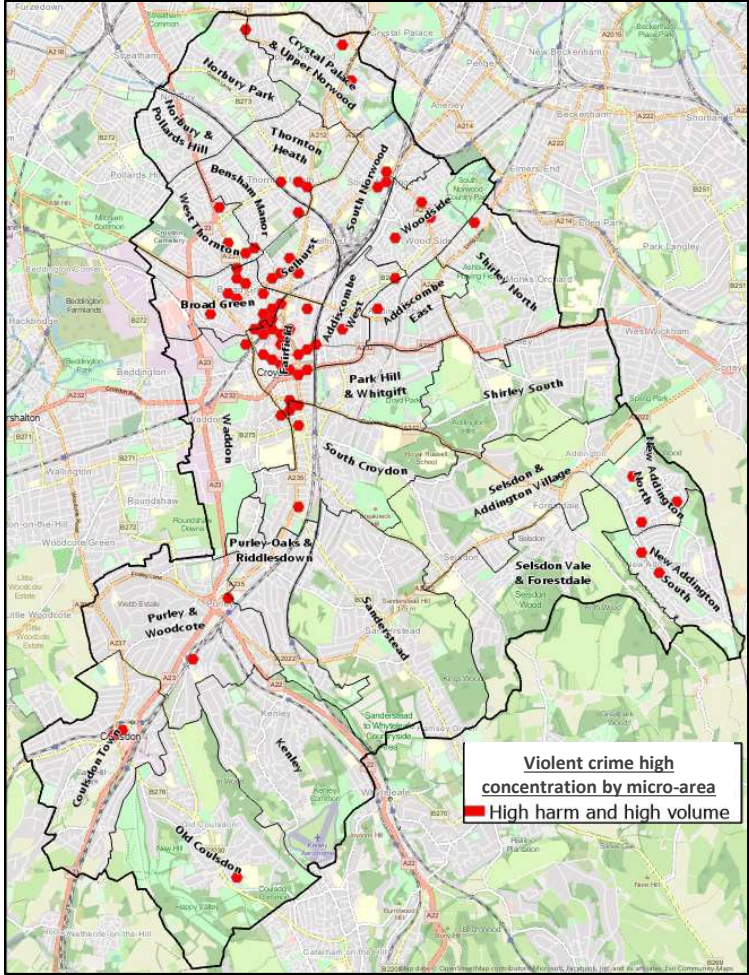
- A useful way to visualise the concentration of crime is by mapping the results by micro-area as shown on the right.
- The first map shows the micro-areas accounting for 25% and 50% of violent crime **volume** in the borough in 2021/22.
- The second map shows the micro-areas accounting for 25% and 50% of violent crime **harm** in the borough in 2021/22.
- As they clearly show when compared, there are significantly more micro-areas on the crime volume map than the crime harm map.
- However, especially in regards to the top 25% of violent crime, it is less clustered for harm compared to volume.



The “high volume high harm” micro-areas to target

- The areas to target in order to be most effective are the areas where high volume and high harm violence is occurring, which is shown on the map on the right.
- A total of 70 hexagons make up these high volume and high harm areas, accounting for 2% of the geographical area of the borough but over a third of all violent crime volume and over a three quarters of all violent crime harm.
- A high number of these areas also contain high volume and harm of other crimes of concern in the borough, specifically sexual offences and hate crime. It is these areas where resources should be targeted for maximum benefit.

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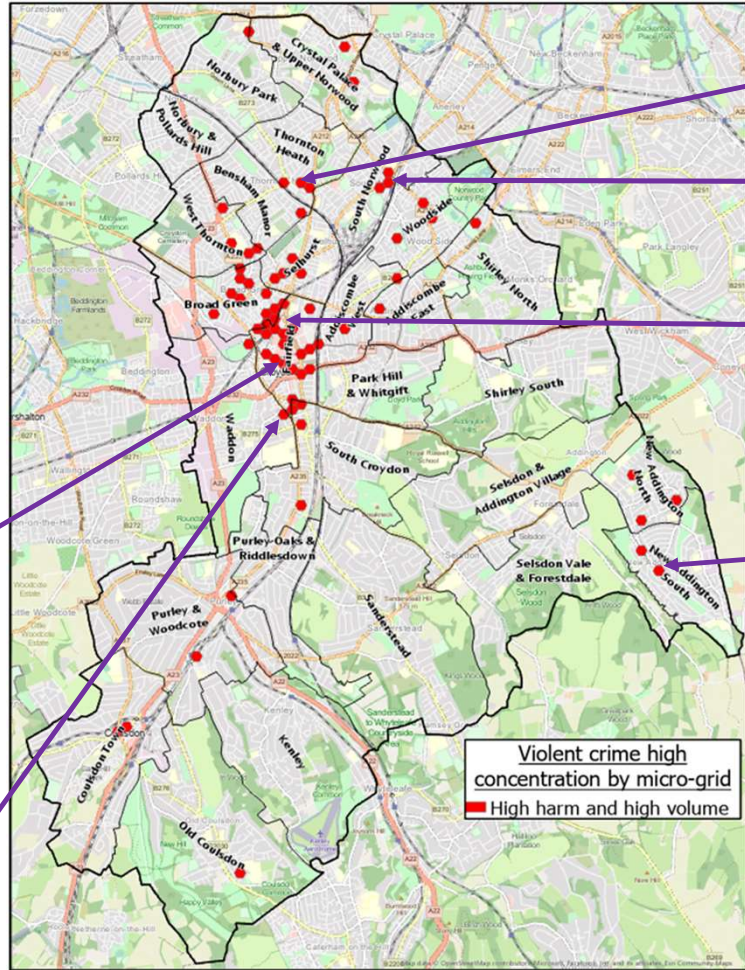
The “high volume high harm” micro-areas to target

- There are specific micro-grids and clusters of micro-grids of high volume and high harm violent crime where further targeting can be implemented. This is because they contain relatively disproportionate levels of violence and other crimes of concern.

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Croydon Town Centre, specifically High Street, Surrey Street and Church Street.

Croydon Town Centre, specifically South End.



Thornton Heath High Street

South Norwood High Street

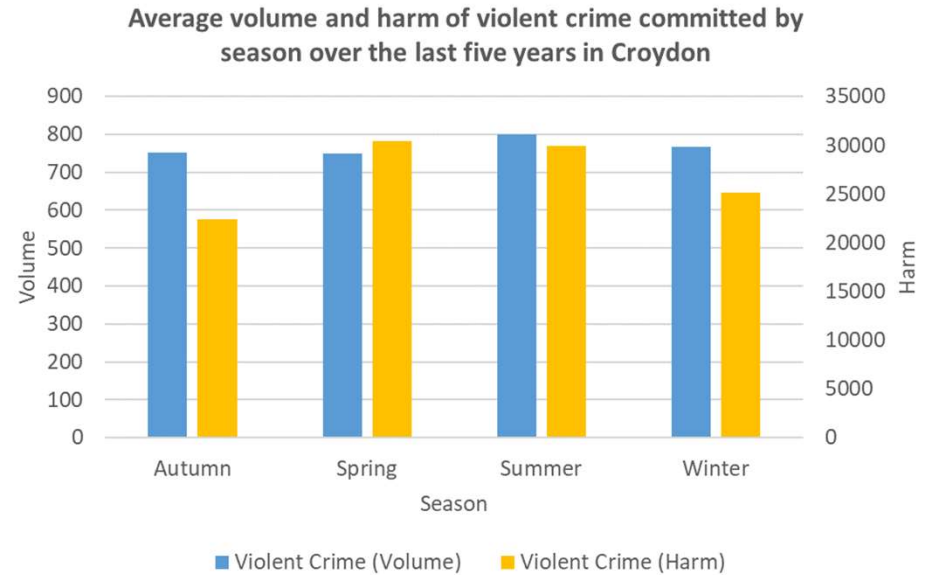
West Croydon/London Road

Central Parade

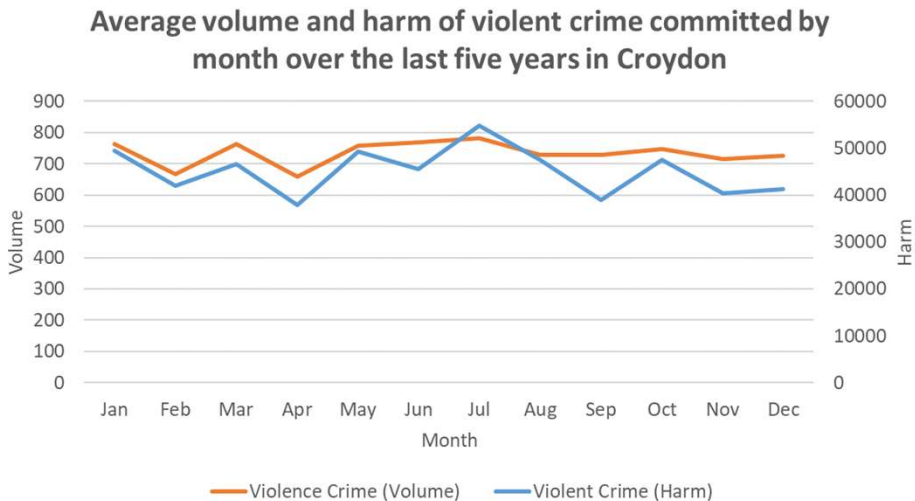
When is the problem?

Violent crime by season and month

- For when violent crime is committed by season, on average over the last five years, for volume it is spread quite evenly with the summer season (June – August) only slightly being the highest for offences.
- Violent harm shows a greater distinction with the spring (March - May) and summer being the seasons with the highest amount of violent harm being committed. This is due to an increase in high harm domestic and street-based violence.



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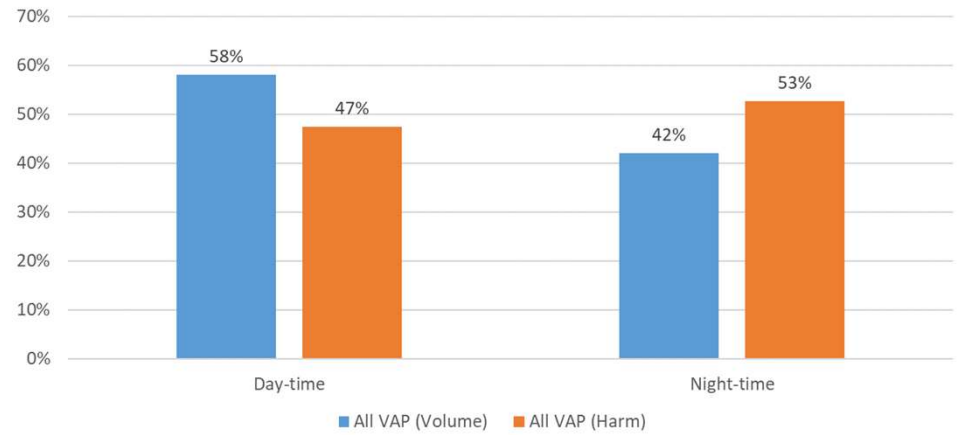


- The volume of violent crime being committed by month is fairly stable with it peaking in June and July.
- Violent harm shows a similar trend to volume but showing clearer rises and falls in harm being committed over the year. The peak month is shown as July.
- This pattern is closely reflected by specific types of violence including domestic violence and street-based violence.

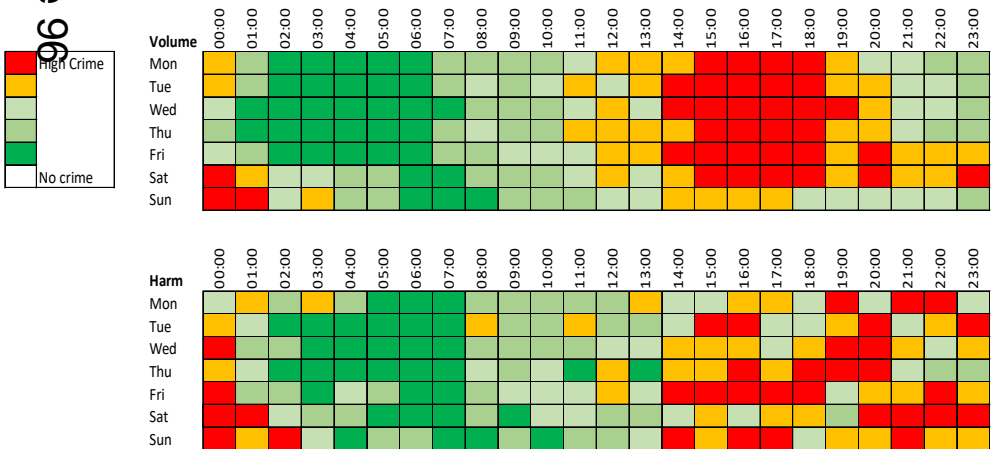
Violent crime by day and time

- There is slight contrast between volume and harm of violent crime when identifying the offence occurring during the day-time or the night-time.
- These times have been calculated by cross-referencing whether the time of offence occurred between sunset and sunrise or not during each specific month of the year.
- Almost 60% of the volume of violent crime is committed during the day-time whereas just over half of the harm is committed during the night-time.

Average % of violent crime committed during the day-time and night-time over the last five years in Croydon



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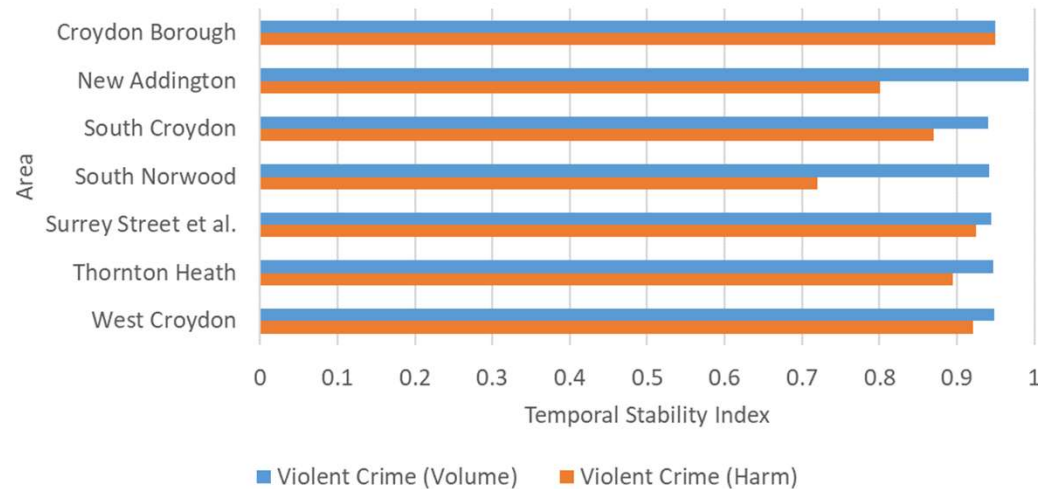
- Analysing the day and time of when violent offences occur show, for volume especially, that offences peak during the “after-school” hours on the weekdays linking a significant number of offences to young people.
- There are also peaks late afternoon on Saturday and after midnight on Saturday and Sunday morning, which are linked to the night-time economy.
- Violent harm is a lot more sporadic with it occurring throughout the week with a slight shift towards the evenings and early mornings, especially on the weekends.

The Temporal Stability Index

- One way to measure the stability of crime patterns is by using a homogeneity index, which is used to summarise the distribution of data across nominal categories.
- The index used is called the *temporal stability index (TSI)*, where crime data for Croydon and each of the primary hotspots highlighted earlier has been split into equal temporal periods and is mathematically calculated to measure whether crime in the area is a result of offences occurring over a short period or crime has been stable over the long term.
- Violent crime volume and violent crime harm was taken in each area over the last five years, split into periods of three months.
- The TSI was then calculated and those areas which show a score above 0.85 suggests that violent crime volume and/or harm levels have been stable over the five year period.
- As shown in the chart on the right, this is true for both violent crime volume and harm for all areas apart from harm in New Addington and South Norwood which are showing relatively low TSIs.
- This means violent harm levels in these areas was not as stable over the five-year period and that it has fluctuated in certain shorter periods.

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Temporal stability index for Croydon and the primary hotspots over the last five years



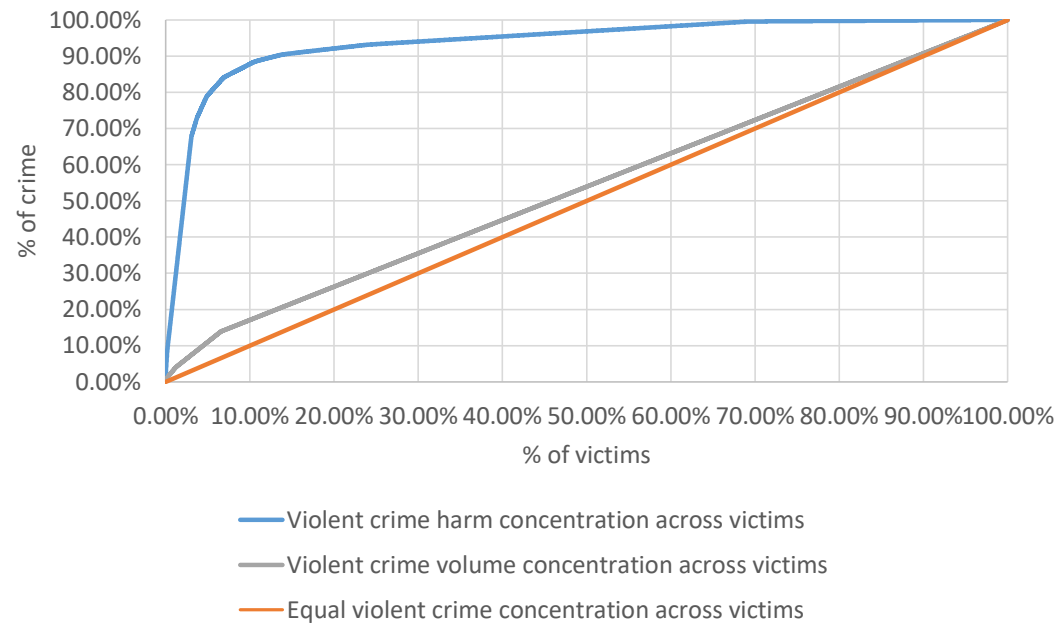
Who is involved?

The “felonious few” and victims of violence

- The implementation and the use of the Cambridge Crime Harm Index is pivotal in the analysis to focus on the “felonious few*”, which research shows that most crime, specifically crime harm, is committed by a small fraction of offenders against a small fraction of victims in a small fraction of locations.
- In many areas within many countries, there are relatively large sums of money spent on investing equal efforts in all offenders, victims and places which produce unequal results.
- The borough should instead refocus its limited resources on the “felonious few”, which could lead to an increased chance of crime reduction, particularly those targets which give rise to serious harm.
- This approach requires no extra costs and could even possibly reduce overall costs in the medium to long-term due to these persistent high harm targets no longer generate such serious crimes or, better still, no crime at all.

As shown below, 10% of victims of violent crime suffered almost 90% of all harm in 2021/22. For the same proportion of victims, less than 20% of the number of all violent offences were attributed to them.

