

**Somerset West
and Taunton**

**Regulatory Services
Enforcement Policy**

2022-2023

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Regulatory Services Enforcement Policy

1. Introduction

1.1 Policy Statement

1.1.1 Somerset West and Taunton (the council) carries out a wide range of regulatory roles in meeting its many statutory duties of protecting the public, individuals and the environment. These duties are mainly met by carrying out programmed inspections of premises, responding to complaints, issuing licenses and offering advice. This Policy outlines the approach we take when considering enforcement action.

1.1.2 This policy applies to all regulatory services or services which have enforcement duties. There are further policies referring to specific legislation and regulations for the different areas of these services which set out the enforcement requirements for each department.

1.1.3 This policy is influenced by good enforcement practice, current legislation, guidance and statutory codes of practice. The appropriate use of the full range of enforcement powers, including prosecution, is important, both to secure compliance with the law and to ensure that those who have duties under it may be held to account for failures to safeguard health, safety and welfare, or breach of regulations enforced by the council.

1.1.4 In deciding on the most appropriate course of action, officers should have regard to the principles set out in this policy and the need to maintain a balance between enforcement and other activities, including inspection, advice and education. Wherever possible, the council will work closely with businesses and other organisations to assist them in meeting their legal obligations, without unnecessary expense.

1.1.5 This document has been approved in accordance with the council's Constitution and is effective from .

1.1.6 This policy is available on the council's website www.somersetwestandtaunton.gov.uk.

2. Principles of good regulation

2.1.1 We will exercise our regulatory activities in a way which is:

- (i) Proportionate – our activities will reflect the level of risk to the public and enforcement action taken will relate to the seriousness of the offence;
- (ii) Accountable – our activities will be open to public scrutiny, with clear and accessible policies, and fair and efficient complaints procedures;

- (iii) Consistent – our advice to those we regulate will be robust and reliable and we will respect advice provided by other regulators. The council shall seek to ensure consistency of enforcement; however, the council realises that consistency is not a simple matter of uniformity. Officers will need to exercise their professional judgement and discretion according to the circumstances of each individual case and the relevant responsibilities and intervention systems maintained by the council;
- (iv) Transparent – we will ensure that those we regulate are able to understand what is expected of them and what they can anticipate in return, and
- (v) Targeted – we will focus our resources on higher risk enterprises and activities, reflecting local need and national priorities and where the council believes its efforts are able to have an impact.

2.2 Regulators' Code

2.2.1 The Regulators' Code came into statutory effect on 6 April 2014 under the Legislative and Regulatory Reform Act 2006, replacing the Regulators' Compliance Code. It provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate. The council has had regard to the Regulators' Code in the preparation of this policy.

2.2.2 Section 6 of the Regulators' Code sets out Government's expectation that local authorities will ensure that their approach to their regulatory activities is transparent and easily understood. The provisions of Section 6 includes an expectation that local authorities will publish a clear set of service standards, setting out what those they regulate should expect from them. This includes their enforcement policy, explaining how they respond to non-compliance.

2.3 Human Rights Act 1998

2.3.1 The council is a public authority for the purposes of the Human Rights Act 1998. We therefore apply the principles of the European Convention for the Protection of Human Rights and Fundamental Freedoms. This Policy and all associated enforcement decisions take account of the provisions of the Human Rights Act 1998. In particular, due regard is had to the right to a fair trial and the right to respect for private and family life, home and correspondence.

2.4 Data Protection Act 2018

2.4.1 Where there is a need for the council to share enforcement information with other agencies, we will follow the provisions of the UK General Data Protection Regulation 2018 (UK GDPR) which forms part of the Data Protection Act 2018.

2.5 The Code for Crown Prosecutors

2.5.1 The council may prosecute in respect of serious or recurrent breaches, or where other enforcement actions, such as voluntary undertakings or statutory notices have failed to secure compliance. When deciding whether to prosecute, the council has regard to the provisions of The Code for Crown Prosecutors as issued by the Director of Public Prosecutions. [The Code for Crown Prosecutors | The Crown Prosecution Service \(cps.gov.uk\)](#)

2.5.2 The Code for Crown Prosecutors is a public document, issued by the Director of Public Prosecutions, that sets out the general principles to follow when decisions are made in respect of prosecuting cases. There are two questions which should be answered.

