

**Annex A**

**HEALTH AND SAFETY SERVICE PLAN 2020-21**

**ENVIRONMENTAL HEALTH  
COMMUNITY SERVICES  
SURREY HEATH BOROUGH COUNCIL**

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**SURREY HEATH BOROUGH COUNCIL  
HEALTH AND SAFETY SERVICE PLAN 2020/21**

**1. Service Aims and Objectives**

**1.1. Aims and Objectives**

1.1.1. The objectives of the health and safety service are:

- to meet the Council's statutory responsibilities to ensure that working environments are safe and without risks to health or welfare, and that work activities do not have an adverse effect on the public.
- to investigate all complaints about health and safety standards and notifications of accidents, occupational ill-health and dangerous occurrences, in premises for which the Council is the enforcing authority i.e. retail, leisure, service sector.

**1.2. Links to Corporate Objectives and Plans**

1.2.1. The aims of the Health & Safety Plan are linked to the overall aims and objectives of the Council.

1.2.2. This plan provides information about how the health and safety service provided and the means for monitoring and reviewing service performance against set standards.

**1.3 Licensing Committee**

1.3.1 The EH & Licensing Manager reports annually to the Licensing Committee on the health and safety activities that have taken place over the last year and on the plans for the forthcoming year.

**1.4 Equality Scheme**

1.4.1 The Council's Equality Strategy demonstrates its commitment to equality internally and externally and ensures that all sections of the community are given an opportunity to contribute to the wellbeing of the community. The Strategy has been taken into account in the drafting of this plan.

**2. Background**

**2.1. Profile of the Borough of Surrey Heath**

Surrey Heath covers 36.5 square miles in North West Surrey and has a population of 86,144 (Census 2011). Approximately 9.8% of the Borough's residents are from a range of ethnic minorities. Camberley is a substantial and developing shopping, commercial and entertainment centre with outlying villages surrounding the town centre, providing a variety of workplaces for which the Council is the enforcing authority

**2.2 Organisational Structure**

2.2.1 The health and safety service is delivered by the Food and Safety Team within Environmental Health which is part of Community Services. The team is led by the Senior Environmental Health Officer

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(Food and Safety) and reports to the Environmental Health and Licensing Manager.

### **2.3 Scope of the Health and Safety Service**

2.3.1 The health and safety service provides the following:

- inspections of businesses for which the Council is the enforcing authority
- investigation of complaints regarding health, safety and welfare in workplaces
- investigation of notifications of accidents, dangerous occurrences and occupational ill health arising from work activities affecting employees or others
- promotion of high health and safety standards through advice, education and training to businesses and the public
- registration of premises and operators carrying out skin piercing activities
- registration of premises with cooling towers
- enforcement action under the Health and Safety at Work (Etc) Act 1974 (HSWA) and associated legislation

### **2.4 Demands on the Health and Safety Service**

2.4.1 We have a duty to 'make adequate arrangements for enforcement' under section 18 of HSWA. The National Local Authority Enforcement Code (National Code) sets out the adequate arrangements for enforcement. Compliance with the National Code is mandatory and focuses on delivering proportionate and targeted enforcement using a full range of regulatory interventions.

2.4.2 There are an estimated 1500 businesses in the Borough, for which the Council is the enforcing authority. These consist of shops, offices, caterers, leisure and consumer services and a wide range of other commercial activities. The Council is required to establish and maintain an accurate and comprehensive database of businesses subject to enforcement. It is recognised that the database of health and safety premises is constantly changing as existing businesses close and new businesses start up within the Borough.

2.4.3 The database of business details and risk rating scores for some businesses has been transferred from the Acolaid system to the Council's new IDOX Uniform computer software. The software enables the service to determine which businesses are 'high risk' in terms of health and safety so that we can effectively target interventions on those premises that need it most.

2.4.4 It is difficult to maintain an accurate health and safety premises database as there is no requirement for most businesses to register with us. Ongoing work is required to obtain accurate and up to date premises information about local businesses and officers conduct adhoc surveys of the trading and industrial estates. Officers also update the database by obtaining information from routine inspections,

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investigations, new business notifications, particular trade sectors, business rates and the Health and safety Executive (HSE).

2.4.5 The Environmental Health Service is based at Surrey Heath House, Knoll Road, Camberley, which is open to callers 9.00 to 16.45 Monday to Friday. The team are contactable in the office by telephone, mail, e-mail, via the Council's website and in person and are contactable by colleagues via mobile phone and e-mail whilst out in the field. In an emergency a member of the team can be contacted outside of office hours by means of the Environmental Health Call-Out Service.

### **2.5 Enforcement Policy**

2.5.1 The service has a documented Environmental Health Enforcement Policy which is in line with the HSE's Enforcement Policy Statement.

2.5.2 The HSE's Enforcement Management Model (EMM), is available for reference when making decisions about health and safety enforcement actions.