Proportion of victims receiving the proportion of violent crime harm and volume in Croydon in 2021/22



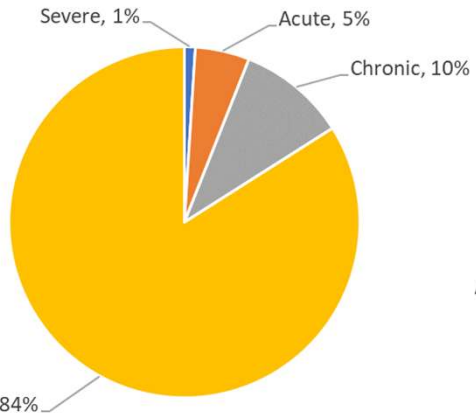
*The “Felonious Few” is more familiarly known as the “Power Few” but it has recently been replaced by the former, especially in regards to offenders, due to the justifiable argument that calling them this suggests they are deserving of praise or respect instead of them being labelled with a name that demanded condemnation for their high harmful crimes.

Violent harm classifications for victims of violence

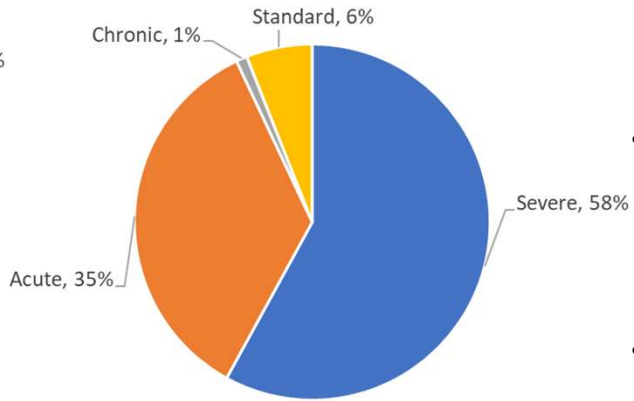
- Using both violent crime volume and harm, a simple model can be used to prioritise interventions for victims of violence. This is a 2 x 2 model shown on the right.
- As shown, each victim is assigned a classification based on the frequency of violence and severity of harm they have suffered.
- A repeat victim is shown as an individual who has been victimised more than once and an individual is of high severity if they receive a harm score greater than 100.
- These thresholds are arbitrary and can be amended to how agencies see fit.

Classification Matrix		Severity	
		Less than 100	More than 100
Frequency	Once	Standard	Acute
	Repeat	Chronic	Severe

Proportion of victims of violent crime volume by classification in the last five years



Proportion of victims of violent crime harm by classification in the last five years

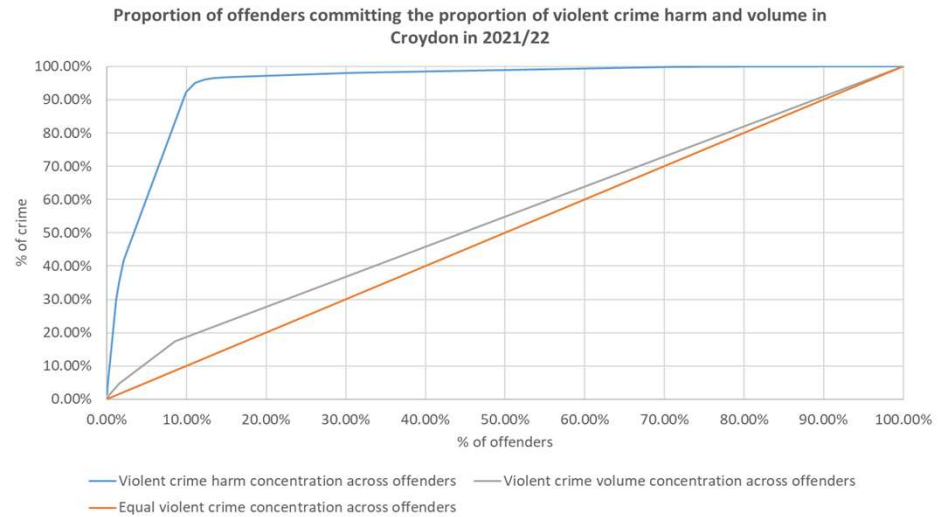


- As an example, using all named victims data of violence over the last five years, the chart on the far left shows that those classified as “Severe” represented 1% of the volume of violent offences but, as shown on the left, represented almost 60% of all violent harm.
- Looking at repeat victims alone, for volume of violent crime, there were ten times of those classified as “chronic” than there was those classified as “severe”. However, for crime harm, those classified as “severe” received 58 times more the amount of harm than those who were “chronic”.
- Therefore, it would deem more effective to target limited resources to those classified as “severe” than any other classification.

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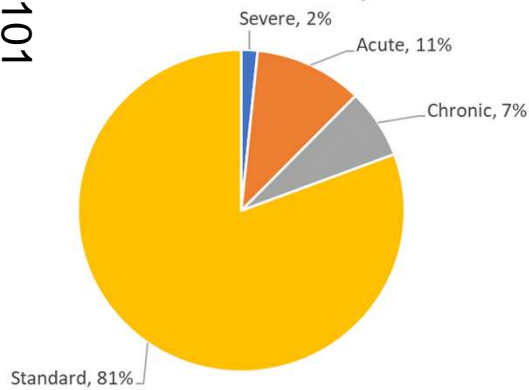
The “felonious few” and offenders of violence

- For offenders of violent crime, the chart on the right shows that over 10% of offenders committed over 90% of violent harm. This is a slightly higher proportion of violent harm attributed to offenders in comparison to victims.
- For the same proportion of offenders, slightly less than 20% of violent crime volume was attributed to them. This is around the same when compared to victims of violent crime.
- Again, even though this shows a greater incentive to invest and focus limited resources on offenders of high harm, it is more difficult to do this with offenders than victims if being directed by the 2 x 2 classification model.

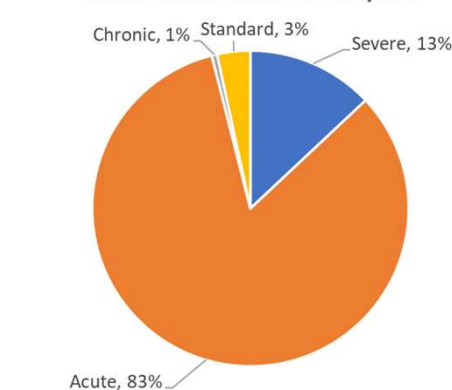


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Proportion of offenders of violent crime volume by classification in the last five years



Proportion of offenders of violent crime harm by classification in the last five years

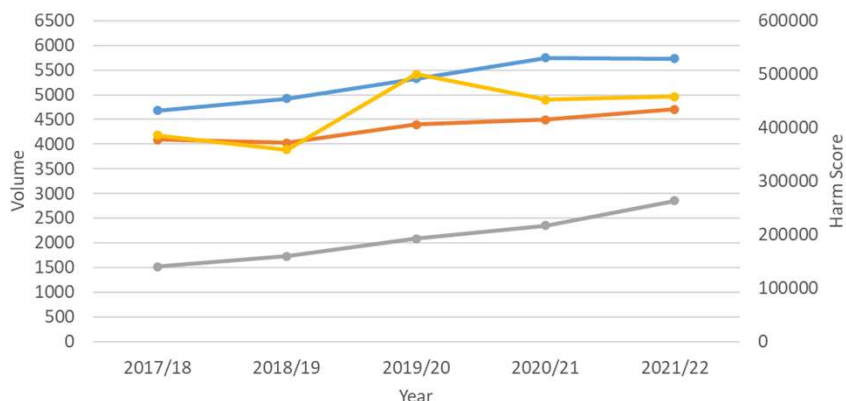


- As opposed to victims, using the 2 x 2 classification model on offenders shows that it is those classed as “acute” who cause the majority of harm rather than those classed as “severe”.
- This means that violent offenders are much more random, especially when it comes to high harm violence, meaning it makes them harder to target.
- However, it must be emphasised this can be down to several reasons including less offenders being charged (especially for domestic violence due to reluctance from the victim) and violent offenders being involved in other types of high harm crime outside of violence, therefore, this was not in the data analysed.

The sex of victims of violent crime

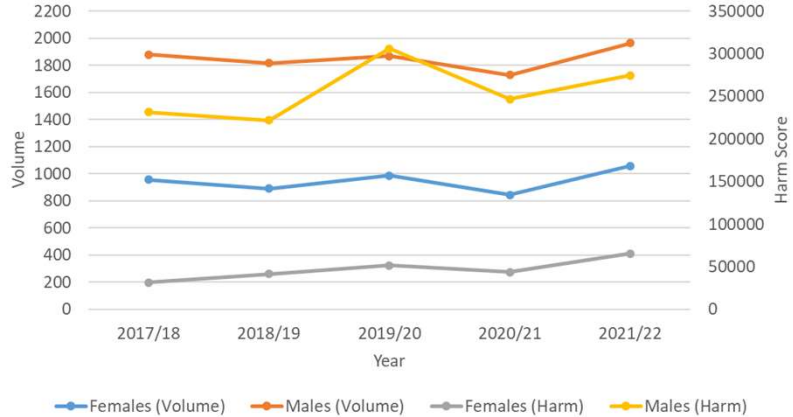
- On average, each year the victims of the volume of violent crime is around 55% female and 45% male. However, around 70% of violent harm is suffered by male victims.
- The number of female victims have increased on average by 7% year-on-year up to last year where it stabilised. The number of male victims followed a similar pattern but continued to rise last year to reach its highest in the last five years.
- The violent harm suffered by female victims has increased on average by 17% each year over the last four years.
- Reaching its peak in 2019/20, harm received by male victims fell by 9% in 2020/21 where it has stabilised in the last year.

Victims of violent crime volume and harm by sex each year in Croydon over the last five years



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Victims of street-based violent crime volume and harm by sex each year in Croydon over the last five years

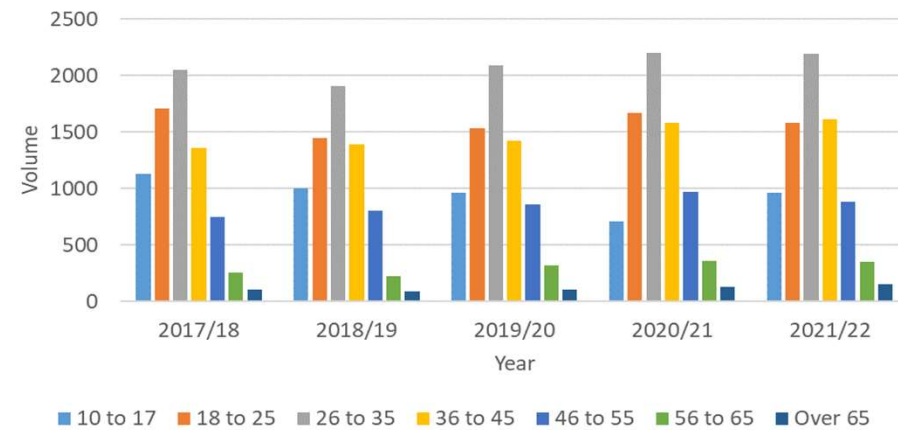


- It can be assumed that the main driver for females of violent crime is because of the rise of domestic violence, seeing that around 75% of victims are female and they suffer over 60% of harm.
- However, both the number of female victims and the harm they suffered from street-based violence was at its highest in 2021/22 in the last five years.
- Each year, on average, males still make up two thirds of victims of street-based violence and 85% of street-based violent harm.
- The number of male victims of street-based violence reached its peak in 2021/22 and this was the second highest for harm suffered by males too in the last 5 years.

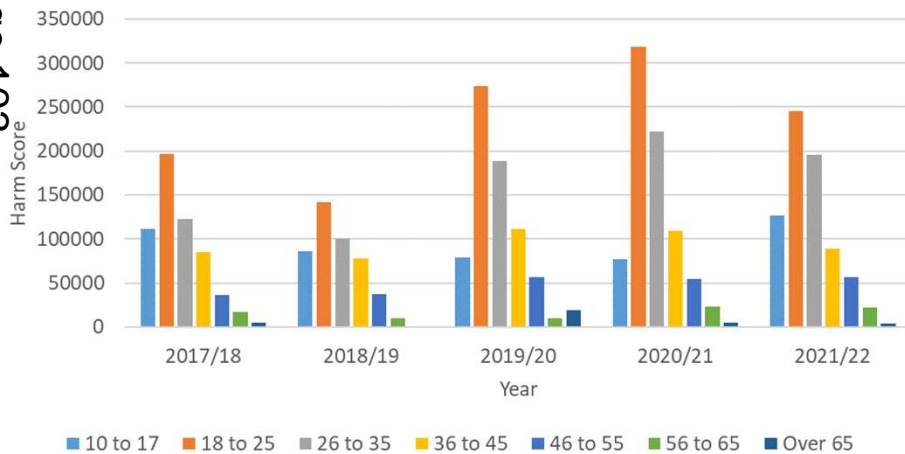
The age of victims of violent crime

- On average, each year the age category where the highest proportion of victims of violent crime are aged 26 to 35 years old, who represent around a quarter of all victims. This is the same for both domestic violence and street-based violence.
- There is a trend of an overall increase of those aged 26 to 35 years old over the last five years. Again, this is because of an increase of victims in this age category for both domestic violence and street-based violence.
- Last year was also the year for the highest number of victims who were aged 36 to 45 years old. This is also because of an increase of victims in this age category who have been victims of domestic violence and street-based violence.

Age of offenders of violent crime volume each year in Croydon over the last five years



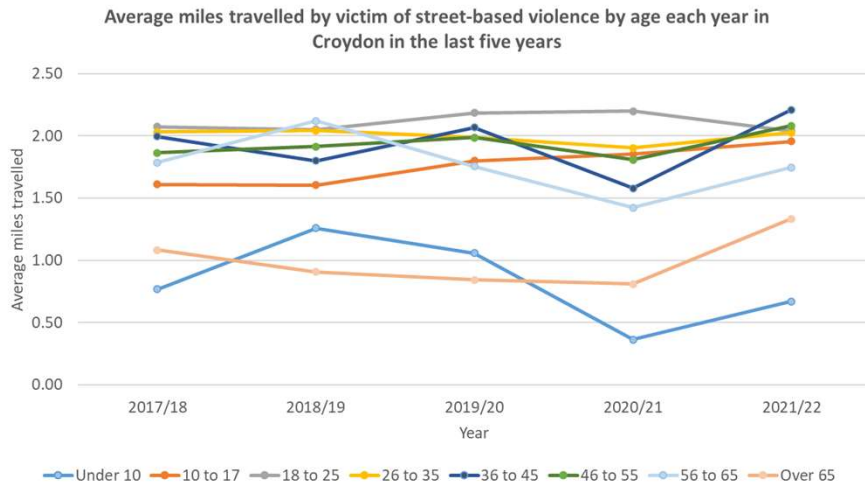
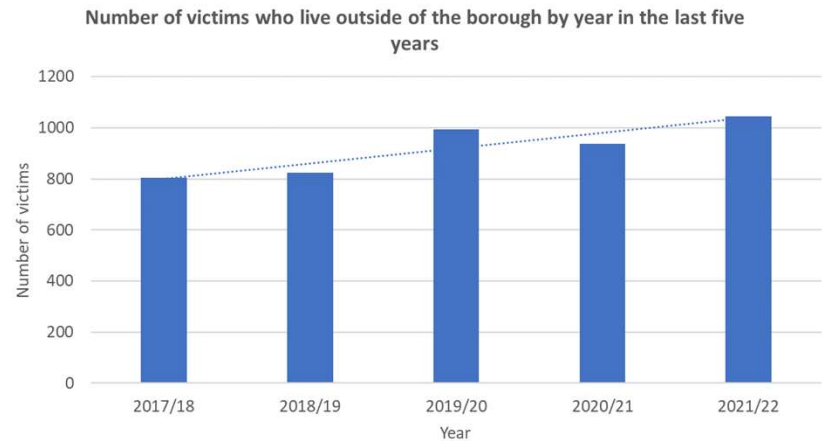
Age of offenders of violent crime harm each year in Croydon over the last five years



- On average, each year the age category where the highest proportion of harm received by victims of violent crime are aged 18 to 25 years old and 26 to 35 years old, who represent around a quarter of all victims each. This is closely reflected for street-based violence.
- For domestic violence, those aged 26 to 35 years old represent around a third of harm each year and those aged 18 to 25 years represent around a quarter of harm.
- 2021/22 was the highest year for harm received by victims aged 10 to 17 years old in the last five years. This is linked to both an increase in harm in domestic violence and street-based violence.

Where victims live and their pattern of travel

- On average, each year around 12% of victims of violent crime live outside of the borough. These victims make up around 16% of violent harm each year. However, there is a general trend that the number of victims travelling from outside of the borough has been increasing over the last five years. There was a slight decrease in 2020/21 as a result of government-imposed restrictions due to the Covid-19 pandemic.
- In 2021/22 there was an 11% increase of victims coming from outside of the borough compared to the year before and a 5% increase compared to 2019/20.
- This overall trend of victims coming from outside of the borough is both due to an increase of victims of street-based violence and of domestic violence.



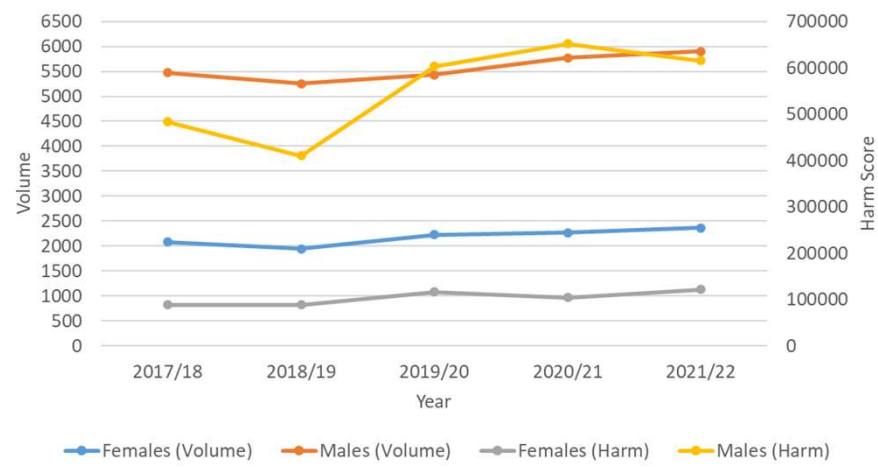
- Looking at street-based violence specifically, there has been an overall incremental increase over the last five years in the distance travelled by victims.
- On average, each year almost 60% of victims of street-based violence were less than a mile from their home.
- After a decrease in distance travelled by victims of most age categories in 2019/20 due to the pandemic, there were sharp increases last year where victims of most age categories have travelled furthest in the last five years.
- However, for those aged 10 to 17 years old, there has been a year-on-year increase in average distance travelled in the last three years.