Is there enough evidence against the defendant?

When deciding whether there is enough evidence to proceed, the council will consider whether evidence can be used in court and is reliable and credible, and there is no other material that might affect the sufficiency of evidence. The council must be satisfied there is enough evidence to provide a "realistic prospect of conviction" against each alleged offender.

Is it in the public interest to bring the case to court?

Before deciding that prosecution is appropriate, the council will balance factors for and against prosecution carefully and fairly, considering each case on its merits. The public interest factors that we will take into account are detailed under the enforcement options available to us in Section 6.

3. Purpose of this policy

3.1.1 This policy sets out standards that will be applied by the council when acting in its role as a regulator and enforcement agency and what residents, businesses, consumers and workers can expect from the council.

3.1.2 All authorised officers concerned will act in accordance with the policy and refer to the policy when making enforcement decisions.

3.1.3 The policy must be read in conjunction with all relevant guidance on enforcement and regard must also be had to any internal procedures.

4. When this policy applies

4.1.1 This policy is the overarching enforcement policy for the regulatory services of the council. It outlines the approach to enforcement and lays down the principles which will be followed in deciding upon, and taking action.

- 4.1.2 Enforcement activities will include any criminal or civil action carried out in the exercise of statutory powers and duties, aimed at ensuring that individuals or businesses comply with the law.
- 4.1.3 This is not limited to formal enforcement action such as prosecution or the issuing of Notices. It also includes the inspection of premises for the purpose of checking compliance with regulation or conditions and the investigation of complaints.
- 4.1.4 This policy has been set in accordance with the Regulators' Compliance Code and the Statutory Code of Practice for Regulators. This means that the council will be open, helpful, fair and careful to ensure that any action required by the council is proportionate to the risks.
- 4.1.5 The council has set out its strategic aims and objectives and its enforcement services will carry out their duties in support of these. This approach is intended to provide better information to businesses and the community and, by doing so, lend support to the council's efforts to deliver best value services.
- 4.1.6 Council services will work with and consult other agencies, and other service areas within the council, as necessary where there is a shared or complementary enforcement role.
- 4.1.7 Officers will take reasonable steps to assist businesses and individuals to comply with the law. However, officers will be prepared to ensure compliance by exercising the formal powers delegated to them in the council's Scheme of Delegation including, where appropriate, prosecution.
- 4.1.8 A departure from this policy must only be in exceptional circumstances and capable of justification. Any departure will first be considered by the service manager unless a delay in making such a decision will result in serious risk of personal injury, risk to public health or impact effective running of the service. All such decisions will be recorded in compliance with the Openness of Local Government Bodies Regulations 2014.

5. Non-compliance

5.1 Approach to dealing with non-compliance

- 5.1.1 Where failures to meet legal obligations are identified, an open, fair and proportionate approach will be taken by the council.
- 5.1.2 The council will commit to providing opportunity for discussion in relation to advice given, actions required or decisions taken in relation to non-compliance.
- 5.1.3 Those approaching the council requiring advice on non-compliance shall receive such advice on the understanding that where they are showing

willingness to resolve the non-compliance, the council will not directly trigger enforcement actions.

- 5.1.4 Best efforts will be used to resolve any issues where the law may have been broken without taking formal action, or referring the matter to the courts when the circumstances indicate that a minor offence may have been committed and the council is confident that appropriate corrective action will be taken. However, there may be occasions when the breach is considered to be serious and/or where informal action is not appropriate. In such cases, immediate enforcement action may be taken without prior notice and, as noted above, some services have specific Legislative Guidance and Regulations which set out the enforcement requirements in these services.
- 5.1.5 Advice regarding the non-compliance, the actions required and decisions taken at the time of our intervention, along with the reasons for these, will be clearly explained. An opportunity to discuss the council's course of action will be provided to ensure actions are proportionate and consistent. As stated in the previous paragraph, where immediate enforcement action is required, the opportunity for discussion may not be given where there is a serious breach or public health or safety is at risk.
- 5.1.6 Officers investigate potential breaches of legislation and they are responsible for managing investigations and making decisions on enforcement action. As part of this process, they may consult with colleagues and managers in determining the best and most appropriate course of action. Officers have the power to use a variety of legislation in the course of their duties, and these have been delegated to them by the Chief Executive Officer.
- 5.1.7 In relation to prosecutions, where relevant, officers' cases are reviewed by a manager in line with this enforcement policy before submitting to the council's legal department for consideration.
- 5.1.8 The enforcement action that the local authority chooses to take will depend upon the particular circumstances and the way in which the breach is dealt with by the business or regulated person in question. Although the general rule will be to use the minimum level of enforcement necessary to reach a satisfactory solution, the council will deal firmly with those that deliberately or persistently fail to comply.
- 5.1.9 We will take account of the circumstances of small regulated businesses, including any difficulties they may have in complying and where appropriate, discuss options that will allow them to secure compliance. We will have regard to the Primary Authority scheme when dealing with non-compliance and will discuss the circumstances of breaches with the local authority representative within such partnerships. We will take these discussions into account when deciding on the best approach following the principles of the Primary Authority scheme (see [Local regulation: Primary Authority - GOV.UK \(www.gov.uk\)](https://www.gov.uk) for more information).

