



Service Enforcement Policy (Part 1)

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Introduction

Fair and effective enforcement is essential to protect the health, safety and interests of the residents, visitors and businesses of Redcar and Cleveland.

This Service Enforcement Policy is designed to make sure that everyone knows the principles that the Service will apply when carrying out enforcement work, ensuring that the same principles are routinely applied, and that everyone involved in the process is treated fairly, consistently, and effectively.

The primary aim of enforcement activities is to achieve regulatory compliance to protect the general public, legitimate businesses, the environment, and groups such as consumers, residents and workers.

Enforcement includes actions aimed at ensuring that individuals or businesses comply with the law, carried out in the exercise of, or against the background of, appropriate statutory powers. This is not limited to formal enforcement action such as prosecution but includes, for example, the provision of warnings and advice to aid compliance.

Part 1: Common Enforcement Policy

The Authorities Enforcement Policy consists of two distinct parts:

Part 1 is an 'umbrella' policy which contains information that is common to all enforcement activities across the Service.

Part 2 is a Team specific policy which includes details of enforcement options and the circumstances where each option will be used. The specific Team areas covered by Part 2 are:

- Environmental Protection
- Environmental Health (Commercial)
- Trading Standards and
- Housing Standards.

Part 2 policies are available separately on request.

This Policy applies to all Teams within the Service. The purpose of this Part of the policy is to summarize the Authority's approach to the enforcement of legislation. This part should be read in conjunction with the relevant team specific policies (see Part 2).

"Enforcement" is defined as including any advice, inspection, action, instruction or warning, caution, prosecution (or other types of court action) taken in relation to a person or organisation who is or is believed to be acting unlawfully.

The Authority will take a graduated approach to enforcement of legislation, where this is permitted. All person(s) and Businesses will be encouraged to understand the nature and extent of their responsibilities and comply voluntarily. The Authority

will pursue prosecution where circumstances indicate a significant risk or crime or where formal action is otherwise in the public interest.

There may be limited circumstances where the Authority will decide to prosecute without prior warning.

Any departure from the policy or decision to prosecute without prior warning will be capable of justification and be fully considered by the Head of Service or the Assistant Director, before a decision is made, unless it is considered that there is a significant risk in delaying the decision.

This policy commits the Service to good enforcement practice, in considering whether to initiate enforcement action the Authority will take account of the following:

- the Code for Crown Prosecutors.
- the Enforcement Concordat.
- the Regulators Compliance Code.
- Police and Criminal Evidence Act 1984 (and associated Code of Practice).
- Criminal Procedure and Investigations Act 1996 - Attorney General's Guidelines on Disclosure. – made under the Criminal Procedure and Investigations Act 1996, Code of Practice Order 2020
- The Regulation of Investigatory Powers Act 2000 (RIPA)
- Criminal Justice and Police Act 2001.
- Regulatory Enforcement and Sanctions Act 2008.
- Investigatory Powers Act 2016.
- Forensic Science Regulator Code of Practice.
- Council procedures: codes of conduct & Corporate Complaints Procedure.
- Investigation Process: Legal process guidelines.
- UK General Data Protection Regulation and The Data Protection Act 2018.
- Have regard to the provisions of any other Code of Practice published by a Government Department or other advisory body as necessary and
- other service specific codes or guidance.

Further information on individual documents is provided in Part 2.

Principles of Enforcement

The Service is committed to firm but fair regulation. Underlying this policy are the principles of:

- **Proportionality** in the application of the law and in securing compliance.
- **Consistency** of approach and application
- **Transparency** about how the Service operates and what those regulated may expect from the Service, and
- **Targeting** of enforcement action.

Proportionality

Any enforcement action taken to achieve compliance or bring duty holders/ individuals to account for non-compliance action will be proportionate to the seriousness of the breach. This does not preclude court action as a first step, although no prosecution will be undertaken without subjecting the case to the tests outlined in the Code for Crown Prosecutors published by the Crown Prosecution Service.

Consistency

The Service will endeavor to carry out activities in a fair, equitable and consistent manner. However, consistency is not a simple matter. In each case officers will consider a few variables including:

- the degree of risk.
- the attitude and competence of management/duty holder.
- the previous history of the duty holder and
- the seriousness of the breach/offence.

The Service has systems in place to promote consistency between officers and other authorities and enforcement bodies.

Transparency

Officers will help duty holders to understand what is expected of them and what they should expect from the Service.

Individuals or businesses may have a right to query or appeal against enforcement action where there are statutory appeal mechanisms. Details of these will be provided where appropriate.