The sex of offenders of violent crime

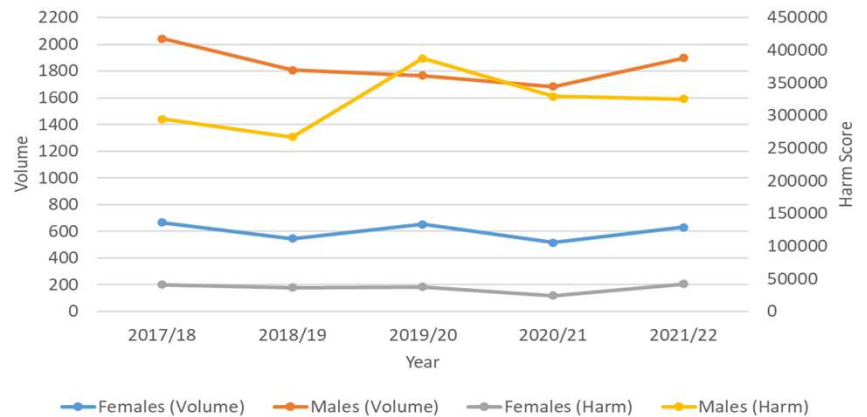
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- There is a trend of less individuals being charged for violent offences which is reflected in national statistics*.
- On average, each year the offenders of the volume of violent crime is around 72% male and 28% female. Around 85% of violent harm is committed by male offenders.
- The number of female and male offenders has increased year-on-year over the last three years where they reached their peak in 2021/22.
- The violent harm committed by female offenders increased by almost a fifth in 2021/22 compared to the year before, reaching its peak in the five year period.
- Harm committed by male offenders fell by 6% in 2021/22 compared to the year before but it was still the second highest year for harm in the five year period.

Offenders of violent crime volume and harm by sex each year in Croydon over the last five years



Offenders of street-based violent crime volume and harm by sex each year in Croydon over the last five years

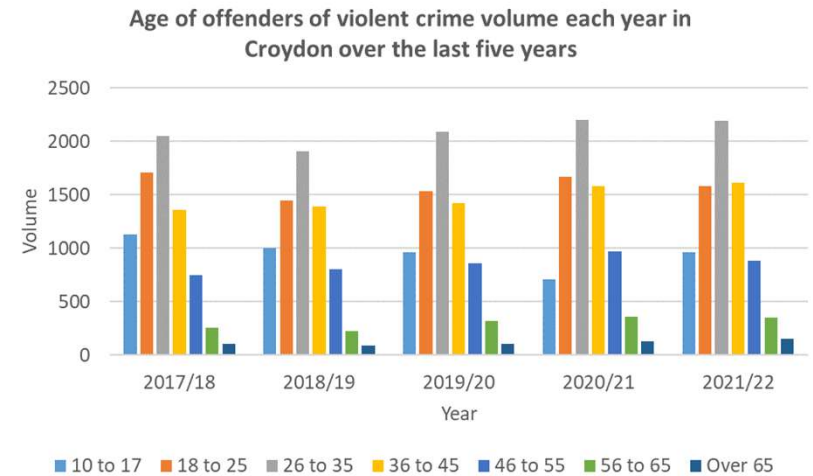


- Almost 80% of domestic offenders are male and around three quarters of domestic harm is committed by male offenders.
- For street-based violence, around three quarters of offenders are male and they commit 90% of harm.
- For street-based violence, even though the number of male offenders has increased by 13% in 2021/22 compared to the year before, the amount of harm committed fell slightly by 1%.
- The number of female offenders increased by almost a quarter in the 2021/22 and the amount of harm committed went up significantly by almost three quarters.

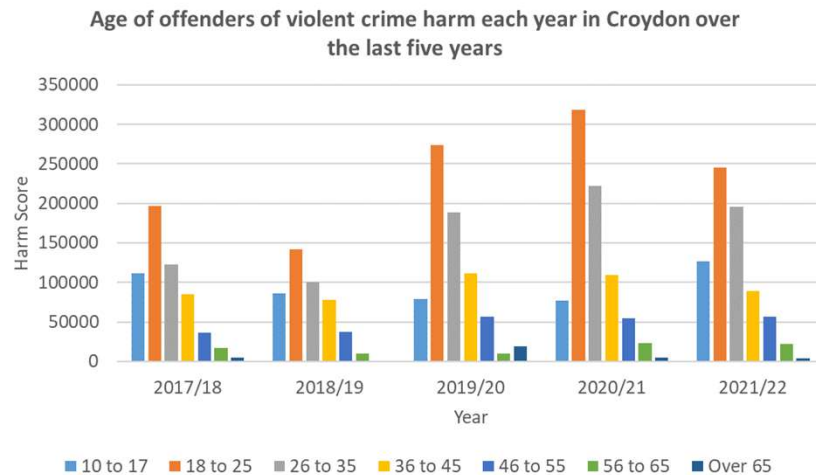
*This is shown in [Crime outcomes in England and Wales 2021 to 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/crime-outcomes-in-england-and-wales-2021-to-2022). For greater accuracy of representation in the profiling, suspect data rather than accused data has only been used when analysing the sex and age of offenders.

The age of offenders of violent crime

- On average, each year the age category where the highest proportion of offenders of violent crime are aged 26 to 35 years old, who represent around just over a quarter of all offenders. This is the same for street-based violence. They also represent around a third of domestic abuse offenders.
- There has been an overall trend of an increase of those aged 26 to 35 years old over the last five years. This is because of an increase of offenders in this age category who have been offenders of domestic violence and street-based violence.
- Last year was also the year for the highest number of offenders who were aged 36 to 45 years old. This is also because of an increase of offenders in this age category who have been offenders of domestic violence and street-based violence.



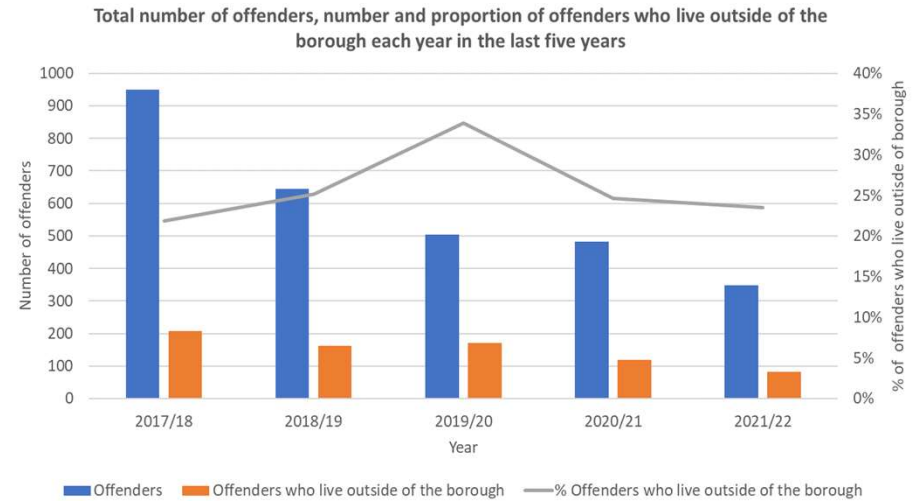
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- On average, each year the age category where the highest proportion of harm committed by offenders of violent crime are aged 18 to 25 years who represent around a third of all harm. This is closely reflected for street-based violence.
- For domestic violence, those aged 26 to 35 years old represent around just under a third of harm each year and those aged 18 to 25 years represent around a quarter of harm.
- 2021/22 was the highest year for harm committed by offenders aged 10 to 17 years old in the last five years. This is linked to both an increase in harm in domestic violence and street-based violence.

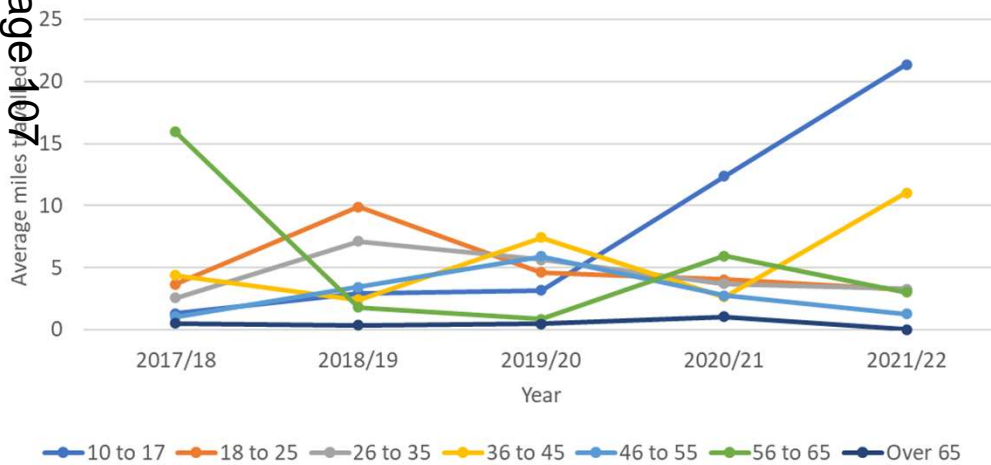
Where offenders live and their pattern of travel

- As noted earlier, there is a trend of less individuals being charged for violent offences nationally, which is shown in the chart on the right. This has contributed to less offenders coming from outside of the borough.
- On average, each year around a quarter of offenders of violent crime live outside of the borough. These offenders make up just over a third of violent harm on average each year.
- There was a spike in the proportion of offenders coming from outside of the borough in 2019/20 but it then fell, most likely due to the Covid-19 pandemic, and has stabilised in 2021/22.



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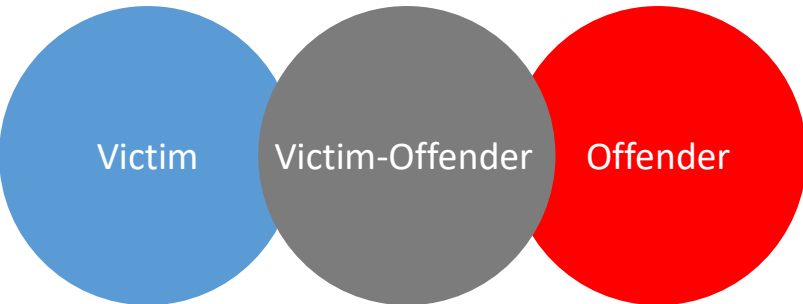
Average miles travelled by offenders of street-based violence by age each year in Croydon in the last five years



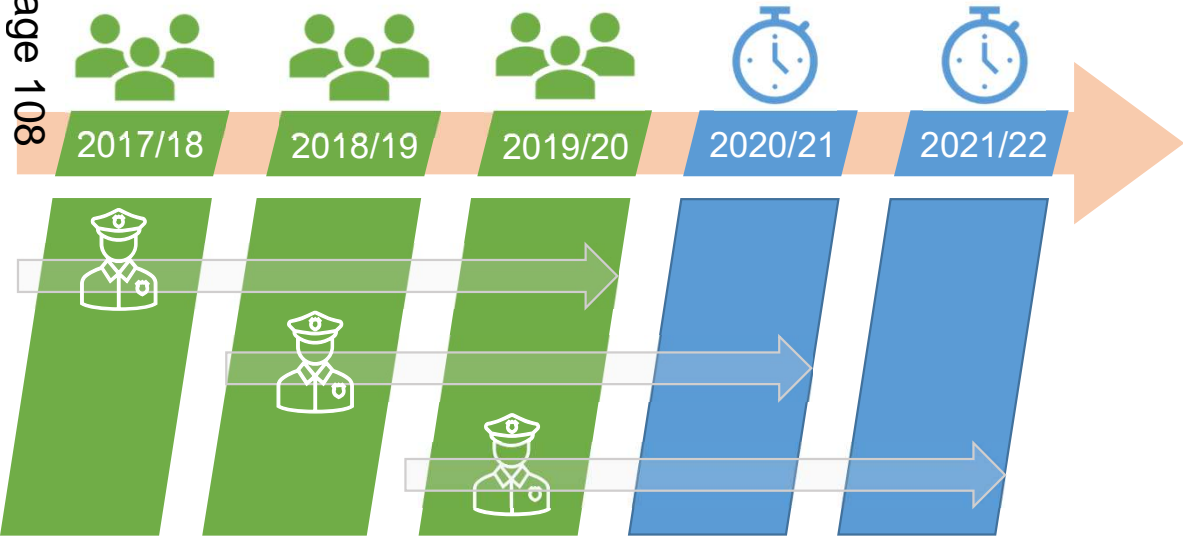
- Looking at street-based violence specifically, overall average distance travelled by offenders has fluctuated over the last five years, reaching a peak of 7 miles travelled in 2021/22.
- Each year an average of just over 40% of offenders live within one mile of the location of the crime they've committed.
- There has been a sharp year-on year increase of the average miles travelled by offenders aged 10 to 17 years old in the last three years reaching an average of 21 miles in 2021/22. It must be emphasised that the number of 10 to 17 year old offenders in 2021/22 was relatively low so it's a small number travelling a long distance.

The Victim-Offender

- The authorities have traditionally dealt with victims and offenders separately. However, there is a type of individual who significantly overlaps both who commit and suffer high volume and harm. This individual is known as the “victim-offender”.
- Research has found the strongest association between victimisation and offending exists with violent personal crimes that include big issues such as domestic violence, gang violence and non-fatal gun crime, with the most pronounced in relation to murder (Gottfredson 1984; Broidy et al. 2006; Papachriston 2018).
- Victim-offenders are the exact individuals who are caught in the cycle of not just violence but all crime in the borough where we should focus our resources.



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- The VRN is currently undertaking research on victim-offenders and their impact on crime in the borough. To conduct the research, the data sample was taken from a three year triggering intake period from 2017/18 to 2019/20 (shown on the left).
- Then there was a two year “follow up” period ending on 31st March 2022. So, for each distinct individual, they were each tracked for a total of three years.
- This gave a list of 65,790 distinct individuals which had entered this period and who were involved in a total of 85,925 crimes in the triggering intake period.
- For violence only, the sample gave a list of 24,043 distinct individuals which had entered this period and who were involved in a total of 29,819 violent crimes in the triggering intake period.

The Victim-Offender

- From the initial results of the analysis, as shown by the figures on the right for all crime, victim-offenders make up a fraction of all individuals involved in crime (4%) compared to victims (84%) and offenders (16%).
- However, victim-offenders are involved in almost three times the number of offences per person compared to victims and offenders.
- In regards to harm, victim-offenders are involved in almost five times the amount of harm as victims and almost three times the amount of harm as offenders.

All Crime			
	Victims	Offenders	Victim-offenders
Total People	55,362	8,090	2,338
Total Crime	67,169	10,768	7,988
Total Harm	4,736,521	957,382	932,035
Crime/Person	1.2	1.3	3.4
Harm/Person	85.6	118.3	398.6

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All Violence			
	Victims	Offenders	Victim-offenders
Total People	20,169	2,149	1,725
Total Crime	23,989	2,408	3,422
Total Harm	1,366,636	465,254	478,122
Crime/Person	1.2	1.1	2.0
Harm/Person	67.8	216.5	277.2

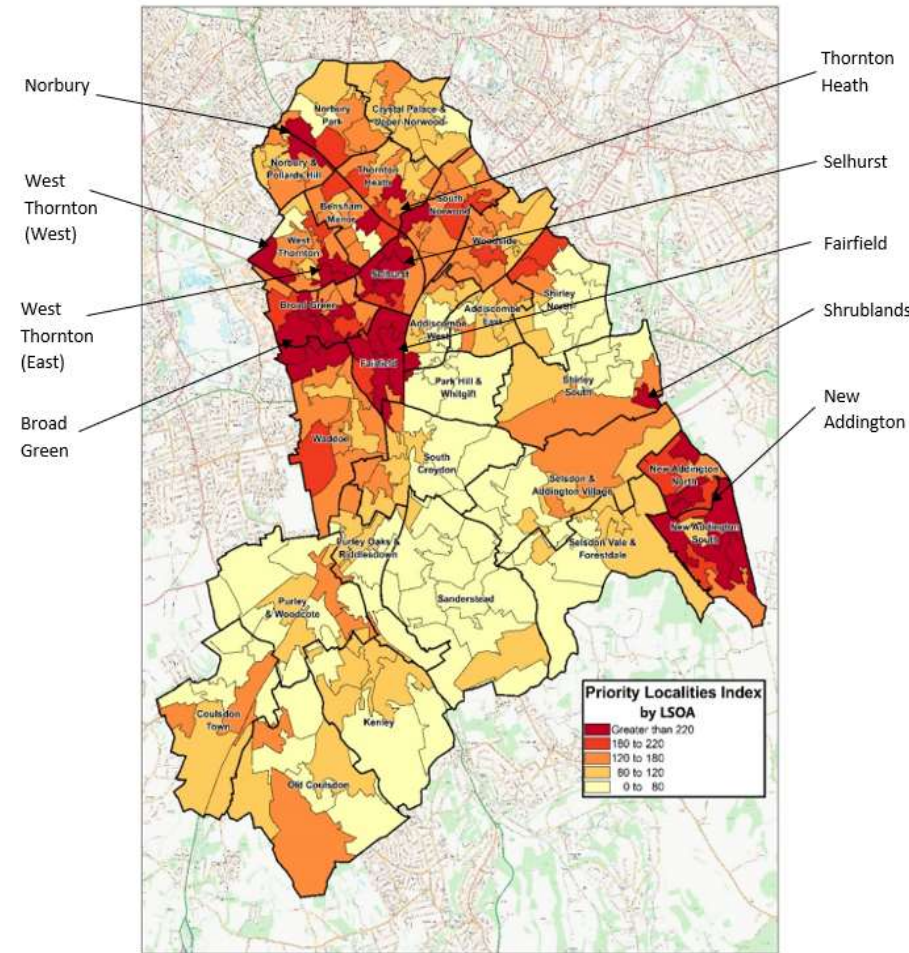
- For violence, as shown on the left, victim-offenders make up the smallest number of individuals involved (7%) compared to victims (84%) and offenders (9%).
- However, victim-offenders are involved in almost twice the number of offences per person compared to victims and offenders.
- In regards to harm, victim-offenders are involved in four times the amount of harm as victims. However, compared to offenders, victim-offenders are still involved in more harm but only 1.3 times higher.

Why is it happening?

The Borough's Priority Localities Index

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- Last year the VRN introduced an adaptation of a known analytical technique called the Vulnerable Localities Index*. This helps identifying neighbourhoods that require prioritised attention.
- Research has shown a variety of benefits including that the VLI is accurate in highlighting areas that suffer from a disproportionately wide range of multi-faceted problems, it creates a more partnership-oriented approach in reducing crime and disorder and it targets those partnership resources more effectively**
- A “alternative VLI” was adapted by the VRN called the “Priority Localities Index” (PLI) using the following variables:
 1. Domestic abuse offences in a residential setting in 2020
 2. Non-domestic criminal damage and arson to a dwelling in 2020
 3. Enquiries made to the Family Justice Centre in 2020
 4. Hate crime offences in 2020
 5. Deliberate fires reported by the London Fire Brigade in 2020
 6. Individuals case managed by the Youth Offending Service in 2020
 7. Individuals who were excluded from school in 2019
 8. Individuals receiving treatment from Turning Point for alcohol and/or substance misuse in 2020
 9. Children reported as missing in 2020
 10. Income deprivation
 11. Employment deprivation
 12. Education, skills and training
 13. Proportion of young people (10 to 24 years) who make up the local population Income deprivation, employment deprivation and education, skills and training taken from the multiple indices of deprivation 2019
- Each of the variables were mapped to Lower Super Output Area level and based on their PLI, nine priority neighbourhoods were identified (right) where the majority correlate with most of the primary and secondary hotspots in the borough. The priority neighbourhoods were agreed to be targeted by the Safer Croydon Partnership under the Community Safety Strategy 2022-2024.