- 5.1.10 Where non-compliance has been dealt with by providing advice or guidance the Council will monitor that compliance in a variety of ways. For low risk, low level non-compliance, they will seek reassurance that compliance will be secured. For more serious non-compliance, re-visits or further proactive monitoring may be undertaken.
- 5.1.11 In some instances, more than one regulatory authority agency may be involved in dealing with non-compliance. In these circumstances, collaborative working will ensure effective coordination to avoid inconsistencies and to ensure that any proceedings taken are proportionate and appropriate. The most effective regulatory outcome and least burdensome impact on the business or individual will be sought.
- 5.1.12 Where a complaint of non-compliance relating to a business, or other regulated person, is received the officers investigating this breach will assess the information received and may make further enquiries to determine whether a complaint requires investigation. In assessing a complaint, officers may consult colleagues and managers to help assess what risk may be involved and this will determine what action is taken.
- 5.1.13 The council will be fair, objective and consistent in its approach. The council's corporate equality and diversity website page can be found here: [Equality and diversity \(somersetwestandtaunton.gov.uk\)](https://www.somersetwestandtaunton.gov.uk/equality-and-diversity).
- 5.1.14 The Council may publicise information about enforcement action that is taken in line with Government guidance on publishing sentencing outcomes (more information can be found here: [\[ARCHIVED CONTENT\] \(nationalarchives.gov.uk\)](https://www.nationalarchives.gov.uk)).

6. Conduct of investigations

- 6.1.1 Investigations will be carried out in compliance with the following legislation and in accordance with any other legislation, associated guidance or codes of practice, in so far as they relate to the council:
- Police and Criminal Evidence Act 1984
 - Criminal Procedure and Investigations Act 1996
 - Regulation of Investigatory Powers Act 2000
 - Criminal Justice and Police Act 2001
 - Human Rights Act 1998 (including the European Convention on Human Rights)
 - Anti-social Behaviour, Crime and Policing Act 2014

- Public Sector Equality Duty under the Equalities Act 2010
- 6.1.2 These Acts and associated guidance control how evidence is collected and used and give a range of protections to citizens and potential defendants.
- 6.1.3 The authorised officers of the council will also comply with the requirements of the particular legislation under which they are acting, and with any associated guidance or codes of practice.

6.2 Powers of authorised officers

- 6.2.1 All authorised officers will carry an authorisation document identifying the legislation under which they are empowered to act. The powers available to officers under these different pieces of legislation vary considerably, and it is not the purpose of this document to provide an exhaustive list of those powers.
- 6.2.2 The authorisation document will certify that an officer is duly appointed as an officer of the council and that they are empowered to make inspections authorised under specific Acts of Parliament and any regulation, byelaw or order made under them. Legislation enables an officer to;
- exercise power of entry
 - carry out any investigations
 - procure samples
 - seize equipment and documents
 - serve legal notices
 - apply for warrants
 - institute legal proceedings
 - issue fixed penalty notices
- 6.2.3 In some cases powers of seizure are used for safety and evidence gathering purposes. Where articles are removed for any of these purposes, a receipt or notice will be given at the time of the inspection or as soon as practicable.
- 6.2.4 Obstructing an authorised officer of the council carrying out duties as set out on their authorisation document is an offence. Obstruction may be physical or it may be the refusal to provide information or the giving of false information. If the officer believes that obstruction is occurring, they will remind the offender of their powers and inform the person that they are committing an offence.

