

Annex A

**HEALTH AND SAFETY SERVICE PLAN 2021-22  
ENVIRONMENTAL HEALTH  
ENVIRONMENT AND COMMUNITY SERVICES  
SURREY HEATH BOROUGH COUNCIL**

**Contents**

Section		Page Number
1	Service Aims and Objectives	
2	Background	
3	Service Delivery	
4	Resources	
5	Review 2020/21	
6	Service Priorities 2021/22	

**SURREY HEATH BOROUGH COUNCIL  
HEALTH AND SAFETY SERVICE PLAN 2021/22**

**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**

1.2.1. The aims of the Health & Safety Service Plan contribute to the Health and Quality of Life, Economy and Efficiency themes contained in the draft Five Year Strategy

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

**1.3 Licensing Committee and Portfolio Holder**

1.3.1 The EH & Licensing Manager (EHLM) 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 and has the opportunity to discuss progress with implementing the service plan at monthly meetings with the Environment and Health Portfolio Holder.

**1.4 Equality**

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 95.05 square kilometres in North West Surrey and has a population of 88,874 (Office of National Statistics 2018). Camberley is a substantial and developing shopping, commercial and entertainment centre with outlying villages surrounding the town centre,

## **Annex A**

providing a variety of workplaces for which the Council is the enforcing authority for health and safety at work.

### **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 Environment and Community Services. The team is led by the Senior Environmental Health Officer (Food and Safety) and reports to the EHLM.

### **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
- Provide health & safety advice for the organisers of events in the borough and where appropriate organise and chair Safety Advisory Group (SAG) meetings with partners from the Police, Surrey County Council (Highways, Fire & Rescue, Emergency Planning) & South East Coast Ambulance Service (SECAM).

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

2.4.1 The Council has 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. The code provides flexibility for LAs to address local priorities alongside the national priorities set by the Health and Safety Executive (HSE). It sets out the Government expectation of a risk-based approach to targeting resources.

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.

## **Annex A**

- 2.4.3 A database of business details is held on the IDOX Uniform computer system. The software enables the service to determine which businesses are 'high risk' in terms of health and safety so interventions can be targeted effectively.
- 2.4.4 Due to the inherent difficulties in maintaining an accurate health and safety premises database as there is no requirement for new businesses to register with EH, there is ongoing work to update premises details using information obtained by means of ad hoc surveys, routine inspections, investigations, new business notifications, business rates, HSE and local intelligence from officers and partners.
- 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.

## **2.5 Enforcement Policy**

- 2.5.1 The Council has a publically available Corporate Enforcement Policy which is in line with the HSE Enforcement Policy Statement.
- 2.5.2 The HSE Enforcement Management Model (EMM), is available for reference when making decisions about health and safety enforcement actions.

## **3. Service Delivery**

### **3.1. Proactive Health and Safety Interventions**

- 3.1.1 Planned interventions are targeted in specific risk areas in accordance with the priorities identified in the National Code. These are 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. Resources are focused 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).
- 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 10) Setting Local Authority Priorities and Targeting Interventions. LAs are required 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

## **Annex A**

high risk activities in Surrey and participate in group project work where possible.

### **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.

### **3.3 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.

### **3.4 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.

### **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

## **Annex A**

our webpages, direct mailings and press releases on particular health and safety issues and new legislation.

- 3.5.3 Where resources permit, the service will undertake targeted local health and safety initiatives and participate in national/regional campaigns that contribute to the Council's work priorities.

### **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 reports into 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 allocated budget for the health and safety and food safety service is £295,448.

### **4.2 Staffing Allocations**

- 4.2.1 Currently there are 5 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 EHLM in conjunction with the Senior EHO is responsible for assessing competency and recommending levels of authorisation to the Strategic Director in line with the Authorisation Policy.
- 4.2.3 Surrey LA's have a flexible warranting arrangement where officers are able to assist and support each other, when necessary, e.g. where 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.

### **4.3 Staff Development Plan**

## **Annex A**

- 4.3.1 The Council's staff appraisal scheme highlights the specific development and training needs of each officer. The EHLM 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 EH 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). This 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 Annual Return to the HSE) and peer review exercises co-ordinated by the Surrey Health and Safety Study Group.