Targeted

Targeting means making sure that regulatory effort is directed primarily towards those whose activities give rise to the most serious risk or where the risks are less well controlled. Action will be primarily focused on those directly responsible for any breach and who are best placed to control it.

Where necessary, statutory powers that exist to enable investigations to continue outside the Council's boundary will be used.

Authorisation of Officers

The Authority has a system for delegating authorisation to individual officers. This delegation is contained in the Authority's constitution which is available online.

It is the Council's procedure that only officers authorised through the delegated powers described in the Council's Constitution will take enforcement action.

Only officers who are competent by training, qualification and/or experience will be authorised to take enforcement action.

Penalties and Offences

The courts have considerable scope to punish offenders and to deter others, including imprisonment or unlimited fines for some offences. The offences will be made clear to prospective defendants throughout the investigation.

Where enforcement includes the issuing of civil penalties, officers will have regard to any applicable statutory guidance when determining the appropriate level of those penalties, and the council's adopted policy. Each breach will be considered on a case by case basis, and the maximum penalty amount will only be reserved for the worst offenders.

Primary Authority Scheme

The Authority is committed to the Primary Authority Scheme, that gives companies the right to form a statutory partnership with a single local authority, which then provides robust and reliable advice for other councils to take into account when carrying out inspections or dealing with non-compliance.

In taking enforcement action officers will notify and agree any legal action with the Primary Authority associated with a business (if such a partnership exists) before taking action unless enforcement action is required to deal with an imminent risk e.g. health and safety prohibition notice.

More information on the Primary Authority scheme is available from:

[Local regulation: Primary Authority - GOV.UK](#)

Investigation with other Agencies

Where an enforcement role is shared with another Agency, it is the policy of this authority to undertake joint enforcement activity in order to minimise any unnecessary duplication and delay. Joint working may be undertaken with agencies including other local authorities, other council services, the Police and HM Revenue & Customs Office for Product Safety and Standards (OPSS), National Trading Standards Teams or any other relevant agency as appropriate.

Equality and Diversity

The Authority has a firm commitment to ensuring full and equal access to all services. This may include:

- The provision of translators for interviews where the interviewee's first language is not English.
- The carrying out of enforcement visits outside normal office hours when the business concerned operates at those times.

- The explanation of actions to fulfil commitments under the UK General Data Protection Regulations under the Data Protection Act 2018.

All enforcement decisions will be fair, independent, and objective. They will not be influenced by issues such as the ethnicity or national origin, gender, religious beliefs, political views, or the sexual orientation of the suspect, victim, witness, or offender.

When dealing with juveniles or people who are vulnerable due to learning difficulties, mental illness or any other factor, due regard will be taken of this.

The Council is a public authority for the purposes of the Human Rights Act 1998 and will apply the principles of The European Convention of Human Rights with particular regard to the right of a fair trial and the right to respect for private and family life, home, and correspondence.

Status and Review

This policy will be reviewed on a regular basis but any interim need to make amendments, such as in the case of a change in legislation, addition of any new civil penalty policies, will not trigger a full review.

Should you have any queries about this policy please contact:

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Enforcement Policy (Part 2) Environmental Health (Commercial)

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Introduction

This document must be read in conjunction with Enforcement Policy Part 1 which is an 'umbrella' policy which contains information that is common to all enforcement activities.

Part 2 of the Enforcement Policy is a service specific policy which includes details of enforcement options and the circumstances where each option will be used.

Aims

Food Safety

To ensure that all food and drink intended for human consumption which is produced, stored, distributed, handled or consumed in Redcar and Cleveland is without risk to the health or safety of the consumer.

Food Standards

To ensure that foods and food packaging meet relevant standards for quality, composition and labelling, presentation and advertising in order that consumers receive food which is of the nature, substance and quality demanded and persons are not placed at unnecessary risk due to incorrect or incomplete labelling.

Private Water Supplies

To ensure all private water supplies that serve more than one relevant person within Redcar and Cleveland are safe for human consumption.

Health and Safety

To protect the health, safety and welfare of people at work, and to safeguard others, mainly members of the public, who may be exposed to risks from the way work is carried out.

To ensure compliance with the Smoke Free Regulations.

Public Health

To protect the health and wellbeing of the residents of Redcar and Cleveland and take action to prevent the spread of infectious diseases.