6.2.5 In order to investigate some alleged or suspected offences interviews may be conducted. These may either be:

- Informal interview, in order to establish whether an offence has occurred
- Formal interview, where evidence already exists that an offence has taken place. Officers will carry out formal interviews in line with this policy and the Police and Criminal Evidence Act 1984

6.2.6 Officers do not have the power of arrest, however, joint working is undertaken with the Police and other agencies. Instances may arise where the Police or other agencies consider that an arrest should be made in connection with an authorised officer's investigation.

6.3 Progress of investigations

6.3.1 Officers carrying out investigations will keep alleged offenders and witnesses informed about the progress of any investigation as far as their involvement in the process is concerned.

7. Enforcement options

7.1.1 There are a range of actions that are available to the council as set out in the different legislation the council enforces. Examples of the main types of actions which may be considered are set out below.

7.2 No action

7.2.1 In certain circumstances, contraventions of the law may not warrant any action. This can be where the cost of compliance to the offender outweighs the detrimental impact of the contravention, or the cost of the required enforcement action to the Council outweighs the detrimental impact of the contravention on the community. In such cases we will advise the offender of the reasons for taking no action.

7.3 Compliance advice, guidance and support

7.3.1 The council uses compliance advice, guidance and support as a first response in the case of many breaches of legislation that are identified. In line with the Regulators' Code, we will clearly explain what the non-compliant item or activity is, the advice being offered, actions required or decisions taken, and the reasons for these.

7.3.2 We will provide an opportunity for dialogue in relation to the advice with a view to ensuring that we are acting in a way that is proportionate and consistent. Advice is provided, sometimes in the form of a warning letter, to assist individuals and businesses in rectifying breaches as quickly and efficiently as possible, avoiding the need for further enforcement action.

- 7.3.3 A warning letter (sometimes called an ‘informal caution/notice’) will set out what should be done to rectify the breach and to prevent re-occurrence. If a similar breach is identified in the future, this letter will be persuasive in considering the most appropriate enforcement action to take on that occasion. Such a letter cannot be cited in court as a previous conviction but it may be presented in evidence.
- 7.3.4 The council recognises that where a business has entered into a partnership with a primary authority, the Primary Authority will provide compliance advice and support, and the council will take such advice into account when considering the most appropriate enforcement action for it to take. It may discuss any need for compliance advice and support with the Primary Authority.
- 7.3.5 Where more formal enforcement action, such as a simple caution or prosecution, is taken, the council recognises that there is likely to be an ongoing need for compliance advice and support, to prevent further breaches.

7.4 Voluntary Undertakings

- 7.4.1 The council may accept voluntary undertakings that breaches will be rectified and/or recurrences prevented. The council will take any failure to honour voluntary undertakings very seriously and enforcement action is likely to result.

7.5 Statutory (Legal) Notices

- 7.5.1 In respect of many breaches the council has powers to issue statutory notices. These include: ‘Stop Notices’, ‘Prohibition Notices’, ‘Emergency Prohibition Notices’, ‘Improvement Notices’, ‘Abatement Notices’ and other Enforcement Notices. Such notices are legally binding. Failure to comply with a statutory notice can be a criminal offence and may lead to prosecution and/or, where appropriate, the carrying out of work in default.
- 7.5.2 A statutory notice will clearly set out actions which must be taken and the timescale within which they must be taken. It is likely to require that any breach is rectified and/or prevented from recurring. It may also prohibit specified activities until the breach has been rectified and/or safeguards have been put in place to prevent future breaches. Where a statutory notice is issued, an explanation of the appeals process will be provided to the recipient.
- 7.5.3 Some notices issued in respect of premises may be affixed to the premises and/or registered as local land charges.

7.6 Work in Default

- 7.6.1 The Council is given powers under the Housing Act 2004 and other legislation to carry out works in default where a person has been required to

do works but has failed to do so. In most circumstances a person will be given notice of the Council's intention to carry out works in their default. Once the Council has started works it is an offence for that person to obstruct the Council or any of the contractors that have been employed to carry out the works. The cost of the works will be recovered in accordance with the relevant statutory provisions. The Council is not obliged to carry out works and reserves the right not to do so where the cost of the works is likely to be very high or there are likely to be difficulties in recovering the costs.