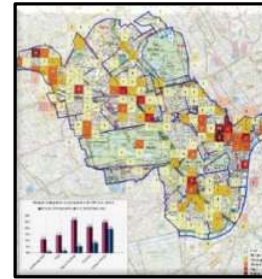


*Bullen, I. 2008. "Priority Neighbourhoods and the Vulnerable Localities Index in Wigan – a Strategic Approach to Crime Reduction" in Chaaney, S.P., & Thompson, L. (Eds), *Crime Mapping Case Studies: Practice and Research*, Chichester: Wiley.
 **Reece-Smith, R. & Kirby, S. 2013. "Exploring the VLI, for identifying priority neighbourhoods, in the context of multi-agency community safety initiatives" in *Policing: a journal of policy and practice*, Volume 7, Issue 1, 2013, pp. 42-52
<https://doi.org/10.1093/police/pas061>

Risk Terrain Modelling

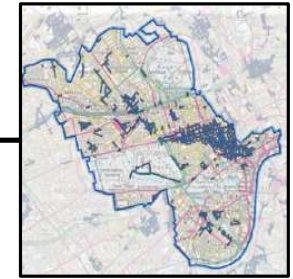
- The VRN have adopted the method of risk terrain modelling (RTM) to establish what are the underlying factors that influence crime occurrence and location.
- Where hotspot mapping, temporal analysis and predictive mapping provide information on where and when crime has previously occurred and assists in anticipating where and when it will happen, RTM assists in answering why it is happening, especially in a specific location.
- Not only is RTM designed to evaluate the physical features of a location (e.g. bus stops, pubs, bars, shops etc.) but also the model can be fed with any set of input factors for evaluation.
- Multi-variate regression analysis is carried out to identify which factors correlate with the specific crime selected.
- The model provides a geographical visualisation where these factors overlay in space to significantly increase risk.
- The model can then be used to assist in the following:
 1. Inform local taskings partner agencies to capture additional intelligence.
 2. It shifts operational, tactical and strategic plans from “reactive” to “problem solving”.
 3. It encourages and enables data sharing and joint tasking with partners.

1. Hot spot Maps

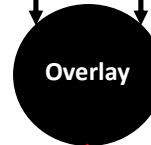


Spatial and temporal pattern of crime.

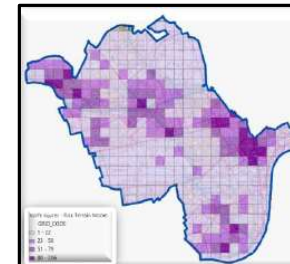
2. Predictive Maps



Where is crime expected most today?



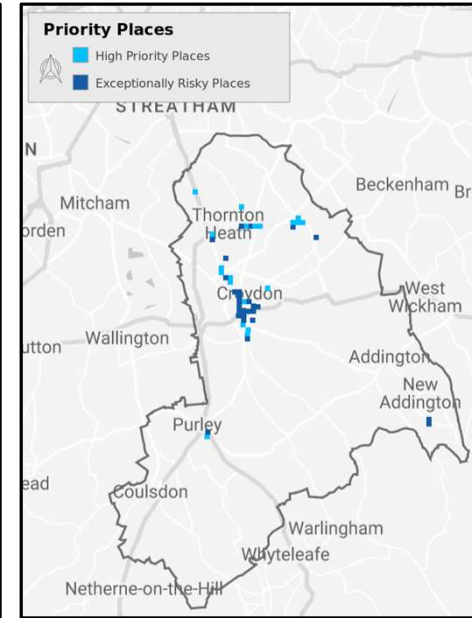
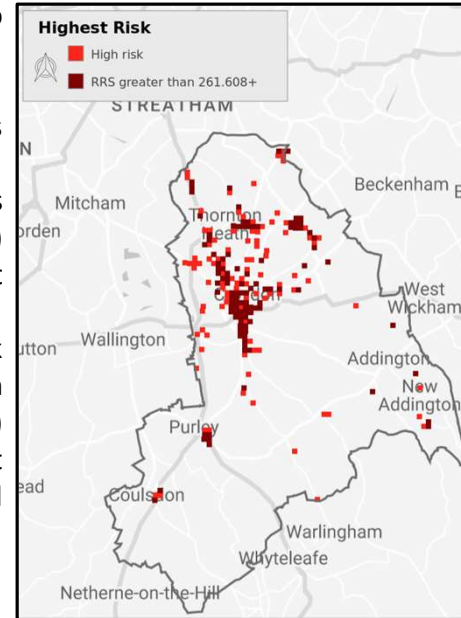
3. Risk Terrain Maps



What are the underlying factors that influence crime occurrence and location?

Risk Terrain Modelling (cont.)

- RTM was used to identify the underlying risk factors which have contributing to causing street-based violence in Croydon in 2021/22.
- The model was run at a micro-level of 150m grid cells.
- A wide range of risk factors were processed from bus stops and schools and colleges to drug trafficking offences and weapon finds.
- The map on the right titled “Highest Risk” shows the places with relative risk scores (RRS) two standard deviations or more above the mean (displayed in dark red) and/or places with RRS equal to or greater than the top 5% value (displayed in bright red).
- The map on the far right titled “Priority Places” Shows all places with relative risk scores (RRS) two standard deviations or more above the mean that intersect with recent past exposures to create exceptionally risky places (displayed in dark blue) and/or places with RRS equal to or greater than the top 1% value (displayed in light blue). The places identified on this map closely reflect the hot spot areas identified earlier.



Risk Factor Name	Operationalisation	Spatial Influence	Relative Risk Score
Bus Stops	Proximity	450	4.181
Alcohol & Substance Misuse Clients	Proximity	300	1.981
Alcohol-related Crime	Density	150	1.898
Off Licences	Proximity	150	1.851
Restaurant, Cafes and Canteens	Density	150	1.74
Drug Trafficking	Proximity	450	1.616
Small Retailers	Proximity	300	1.606
Bus Crimes and ASB	Density	450	1.543
Weapon Finds	Proximity	150	1.508
Schools and Colleges	Proximity	150	1.502
Retailer - other	Proximity	150	1.433
Supermarkets	Proximity	450	1.376
Anti-social Behaviour CAD Calls	Proximity	150	1.322
Drug-related CAD Calls	Proximity	150	1.307
Takeaways	Proximity	150	1.293
Hotels and Guesthouses	Proximity	150	1.266

- The top risk factors for street-based violence are shown in the table on the left. The highest risk was bus stops, which especially reflects the survey the VRN conducted with women and girls in the borough last year where bus stops came highest as a place they do not feel safe.
- The risk factors linked to alcohol and drugs were also particularly high.
- The analysis carried out is constant and, therefore, the VRN are working to collect, collate and process more data from a wide range of sources to build the most accurate picture of the risk factors causing violence in specific areas.

Recommendations

From the analysis conducted in this document, the following recommendations are:

1. To write a **problem profile on Violence Against Women and Girls (VAWG)** in the borough which will feed into the VAWG strategy. This is not only to cover both domestic and non-domestic violence and sexual offences but other specific offences which have seen notable increases including stalking, threats to kill and malicious communications.
2. To evaluate and target **“high volume high harm” micro-areas** of violence using Risk Terrain Modelling so appropriate short, medium and long-term interventions can be implemented.
3. To investigate further into the **rise in victims travelling from outside of the borough** and to work with the relevant authorities in those areas to protect potential victims who are travelling from there.
To explore and utilise the “2 x 2” model to **prioritise appropriate interventions for individuals involved in violence.**
4. To further explore the concept of **“victim-offenders”** so that intensive long-term provision can be provided to significantly reduce all crime in the borough, not just violence.
6. To further utilise **alcohol and substance misuse service provision.**
7. To have a greater focus on **public transport in the borough**, especially around bus stops which have been identified as a high risk factor for violence.
8. To further investigate **cruelty and neglect of children**, which has seen a small but significant increase in the borough.
9. With the increase in knife crime being driven by **knife-enabled robbery**, this is to be a priority for the next 12 months.

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Agenda Item 6

REPORT TO:	SCRUTINY AND OVERVIEW COMMITTEE 6 TH SEPTEMBER 2022
SUBJECT:	COUNCIL TAX COLLECTION, RECOVERY AND ENFORCEMENT
LEAD OFFICER:	Catherine Black – Head of Payments Revenues Benefits & Debt
CABINET MEMBER:	Cllr Jason Cummings Cabinet Member for Finance
PUBLIC/EXEMPT:	Public

ORIGIN OF ITEM:	This item has been requested by the Chair of the Scrutiny & Overview Committee as part of the Committee's ongoing review of items linked to the cost of living crisis.
BRIEF FOR THE COMMITTEE:	The Scrutiny & Overview Committee is asked to review the information provided on Council Tax collection, recovery and enforcement.

1. EXECUTIVE SUMMARY

- 1.1. Following enquiries from several Members about the use of enforcement to collect Council Tax arrears, the Scrutiny and overview committee have asked for clarification around the use of enforcement for the purposes of collection of Council Tax.
- 1.2. This report not only sets out the use of Enforcement Agents in the collection of Council Tax, but it also clarifies the end-to-end process of budget setting and the setting of Council Tax, through Council Tax collection, recovery, and enforcement.
- 1.3. The Council uses Enforcement Agents for the collection of Council Tax, Business Rates or National Non-Domestic Rates (NNDR), and Parking warrants. This report focuses on collection of Council Tax.

2. Council Tax Collection Recovery and Enforcement

2.1. Background

- 2.2. The Local Government Act 2000 states that it is the responsibility of the full council, on the recommendation of the executive or the elected mayor to approve the Councils budget which sets the Council Tax for the following financial year. Budget setting is generally agreed in February.
- 2.3. The Council has a statutory obligation to administer and collect Council Tax, so once the Council Tax has been set as part of the budget setting process, the Council produces and sends annual Council Tax bills. The annual bills are issued during March in the name of the liable party who is responsible for payment of Council Tax. Council Tax bills are issued to each domestic dwelling in the borough, and we have approximately 168k domestic dwellings in Croydon. When the annual bills have been issued this enables

residents to commence payment of their Council Tax through monthly instalment from April. Monthly instalment can be paid over 10 months from April to January each financial year or over 12 months from April to March.

- 2.4. The value of all the Council Tax bills issued, less any Council Tax Support, exemptions, discounts and disregards that have been awarded to reduce the value of the bill, is called the Net Collectable Debit (NCD) or the Council Tax Base and the NCD for 2022/23 is £271m.
- 2.5. Council Tax bills are made up of 3 components,
- London Borough of Croydon precept (set by the Council)
 - Adult social care precept (set by the Council),
 - GLA precept (we have no control over this)
- 2.6. The 3 components make up the Council Tax charge depending on which valuation banding the property is placed into.
- 2.7. The Valuation Office Agency (VOA) has the responsibility for placing each domestic dwelling into a property band ranging from A to H, depending on the market value of the property as of 1st April 1991.

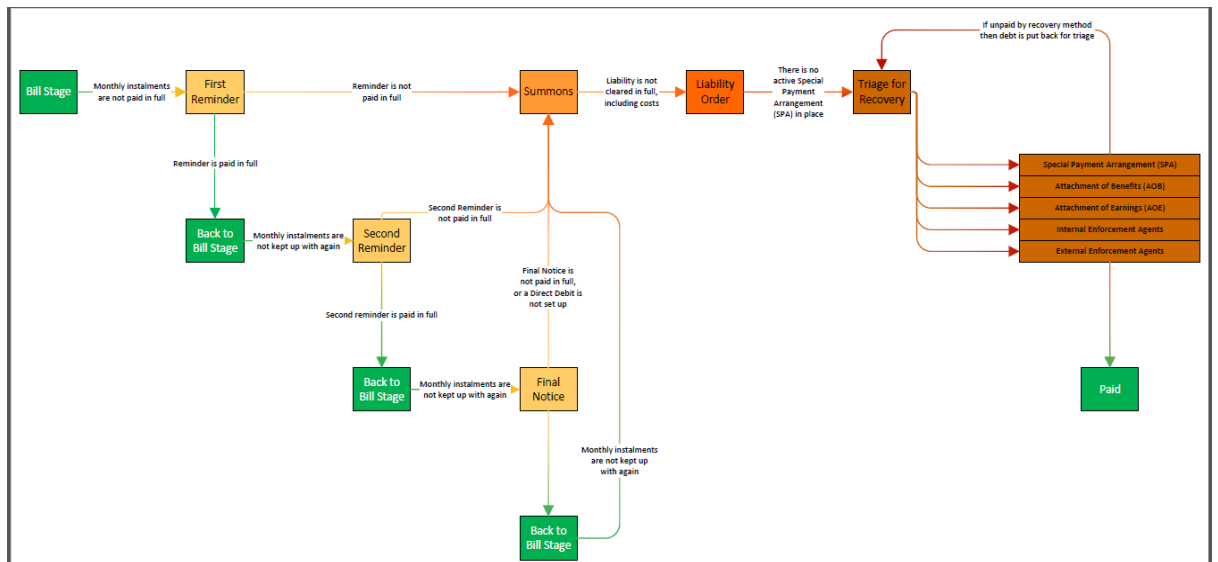
Property Band	Value as at 1 April 1991
A	up to £40,000
B	£40,001 to £52,000
C	£52,001 to £68,000
D	£68,001 to £88,000
E	£88,001 to £120,000
F	£120,001 to £160,000
G	£160,001 to £320,000
H	more than £320,000

- 2.8.
- 2.9. The VOA then advise the Council, on all new entries on the valuation lists, as well as any deleted properties, and any changes to property banding.
- 2.10. The Council Tax payable for each property banding is detailed in the table below and as you can see someone who lives in a band H property pays twice as much as someone who lives in a band D property. Someone who lives in a band A property pays 1/3 of band H property and 2/3 of band D property.

Band	2022					Ninths
	LBC	ASC	Total Croydon	GLA	Total Council Tax	
A	922.91	123.81	1046.72	263.73	1310.45	6
B	1076.72	144.44	1221.16	307.68	1528.84	7
C	1230.54	165.08	1395.62	351.64	1747.26	8
D	1384.36	185.71	1570.07	395.59	1965.66	9
E	1692.00	226.98	1918.98	483.50	2402.48	11
F	1999.63	268.25	2267.88	571.41	2839.29	13
G	2307.27	309.52	2616.79	659.32	3276.11	15
H	2768.72	371.42	3140.14	791.18	3931.32	18

2.11.

- 2.12. In setting the budget the Council assumes an overall collection rate of 98.5% for Council Tax, and in year collection rates are also monitored. Prior to covid the in-year collection rate was 97.25%, however since the pandemic the in-year collection rate has dropped by approximately 2%.
- 2.13. The Council keep 80% of in year collection and 20% is given to the GLA. The in-year Council Tax collection makes up a large part of the Council's finances, which is used to pay for front line services and to protect our most vulnerable residents. It is vital to the Council's financial position that we collect as much Council Tax as possible. The Council's 2022/23 budget projects Council Tax income of £214.11m
- 2.14. **Council Tax Recovery Process**
- 2.15. The regulations governing the collection and recovery of Council Tax is known as The Council Tax (Administration and Enforcement) Regulations 1992 and as a Council we must follow these regulations.
- 2.16. The diagram below (2.18) illustrates what happens if a resident does not keep up to date with payment of their monthly Council Tax instalments, following the issue of their annual or adhoc bill.
- 2.17. If a monthly instalment is not paid in full a reminder notice is issued to the liable party, requesting that payment is brought up to date within 7 days. If the resident makes payment in accordance with the reminder notice, they continue to pay by monthly instalments as per their bill. If a resident fails to make payment as per the reminder notice, their names is entered onto a complaint list for Summons at court. Once a summons has been granted the resident has lost their right to pay by monthly instalments, which means the full year balance is due to be paid, and £117.50 summons costs is added to the bill. A summons letter is sent to the resident advising them of their outstanding balance, and they are advised that proceeding will be stopped if they pay now, ie before the virtual court hearing. They are also asked to call the Council immediately to make payment, set up an arrangement to pay or discuss their account. Failure to pay their account in full before the court hearing results in a Liability Order which will incur further costs of £15. The Liability Order gives the Council the power to enforce recovery action by other methods, eg attachment of Benefit, attachment of Earning, or to send an Enforcement Agent to collect the debt or remove goods.



2.18.

2.19. **Liability Orders**

2.20. The table below confirms the numbers of Liability Orders granted over the previous 4 financial year and the current year to date. To note Croydon is a multi-year billing authority which means a Liability Order can be granted for multiple years debt. You can see below the number of households receiving a Liability Order, the value of the Liability Order, the NCD for that financial year, and the value of the Liability Orders as a percentage of the NCD.

Year	Total Households who have not paid	Total Liability Order Value	NCD	% of NCD
2018	16,658	£ 19,980,995.09	£ 210,162,379.27	9.51%
2019	15,592	£ 20,165,772.84	£ 224,146,425.26	9.00%
2020	4,255	£ 3,371,371.44	£ 232,009,043.47	1.45%
2021	17,421	£ 37,574,257.14	£ 250,920,981.62	14.97%
2022 (to date)	8,269	£ 20,453,553.60	£ 271,380,820.56	7.54%

2.21.



2.22.

2.23. The average value of a Liability Order has increased significantly from 2018 and 2019 where it was £1.2k and £1.3k to £2.2k and £2.4k in 2021 and 2022. This is due to several factors. In March 2020 when the pandemic hit, the courts closed, and the law was changed to prevent any recovery or enforcement action for Council Tax collection. During 2021 the courts re-

opened virtually, and the Council had to catch up recovery from the previous year when recovery was prevented, as well as in year recovery. Due to the pandemic and the changes to the Council Tax support scheme, the Council committed to not taking any court action against anyone in receipt of Council Tax Support. Anyone in receipt of Council Tax Support is excluded from Summons or Liability Order action.

2.24. Once a Liability Order is granted the account is triaged to understand what the best route of recovery is, based on the individuals' circumstances. Only when we have not been able to agree a repayment plan or attachment of benefits or earnings, or we have received no contact from the liable party, would we consider either sending the Liability Order to the internal Enforcement Agent team, if the liable party was resident in Croydon, or one of our six external Enforcement Agent teams, if the liable party is not a Croydon resident, or if the internal team was unable to trace someone.

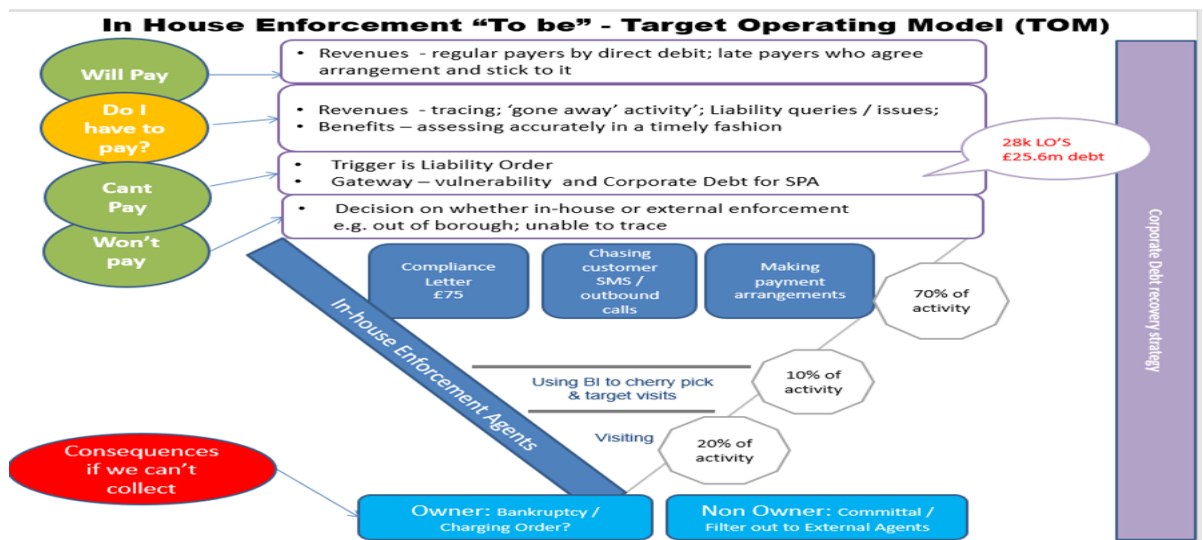
2.25. **Internal Enforcement Agents (EA) (formerly known as Bailiffs)**

2.26. As part of our Corporate Debt Recovery strategy the Council agreed to an internal EA team from April 2016.

2.27. Members signed up to a vision of

- Those who can pay, will pay
- Those of can't pay, we will support to do so through arrangements
- Those of won't pay, we will take a tough stance through enforcement

2.28. The Target Operating Model of the internal EA team:



2.29.

