

**From:** Mike Hill, Cabinet Member for Community and Regulatory Services  
Barbara Cooper, Corporate Director, Growth, Environment & Transport

**To:** Growth, Economic Development and Communities Cabinet Committee – 17th November 2020

**Decision No:** N/A

**Subject:** KCC Public Protection Intelligence Team

**Classification:** Unrestricted

**Electoral Divisions:** All

**Summary:**

To inform the Cabinet Committee about the work undertaken by the Public Protection Intelligence Team.

**Recommendation(s):**

The Growth, Economic Development and Communities Cabinet Committee is asked to note this report.

**1. Introduction**

- 1.1 The Public Protection Intelligence Team (PPIT) sits within Public Protection's Business Development Team, within the Environment, Planning and Enforcement Division.
- 1.2 The PPIT is a small team established in 2012 to enable KCC to achieve its goal of operating one of the first truly intelligence-led Trading Standards service in the UK, with a 'sterile wall' between intelligence and operational enforcement. This successful transition enables Trading Standards to be more efficient and effective in tackling issues causing the greatest harm to our residents, whilst supporting legitimate businesses.
- 1.3 Since its establishment, the remit and impact of the PPIT has grown considerably in terms of the breadth and complexity of the work it undertakes for a number of KCC services and projects.
- 1.4 The PPIT is now seen as a 'trusted intelligence partner' by Kent Police, Kent Fire and Rescue, and a wide range of external regulatory partners.

**2. Background**

- 2.1 The PPIT has access to some of the most sophisticated intelligence tools and systems available within the criminal intelligence community and has access to both restricted criminal and non-criminal data. It has access to more than 220 million items of consented personal data.

- 2.2 The PPIT is the only team in KCC to have direct access to the Police National Computer (PNC). This puts the Public Protection Group in a unique position to direct and manage intelligence-led operations.
- 2.3 Each team member has enhanced vetting by Kent Police to enable them to access the PNC system and they are trained to a nationally recognised intelligence standard.
- 2.4 The team's approach and use of intelligence is comparable with the Police and it has gained a local and regional reputation for being professional, proactive, and innovative in its approach.
- 2.5 The PPIT works at the centre of the Public Protection Group both directing and supporting 'Business as Usual' for individual services protecting Kent residents, consumers and legitimate businesses.
- 2.6 In addition, the PPIT shares its skills and knowledge to protect KCC's reputation and finances and work on a number of KCC-wide projects.

### **3. Trading Standards**

- 3.1 The PPIT reviews approximately 17,000 confidential consumer complaints per year, along with a further 10,000 criminal intelligence reports from a variety of sources, including Kent Police, district councils and National Trading Standards. This information is used to identify the businesses and trade sectors causing the most harm and detriment to Kent residents and legitimate businesses, whether that be the financial abuse of residents, issues of public health and safety, or businesses not complying with trading law. The PPIT then produces 'action ready' intelligence packages for Trading Standards.
- 3.2 Anyone can be a scam victim, regardless of age, gender, education or economic background. National Trading Standards estimates that 53% of people aged 65+ have been targeted by scams and criminals. The PPIT identifies victims of scams and ensures that appropriate action by KCC is taken, either through the Victim Safeguarding Officer in Trading Standards or the Community Warden service, to assist and protect the victim from further scams. The team analyses and profiles more than 2,000 scam victims per year using restricted data from the National Scams Hub.
- 3.3 The PPIT processes an immense amount of information and intelligence for Trading Standards and in addition to identifying its priorities as above, it also provides dedicated ongoing support to the most complex investigations which conclude through the Court process.
- 3.4 'Trading Standards Checked' is KCC's new fair trader scheme, created as a critical element in the Public Protection preventative agenda to tackle rogue and illegitimate traders, protect legitimate traders, and to protect the most vulnerable residents in Kent. It was developed by the Public Protection Business Development Team and is run on a day-to-day basis by the PPIT. The PPIT provides the vetting of all traders and proactively develops the scheme which currently has over 500 members.
- 3.5 The PPIT will also play a crucial role in Trading Standards' product safety and standards intelligence under any post-Transition trade arrangements with the European Union.