Primary Legislation

Food Safety

- The Food Safety Act 1990
- Food Safety and Hygiene (England) Regulations 2013
- The Official Feed and Food Controls Regulations 2009
- Assimilated Food Safety Legislation originating in the European Union

- Assimilated Regulation (EU) 2017/625 on official controls and other official activities performed to ensure the application of food and feed law

Food Standards

- Food Information Regulations 2014
- Assimilated Regulation (EU) No 1169/2011 on the provision of food information to consumers

Private Water Supplies

- Water Industry Act 1991
- The Private Water Supplies (England) Regulations 2016

Health and Safety

- The Health and Safety at Work etc Act 1974
- The Health Act 2006
- Sunbeds Regulations Act 2010

Public Health, Statutory Nuisance, and Open to Access

- Public Health (Control of Disease) Act 1984
- Coronavirus Act 2020
- Environmental Protection Act 1990
- Local Government (Miscellaneous Provisions) Act 1982
- Prevention of Damage by Pests Act 1949
- Anti-social Behaviour, Crime and Policing Act 2014

Enforcement Options

The Authority may choose to pursue more than one enforcement option for example the service of a Hygiene Emergency Prohibition Notice while also considering prosecution procedures.

Food Safety

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
Informal action – verbal or written advice	This may include advice, verbal or written warnings and information. This action will be considered if: • The act or omission is relatively minor. • From the individual/business' history it can be reasonably expected that informal action will achieve compliance. • Confidence in the individual/business's management practices is high. • The consequence of non-compliance will not pose a significant risk to those affected by the activities of the food business.

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
Hygiene Improvement Notice (The Food Safety and Hygiene (England) Regulations 2013)	• Formal action is proportionate to the risk to public health. • There is a record of non-compliance with breaches of food hygiene regulations. • The authorised officer has reason to believe that an informal approach will not be successful.
Improvement Notice (Food Safety Act 1990 section 10)	• Formal action is proportionate to the risk to public health. • There is a record of non-compliance with breaches of food laws relating the labelling, composition, promotion and advertisement of food. • The authorised officer has reason to believe that an informal approach will not be successful.
Remedial Action/ Detention Notices (applicable to approved premises only)	• There is a breach of the Hygiene Regulations. • An inspection under the Hygiene Regulations has been hampered. • There are indications or suspicions that food at an establishment is unsafe and requires examination. • Immediate action is required to ensure food safety. • Continuing offences require urgent action and corrective actions have been ignored.
Voluntary Prohibition (food hygiene and standards)	• Closure required to remove an imminent risk of injury to health. • Taken in agreement with the food business operator. • Officer is confident that premises will not reopen without prior consent of the officer.
Hygiene Emergency Prohibition Notice (followed by application to Magistrates Court for a Hygiene Emergency Prohibition Order)	• There is an imminent risk of injury to health. • Informal voluntary closure is considered inappropriate due to the nature or severity of the health risk conditions. • Immediate action is required to protect public health.
Formal Written Warning	• Deal quickly and simply with less serious offences. • Divert offenders where appropriate from appearing in criminal courts and to reduce the likelihood of re-offending.
Prosecution	• The offence is serious. • There is a poor history of compliance. • There has been a failure to comply with a hygiene improvement notice or hygiene emergency prohibition

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
	notice/order; 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. • Officers have been intentionally obstructed in the lawful course of their duties.

Seizure and Detention of Food

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
Voluntary surrender or destruction	• Taken in agreement with the food business operator. • The food business operator agrees the food is not suitable for human consumption.
Seizure and Detention	• The food business operator fails to comply with food safety requirements • The officer suspects the food has not been produced or distributed in accordance with hygiene laws

Guidance

Food Standards Agency Food Law Code of Practice and Practice Guidance.
Industry Guides to Good Hygiene Practice.

Food Standards

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
Informal action – verbal or written advice	This may include advice, verbal or written warnings and information. This action will be considered if: • The act or omission is relatively minor. • From the individual/business' history it can be reasonably expected that informal action will achieve compliance. • Confidence in the individual/business's management practices is high. • The consequence of non-compliance will not pose a significant risk to those affected by the activities of the food business.
Food Information Regulation Notice	• Formal action is proportionate to the risk to public health. • There is a record of non-compliance with breaches of food information regulations. • The authorised officer has reason to believe that an informal approach will not be successful.

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
Formal Written Warning	• Deal quickly and simply with less serious offences. • Divert offenders where appropriate from appearing in criminal courts and to reduce the likelihood of re-offending.
Prosecution	• The offence is serious. • There is a poor history of compliance. • There has been a failure to comply with a food information regulation notice; 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. • Officers have been intentionally obstructed in the lawful course of their duties.