2.30. The team was seen as forming part of an effective Corporate Debt strategy.



2.31.



2.32.

2.33. Generally, if a resident lives within the borough and we need to send an EA to visit the property, we would pass the case to the internal team to deal with in the first instance. The team is made up of 1 Manager, 5 back-office members of staff and 3 EA. We have trained 2 previous members of staff to become fully accredited EA, so we were growing our own EA and investing in our people. EAs are qualified to at least Level 2 Taking Control of Goods Act, and it is a condition of employment in line with statutory regulations that govern EA, that they maintain an accreditation certificate with the County Court, and this is renewed every 2 years. It is also a condition of employment that each EA have a valid bond (insurance) and that the certificate and bond must be maintained and run concurrently.

2.34. All our EA staff are trained on ethical debt collection principles and how to recognise and understand vulnerability. Our EA are subject to the same performance monitoring as any other member of staff, eg they are set smart objectives and they have monthly appraisals, attend team or individual meetings with their manager.

2.35. The EA must sign up to the Council's Code of Conduct which is local guidance for our EA and sets out our responsibilities, obligations, professionalism and conduct of EA, training, and vulnerable situations. It should be noted that our external EA partners must also sign up to Croydon's code of conduct. (Appendix A)

2.36. When it has been decided that a Liability Order should be placed with the internal EA team for collection of the debt, there are legal processes that must be followed. The regulations that govern these processes is The Taking Control of Goods Regulations 2014. It should be noted that the way in which debt can be enforced by EA was completely overhauled in 2014, with the introduction of these regulations, legislation was also introduced at the same time to set the level of fees that can be charged. There are 2 stages to the process, stage 1 is called the compliance stage (£75 fee) and stage 2 is called the enforcement stage (£235 fee plus 7.5% of the value of the debt that exceeds £1,500).

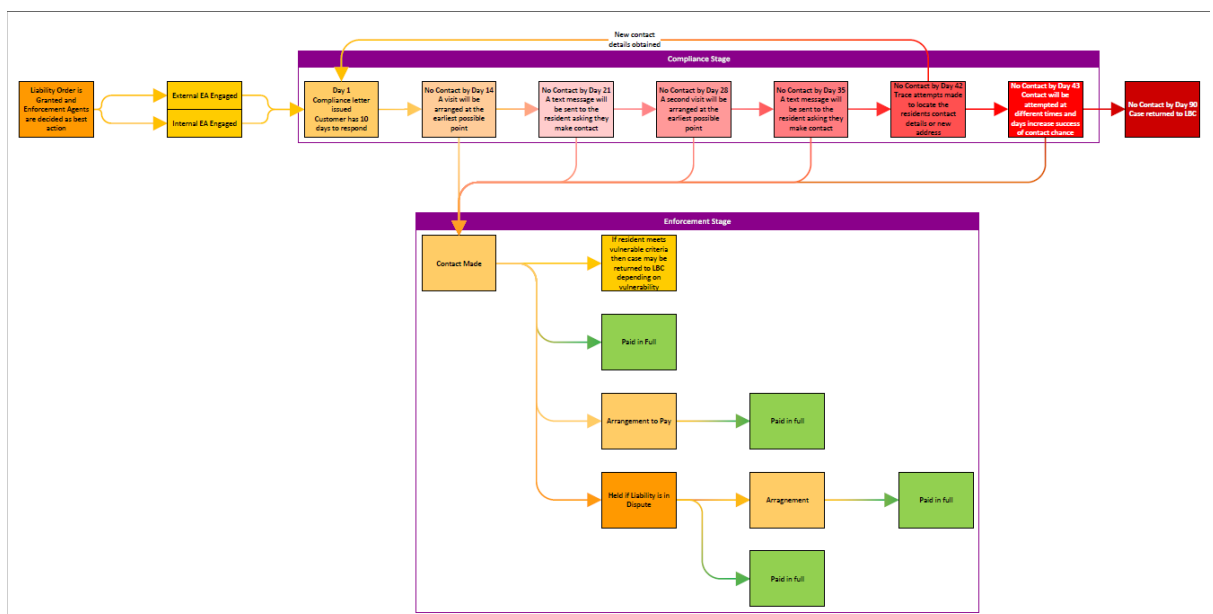
2.37. **Compliance Stage**

2.38. When the internal EA team receive a liability order they must issue a Notice of Enforcement. This notice must provide the date of the notice and the date and time by when full payment or a payment arrangement must be set up. This is known as the “compliance stage”. An EA must give by law a minimum period of seven clear days before making a personal visit to a property. The compliance fee of £75 is payable for each Liability Order.

2.39. **Enforcement Stage**

2.40. If during the compliance stage, full payment or a payment arrangement is not made or if a previous payment arrangement is broken, the case will progress to the enforcement stage. This is where the EA will make a personal visit to a property. The purpose of the visit would be to “take control of goods”, however the reality is much different. The enforcement fee of £235 becomes payable only when the EA has visited the property, it cannot be charged before a visit takes place. If an EA is enforcing more than one LO, only one enforcement stage fee is charged. We do not apply multiple enforcement fees.

2.41. The journey of a LO when reaching the internal EA team is illustrated below.



2.42.

- 2.43. When an EA knocks on a resident's door they must provide the resident with their ID to confirm their identity. They explain who they are, and the nature of the debt with the person named on the liability order. They will not discuss the debt with anyone else in the household. They will either agree payment in full, payment in part i.e., payment arrangement or refer the debt back to the Council Tax team, if there are and issues/questions regarding the outstanding amounts due, or if it is deemed that the resident is vulnerable. Our EAs are also very aware of the cost-of-living crisis, and they are much more accepting of longer re-payment plans for smaller values, based on individuals' ability to pay. They are not knocking on the door to take control of good.
- 2.44. As an organisation we work with partners to support our most vulnerable residents, we are a referral partner of Money and Pensions Advice Service (MAPS). MAPS is the largest single funder of free debt advice in England and works alongside partners across the UK to make debt advice easier and quicker to access, and to improve standards and quality across the sector. We also work with CAB, and we were one of the first LAs in London to sign up to the Council Tax collection protocol, we work with Southwest London Law Centre, Step Change, AgeUK, MIND, and CroydonPlus Credit Union. This list is not exhaustive.
- 2.45. The value of debt collected, and the running costs of the team are detailed below. During 2021/22, the running costs of the internal EA team were £630k. The fee income received into the council was £1m, they collected £3.7m in Council Tax, £46k in Business Rates income (NNDR), and £123k in parking warrants.

	Running Cost	Fee Income Total	Ctax Collection	Ctax fee Income	NNDR Debt Collection	NNDR Fee Income	Parking debt Collection	Parking Fee Income
21/22	£630,161.13	£1,001,479.10	£3,672,165.62	£899,951.68	£46,865.05	£8,221.00	£122,951.67	£93,306.42
20/21		£305,988.56	£550,770.75	£111,547.39	£69,095.03	£1,265.70	£130,180.83	£193,175.47
19/20		£1,024,972.70	£2,528,997.88	£700,353.93	£548,632.25	£66,739.49	£198,795.85	£257,879.28

2.46.

2.47. External Enforcement Agents

2.48. The Council has contracted with 6 external EA companies for collection of Council Tax, Business Rates liability orders and Parking warrants.

- Newlyn
- Jacobs
- Chandler
- CDER
- Bristow & Sutor
- Marston

2.49. Where the debtor does not live within the borough, and we have a liability order for non-payment of Council Tax this is sent to an external agent for collection. Alternatively, if the internal EA team cannot make contact with a resident who lives in the borough, this is sent to one of the external EAs for collection.

2.50. The same compliance stage and enforcement stage of the collection process is followed by the external EAs.

2.51. The value of collection from the external teams is detailed below.

	Internal	External
18/19	£3,123,142.07	£ 1,469,751.20
19/20	£2,528,997.88	£ 2,068,005.11
20/21	£550,770.75	£ 701,355.72
21/22	£3,672,165.62	£ 2,558,980.08

2.52.

2.53. As well as being signed up to Croydon's code of conduct the external agents are also compliant with their own codes of conduct, and the Civil Enforcement Association (CIVEA) code of conduct, CIVEA is the principal trade association representing civil enforcement agencies employing around 2000 certificated enforcement agents that operate in England and Wales. Please see below. (Appendix B, Appendix C)

2.54. Revenues have monthly performance meetings with each EA company, and quarterly steering group meetings are held to monitor against the contract.

2.55. **Complaints**

2.56. There have been no complaints this year, made against the behaviour of the internal EAs.

2.57. There have been 2 complaints this year regarding the behaviour and approach of the external EAs.

2.58. **The Future of Enforcement Agents**

2.59. The bailiff service was overhauled and regulated in 2014. Gone were the days where a bailiff could climb up a ladder and enter someone's home through an open window. The law was changed, and the fee structure was regulated. Bailiffs are now called EA.

2.60. The regulatory enforcement body is called Civil Enforcement Association (CIVEA). CIVEA is the principal trade association representing civil enforcement agencies employing around 2,000 certificated enforcement agents that operate in England and Wales.

2.61. There is also a new enforcement conduct board being established because of ground-breaking collaboration between CIVEA and debt advice sectors, with the support of the Centre for Social Justice. The new regulatory body will be launched in the autumn of 2022.

2.62. This has been created to provide an independent, oversight of the Enforcement Sector. The board members have a mix of skills and experience that will enable them to work with CIVEA as they navigate the incredibly challenging task of assisting local authorities and central government with revenue collection while protecting people hit hard by the cost-of-living crisis."

2.63. The Enforcement Conduct Board will have a mandate to protect the financially vulnerable, balance the critical financial needs of local councils and ensure fairness for all.

CONTACT OFFICER: *Catherine Black Head of Payments Revenues Benefits and Debt 07715370951*

APPENDICES TO THIS REPORT
Appendix A,B and C below

Enforcement Agents Code of Conduct

*Local guidance for enforcement agents
and external enforcement agencies*

CROYDON
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June 2019

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INTRODUCTION

Our code of conduct, for enforcement agents, reflects the values of Croydon Council and the behaviours that we want to be known for.

Our values guide the way we behave and give us standards by which to measure ourselves and our partners working with us, and how we interact with and support our customers.

Our values

One team

Crossing boundaries to work together towards shared goals with colleagues, partners and communities.

Proud to serve

Striving to always do our best for the community, getting the most from limited resources and using taxpayers' money wisely.

Honest and open

Working hard to build trust by treating everyone with honesty and integrity.

Taking responsibility

Encouraging and supporting each other to take responsibility and show what we can do, learning together and recognising all of our contributions.

Valuing diversity

We make the most of the many perspectives that make Croydon distinctive.

The code of conduct sets out the guidelines for acceptable behaviour, compliance with all applicable legislation, appropriate use of good judgment, standards of learning and development, commitment to equality and diversity, confidentiality and data protection, monitoring and complaints.

This code of conduct does not replace the Council's disciplinary, performance and employee Complaints policies and procedures or, the terms and conditions specified in the Enforcement Agents employment contract. The Council reserves the right to review and amend this local procedure.

These standards are intended for all enforcement agents, both internal and external.

It covers Croydon Council's enforcement agency which employs internal enforcement agents and external enforcement agencies acting on behalf of Croydon Council, employing or engaging their own enforcement agents. It also applies to the council

teams that use their services, specifically, the responsible council debt portfolio owners and officers.

All enforcement agents and the representatives of the enforcement agencies **must confirm** that they have read this document before undertaking enforcement activity for Croydon Council.

In order to improve the public's perception of the profession, enforcement agents and those who employ them or use their services, must maintain high standards of business ethics and practice

This code applies to the conduct of enforcement agents in the collection of the following debts:

- Council tax
- Non-domestic rates (Business rates)
- Business improvement district levy (BID levy)

In addition to local priorities and needs this document also incorporates appropriate good practice standards from the ministry justice (Taking control of goods, national standards) and the civil enforcement agency (CIVEA) code of conduct and good practice guide.

Terms used

Creditor	The organisation the debt is recoverable for. This is the Croydon Council
Debtor	The person liable to pay the debt
Enforcement	The lawful process of warrant and taking control of goods (Enforcement powers referred to as 'Schedule 12 Procedure')
Enforcement Agency	The business that employs enforcement agents. This includes both Croydon's internal enforcement agency and external agencies acting on behalf of Croydon council
Enforcement Agent	Someone who is authorised (certificated) to take enforcement action

What is covered in the code

- The council's responsibility as a creditor
- Enforcement agencies' obligations (internal and external)
- Professionalism and conduct of enforcement agents,
- Training and certification standards
- Vulnerable situations
- Debtors' obligations,
- Documentation, data and record keeping
- Fees and charges

- Taking control of goods
- Complaints and disciplinary procedures

1.0 CROYDON COUNCIL'S RESPONSIBILITY AS CREDITOR

1.1 Business standards

For the enforcement process to work effectively, the council service which is pursuing recovery of the debt must be fully aware of its own responsibilities. These should be observed and set out in the terms of the service level agreement (SLA) with the enforcement agency.

The council must never seek payment from an enforcement agency or enforcement agent in order to secure a contract.

The responsible council debt portfolio owner is responsible and accountable for the enforcement agents acting on their behalf.

1.2 Responsibility to the debtor

- Act proportionately when seeking to recover debt, taking into account debtors' circumstances.
- Notify the debtor that if payment is not made within a specified period of time, and that action may be taken to enforce payment.
- Provide a contact point at appropriate times to enable the enforcement agent or agency to make essential queries, particularly where they have cause for concern.
- Ensure that there are clear protocols agreed with their enforcement agents governing the approach that should be taken when a debtor has been identified as vulnerable.
- Should a debtor be identified as vulnerable, be prepared to take control of the case, at any time, if necessary.
- A clear complaints' procedure must be in place to address complaints regarding their own enforcement agents or external enforcement agents acting on their behalf.

1.3 Responsibility to the enforcement agency

- Notify the enforcement agency of all payments received and other contacts with the debtor, including repayment agreements made with the debtor.
- Avoid using enforcement agencies when they have evidence that a debtor falls within the category considered 'vulnerable'. The definition of vulnerable is covered in section 5.
- Council services must not issue a warrant knowing that the debtor is not at the address, as a means of tracing the debtor at no cost.
- If agreeing the suspension of an order or warrant, or if they make a direct payment arrangement with debtors they must give appropriate notification to the enforcement agent
- All background information relating to the debtors circumstance or health/welfare, together with any relevant case history, should be given to the enforcement agency when they are instructed to collect the debt.
- Consider the appropriateness of referring debtors in potentially vulnerable situations to enforcement agents and, if they choose to proceed, must alert the enforcement agent to this situation.
- Inform the enforcement agency if they have any cause to believe that the debtor may present a risk to the safety of the enforcement agent.

2.0 ENFORCEMENT AGENCIES' OBLIGATIONS

2.1 Responsibility for conduct

Enforcement agencies must ensure that enforcement is conducted in accordance with prevailing legislation and in a professional, ethical and proportionate manner. The objective should be the recovery of the sum outstanding as quickly as possible, without causing unnecessary hardship

Enforcement agencies have a responsibility to ensure that all personnel engaged to enforce warrants and orders are properly vetted and possess an appropriate knowledge and understanding of all relevant legislation, case law and powers, and at all times act in accordance with them.

Procedures must be in place to ensure that all enforcement personnel are subject to regular appraisal and performance reviews, at a minimum of yearly intervals. Internal enforcement personnel will be covered by Croydon Council's appraisal scheme.

Such appraisal should include identification of learning, development and training needs as well as a review of incidents and complaints.

Enforcement agencies must work in a way that, so far as possible, allows them to distinguish between debtors who can't pay and those who could pay or who won't pay.

Enforcement agencies must ensure that legislation restricting the enforcement activity to enforcement agents is complied with.

2.2 Statutory and financial requirements

An audit of the agency's accounts by independent accountants should be undertaken at least once a year. This requirement is mandatory and applies to large and small companies and sole traders.

An audit of individual enforcement agents must be conducted at least annually. Ideally this audit should be independent of the officer's line management.

Enforcement agencies must keep a complete record of all financial transactions in

whatever capacity undertaken. A separate account for monies due to the creditor should be maintained and accurate books and accounts should be kept and made available to establish monies owed to the council..

All payments to the council received by the internal enforcement agency will be paid into fund 34 via the council's main payment system AIM.

Enforcement agencies must maintain suitable and comprehensive insurance cover to include:

- Professional indemnity
- Public and employers liability
- Cover for goods taken into control including goods in transit.

2.3 Customer services

All enforcement agencies must maintain sufficient telephone lines, with sufficient trained and competent staff available to answer debtor calls. Telephone calls must be answered within a reasonable time limit.

3.0 PROFESSIONALISM AND CONDUCT OF ENFORCEMENT AGENTS

3.1 Requirement to act within the law

Enforcement agents must act within the law at all times, including all relevant legislation and observe all health and safety requirements in carrying out enforcement. They must maintain strict client confidentiality and comply with data protection legislation and, where appropriate the Freedom of Information Act.

Enforcement agents must act in accordance with the Human Rights Act 1998 and the Equality Act 2010. They must not discriminate unfairly on any grounds including those of age, disability, ethnicity, gender, race, religion or sexual orientation.

3.2 Misrepresentation

Enforcement agents must not attempt to misrepresent their status or imply they are anything to do with the police or any other government agency.

They must not be deceitful by misrepresenting their powers, qualifications, capacities, experience or abilities, including, but not restricted to, falsely implying or stating that:

- Action can or will be taken when legally it cannot be taken by that enforcement agent
- A particular course of action will ensue before it is possible to know whether such action would be permissible
- Action has been taken when it has not
- A debtor's refusal to allow entry to a property is classed as an offence.
- They are an officer of Croydon Council (if they are not)
- They are an officer of the court

Enforcement agents must not seek to enforce the recovery of fees where an enforcement power has ceased to be exercisable. For example where someone else is now liable and they are not liable for the original debt

3.3 Identification and evidence to be provided

When visiting a property the enforcement agent must attempt to speak to the customer before leaving a notice. This applies to all visits.

It is a fundamental principle of this code that all enforcement agents must always introduce themselves and produce photographic identification issued by the council or external enforcement agency and a copy of the letter of authorisation in respect of enforcement proceedings.