7.7 Fixed Penalty Notice

- 7.7.1 The council has powers to issue fixed penalty notices in respect of some breaches. Officers and their representatives will follow this guidance <http://www.gov.uk/guidance/enforcement-officers-issuing-fixed-penalty-notices> to determine if it is appropriate to issue an FPN.
- 7.7.2 A fixed penalty notice is not a criminal fine and does not appear on an individual's criminal record. If a fixed penalty is not paid, the council may commence criminal proceedings or take other enforcement action in respect of the breach.
- 7.7.3 If a fixed penalty is paid in respect of a breach, the council will not take any further enforcement action in respect of that breach. Payment of a fixed penalty does not provide immunity from prosecution in respect of similar or recurrent breaches.
- 7.7.4 The council is only able to issue fixed penalty notices where it has specific powers to do so. If fixed penalty notices are available, their issue is at the discretion of the council. In some circumstances, in particular where breaches are serious or recurrent, it may be that prosecution is more appropriate than the issue of a fixed penalty notice.

7.8 Civil or Financial Penalty Notices

- 7.8.1 The Council has in certain circumstance the power to issue Civil or Financial Penalties in relation to particular offences in question. The powers are set out in law and the Council will follow the relevant policy and procedures when deciding on whether to make a financial penalty or civil penalty and the level or amount that the penalty should be. The details of the method of appealing these penalties will be set out in any notices served. In some cases this will include the right to make representations before a final penalty notice is made.

7.9 Injunctive actions, Enforcement Orders etc.

- 7.9.1 In some circumstances the council may seek a direction from the court (in the form of an order or an injunction) that a breach is rectified and/or prevented from recurring. The court may also direct that specified activities be suspended until the breach has been rectified and/or safeguards have been put in place to prevent future breaches.

7.9.2 Failure to comply with a court order constitutes contempt of court, a serious offence which may lead to imprisonment.

7.9.3 The council is required to seek enforcement orders after issuing some enforcement notices, providing the court with an opportunity to confirm the restrictions imposed by the notice. Otherwise, the council will usually only seek a court order if it has serious concerns about compliance with voluntary undertakings or a notice.

7.10 Prosecution

7.10.1 The council may prosecute in respect of serious or recurrent breaches, or where other enforcement actions, such as voluntary undertakings or statutory notices have failed to secure compliance. When deciding whether to prosecute the council has regard to the provisions of The Code for Crown Prosecutors as issued by the Director of Public Prosecutions.

7.10.2 Prosecution will only be considered where the council is satisfied that it has sufficient evidence to provide a realistic prospect of conviction against the defendant(s).

7.10.3 Before deciding that prosecution is appropriate, the council will consider all relevant circumstances carefully and will have regard to the following public interest criteria:

- the gravity of an alleged offence, taken together with the seriousness of any actual or potential harm, or the general record and approach of the alleged offender
- there has been a reckless disregard of regulatory requirements
- there have been repeated breaches giving rise to significant risk, or persistent and significant poor compliance
- there has been a failure to honour voluntary undertakings or comply with statutory notices; or there has been a repetition of a breach that was subject to a simple caution
- false information has been supplied wilfully, or there has been an intent to deceive, in relation to a matter which gives rise to significant risk
- authorised officers have been intentionally obstructed in the lawful course of their duties

7.10.4 The council will also consider prosecution where it is appropriate to draw attention to the need for compliance with the law and to deter others.

7.10.5 This is not an exhaustive list. The council acknowledges that there may be occasions where the above factors may be present but where the public interest does not require a prosecution.

7.10.6 A successful prosecution will result in a criminal record. The court may impose a fine and in respect of particularly serious breaches a prison sentence. The court may order the forfeiture and disposal of non-compliant goods and/or the confiscation of any profits which have resulted from the breach. Prosecution may also lead, in some circumstances, to the disqualification of individuals from acting as company directors.

7.11 Refusal, suspension and revocation of licences, permit or certificate

7.11.1 The council issues a number of different licences, consents, registrations and permits. They are applied for by submission of an application, the form and content of which is sometimes specified in law. Applications are generally granted for a limited defined period and will be required to be renewed.

7.11.2 The council may be permitted to ask supplementary questions on an application form in order to assist it in reaching a decision on whether the applicant is a fit and proper person to hold such a licence.