## **3. Service Delivery**

### **3.1. Health and Safety Inspections**

3.1.1 Enforcement in the form of planned interventions must be targeted in specific risk areas in accordance with the priorities identified in the National Code. This will be at those premises where activities give rise to the most serious risk and are known to be least well controlled, with the aim of ensuring dutyholders effectively manage and control the risks of their work activities. We must focus resources on those premises most likely to cause working days lost and public injury, ill health or sickness absence and where dutyholders seek economic gain or advantage from non-compliance (e.g. rogue traders). The overall aim is targeted intervention involving the right people in businesses and the activities which present the greatest risk, and therefore maximise impact in improving health and safety outcomes.

3.1.2 LAs have a range of interventions available to them to ensure a business is managing its risks effectively and guidance is provided by the HSE in LAC 67/2 (revision 9) Setting Local Authority Priorities and Targeting Interventions. It is important that LA's are able to justify any inspection they undertake and the National Code requires national and local intelligence is used to inform priorities. LAs must be able to deal reactively with matters of evident or potential major health and safety concern, especially when visiting premises for other reasons, e.g. food safety intervention.

3.1.3 The service will liaise with the other Surrey LAs through the Health and Safety Study Group and gather local intelligence to identify areas of high risk activities in Surrey and participate in group project work where possible.

3.1.4 In 2019/20, a total of 412 health and safety interventions were carried out. (Interventions are contacts with businesses and include inspections as well as revisits, telephone calls and advice.) In addition

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27 skin piercing inspections for premises and persons were carried out.

- 3.1.5 In 2019/20, 21 warning notices & letters were issued to businesses. One Prohibition Notice was served prohibiting the use of an unsafe liquefied petroleum gas system at a retail premises which presented a risk of serious personal injury. Letters were also sent to 180 businesses that could possibly hire out inflatables giving information on how to hire and operate safely after recent serious accidents in this sector.

### **3.2. Reactive Services for Health and Safety**

- 3.2.1 All complaints about health and safety conditions within workplaces for which the Council is the enforcing authority are investigated. Reactive complaint work takes priority over programmed visits to ensure that requests for service are dealt with effectively. Requests for information about health and safety standards and legislation will also be met. In some cases, complaints will trigger a full health and safety inspection of the premises.
- 3.2.2 In 2019/20, 28 visits were made as a result of a complaint relating to health and safety.

### **3.3 Investigation of Accidents, Dangerous Occurrences and Occupational Ill Health**

- 3.3.1 Notifications of accidents at work made under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 are investigated in accordance with the HSE Accident Investigation Policy. Although the policy states that not all accident notifications will be investigated, in practice, the vast majority of those received meet the criteria for investigation. Non-reportable notifications are not usually investigated, but are acknowledged by means of a standard letter.
- 3.3.2 In 2019/20, 43 accident notifications were investigated.

### **3.4 Primary Authority Partnership (PAP)**

- 3.4.1 Surrey Heath Borough Council has a PAP with Manning Impex, an imported food company and Exclusive Hotel Group, who own Pennyhill Park, which covers health and safety (and food safety). The businesses are charged for the officer time spent on partnership work.
- 3.4.2 The PAP Scheme entitles any business or organisation to ask for a Partnership with a Local Authority (LA). Those businesses will be expected to work closely with the LA to ensure they comply with the Regulations that apply to them. This is expected to lead to greater compliance by the business, but also greater consistency and co-ordination of regulatory enforcement by LAs. A central register is maintained of all businesses with a PAP. We are expected to consult with other LAs before undertaking any enforcement work when a business has a PAP. This will have an impact on the service both as an enforcing authority needing to consult with other LA's before undertaking enforcement interventions in businesses within Surrey Heath, and as an authority with a PAP.

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### **3.5 Support to Businesses**

- 3.5.1 The Council's approach to enforcement includes offering advice to businesses in the first instance to assist them in achieving a satisfactory standard of compliance with health and safety law, where this does not compromise the safety of workers or the public.
- 3.5.2 In addition to the advice that is provided during inspections, revisits and investigatory visits to premises, advice is available to businesses on request at any time. Advice to businesses is also provided by means of our webpages, direct mailings and press releases on particular health and safety issues and new legislation.

### **3.6 Liaison with other Organisations**

- 3.6.1 The service has various liaison arrangements in place to ensure that enforcement action taken in its area is consistent with those of neighbouring LAs.
- 3.6.2 The service has a representative on the Surrey Health and Safety Study Group, which meets 4 times a year and is attended by the 11 Surrey LAs, as well as the HSE. This group is also attended by a representative from the Surrey Environmental Health Managers Group, enabling consistency issues to be discussed by the managers of the different health and safety services in Surrey.
- 3.6.3 Arrangements are in place for referring cases to the relevant enforcing authority e.g. another local authority or the HSE, where this is necessary.