When required by legislation the written authorisation from the council must also be shown to the debtor if requested

3.4 Appropriate behaviour

Enforcement agents must carry out their duties in a professional, calm and dignified manner in accordance with relevant legislation and codes of practice. They must dress and speak appropriately and act with discretion and fairness.

They must conduct themselves in a humane, firm but fair manner, act responsibly and shall do nothing to prejudice the reputation and integrity of the council.

Enforcement agents must not act in a threatening manner by making gestures or taking actions which could reasonably be construed as suggesting harm, or risk of harm to debtors, their families, appointed third parties or property.

For the purpose of taking control of goods, enforcement agents must never gain access to the goods by using force or implying that they can use force. The enforcement agent must produce all relevant notices and documents, such as controlled goods agreements, that are required by regulations or statute.

Enforcement agents shall at all times attempt to act in a way which will minimise inconvenience and distress to the debtor and their family. In particular they must avoid responding immediately to provocation.

Enforcement agents must not act in a way likely to be publicly embarrassing to the debtor, either deliberately or negligently (that is to say through lack of care) They shall at all times, act to minimise any embarrassment to debtors. Wherever possible the debtor should be interviewed in private unless the debtor wishes otherwise or declines the invitation.

3.5 Information and confidentiality

When attending a domestic property to meet with an individual debtor, the enforcement agent shall take reasonable steps to ensure they are speaking directly to the debtor, before identifying themselves as an enforcement agent. If the debtor is unavailable the enforcement agent must ascertain when they will be available. Where the debtor is not seen the relevant documents must be left at the address in a sealed envelope addressed to the debtor.

The enforcement agent should seek to establish the identity of all those present, and inform the debtor (when present) of the purpose of the visit, and where appropriate explain the powers of the enforcement agent.

If the person answering the door claims that they are not the debtor and do not know of their whereabouts, the enforcement agent should ask for their name and identification. If they refuse to give this, the enforcement agent should contact the responsible council debt portfolio owner before proceeding.

If the enforcement agent is in any doubt about the occupancy of the address, they should try to establish who is in occupation by requesting proof of occupation for example, a lease or a utility bill. If occupation remains in doubt they should contact the responsible council debt portfolio owner.

If the debtor disputes the liability in person, the enforcement agent must contact the responsible council debt portfolio owner before proceeding further. If required, the enforcement agent will provide the debtor with a telephone number that can be used to contact the council during normal office hours.

Every effort should be made to avoid discussing the nature or purpose of their visit with anyone other than the debtor. The enforcement agent shall take care to ensure that the debtor's circumstances are not disclosed or discussed with a third party other than to someone nominated by the debtor, for example an advice agency representative. This might be relaxed when speaking with a partner or close relative of the debtor.

When attending a business and the debtor is not available, the enforcement agent may deal with a person in apparent authority who is on the premises where those premises are used either wholly or in part to carry on a trade or business

The enforcement agent shall clearly state to the debtor the purpose of the visit. Informing the debtor which enforcement agency they are employed or engaged by and that they are acting on behalf of Croydon Council They should explain that the warrant or order instructs the enforcement agent to take control of goods, to secure payment of the debt under threat of the removal and sale of these goods.

The relevant documentation including details of costs incurred to date must be handed to the debtor or left at the premises. Where the debtor is not seen, the relevant documents must be left at the address in a sealed envelope addressed to the debtor.

All information obtained during the administration and enforcement of warrants or orders must be treated as confidential.

The name of the actual enforcement agent attending the premises must be made clear on any documents left with the debtor or left on the premises. All relevant contacts and telephone numbers must be clearly displayed as must the relevant reference numbers.

The consequences of a failure to pay, together with the details of the fees that have already been incurred and any additional fees/costs that may be incurred, must be fully explained. If settlement is not immediately forthcoming the enforcement agent should consider the appropriateness of a controlled goods agreement, with a suitable payment arrangement.

If the debtor disputes liability over the phone, the enforcement agent must contact the responsible council debt portfolio owner before proceeding further. If required, the enforcement agent will provide the debtor with a telephone number that can be used to contact Croydon Council during normal office hours.

4.0 TRAINING AND CERTIFICATION

4.1 Recruitment

Only staff who have been subject to appropriate pre - employment vetting and who are able to provide verifiable and satisfactory references must be engaged as an enforcement agent.

All staff that will be engaged in a direct customer facing position must be subject to a check with the Disclosure and Barring Service. As a result of legislation introduced in 2006, Enforcement Agents are exempt from the provisions of the Rehabilitation of Offenders Act.

Staff directly engaged in enforcement by taking control of goods must not have previously been convicted of any (unspent) criminal offence or any offence involving fraud, dishonesty or violence or have any current County or High Court judgments made against them.

Recruitment must not discriminate unfairly on any grounds including those of age, disability, ethnicity, gender, race, religion or sexual orientation

4.2 Training

Enforcement agencies must ensure that all enforcement agents, employees and contractors are provided with appropriate training to ensure that they understand and are able to act, at all times, professionally and within the bounds of the relevant legislation.

This training should be provided at the **start** of employment and at intervals afterwards to ensure that their knowledge is kept up to date. Professional training/assessment should be to a standard that complies with relevant legislation.

Legislation covering enforcement includes but is not restricted to:

- The Tribunals, Courts and Enforcement Act 2007
- The Tribunals, Courts and Enforcement Act 2007 (Consequential, Transitional and Saving Provision) Order 2014
- The Taking Control of Goods (Fees) Regulations 2014
- The Taking Control of Goods Regulations 2013
- The Certification of Enforcement Agents Regulations 2014 and
- Council tax and Business rates legislation

Enforcement agencies must ensure that legislation restricting the enforcement activity to enforcement agents is complied with.

Enforcement agencies must ensure that all employees, contractors and agents will at all times, act within the scope of current legislation, for example:

- The Companies Act,
- HMRC provisions,
- Data Protection,
- Health and Safety,
- Equality and the Human Rights Acts etc.

They must ensure that they have appropriate knowledge and understanding of it and be aware of any statutory obligations and provide relevant training.

Enforcement agents should be trained to recognise and avoid potentially hazardous and aggressive situations and to withdraw when in doubt about their own or others' safety.

Enforcement agents should be trained to recognise vulnerable debtors (see section 5.0, to alert the responsible council debt portfolio owner where they have identified such debtors and when to withdraw from such a situation.

4.3 Equality and human rights legislation

Relevant aspects of the Human Rights Act 1998

- Article 1. Right to the peaceful enjoyment of possessions**
But this is subject to the conditions provided for by law and does not prevent the right to ensure the payment of taxes or other contributions or penalties
- Article 8: Right to respect for private and family life and home.**
But this is subject conditions provided by law and when it is necessary in the interests of the economic well-being of the country or for the protection of the rights of others.
- Enforcement agents must be able to confirm their authority to act within the exceptions to the act, Enforcement agents must be able to confirm their authority to act within the exceptions to the act,
- Action taken by enforcement agents must be proportional, prescribed by law and not discriminatory
- Enforcement agents must act fairly and in good faith, have respect for individuals and their property.

Relevant aspects of the Equality Act 2010

- Enforcement agents must not act in a discriminatory way on grounds of age, disability, ethnicity, gender, race, religion or sexual orientation)
- The Act provides the legal sanction for breaches of the national standards for enforcement agents.

4.4 Certification of enforcement agents

Internal and external enforcement agents must have a current unexpired certificate in order to act on behalf of Croydon Council in the enforcement of powers of taking control of goods.

Internal enforcement agents are required to have a certificate showing Croydon Council named as their employer. Newly appointed enforcement agents may act temporarily for the council in enforcing powers of taking and control of goods as long as

They have a current, unexpired certificate and

- The court has been notified of the change of employer with the intention of arranging a court hearing for the issue of a replacement certificate and
- The enforcement agent has bond security to act for the council and
- The enforcement agent has a letter of authority to act on behalf of the council

An individual, who is not an enforcement agent, may act in the presence and under the direction of a certificated enforcement agent. An enforcement agent can take other people on to a debtor's premises to assist them in exercising any power but they must not remain on the premises without the enforcement agent. Such experience will form an essential part of the training and development of trainees seeking to qualify and achieve certification as an enforcement agent.

4.5 Renewal certificates and bonds

Both the enforcement agency and the enforcement agent are responsible for ensuring timely renewal of certificates and bonds. A certificate expires two years from the date it was issued. Before expiry an enforcement agent must apply to the court for a renewal certificate. This will involve attending an interview with the District Judge.

A security bond expires two years from the date it was issued. The bond must be renewed before it expires. If the bond has expired and has not been renewed the enforcement agent's certification is invalidated even if the certificate has not yet expired.

Failure to renew your Certification and bond to the Council's satisfaction, have your Certification and bond withdrawn, or allow your Certification and bond to lapse on more than one occasion, will be considered a disciplinary offence and the Council's formal disciplinary process will apply.

4.6 Requirements before certification

For an individual to become an enforcement agent they must fulfil the following criteria

- They must have passed the qualifying examination in taking control of goods at or above level 2 of the Qualifications and Credit Framework or equivalent as determined by a nationally accredited body, such as the Chartered Institute of Credit Management (CICM)
- To be eligible to take the examination they must have registered as an affiliate member of the CICM
- They have undertaken appropriate training and work experience
- Booked the examination at a Pearson Vue Centre

Those who have passed the examination successfully must then fulfil the additional criteria:

- Complete an application form for a certificate to act as an enforcement agent and
- Provide evidence with the application that they are a fit and proper person to act as an enforcement agent, which will include:

- ❑ Two references which may be from the applicant's employer or from an approved officer of the Civil Enforcement Association or the High Court Enforcement Officers Association and
- ❑ A certified copy of the results of a search of the register of judgments, orders, fines and tribunal decisions and
- ❑ Certified copies of evidence of their CICM qualification and
- ❑ Copies of the forms the applicant intends to use when exercising powers and that these conform to legal requirements and
- ❑ Attend an interview with the District Judge who will want to be satisfied that the applicant is a fit and proper person to hold a certificate and has sufficient knowledge and experience of the taking control of goods process, the national standard and legislation
- ❑ Provide a certified copy of a criminal conviction certificate and
- ❑ Evidence that the applicant has lodged bond security for £10,000

4.7 Continuing Professional Development

Qualification at level 2 is the minimum standard required for certification. But enforcement agents should be encouraged to develop and update their skills. Enforcement agencies should provide appropriate development opportunities

5.0 VULNERABLE SITUATIONS

5.1 Risk assessments

In circumstances where the enforcement agency requires it, and always where there have been previous acts or threats of violence by a debtor, a risk assessment should be undertaken prior to the enforcement agent attending a debtor's premises.

Where enforcement agents have identified vulnerable debtors or situations, they should alert the responsible council debt portfolio owner and ensure they act in accordance with all relevant legislation.

5.2 Identifying vulnerability

Enforcement agencies, enforcement agents and the council must recognise that they all have a role in ensuring that the vulnerable and socially excluded are protected; and that the recovery process includes procedures for dealing with such situations and are agreed between the agent/agency and the council.

A debtor may be considered vulnerable if, for reasons of age, health, disability or severe financial insecurity, they are unable to safeguard their personal welfare or the personal welfare of other members of the household.

Although there is no definition of vulnerability in the legislation, the appropriate use of discretion is essential in every case and no amount of guidance could cover every situation. Therefore the enforcement agent has a duty to contact the Council and report the circumstances in situations where there is evidence of a potential cause for concern.

Enforcement agents should be aware that vulnerability may not be immediately obvious. Some groups who might be vulnerable are listed below. However, this list is not exhaustive. Care should be taken to assess each situation on a case by case basis.

Potential vulnerability might include:

- Elderly persons
- People with a disability
- People with mental impairment or learning difficulties
- People experiencing serious illness
- Recently bereaved
- Lone parent families;
- Pregnancy;
- Unemployed people;
- People with obvious difficulties understanding English.

5.3 Elderly Persons

An elderly person is not necessarily vulnerable and many elderly people are financially secure and both mentally and physically healthy. However, some elderly people are frail, confused, ill, and living on fixed and limited incomes and, therefore, are considered to be vulnerable.

If it is evident that the debtor either falls into the latter categories no attempt to take control of goods should be made without first consulting the responsible council debt portfolio owner.

5.4 People with a disability

A person with a disability is not necessarily vulnerable; however, where the disability affects the person's ability to deal with their financial affairs they should be considered to be vulnerable.

Regardless of the severity of the disability, the enforcement agent should **never take control of goods that are necessary to the wellbeing of the person due to their disability**. If it is evident that the debtor has a disability that is anything other than a relatively minor disability, no action should be taken without consulting the responsible council debt portfolio owner.

5.5 Persons with mental impairment or learning difficulties

If it is evident that the debtor has a mental impairment or learning difficulties they should be considered to be vulnerable and no action should be taken without consulting the responsible council debt portfolio owner

5.6 Persons experiencing serious illness, including mental illness

Where the debtor (or the debtor's partner) appears to be suffering from any condition which is serious or life threatening they could be considered to be vulnerable. No action should be taken if the debtor (or the debtor's partner) is suffering from any condition

which is serious, life threatening, or where the enforcement agent has concern that further action may be seriously detrimental to the person's welfare.

5.7 Recently bereaved

A person suffering the recent bereavement of a close relative could be considered to be a vulnerable person. Bereavement affects different people in different ways and the enforcement agent will need to exercise discretion in determining whether a person that has experienced recent bereavement is vulnerable based on the individual circumstances. Where the debtor (or the debtor's partner) is obviously still extremely distressed the enforcement agent should seek guidance from the responsible council debt portfolio owner before proceeding even though some time may have passed.

5.8 Lone parent families

A lone parent is not necessarily a vulnerable person and it is recognised that some lone parents are financially secure. However, lone parents, and in particular those with very young children, may have difficulty in undertaking employment and, therefore, rely on welfare benefits. The enforcement agent should exercise discretion and consult the responsible council debt portfolio owner before taking action where there is reason to believe that a lone parent may be vulnerable.

5.9 Pregnancy

A woman in the later stages of pregnancy may find dealing with serious financial issues stressful, particularly if they are not supported by a partner, or if they are on a low income or benefits. This may be compounded by any additional essential expenditure due to the pregnancy or birth of a child. Where it is evident that a debtor, or their partner, is pregnant, the enforcement agent should take care to avoid causing stress as this could be detrimental to the person's wellbeing. Where the enforcement agent has concerns that further action may be detrimental to their welfare they should seek further advice from the responsible council debt portfolio owner

5.10 Unemployed people

Unemployment does not automatically mean the debtor is vulnerable. For example a person may have received a substantial redundancy payment and be financial secure in the short-term. However, loss of employment may result in serious financial difficulties if a person is suddenly unable to meet their existing financial commitments.

A person who has recently become unemployed after a long period of employment may be unfamiliar with processes for claiming benefits and may need additional assistance to understand their entitlements. If it is evident from the enforcement agent's observation of the debtor's circumstances that the debtor may be vulnerable, no action should be taken without consulting the responsible council debt portfolio owner.

If a debtor appears to have significant financial issues having consulted with the council it may be appropriate to make a referral to Gateway services.

5.11 People with obvious difficulties understanding English

Where a person does not understand either spoken or written English they should be considered to be vulnerable, particularly if they do not have support from family members who can speak and read English.

Where the enforcement agent has reason to believe a person may have difficulty understanding English this should be reported to the responsible council debt portfolio owner who will provide advice on how to proceed.

5.12 Action when vulnerability is identified

The appropriate use of discretion is essential in every case and no amount of guidance could cover every situation, therefore the enforcement agent has a duty to contact the responsible council debt portfolio owner and report the circumstances in situations where there is potential cause for concern.

Where vulnerability is identified or suspected enforcement should be suspended and the matter should be referred back to the responsible council debt portfolio owner for guidance

Where the debtor is a vulnerable person the enforcement agent should give the debtor an adequate opportunity to get assistance and advice in relation to the exercise of the enforcement power.

If necessary, the enforcement agent will advise the responsible council debt portfolio owner if further action is appropriate. The exercise of appropriate discretion is needed, not only to protect the debtor, but also the enforcement agent who should avoid taking action which could lead to accusations of inappropriate behaviour. If identified at the enforcement stage, the process reverts back to the compliance stage without further action

Where the debtor is a vulnerable person, the fees due are not recoverable unless the enforcement agent has, before proceeding to remove goods, given the debtor an adequate opportunity to get assistance and advice in relation to the exercise of the enforcement power¹.

The enforcement agent must be sure that the debtor or the person to whom they are entering into a controlled goods agreement understands the agreement and the consequences if the agreement is not complied with.

The enforcement agent must not enter into a controlled goods agreement with the debtor or another person if it appears to the enforcement agent that that person does not understand the effect of, and would therefore not be capable of entering into, such an agreement. This will include instances where it is evident that the debtor's understanding of English is so limited as to make this the case.

Wherever possible, enforcement agents should have arrangements in place for rapidly accessing interpretation services (including British Sign Language), when these are needed, and provide on request information in large print or in Braille for debtors with impaired sight.

¹ The Taking Control of Goods (Fees) Regulations 2014 reg. 12

5.13 Unaccompanied children

Enforcement agents must withdraw from domestic premises if the only person present is, or appears to be, under the age of 16 or is deemed to be vulnerable by the enforcement agent; they can ask when the debtor will be home - if appropriate. The enforcement agent must not hand documentation/notices to a person who is, or appears to be, under the age of 16.

Enforcement agents must withdraw without making enquiries if the only persons present are children who appear to be under the age of 12. The enforcement agent must report this to the council's enforcement agency manager and a referral to social services will be made. The enforcement agent must wait at the property until the child's parent or carer returns.

5.14 Duty to report in other circumstances

It may also be appropriate for enforcement agents to report concerns for the health or safety of other potentially vulnerable people, which they identify in the course of their work. For example, concerns for the wellbeing of children who are accompanied by an adult, or for vulnerable adults who may be at risk of harm.

5.15 Sensitive premises

The enforcement agent must not knowingly visit sensitive venues which include but are not limited to:

- Places of worship
- Nursery schools
- Hospitals
- GP's surgeries
- Funeral directors
- Hospices
- Care homes

If this situation arises the case must be returned and the council service notified. If there is any doubt whether a venue is sensitive, the enforcement agent must contact the responsible council debt portfolio owner for guidance.

5.16 Times and hours for enforcement

Enforcement agents should be respectful of the religion and culture of others at all times. They should attempt to be aware of the dates for religious festivals. They should carefully consider the appropriateness of undertaking enforcement on any day of religious or cultural observance or during any major religious or cultural festival.

Enforcement agents may not take control of goods before 6am and after 9pm ²

- Unless authorised otherwise by a court, or
- If the goods are located on business premises in which case enforcement action may be taken during trading hours, or
- If the enforcement agent has begun to take control during authorised hours but to complete the action it is necessary to continue after 9pm (as long as the time spent is reasonable)

² The Taking Control of Goods Regulations 2013 (13)(1)

Croydon council's internal enforcement agency will normally operate between the hours of 7am and 7pm.

6.0 DEBTORS' OBLIGATIONS

6.1 Debtor's conduct

A debtor is equally responsible for ensuring that an enforcement encounter is concluded in a civil, polite, honest and non-threatening manner. An enforcement agent is entitled to be treated with respect and courtesy and should not be subjected to violence, threats or intimidation.