## **4 Community Warden Service**

- 4.1 The PPIT works closely with the Community Warden service providing them with the names and addresses of the most vulnerable residents who have been the victim of scams and doorstep crime. The Covid-19 pandemic has seen the number and complexity of scams affecting residents increase and the PPIT direct the wardens to those in most need, with the wardens then offering help and support.

## **5. Public Protection Communications**

- 5.1 In response to the Covid-19 pandemic, the Public Protection Business Development Team developed and implemented a sophisticated social and digital media plan to inform and help protect Kent residents and businesses. Between 17<sup>th</sup> March and 29<sup>th</sup> September the PPIT contributed information about a wide range of scams and doorstep crime activity into this plan which had a total reach of 4,266,000, and an Email Open Rate ranging from 55-59% (industry average is 18%) demonstrating the relevance and timeliness of the information.

## **6. KCC Gypsy and Traveller Service (GTS)**

- 6.1 The GTS service was part of the Public Protection Group for three years before transferring to another group, and this established an operational intelligence relationship leading to a more robust approach to pitch allocations. It ensured that decisions with regards to pitch applications were made based on appropriate and relevant information and insight, which was provided by PPIT. Since the realignment of the GTS service into another group, this relationship has continued and there is an intelligence sharing relationship in place which also means that any civil enforcement action (for example an eviction) can be taken based on and utilising appropriate intelligence, which increases the success rate when going through the civil courts process.

## **7. Fly Tipping Enforcement**

- 7.1 The Kent Resource Partnership (KRP) commissions the PPIT to supply a dedicated Intelligence Analyst to provide enforcement intelligence services to all members of the KRP – 12 district and borough councils and KCC's Waste Management team.
- 7.2 Whilst this is a dedicated fully funded post, the provision of this post also benefits other KCC enforcement functions and projects as it enriches our intelligence picture and has enabled the identification of common nominals of interest and also opportunities for joint and multi-agency investigations, in particular with the GTS and Trading Standards Checked.
- 7.3 The KRP collaborates on a number of multi-agency 'days of action' (Op Assists) against fly-tipping and traders operating without a waste carriers licence. These are designed and directed by the PPIT.

## **8. Vetting and Tracing**

- 8.1 Vetting is the process of thoroughly investigating an individual, company or other entity and completing a range of due diligence checks, before making a decision.

- 8.2 Tracing is the process of finding and identifying people of interest and their assets.
- 8.3 The PPIT has access to a significant amount of information and tools that can provide instant access to a range of commercial and business-related intelligence. The team works closely with colleagues in the Economic Development Division to ensure that decisions about lending and issuing of grants by KCC are made with the most detailed Vetting information available.
- 8.4 Some of the intelligence tools that the team has access to for regulatory work is also being used to provide a Tracing service to Economic Development to recover debts associated with loans and grants that were issued prior to the due diligence vetting checks referred to above. A recent successful trace conducted by the PPIT enabled colleagues in Economic Development to pursue a £10,000 debt which had been outstanding for a considerable period of time.
- 8.5 The PPIT is also commissioned by the KCC Debt Recovery team to provide a debtor Tracing service that has proven to be quicker and more accurate than the external provider previously used. The PPIT is also exploring commercial applications for both its Vetting and Tracing capability with Cantium Business Solutions.

## **9. Officer Safety**

- 9.1 The PPIT has access to personal warning marker information which is used to ensure the health, safety and wellbeing of staff. The Public Protection Group deals with many residents face-to-face, in their homes and in business premises, potentially dealing with extremely dangerous individuals, criminals and organised crime groups. Ensuring that due care and consideration is given to officer safety is of paramount importance and the PPIT is able to screen people for warning markers, for example violence markers. Public Protection staff from Trading Standards, Community Wardens, Coroners Officers, and other EPE staff from the Gypsy and Traveller Service and Public Rights of Way all benefit from this capability. A recent example prevented a female Community Warden attending the house of a former sex offender, who had live warning markers about females not attending his residence alone due to the high risk he posed.