## **4. Resources**

### **4.1 Financial Allocation**

- 4.1.1 The budget for the health and safety service is jointly held with that of the food safety service. The combined budget for 2019/20 is £346,797.

### **4.2 Staffing Allocations**

- 4.2.1 Currently there are 4 officers authorised and competent in health and safety. The time allocated to health and safety equates to a total of 1.0 FTE officer time and there is an additional 0.1 FTE administrative support. The Council's Contact Centre receives initial telephone calls, emails and other correspondence for the service.
- 4.2.2 The Environmental Health & Licensing Manager in conjunction with the Senior EHO is responsible for assessing competency and recommending levels of authorisation to the Executive Head of Community in line with the Authorisation Policy.
- 4.2.3 The Surrey LA's have a flexible warranting arrangement where officers are able to assist and support each other when necessary, e.g., where

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a serious incident has taken place and more resources are needed to help take witness statements etc, where another LA may have specialist knowledge in an area, e.g., workplace related death investigation and where competent and authorised officers are absent e.g., holiday / sickness, and less experienced staff are required to take enforcement action. We have agreed to participate in this and in particular have a good working relationship with Woking Borough Council.

### **4.3 Staff Development Plan**

- 4.3.1 The Council's staff appraisal scheme highlights the specific development and training needs of each officer. The Environmental Health & Licensing Manager monitors to ensure that these needs are identified and met by the scheme.
- 4.3.2 The training and development of staff is achieved through attending courses, on-line training, information updates in team meetings and staff mentoring. The Senior EHO maintains a training log for all officers.
- 4.3.3 EHOs are encouraged to be Members of the Chartered Institute of Environmental Health (CIEH), in order to further demonstrate competence and professional accreditation. It is a membership requirement that officers achieve a total of 20 hours Environmental Health related CPD (30 hours for Chartered Members) and where possible development opportunities will be provided to facilitate this.
- 4.3.4 Corporate training is also provided for general subjects such as IT, Safeguarding, health and safety, and customer service skills.
- 4.3.5 The Council subscribes to the Regulatory Information and Management System (RIAMS) which provides online access to relevant reference material which is automatically updated and version controlled so that officers have access to the most up to date information and legal references. The service also has online access to the HSE and LA enforcement information resource HELAExtranet.

### **4.4 Quality Assessment**

- 4.4.1 Monitoring activities include regular team and one to one officer meetings, ongoing staff appraisals, accompanied inspections / visits, statistical performance monitoring (LAE1 Return) and peer review exercises co-ordinated by the Surrey Health and Safety Study Group. The latter are required as part of the requirements of the National Code and are conducted annually within the Group.

## **5. Review**

### **5.1. Review Against the Service Plan**

- 5.1.1. Performance will be monitored throughout the year and a full review will take place annually when the next year's plan is being drafted. Where

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variance from the plan is identified, the reasons for this will be investigated and corrective action taken as required.

- 5.1.2. The COVID-19 pandemic and associated lock down had the effect of suspending health and safety site visits. Officers were redeployed to work on the Council's COVID-19 welfare response and enforcement of the new business restriction regulations.

### **5.2. Forward Planning**

- 5.2.1. The health and safety work programme for 2020/21 will be prioritised in line with the National Code and LAC 67/2 (rev9).
- 5.2.2. The current priority for health and safety is ensuring that workplaces are COVID-19 safe for employees and for members of the public visiting work places. As lock down has relaxed the work load in relation to service requests from businesses and complaints from employees and public regarding COVID-19 controls.
- 5.2.3. The impact of possible competing demands on Environmental Health staff in delivering COVID-19 Local Outbreak Control Plans will need to be kept under review and alternative resourcing options considered where necessary. The Council has updated the health and safety advice available to businesses to provide information about changes to the service and guidance has been made available on safely reopening businesses after lockdown with regard to legionella control /water supply safety and pest control, in addition to COVID-19 controls.

### **5.3 Review of Service Delivery Methods**

- 5.3.1 In response to the changes in the food premises intervention programme and the Government's work from home where you can guidance, the team has adapted to find new ways of delivering the food safety service. In line with corporate policy greater use has been made of telephone and email contact with electronic review of submitted documentation and photographs from businesses playing an increased role in assessing standards and communicating with businesses and the public on food safety matters. This will be kept under review to ensure that the advantages of new ways of working are retained, whilst maintaining a high standard of service delivery.

### **5.4 Computer System**

- 5.4.1 The replacement of the Acolaid database with the IDOX Uniform system has been very resource intensive during 2019/20 with regard to extensive mapping and configuration work prior to data transfer. Significant work will be ongoing in 2020/21 to achieve the required level of functionality from the system, particularly with regard to performance monitoring reporting. Processes and procedures also need to be developed further to ensure officer consistency in the use of the system and additional officer training will also be required.