6.2 Assumption of debtor's awareness

Attendance by an enforcement agent is never the first course of action by the Council and consequently the enforcement agent is entitled to assume that the debtor is fully aware of their liability. The enforcement agent is equally entitled to assume that the debtor has received and understood any documentation sent by the enforcement agency or the creditor.

Debtors should ensure that they respond immediately to correspondence and should not attempt to delay matters by making false claims or attempt to conceal their true identity. A failure to respond to correspondence and/or contact from the enforcement agency will inevitably result in the matter being escalated, with the potential for goods to be seized and removed, thus incurring additional costs, charges and fees.

Debtors should understand that any documents posted or delivered to the debtor's address, by the enforcement agents will be deemed to have been delivered.

6.3 Challenging the debt

If a debtor believes that they have a legitimate challenge to the debt, this must be raised immediately and progressed without delay. The grounds of any challenge must be communicated to both the council and the enforcement agency, supported by evidence.

Debtors who may feel that they fall into a vulnerable or hardship category must inform the enforcement agency immediately of their circumstances. They should be aware that such claims must be corroborated, which may involve a personal visit to observe their circumstances.

If a debtor does not understand what is happening or needs help in dealing with their debt then they should seek the assistance of a free advisory service immediately. If doing so they should provide that agency with **all** documentation they have received.

Debtors should realise that delay may increase costs, fees and charges. Ignoring a debt does not make it go away, it merely delays the inevitable and may increase costs, charges and fees.

6.4 Discretion to agree arrangements

The warrant or order, that is being enforced, empowers the immediate taking of goods and there is no automatic right to have an extended payment arrangement or instalment plan. When an enforcement agent first demands payment they are seeking full payment. Any agreement for extended terms is solely at the enforcement agent's discretion.

If a payment is promised or an agreement or arrangement is reached for settlement of a debt, the debtor must keep to the strict terms of that contract. Should the terms of an agreement be breached or broken the debtor should understand that the enforcement agent will proceed to recover the full remaining debt, with additional costs.

If paying by debit/credit card or by cheque, a debtor should ensure that there are sufficient funds by which to pay the amount and realise that if the payment by card is declined or the bank return a cheque unpaid then the enforcement agent will return and further costs, charges and fees will be applied.

It is common practice for advisory agencies to recommend that a debtor should deny access to the enforcement agent and refuse to sign any documentation. The debtor should realise that by accepting this advice they could be prejudicing the potential for an instalment plan to be agreed and any accessible goods could be removed immediately.

If a debtor disputes the level or appropriateness of any cost, charge, or fee they can apply to the court for those items to be assessed, once payment has been made.

A debtor should be aware that if the enforcement agent is not successful in recovering the debt due, then the council, subject to the relevant legislation, has several other options open to it to achieve recovery of their money, which can include; attachment of earnings or benefit, administration or sequestration orders, bankruptcy or liquidation, or committal to prison

6.5 Third party advisors

An enforcement agency is not legally obliged to deal with a third party advisor. Enforcement agencies will normally deal with bona fide organisations, but only if they are in possession of evidence that they are empowered to act and if their involvement is beneficial to clearing the debt.

Enforcement agents are not bound to accept any offer made by an advisor and may refuse such offers if they are felt to be unreasonable.

Advisors should restrict themselves to relevant issues, namely settlement or discussion of the actual debt. Making uncorroborated and possibly unfounded claims or allegations against the enforcement agent or their company is not conducive to bringing the matter to a satisfactory conclusion.

If an advisor believes that the debtor has a genuine grievance in respect of their treatment, this should be addressed as a separate issue, firstly to the enforcement agent or enforcement agency.

If the grievance is not resolved at this first stage, it can then be escalated through the complaints procedure (see section 10.0).

7.0 DOCUMENTATION, DATA AND RECORD KEEPING

7.1 Standards of documentation

All notices, correspondence and documentation issued by the enforcement agent/agency must be clear, complete and unambiguous and to the satisfaction of the responsible council debt portfolio owner. They must not use unhelpful legal or technical language and should comply with relevant legislation.

On returning any un-executed warrants, the enforcement agent should report the outcome to the responsible council debt portfolio owner and provide further appropriate information, where this is requested and, where appropriate, paid for by the responsible council debt portfolio owner.

All information obtained during the administration and enforcement of warrants must be treated as confidential between the enforcement agent, debtor, the responsible council debt portfolio owner and any third parties nominated by the debtor.

Enforcement agents should provide clear and prompt information to debtors and the responsible council debt portfolio owner

Enforcement agents should make debtors aware of the possible additional costs of enforcement which will be incurred if further action becomes necessary. If a written request is made, an itemised account should be provided.

Enforcement agents will clearly explain and give in writing, the consequences of taking control of a debtor's goods. Except where a notice or other documentation is handed to the debtor, it must be enclosed in a sealed envelope and addressed to the debtor with their full postal address on the envelope.

Documentation and notices must comply with the legislation. Failure to do so will result in the removal of the fee if applicable. The enforcement agency must answer all correspondence from debtors within 10 working days of receipt.

Failure to comply with the above requirements may result in the removal of fees charged.

The enforcement agency must retain enforcement records relating to Croydon Council for a minimum of 5 years, even if no longer representing Croydon Council.

7.2 Case records, notices and documentation

Action	Timescale for Revenues	Timescale for Parking
Accurate, timely records should be kept of all action on a case when it has been issued to an enforcement agency. Details of action taken, by who and when should be uploaded to the agency's system	Within 1 week of the action having taken place	By the following working day
Copies of all notices and documentation issued to the debtor should be uploaded to the agency's admin system	Within 1 week of the documentation being issued	By the following working day
Documentary evidence to support all stages of recovery taken must be uploaded to the agency's admin system	Within 1 week of the documentation being issued	within 24 hours of any activity
All events must be shown on the agency's client system. This includes telephone calls, correspondence and fees charged. This information will be used by the council when reviewing cases.	Within 1 week of any activity	Within 24 hours of any activity

7.3 Data Protection

The public trust us to keep their personal information safe and secure and not to disclose confidential information, unless we are authorised to do so.

As well as understanding the points below, enforcement staff should also make sure they are aware of the key points of the Data Protection Act 1998, which imposes a legal duty on

individuals and the Freedom of Information Act 2000 which promotes greater openness and accountability by giving a right of access to information held by public authorities.

The council's own policies on data protection and freedom of information are available on the council's intranet.

You must not:

- Use confidential information for own purposes;
- Disclose confidential information to anyone or third party outside the council.
- Improperly disclose, or use (directly or indirectly) any information (either about council business, employees or members of the public) that is received in the course of work or allow others to do so.
- Use data held by the council for any purpose other than that for which it is registered to be kept and used.
- Request more information than is necessary from customers
- Share customer information without their informed consent or lawful authority to do so
- Conceal any matter that it is a duty to report.

You must:

- Keep all council and personal data confidential, safe and secure whether computerised or manually held and comply with the law and council policies. This includes:
 - Not leaving it unattended or where anyone can see it.
 - Leaving it in a public place, like a café or on a train.
 - Discussing it where you could be overheard.
 - In a public place where confidential information can easily be read by a third party.
 - Sending it to a private email address.
- Check that anyone who asks for council information has a valid reason for doing so.
- Check with your director or the monitoring officer if you are unsure if information can be disclosed.
- Follow the information management and data loss procedures and guidance.

Enforcement agents shall ensure that all information coming into their possession during the performance of the contract is treated as strictly confidential and is not used for any other purpose.

All data passed to the enforcement agent by the council, or obtained by the enforcement agents in the performance of their duties and services, remains confidential and the property of the council at all times.

In particular, the company as a "data processor" must comply with obligations equivalent to those imposed on the council as a "data controller" by the seventh principle (Schedule 1, Part II, Para 12) of the Data Protection Act 1998, that is, appropriate technical and

organisational measures should be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to personal data.

Wherever possible the exchange of information between the council and the enforcement agent shall be secure to protect the interests of the debtor and the principles of the Data Protection Act 1998. This will be achieved through the encryption of data, wherever and whenever necessary.

8.0 FEES AND CHARGES

Fees and charges

8.1 Stages of enforcement

There are three stages of enforcement, the compliance stage, the enforcement stage and the sale stage. Specific fees are payable by the debtor, should each stage become necessary. If full payment is made at the compliance stage, only the compliance fee is incurred.

Details of the fees and disbursements and the stages of enforcement are set out in the appendix to this document.

Enforcement agents will clearly explain to the debtor the consequences of taking control of goods and ensure that debtors are aware of any additional charges that will be incurred.

Enforcement agencies must make payments to the council on account of monies collected within 21 days. Each payment must be supported by a schedule giving sufficient information to enable the council to credit each debtor's account correctly.

There must be adequate facilities available to allow the debtor to make payment both to an office location and directly to the enforcement agent.

Costs charged to the debtor should be strictly in accordance with the relevant regulations.

The enforcement agent must provide details of any direct charges to the debtor. Debtors must be provided with a full, clear breakdown of fees charged, including the action which triggered the costs if requested by the council, the customer or someone acting on the customer's behalf.

All documents, whether posted or hand delivered must be in accordance with the relevant legislation and should not be ambiguous or misleading

8.2 Order of fee payment

1. Amounts due to any co-owner (from sale of goods)
2. Auctioneer costs
3. Compliance fee, prior to collection of council's outstanding balance or additional fees.
4. Enforcement fee is paid at a pro rata rate. If the council tax element (including court costs) constitutes 75% of the total debt, the council will receive 75% of any payment.
5. Sale Stage fee is paid at a pro rata rate. If the council tax element (including court costs) constitutes 75% of the total debt, the council will receive 75% of any payment.

9.0 TAKING CONTROL OF GOODS

9.1 Entry to premises

Before seeking access to premises an enforcement agent should ensure where possible that the debtor is still resident at the property or carries on a business or trade from the premises.

Force should never be used to gain entry to premises and deception should never be used to gain physical access to premises and an enforcement officer must not misrepresent their power to force entry.

Enforcement agents should not seek to gain entry to premises under false pretences; for example asking to use the toilet. They should be clear as to why they are seeking entry to the premises.

Enforcement agents should only enter premises as part of the enforcement process.

Enforcement agents must only use a door or usual means of entry to enter premises.

A power to re-enter premises by force applies to both residential and business premises where a controlled goods agreement is in place and the goods remain on the premises but the debtor has failed to comply with the repayment terms of the controlled goods agreement. This power should only be used to the extent that it is reasonably required and only after the debtor has been given notice of the enforcement agent's intention to re-enter.

9.2 Taking payments and making arrangements

If on attendance, contact is made with the debtor, the enforcement agent should attempt to recover the full amount owed as quickly as possible taking into account the circumstances of the individual debtor.

Debtors must not be pressed to make unrealistic offers and should be asked to consider carefully any offer they voluntarily make.

A family member or third party should not be pressured into paying the sum due on behalf of an individual debtor, though the enforcement agent may accept a voluntary payment if tendered and which might avoid goods being seized or removed.

Where a council service has accepted a reasonable repayment offer, the enforcement agency must accept the terms of the arrangement as instructed by the responsible council debt portfolio owner.

All payments offered by debtors must be accepted. However, it is important that the enforcement agent explains to the debtor that acceptance of a payment does not necessarily imply that an arrangement has been agreed on the same instalment terms.

For example, if the debtor offers a payment which is less than the amount of an instalment which the enforcement agent is prepared to accept as part of a repayment arrangement. The enforcement agent must take the payment to reduce the debt but also explain to the debtor that this does not constitute the instalment terms of a repayment agreement.

If the enforcement agent experiences difficulty taking a payment, the responsible council debt portfolio owner must be contacted immediately to take the payment from the customer.

The debtor must be given a receipt for all payments giving the following details:

- Name of the debtor
- Payee (if different)
- Account reference number
- Bailiff reference number
- Liability order/warrant number
- Amount of payment
- Date
- Authorisation code for any credit/debit card payments.

Where payments are taken by an external enforcement agent, the payment must be remitted to the council within 21 working days.

9.3 Controlled goods agreement

If the debtor cannot pay the debt in full, the enforcement agent must be prepared to make an arrangement. The debtor should be invited to sign a controlled goods agreement which lists

all goods subject to the agreement and details the arrangement. A copy of the signed controlled goods agreement must be given to the customer.

The enforcement agent must make payment arrangements to collect the full outstanding balance in the shortest time possible having regard to the debtor's ability to pay. Only in exceptional circumstances, and only with the agreement of the responsible council debt portfolio owner should an arrangement to pay be accepted which exceeds a period of twelve months.

When compiling the controlled goods agreement the enforcement agent should be confident that if sold the sale would raise enough to cover the cost of removal, storage and sale and pay off a 'meaningful' amount of the debt. By 'meaningful', we expect at least 50% of the debt to be paid. Where this is not achievable the responsible council debt portfolio owner should be notified.

Where there are insufficient goods on which to take control, a signed certificate to this effect must be sent to the council.

9.4 Debtor refuses a controlled goods agreement

Where the debtor refuses to pay the debt in full or enter a controlled goods agreement then the enforcement agent may proceed to the sale stage. In these circumstances sale stage fee can be applied on the same day as the first attendance by the enforcement agent when the only remaining remedy is the removal of goods.

In council tax only, where a controlled goods agreement is not agreed with the debtor, and no immediate payment is obtained, the enforcement agent should try to establish whether a defaulting debtor is in employment. If so, the enforcement agent should obtain the name and address of the employer. If the debtor is unemployed, the enforcement agent should determine whether claims have been made for state benefits and council tax support or housing benefit.

9.5 Removing Goods

Enforcement agents must only take goods in accordance with the appropriate regulations or statute.³

All reasonable attempts should be made to ensure that the debtor is present when goods are taken into control.

Enforcement agents must ensure that goods are handled with proper care so that they do not suffer any damage or cause damage to other goods or property, whilst in their possession. Enforcement agents should have insurance in place for goods in transit so that if damage occurs this is covered by the policy.

³ The Taking Control of Goods Regulations 2013 reg. 4

A detailed and complete receipt for the goods removed should be given to the debtor or left at the premises in accordance with the appropriate regulations.

Enforcement agents should take all reasonable steps to satisfy themselves that the value of the goods taken into control to cover the sum outstanding is proportional to the value of the debt and fees owed.

Enforcement agents should not take control or remove goods clearly belonging solely to a third party not responsible for the debt. Where a claim is made, the third party should be given clear instructions on the process required to recover their goods.

Enforcement agents should be aware of circumstances where a 'no goods' (nulla bona) valuation may be appropriate, for example where no goods of sufficient value have been identified; or where the removal of goods would lead to severe hardship for the debtor. In such instances the enforcement agent should make the council aware of this situation.

9.6 Multiple warrants

Where enforcement agents have multiple warrants for a single debtor, an enforcement agent must take control of goods, and sell or dispose of these goods, on the same occasion except where it is not practical to do so.

The compliance fee can be charged on each liability order received where a 7 day compliance letter is issued.

Only **one** enforcement fee and **one** sale fee can be charged in respect of a debtor across multiple liability orders/warrants sent to the enforcement agent

Where warrants are sent to the enforcement agency at different times the following applies;

- If there is no controlled goods agreement in place and the arrangement is being maintained the enforcement agent/agency must attempt to contact the debtor to add the new balance to the arrangement.
- Where it is reasonably practical to do so the liability orders/warrants must be enforced at the same time
- Circumstances where this may not be practical are where for instance, several warrants are dealt with and resolved on the same occasion, but a new warrant arises after that date and could not have been dealt with at the same time, a new separate, enforcement fee is appropriate.

9.7 Applications to court

No applications may be made to the court in respect of enforcement action without prior consultation and approval from the responsible council debt portfolio owner.

9.8 Returning liability orders and warrants

Liability orders and warrants must be returned at the responsible council debt portfolio owner's request with all fees removed from the customer balance if requested

Returns should be confirmed within 48 hours. All returns must be accompanied with a report on what action has taken place, the time and date of any activity, to include details of any payments made by the customer.

Following enforcement agency performance review, should the responsible council debt portfolio owner request cases be returned due to non-collection, cases will be returned with all fees removed.

9.9 Council tax: removal of goods (Sale stage)

The enforcement agent must not remove goods without first consulting and receiving permission from the responsible council debt portfolio owner.

Where a signed controlled goods agreement is in operation and the debtor fails to maintain the payment arrangement, a warning letter must be issued before goods are removed if the debtor is not present. A minimum of 7 days written notice to the debtor (excluding Sundays and bank holidays) is required prior to re-entry of premises, and only with permission from the responsible council debt portfolio owner

When the goods are removed the debtor must be issued with the required notices.

Where goods are removed the notice should include the location where the goods have been stored.

9.10 Business rates: removal of goods (sale stage)

The enforcement agent must not remove goods without first consulting and receiving permission from the responsible council debt portfolio owner.

In business rates, where the debtor defaults on a controlled goods agreement and the enforcement agent has grounds to believe that there is a risk of the debtor absconding with the controlled goods, the requirement for the enforcement agent to give notice prior to re-entry to the premises may be waived with the agreement of the responsible council debt portfolio owner.

When the goods are removed the debtor must be issued with the required notices.

If entry has to be forced to take control of goods, (where a signed controlled goods agreement is in place), permission must be sought from the responsible council debt portfolio owner. Following forced entry the property must be secured afterwards.

Where goods are removed the notice should include the location where the goods have been stored.

9.11 Vehicles

The enforcement agent must not remove goods without first consulting and receiving permission from the responsible council debt portfolio owner

A DVLA check must be carried out and confirmed for all vehicles that are included in a controlled goods agreement.

Vehicles must not be immobilised or removed if the tax disc indicates that it is owned by a disabled driver or the vehicle has a disabled person's badge displayed.

Vehicles must not be immobilised without gaining confirmation from the DVLA that they belong to the debtor.

Motor vehicles must not be seized if they are:

- Necessary for work (for example, a taxi), study or business, this rule does not apply if debts are for business rates or taxes
- On a hire purchase or conditional sale agreement
- Displaying a disabled blue badge and is used for transporting a disabled person
- Used by the emergency services, such as a car displaying a genuine "doctor on call" badge
- Also their home (such as a motorhome)

The enforcement agent must not remove goods without first consulting and receiving permission from the responsible council debt portfolio owner

If they take a vehicle incorrectly for example, if it is an unidentified mini cab this must be returned

9.12 Removal of goods

When goods are taken into control, a complete inventory of the goods covered must be made. The inventory must detail individual items and not include 'catch all' items purporting to cover goods not specifically listed. There must be no doubt as to which goods are in the enforcement agent's legal possession.

Enforcement agents must only take goods in accordance with the appropriate regulations or statute. When goods have to be removed the enforcement agent must ensure that sufficient and appropriately skilled personnel are available.

Only goods that belong to the debtor or which the debtor has an actual interest may be taken.

Enforcement agents must ensure that goods are handled with reasonable care so that they do not suffer any damage whilst in their possession and should have insurance in place for goods in transit so that if damage occurs this is covered by the policy.

Removed goods must be transported in vehicles suitable for the purpose and packed and secured in such a way as to minimise the risk of damage to them. Goods must be stored in such a place and manner as to minimise the risk of theft, damage or deterioration. Any sub-contractors engaged to assist in a removal must be directly supervised by the enforcement agent.

Enforcement agents should take all reasonable steps to satisfy themselves that the value of the goods taken into control is proportional to the value of the debt and the charges owed. Goods belonging to, or for the exclusive use of a child should not be removed.