## **10. GET - Investigations and Enforcement Project (IEP)**

- 10.1 The IEP project was formed when the Public Protection Group recognised that there were potential opportunities for KCC to firstly improve its own investigation and enforcement competency, policies, processes and performance, and secondly for KCC to work more closely with Kent Police, district councils and other public bodies to tackle criminal activity more effectively and efficiently.
- 10.2 The project has a dedicated Intelligence Analyst from the PPIT who attends all district Organised Crime Group (OCG) working groups on behalf of GET in order to ensure coordinated approach to operational intelligence sharing and identification of collaborative investigation and enforcement activity with other enforcement agencies.
- 10.3 A PPIT Analyst has recently led two multi-agency on-site tactical operations on a gypsy and traveller site with the aim of securing arrests and/or gathering intelligence on people fly-tipping. The operations coordinated by the PPIT were successful and partners wish to repeat these operations on a regular basis.

## **11 Doorstep Crime Project**

- 11.1 In 2017, losses to victims in Kent from scams and doorstep crime totalled £3.6 million, of which nearly £2.6 million (72%), related to doorstep crime.
- 11.2 In June 2019, this Cabinet Committee received an update on the prevalence and impact of Doorstep Crime in Kent and was supportive of the actions to be taken.
- 11.3 The Doorstep Crime project has identified that there are more than 10 different victim lists being held by different public sector bodies, with victims receiving different levels of intervention across Kent. This lack of coordination means that no single agency holds the actual list of who has been a victim of doorstep crime/scams in Kent in the last year, resulting in no single agency being able to instigate meaningful and impactful interventions.
- 11.4 With its knowledge of the wide range of systems being used to record lists of victims, a Project Officer within the PPIT is working closely with Trading Standards colleagues, all district and borough councils, KCC departments and the Police to implement the sharing of victim data to ensure consistent information between all partner agencies and create an agreed single reporting method that could be accessed by all partner agencies.

## **12. KCC Serious and Organised Crime Project**

- 12.1 In June 2019, this Cabinet Committee received an update on the prevalence and impact of Doorstep Crime in Kent and was supportive of the actions to be taken.
- 12.2 The PPIT initially highlighted the risks of serious and organised crime (SOC) to KCC and is leading a project across KCC to review and make recommendations as to how the authority manages, tackles, and responds to SOC. Whilst no one agency knows the full size and scale of the issue of SOC, it is known that it affects more UK citizens, more often, than any other national security threat and that it costs the UK economy more than £37 billion per year (pre Covid figure).
- 12.3 Through its various operations and projects the PPIT has an exceptional understanding of SOC and this project will identify the scale of risk it poses to KCC and provide a series of evidence-based recommendations to CMT in early 2021.

## **13. Financial Implications**

- 13.1 The PPIT is funded by a combination of revenue base budget, project budgets, grants and income.

## **14. Policy Framework**

- 14.1 The PPIT helps deliver 'Business as Usual' for a wide range of services against a wide range of policies and statutory duties. As can be seen from the narrative, all services benefit considerably from its involvement and can identify efficiency and performance gains as a result.

## **15 Equalities Impact Assessment**

15.1 Existing 'Business as Usual' for the services supported by the PPIT is governed by a suite of Equality Impact Assessments. The PPIT produces Equality Impact Assessments for all projects that it leads – for example the Serious and Organised Crime Project.

## **16. General Data Protection Regulation Considerations**

16.1 A Data Protection Impact Assessment is not needed for this overarching narrative report.

## **17. Conclusion**

17.1 The importance and value of the PPIT to the services and projects mentioned in this report has accelerated considerably over the past few years. The PPIT has enabled a number of services and partnerships to benefit from the use of intelligence.

17.2 The PPIT is uniquely placed to access and lawfully disseminate criminal intelligence and other information to a wide range of law and regulatory enforcement partners. After many years of developing professional relationships with the wider intelligence community, the PPIT is now a highly respected and trusted intelligence partner.

## **18 Recommendation(s)**

### **Recommendation(s):**

The Growth, Economic Development and Communities Cabinet Committee is asked to note this report.

## **19. Contact details**

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