## **5. Review 2020/21**

### **5.1. Review of Performance and Impact of Covid-19**

- 5.1.1. In addition to the ongoing performance monitoring of the health and safety service, performance is reviewed on an annual basis by the Strategic Director and the Licensing Committee.
- 5.1.2. In 2020/21 in light of the competing demands on EH staff from enforcement of Covid-19 business controls and containment and outbreak control work, the service was delivered in accordance with the HSE instruction to focus interventions on those premises and incidents that present the greatest safety risk and the work programme was aligned to these revised priorities.
- 5.1.3. This reprioritisation and the Covid-19 lockdown closures of businesses, meant a reduction in the number of non Covid-19 related health and safety interventions and service requests/accidents investigated in 2020/21, with resources redeployed to workplace Covid-19 work. 250 Covid-19 workplace related complaints/enquiries from businesses and

## **Annex A**

the public were dealt with during this period and appropriate action taken under the relevant coronavirus restriction regulations.

- 5.1.4. In light of the possible legionella risks that reopening businesses after lockdown presented, the service wrote to relevant business sectors giving advice on appropriate control measures. An investigation was also undertaken into a case of legionella relating to a swimming pool and neighbouring dwelling, which required the taking of water samples for analysis.
- 5.1.5. The service's work on safety at public events in 2020/21 was impacted by the Health Protection (Coronavirus Restrictions) (England) (No3) Regulations 2020 which gave LAs powers to respond to serious and imminent threats to public health as a result of Covid -19. Surrey Heath Safety Advisory Group worked with 20 event organisers on their events to ensure that the necessary plans were in place to limit possible widespread transmission of Covid -19.
- 5.1.6. In 2020/21 skin piercing activities continued to be regulated with 14 skin piercing inspections for new practitioners and 4 new skin piercing premises inspections were carried out.
- 5.1.7. Work continued on implementing the IDOX Uniform system to effectively manage the delivery of the health and safety service including the necessary IDOX consultancy time and officer training. The service delivery benefits from increased use of telephone /electronic communication with businesses and the public including review of documentation and photographs have been retained where appropriate.

### **6.0 Service Priorities 2021/22**

- 5.1.8. The health and safety work programme for 2021/22 will continue to be prioritised in line with the National Code and LAC 67/2 (Revision 10). The HSE acknowledge that in light of COVID-19 enforcement priorities cannot revert to Business As Usual and there is a need for LAs to prioritise regulatory resource and where appropriate shift the focus to Covid-19 health and safety at work related activities.
- 5.1.9. From 19 July 2021 most specific Covid-19 business restrictions were removed in England, however employers are still required under the HSWA to control the risks by reviewing and updating their workplace risk assessments particularly with regard to adequate ventilation, sufficient cleaning and good hand hygiene in accordance with the new Government guidance on 'Working Safely during coronavirus' and other more general public health Covid-19 guidance.
- 5.2. The current priority for health and safety in 2021/22 is therefore undertaking proactive interventions of high risk businesses to ensure that workplaces have Covid- 19 safe controls in place for employees and visitors and reactive interventions, responding to service requests from business and investigating complaints from employees and public regarding inadequate controls. The Council will continue to update the relevant health and safety advice available to businesses on the

## Annex A

website and via the Economic Development business newsletter and other available communication methods.

- 5.2.1. In 2021/22 work will continue to work with public event organisers and other regulatory partners to ensure event safety, including the risk of Covid-19 transmission. The Health Protection (Coronavirus, Restrictions) (England) (No3) Regulations 2020 that relate to this work have been extended to 24th March 2022.
- 5.2.2. The service will be updating the Council's skin piercing register in 2021/22 by sending out letters to the 96 registered premises to check their registrations are current and ensure all their practitioners are registered. Letters will also be sent to the Borough's 170 close contact businesses (hairdressing, beauty, wellbeing services), to remind them of the skin piercing procedures that need to be registered and giving the guidance on how to register with the Council. This is seen as a priority given the large increase in home -based businesses in this sector in the last year.
- 5.2.3. In 2021/22 the service in partnership with the HSE has a programme of Covid-19 'Spot Checks' to monitor the controls businesses have in place in with the 'Working Safely guidance'. This initiative will focus on office and gym businesses initially and if successful will be rolled out to other business sectors later in the year.
- 5.2.4. The service is working in partnership with Economic Development on a project to survey small independent businesses to seek their views on how the Council can best support them in carrying out effective Covid-19 risk assessments, with a view to offering tailored health and safety advisory visits.