When goods are removed the enforcement agent must comply with the legal requirements relating to notices and inventories. Reasonable care must be taken of the debtor's goods pending sale, including suitable and secure storage facilities and adequate insurance cover. Any sale which takes place must be properly publicised and as many potential buyers as possible encouraged to attend, to secure the best price available.

Certain goods are protected from being taken into control. Enforcement agents should be familiar with the circumstances when goods are exempt.

10.0 COMPLAINTS AND DISCIPLINARY PROCEDURES

10.1 Requirement for complaints and disciplinary procedures

Enforcement agencies must aim to provide a high level of customer care and must operate comprehensive complaints and disciplinary procedures with which enforcement agents, administrative staff, the responsible council debt portfolio owners and their staff must be fully conversant.

How to make a complaint should be clear and accessible to the debtor and obstacles must not be placed in the way of complainants

Complaints procedures must

- be set out in plain English,
- have a main point of contact
- have timescales for dealing with complaints
- an independent appeal process

Enforcement agencies must also have disciplinary policies and procedures in place to address potential misconduct by their employees or those engaged to act for them.

10.2 Interaction between complaints' procedures

Customers may access both the council and external enforcement agencies complaints' procedures. If in the first instance, a customer approaches the council to make a complaint about an external enforcement agent, the council will complete a full investigation and response under the council's complaints procedure and send a copy of the response with any recommendations to the external enforcement agency. It will not normally be necessary for the customer to make an additional complaint to the external agent.

However, if the customer complains directly to the external agency, then the external agency should conduct their own investigation and forward the results to the council. The council will then review the response.

External enforcement agencies must make available details of their own and the council's complaints procedure on request or when circumstances indicate it would be appropriate to do so.

External enforcement agency complaints procedure must detail any escalation procedure to the Civil Enforcement Association (CIVEA) and set out timeframes.

CIVEA's recommendations for complaints standards are

It is recommended that within 10 working days of receiving a complaint (note this is a different standard to the council)

the enforcement agency write to the debtor, acknowledging receipt of the complaint and enclosing a copy of their complaints' procedure and

informing the debtor that the complaint has been registered and will be investigated in accordance with that procedure.

10.3 Croydon council complaints procedure

Details of the council's complaints procedure can be found at:

<https://www.croydon.gov.uk/democracy/feedback/complaints-procedure/policy>

Stage 1

In the first instance the council should contact the customer within 5 working days, with the aim to resolve the complaint or to provide details of when they will receive a full response.

The council has **20 working days** in which to send the customer a full response. If there is a delay the customer should be notified by the department.

Stage 2

If the customer is dissatisfied with the investigation at stage 1 of the process, they have the right to ask for an independent review which forms the final stage of the corporate process. Once accepted and acknowledged, the customer should receive their response within 20 working days.

If the council requires information to help resolve a complaint, a full report must be emailed to the council within 48 hours of the request. This must include answers to specific questions. Information must be clear, unambiguous and include evidence to support it where possible. If the police were present, full details of this should be included in the report and a crime reference number must be provided if applicable.

Local Government Ombudsman

If, after a stage two investigation, a customer is still not satisfied then they have the right to refer their complaint to the local government ombudsman.

10.4 Compensation

Where a complaint is upheld due to misconduct or noncompliance with relevant legislation or noncompliance with this code of conduct; enforcement and sale fees may have to be removed or compensation paid.

Where this occurs the enforcement agency involved will be responsible for making compensation payments as determined or refunding any fees as determined.

10.5 Complaints monitoring and review

Enforcement agents must register all complaints they receive and maintain records of investigations, outcomes and responses. Monthly reports on complaints activity should be provided for the council.

Representatives of external enforcement agencies and council managers should liaise monthly. There should be quarterly reviews of complaints. The objective of reviews is to facilitate organizational learning from complaints to recommend changes to the service, processes, procedures and training as appropriate.

Appendix: The statutory fee structure

Fees must not exceed the statutory amounts listed in the fee table. No additional charges should be made for any reason

Stage	Fee	Frequency	Trigger	Comments
Compliance stage	£75.00	Fee can be charged on each liability order	When EA receives instruction and then issues a compliance letter (known as a Notice of Enforcement) in prescribed format. They can then charge compliance stage fee	<p>The Notice of Enforcement letter is also known as a 7 day compliance letter, as legally the debtor must be given at least 7 clear days' notice (not including Sundays or Bank holidays before the Enforcement stage can begin).</p> <p>However, Croydon council's policy (also recommended by CIVEA's code of conduct) is that at least 14 clear days will be given to allow for post delays</p>

<p>Enforcement stage</p>	<p>£235.00</p> <p>Plus 7.5%</p> <p>(for liability orders where the total is over £1,500)</p>	<p>Fee can be charged once only regardless of the number of liability orders, when enforced at the same time</p>	<p>Enforcement Fee can be only be charged</p> <ul style="list-style-type: none"> • after 14 clear days (not including Sundays and bank holidays) from the date that the compliance letter was sent and • Where an arrangement has not been set at compliance stage, or the arrangement set has been broken and • Where the EA has made a First Attendance with the intention of entering a signed controlled goods agreement and/or setting an arrangement. 	<p>All three conditions must be met before the Enforcement stage fee can be charged.</p> <p>So the 14 day notice period must have been given and the debtor has not made an arrangement or has broken an arrangement and the Enforcement Agent must have attended at the debtor's address.</p> <p>The intention of the EA when attending is to enter a signed controlled goods agreement and/or making an agreement with the debtor.</p>
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Scrutiny Template

<p>Sale stage</p>	<p>£110.00</p> <p>Plus 7.5%</p> <p>(for liability orders where the total is over £1,500)</p>	<p>Fee can be charged once only regardless of the number of liability orders, when enforced at the same time</p>	<p>First attendance for the transportation of goods to place of sale, up to completion of sale.</p>	<p>Goods subject to a signed controlled goods agreement must be removed first.</p> <p>This fee can only be applied on the same day as the first attendance by an EA where the debtor refuses to pay or enter into a controlled goods agreement, and the only remaining remedy is the removal of goods.</p> <p>In all circumstances an EA must give the debtor the opportunity to pay, or enter into a controlled goods agreement, before starting removal.</p> <p>This fee cannot be applied if permission to remove is not given by Croydon Council</p>
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Scrutiny Template

Disbursements	Reasonably incurred		<p>Locksmith charges, storage charges</p> <p>The enforcement agent MUST, as far as practicable, minimise the disbursements recoverable from the debtor by dealing with the goods taken into control pursuant to the instructions together, and on as few occasions as possible.</p>	
Auctioneer	<p>Costs not to exceed:</p> <ul style="list-style-type: none"> •15% of the sum realised, where sold at public auction •7.5% of the sum realised, where sold on site •7.5% of the sum realised, where sold via internet auction 		<p>Goods cannot be sold until at least 7 days has expired since the date they were removed</p>	

Scrutiny Template

APPENDIX B



CIVEA_Code_final.pdf

APPENDIX C



Newlyn's Code of
Conduct (003).pdf

Agenda Item 8

REPORT TO:	Scrutiny & Overview Committee 6 September
SUBJECT:	SCRUTINY & OVERVIEW COMMITTEE WORK PROGRAMME 2022-23
PERSON LEADING AT SCRUTINY COMMITTEE MEETING:	Councillor Rowenna Davis – Chair of the Scrutiny & Overview Committee
PUBLIC/EXEMPT:	Public

ORIGIN OF ITEM:	The work programme of the Scrutiny & Overview Committee and its Sub-Committees is included as a standard item on each agenda.
BRIEF FOR THE COMMITTEE:	The Scrutiny and Overview Committee is asked: - <ol style="list-style-type: none">1. To note the most recent version of the Work Programme.2. Consider whether there are any other items that should be provisionally added to the work programme as a result of the discussions held during the meeting.

1. SCRUTINY & OVERVIEW COMMITTEE WORK PROGRAMME 2022-23

- 1.1. At the previous meeting of the Scrutiny & Overview Committee on 21 July 2022, the Committee agreed to note an initial draft of the work programme which set out a range of potential areas of scrutiny for further investigation by the Scrutiny Chairs, before scheduling.
- 1.2. Since the last meeting on 21 July, the Chairs have continued to develop the work programme and a working draft can be found appended to this report. At the time of writing, pre-decision scrutiny of Cabinet decisions has yet to be scheduled. Given it is good practice for scrutiny not to include more than two substantive items on any one agenda it may require other scheduled items to be moved to accommodate these where identified.
- 1.3. The Chair of Scrutiny is due to meet with the Executive Mayor on 2 September to discuss the arrangements for pre-decision scrutiny, to ensure that the potential benefits from this form of scrutiny are maximised.

CONTACT OFFICER:

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Appendices

Appendix 1: Draft Scrutiny Work Programme 2022-23

Scrutiny & Overview Committee Work Programme

The below table sets out the working version of the Scrutiny & Overview Committee work programme. The items have been scheduled following discussion with officers and may be subject to change depending on any new emerging priorities taking precedent.

Meeting Date	Item	Scope
06/09/2022	Budget Monitoring – Month 2,3&4	To review the monthly budget monitoring reports with a view to highlighting any areas of concern for further scrutiny.
	Crime & Disorder Strategic Assessment	To use the Crime & Disorder Strategic Assessment to provide challenge to the Community Safety Partnership on its performance.
18/10/2022	Cabinet Budget Consultation report	To review the Cabinet Budget consultation report and use the information provided to give initial feedback on the early budget proposals and set out the budget scrutiny process.
	Croydon Renewal Plan	For consultation on the updated Croydon Renewal Plan
	Annual Complaints Report	To review the Annual Complaints Report and provide challenge based on the information provided.
06/12/22	TBC	Potentially a budget scrutiny item will be added to this meeting.
10/01/2023	Budget – Deep Dive	To challenge in depth two to three high risk budget areas ahead of the 2023-24 budget being set.

14/02/23	Final Budget Scrutiny Session	To sign-off the Scrutiny report on the Budget Scrutiny process which will be submitted to the Budget Council meeting.
28/03/23	Town Centre Masterplan	The Scrutiny & Overview Committee would like the opportunity to conduct pre-scrutiny on this report prior to its consideration by the Executive Mayor at Cabinet.
	Climate Change	The Scrutiny & Overview Committee would like the opportunity to conduct pre-scrutiny on this report prior to its consideration by the Executive Mayor at Cabinet.

Standing Items:

Work Programme Item	Notes
Monthly Budget Monitoring Reports	To be included on each agenda as available to ensure the Committee is aware of the progress made with delivering the 2022-23 budget.

Items of Interest

The following items haven't been scheduled into the work programme, but are highlighted as potential items of interest to be scheduled during the year ahead.

Work Programme Item	Notes
People Strategy	<p>The Scrutiny & Overview Committee would like the opportunity to conduct pre-scrutiny on this report prior to its consideration by the Executive Mayor at Cabinet, once it has been scheduled.</p> <p>The basis for the Committee's interest in this report is to seek further reassurance on the progress towards changing the culture of the Council.</p>

Borough of Culture 2023	Given the profile of Croydon being awarded the London Borough of Culture in 2023, the Committee is keen to review the preparations for this, particularly given both the financial challenges of the Council and concerns about staff capacity.
Cost of Living Crisis	At its meeting on 21 July, the Committee identified a number of areas related to the cost of living crisis that it would like to do a deep dive on over the course of the year. These include the Council's relationship with the community and voluntary sector, digital exclusion and the impact of rising fuel and food costs. These items will be scheduled where possible throughout the year.
New Telephony System (Digital Strategy)	To review the performance of the new telephony system.

Health & Social Care Sub-Committee

The below table sets out the working version of the Health & Social Care Sub-Committee work programme. The items have been scheduled following discussion with officers and may be subject to change depending on any new emerging priorities taking precedent.

Meeting Date	Item	Scope
20/09/22	ASC Budget	Standing Item tracking progress with the delivery of 2022/23 Budget (To review by exception).
	Accessing Healthcare in Borough	To review with partners capacity within the capacity within the healthcare system in the borough.
	New Health Scrutiny guidance	Information item on the recent Health Scrutiny Guidance
08/11/22	ASC Budget	Standing Item tracking progress with the delivery of 2022/23 Budget (To review by exception).
	Croydon Safeguarding Adults Board – Annual Report	Using the CSAB Annual Report as a starting point, to seek reassurance on the performance of the board.
	Redesign of Sexual & Reproductive Health Services	To provide input into the commissioning process for the community based sexual and reproductive health services in Croydon.
	Menopausal Services	An initial scoping report on the services delivering menopausal support in the borough

24/01/23	Budget Deep Dive	To review in-depth two high risk budget areas as part of the scrutiny of the 2023-24 budget setting process.
07/03/23	ASC Budget	Standing Item tracking progress with the delivery of 2022/23 Budget (To review by exception).
	Review of Mental Health Services	To be planned with the input of SLaM and council officers responsible for commissioning mental health services. To cover areas including <ul style="list-style-type: none"> • Use of restraint • Older people Mental health • Mental health transitions

Items of Interest

The following items haven't been scheduled into the work programme but are highlighted as potential items of interest to be scheduled during the year ahead.

Work Programme Item	Notes
Community Service	To arrange an initial training session for Members on the Integrated Care Partnerships
Integrated Care Partnerships	
Immunisation	To be scheduled. To possibly look at:- <ul style="list-style-type: none"> - <i>What's the current level of take-up for the various vaccines?</i> - <i>How does that compare with other areas?</i> - <i>Is Croydon learning from high performing areas</i> - <i>What are we going to do differently this year to improve take-up?</i>

Dental Provisions in the borough

An update on the commissioning process will be sought, before a decision is taken on next steps.

Needs further consideration to identify what further benefit the Committee can deliver beyond the Healthwatch report.

Children & Young People Sub-Committee

The below table sets out the working version of the Children & Young People Sub-Committee work programme. The items have been scheduled following discussion with officers and may be subject to change depending on any new emerging priorities taking precedent.

Meeting Date	Item	Scope
13/09/22	Croydon Safeguarding Children Board - Annual Report 2021-22	To consider whether there are any recommendations or concerns it may wish to submit to the Cabinet during its consideration of the Annual Report. Give consideration as to whether the Annual Report provides sufficient reassurance on the performance and effectiveness of the Croydon Safeguarding Children Board.
	Children's Centre Contract	To review and conduct the post-decision scrutiny of the Children's Centre Contract.
01/11/22	Police representation and Multi-Agency Working	To review the Youth Safety Strategy and Police Partnership working alongside the and use of stop and search.
	Antenatal and Health Visiting	To review shortfalls in the number of health visitors, antenatal and postnatal visits.
17/01/23	Budget Deep Dive	To review in-depth high risk budget areas as part of the scrutiny of the 2023-24 budget setting process.
	Education Estates Strategy	To consider whether there are any considerations or concerns it may wish to submit to the Cabinet during its consideration of the Strategy.

28/02/23	Child and Adolescent Mental Health Services	To look at targets for waiting times for Child and Adolescent Mental Health Services alongside the monitoring framework.
	Exclusions (Provisional)	To look at the use of Behavioural Isolation Units, Pupil Referral Units and Off-siting. To look at progress made against adopting the recommendations made by the Task and Finish Group.
18/04/23	Elective Home Education	To look at Elective Home Education in the borough and to review the number of children who have not returned to schools following the pandemic. To review how many families follow the curriculum and framework, the number of children completing exams and other data.
	Unaccompanied Asylum-Seeking Children (Provisional)	To review the number of UASC in the borough alongside central government funding and the performance of the National Transfer Scheme. To look at the impact of the war in Ukraine on additional numbers of UASC.

Standing Items:

Early Help, Children Social Care & Education Performance Dashboards - review and consider whether there are any areas of concern that may need to be scheduled for further scrutiny at a future meeting.

Items of Interest

The following items haven't been scheduled into the work programme but are highlighted as potential items of interest to be scheduled during the year ahead.

Unallocated Items	Notes
Recruitment and Retention (S&O Committee to review People Strategy in September 2022)	<p>To review Staff Caseloads, AYSE Caseload Sharing and the number of supervisions carried out.</p> <p>To receive a breakdown of vacancies and caseloads by individual teams and to look at London Councils best practise for recruitment and retention.</p> <p>To undertake direct engagement with social workers</p> <p>To look at how feedback from exit interviews can be incorporated into retention strategies</p>
Apprenticeships & Youth Unemployment	To look at the offer of available apprenticeships in the borough and data on youth unemployment.
OFSTED Reports	To review any OFSTED reports as and when they are available.
Delivery of Early Years Strategy	To review the delivery and implementation plan of the Early Years Strategy
SEND Strategy	To review the renewal of the SEND Strategy
Surplus Schools Places	To review the Surplus Schools Places report

Streets, Environment & Homes

The below table sets out the working version of the Streets, Environment & Homes Sub-Committee work programme. The items have been scheduled following discussion with officers and may be subject to change depending on any new emerging priorities taking precedent.

Meeting Date	Item	Scope
27/09/22	Future of Healthy Neighbourhoods (including School Streets, Vision Zero, Cycling and Walking Strategy Update)	To cross reference relevant Climate Commission and Climate Citizen's Assembly recommendations and TfL scoring with the Council's delivery of Healthy Neighbourhoods alongside an update on School Streets, Vision Zero, and Cycling and Walking Strategies.
	Housing Needs Transformation Plan	To receive an update on the development of the Housing Needs Transformation Plan alongside the pressures of delivering in-year savings
15/11/22	Review of refuse and recycling and street cleansing contract	To review the performance of the refuse and recycling and street cleansing contract. Additionally, to review the Council's management of the contract.
	Environmental Enforcement	To review the performance of Environmental Enforcement in the borough.
31/01/23	Budget Deep Dive – Housing and SCRER	To review in-depth high risk budget areas as part of the scrutiny of the 2023-24 budget setting process.
	HRA Business Plan (and update on commissioning of	To review the development of the HRA Business Plan and any updates that have been made to the Plan in this year.

	new responsive repairs contract)	
14/03/23	Train Services and Operators	To receive an update from relevant representatives (TfL, Govia, Network Rail) and engage in discussion on key aspects of their operations.
	Local Plan Review	To consider the work done on the Council's review of the Local Plan.

Standing Items:

Budget Dashboards for Housing and SCRER - Standing Item tracking progress with the delivery of 2022/23 Budget (To review by exception).

Update on the Housing Improvement Plan

Items of Interest

The following items haven't been scheduled into the work programme but are highlighted as potential items of interest to be scheduled during the year ahead.

Unallocated Items	Notes
Environment Bill Responsibilities	To review the additional responsibilities that will fall upon the Council following the adoption of the Environment Bill
Biodiversity Strategy	To review the upcoming Biodiversity Strategy once written.
Implications of the Levelling Up and Regeneration Bill	To review the possible implications of the Levelling Up and Regeneration Bill

Purley Pool Options Appraisal	To look at the options that have been appraised for the reopening of Purley Pool
Brick by Brick Wind-down	To review progress on the wind-down of Brick by Brick with Director of Commercial Investment, an Officer from Board, and the Financial Director of BXB.
Graffiti Removal Service	To review the progress on the Mayor's pledge to reinstate a dedicated Graffiti Removal Service.
Review of the Waste Contract	To review the progress on the review of the Waste Contract.
Environmental Enforcement	To review the Environmental Enforcement service.
Flood Risk and Planning	To review the Council's flood planning and risk assessments