7.11.3 In some cases applications are subject to either a public or interested party consultation process and any application that attracts adverse comment or objection or does not meet council policy requirements, will be referred to an internal civil hearing forum (a committee hearing) to determine the application.

7.11.4 Most licences and other permissions have conditions attached which can be standard conditions or specific conditions or a combination of both. These conditions form part of the licence and lay down requirements that a business or individual must have regard to when trading. Breaching a condition may be a civil or criminal matter. Breach of these conditions may lead to a review of the licence which may result in its suspension, revocation or amendment.

7.11.5 When considering future applications, information supplied with the application, together with any previous enforcement action and compliance record, can be taken into account when reaching a decision.

7.12 Post – Conviction Court Orders

7.12.1 A person that is convicted of a relevant offence in the Criminal Courts, can under the Anti-Social Behaviour Crime and Policing Act 2014, be given an order that is equivalent to an Anti-Social Behaviour Order, known as a Criminal Behaviour Order, which prohibits and/or requires the offender from doing anything described in the order. A Remedial Order can be made for breach of a Community Protection Notice under section 49 of the Anti-social Behaviour, Crime and Policing Act 2014. Dog Destruction and Control Orders can be made under The Dangerous Dogs Act 1990 and the Dogs Act 1872.

7.13 Confiscation of Proceeds of Crime

7.13.1 Where a prosecution concerns offending conduct falling within the relevant tests under the Proceeds of Crime Act 2002, we will consider seeking a confiscation order to remove the benefit obtained from such criminal conduct. The making of such orders sends a clear message that ‘crime does not pay’. The purpose is to recover the financial benefit the offender has obtained from their criminal conduct.

8. Decisions on enforcement action

8.1 How decisions are made on enforcement action

8.1.1 In assessing what enforcement action is necessary and proportionate, consideration will be given to the six core principles underlying the design of an effective modern sanction system set out in the Macrory Review;

- aim to change the behaviour of the offender
- aim to eliminate any financial gain or benefit from non-compliance
- be responsive and consider what is appropriate for the particular offender and regulatory issue, which can include punishment and the public stigma that should be associated with a criminal conviction
- be proportionate to the nature of the offence and the harm caused
- aim to restore the harm caused by regulatory non-compliance, where appropriate
- aim to deter future non-compliance

8.1.2 In line with the Regulators’ Code, we will also ensure that risk assessment precedes and informs all aspects of our approaches to regulatory activity, including advice, support, enforcement and sanctions by assessing the risks to regulatory outcomes.

8.1.3 Our risk assessments framework will:

- be based on all available relevant and good-quality data
- include explicit consideration of the combined effect of the potential impact of non-compliance on regulatory outcomes, and the likelihood of non-compliance
- evaluate the likelihood of non-compliance, consider all relevant factors including, past compliance records and potential future risks, the existence of good systems for managing risks, evidence of recognised

external accreditation, and management competence and willingness to comply

8.1.4 Where national schemes or authoritative guidance for enforcement risk assessment exist, we will base our assessments upon them where it is appropriate to do so. An example of this is the HSE Enforcement Management Model.

8.1.5 The council will consult other organisations before taking enforcement decision, including consulting Primary Authorities where appropriate.

8.2 How decisions are communicated to those affected

8.2.1 When we decide to take enforcement action, we will;

- Clearly explain any advice, actions required or decisions that we have taken
- Discuss and agree timescales that are acceptable to both you and us, in relation to any actions required
- Provide in writing details of how to appeal against any advice provided, actions required or decisions taken, including any statutory rights to appeal
- Explain what will happen next and offer practical information on the process involved
- Keep in touch with you, where required, until the matter is resolved

9. Review of this policy

9.1 This policy will be reviewed periodically or in line with changes in relevant legislation, or Regulators' Code. Any significant changes will be subject to prior approval by relevant elected Members.

10. Comments and complaints

9.1.1 All appeals in relation to enforcement action taken should be via the statutory appeals process outlined in the relevant legislation.

9.1.2 Complaints about the conduct of officers should be made via the council's corporate complaints procedure. More details can be found here; [Complaints and compliments \(somersetwestandtaunton.gov.uk\)](https://www.somersetwestandtaunton.gov.uk/complaints-and-compliments).