Private Water Supplies

Enforcement option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
No Action	This course of action is only considered appropriate where, in the officer's opinion, all relevant statutes and guidelines are satisfactory complied with and there is no evidence of sample failures.
Investigation	If a water sample fails to comply with the prescribed concentrations or values, defined in the regulations, the Council will carry out an investigation to determine the cause of the failures. The relevant person will then be informed of the findings of the investigation and what further action will be necessary to ensure that the water complies with the prescribed concentration or value. Such in an investigation will involve the taking of resamples from the private water supply. Depending on circumstances such samples maybe taken from points on the private water supply other than was sampled previously.
Informal Action	Informal action is the first enforcement action to be considered by an officer where the water is unwholesome but not a potential danger to human health. Informal action is action which will, in the officer's opinion, secure compliance with legislation by offering advice, issuing verbal warnings, the issue of letters and risk assessment reports. Officers may recommend informal action where:

Enforcement option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
	• The risk to human health is not serious enough to warrant formal action. (Low or Medium as defined on the DWI Risk Assessment Tool) • The previous record of the supply is such that it would be reasonable to expect compliance when informal action is taken. • Confidence in the supply's management is high. • The risk to public health because of non-compliance is not significant. • The action is part of an ongoing project to improve standards. • The supply is for a single domestic dwelling. • At the conclusion of every visit or investigation the officer will discuss the result of the visit or investigation with the Person in control/Relevant Person for the supply. When taking informal action, the officer will: • Give all the necessary information to enable all relevant person(s) to understand what is required to remedy the situation and why the action is necessary. • Indicate that any other means that achieve the objectives of compliance will be equally acceptable. • Clearly differentiate between legal requirements and recommendations of good practice in any report or correspondence. • Arrange to carry out follow-up visits to the supply to monitor compliance and, where necessary, steps to confirm compliance. The timing of these visits will be determined by the significance of the breaches and should, wherever possible, be carried out by the original inspecting officer.
Issue 'boil-notice'. (Regulation 18, The Private Water Supplies (England) Regulations 2016)	If the private supply of water intended for human consumption constitutes a potential danger to human health, then a notice must be served on the relevant person. The notice must: • identify the private supply to which it relates. • state the grounds for serving the notice. • prohibit or restrict the use of that supply. • specify what other action is necessary to protect human health. The consumers of the supply will be informed of the notice and provided any necessary advice. If insufficient information is available to determine if the water constitutes a potential danger to human health, the Council will consult with the UK Health Security Agency.

Enforcement option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
Serve a notice (Section 80, The Water Industry Act 1991)	If the private supply of water intended for human consumption is unwholesome or is likely to be supplied in an unwholesome state, then the Council may serve such a notice. This notice will specify what steps are necessary to ensure that the water supplied is wholesome.
Works in default	The decision to carry out works in default is a serious matter and will only be considered after consultation with the Environmental Health Team Manager (Commercial) and Head of Service. The case and the available evidence would be discussed with the Council's Legal Officer prior to any decision being made. The relevant criteria to be considered by officers when work in default is being considered are one or both of the following: • Where the offence involves a failure either in full or in part with the • requirements of a statutory notice. • Where all opportunities for appeal against the notice have expired.
Prosecution	Prosecutions will be taken under the following circumstances: • The offence is serious. • There is a poor history of compliance. • There has been a failure to comply with a statutory notice. • 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. • Officers have been intentionally obstructed in the lawful course of their duties.

Health and Safety

The Authority may choose to pursue more than one enforcement option for example the service of a notice in addition to prosecution.

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
No action	• Where an inspection or investigation reveals no contravention and the existence of satisfactory management controls. Business proprietors and/or complainants will be advised accordingly.
Informal action	• The act or omission is relatively minor.

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
This may take the form of: • Advice • Verbal warning • Written information Inspection reports	• From the individual/business' history it can be reasonably expected that informal action will achieve compliance. • Confidence in the individual/business's management practices is high. • The consequence of non-compliance will not pose a significant risk to those affected by work activities.
Improvement Notice	• The breach of the law is more serious. • There is a lack of confidence in the proprietor responding to an informal approach. • There is a history of non-compliance with informal action. • Standards are generally poor, and management are not aware of the required controls/standards. • The consequences of non-compliance could result in serious risks to health and safety or inadequate welfare provision. • Although there is an intention to prosecute, effective action is needed to remedy conditions that are serious or deteriorating.
Prohibition Notice	• an activity involves, or will involve, a risk of serious personal injury.
Formal Written Warning	A formal written warning is a non-statutory method of disposing of first-time, low-level offences. The aims of a formal written warning are: • To deal quickly and simply with less serious offences. • To divert offenders where appropriate from appearing in criminal courts; and • To reduce the likelihood of re-offending. Simply cautions are issued in accordance with current Ministry of Justice guidance.
Prosecution	• the gravity of the alleged offence, taken together with the seriousness of any actual or potential harm, or the general record and approach of the duty holder warrants it. • there has been reckless disregard of health & safety requirements. • there have been repeated breaches which give rise to significant risk, or persistent and significant poor compliance. • work has been carried out without or in serious non-compliance with an appropriate licence or safety case. • a duty holder's standard of managing health and safety is found to be far below what is required by health and safety law and to be giving rise to significant risk. • there has been a failure to comply with an improvement or prohibition notice; or there has been a repetition of a breach that was subject to a formal 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.

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
	inspectors have been intentionally obstructed in the lawful course of their duties.

Guidance

Health and Safety Executive Enforcement Guide.

Health and Safety Executive Enforcement Management Model.

Smoke Free Legislation

Offences and Penalties

	Offence	FPN If paid in 15 days	FPN If paid in 29 days	Max court awarded fee If found guilty
1	Failure to display a no smoking sign in a smoke free premises or vehicle Section 6(5)	£150	£200	£1000 (level 3)
2	Person who smokes in a smoke free place or vehicle Section 7(2)	£30	£50	£200 (level 1)
3	Person having management or control of smoke free premises or vehicle fails to stop a person from smoking there Section 8 (4)	N/A	N/A	£2500 (level 4)
4	Any person who intentionally obstructs an authorised officer or who fails to give assistance when requested to do so or who gives false or misleading information Section 11	N/A	N/A	£1000 (level 3)

N.B. FPN= fixed penalty notice

Levels relate to the standard scale for prosecution fines

FPN's will be in the form prescribed in the Regulations (see Relevant Guidance). A person may elect to receive a summons to court rather than accept an FPN.

A FPN will only be issued in circumstances where there is enough evidence to support a prosecution.

Once a FPN is paid no further legal action may be taken for the same offence. However, if the FPN remains unpaid then this will lead to prosecution.

Public Health, Statutory Nuisance and Open to Access

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
Informal action – verbal or written advice	This may include advice, verbal or written warnings and information. This action will be considered if: • The act or omission is relatively minor. • From the individual/business' history it can be reasonably expected that informal action will achieve compliance. • Confidence in the individual/business's management practices is high. • The consequence of non-compliance will not pose a significant risk to those affected by the activities of the business.
Fixed Penalty Notice	• Formal action is proportionate to the risk to public health. • There is a record of non-compliance. • The authorised officer has reason to believe that an informal approach will not be successful. • Officers have been intentionally obstructed in the lawful course of their duties.
Prohibition Notice	• Formal action is proportionate to the risk to public health. • The authorised officer has reason to believe that an informal approach will not be successful. • There is an imminent risk of injury to health. • There is a record of non-compliance with breaches of legal requirements • Immediate action is required to protect public health.
Community Protection Warning and Notice	• There is a breach of the Regulations. • There are indications or suspicions that the establishment is continuing to breach legal requirements • Immediate action is required to ensure public safety.
Works in default	The decision to carry out works in default is a serious matter and will only be considered after consultation with the Environmental Health Team Manager (Commercial). The relevant criteria to be considered by officers when work in default is being considered are one or both of the following: • Where the offence involves a failure either in full or in part with the requirements of a statutory notice.

Enforcement Option	Qualifying Criteria for Option (please note the use of each option will only be considered when one or more of the criteria apply)
	Where all opportunities for appeal against the notice have expired.
Prosecution	- The offence is serious. - There is a poor history of compliance. - There has been a failure to comply with a Prohibition Notice, or there has been a repetition of a breach. - 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.

Guidance and further information

- Food Law Code of Practice and Practice Guidance
- Industry Guides to Good Hygiene Practice
- Health and Safety Executive Enforcement Guide
- Health and Safety Executive Enforcement Management Model
- Trade or best practice guidance as appropriate
- The Private Water Supplies Technical Manual
- The Criminal Procedure and Investigations Act 1996 (CPIA)
- Police and Criminal Evidence Act 1984 (PACE)
- The Regulation of Investigatory Powers Act 2000 (RIPA)
- Code of Conduct & Complaints Procedure
- Home/Primary Authority Arrangements
- Legal process guidelines