HAMBLETON DISTRICT COUNCIL

Report To: Cabinet

15 April 2014

Subject: HEALTH & SAFETY INTERVENTION PLAN 2014-2016

All Wards

Portfolio Holder for Leisure and Health: Councillor Mrs S Shepherd

1.0 PURPOSE AND BACKGROUND:

- 1.1 The purpose of this report is to present for approval the Health & Safety Intervention Plan for 2014-2016 in order to meet a requirement of the National Local Authority Enforcement Code published by the Health & Safety Executive.
- 1.2 The existing Health & Safety Intervention Plan was approved by the Licensing & Environmental Protection Committee at its meeting on 26th June 2012. The national guidance on service delivery was then subject to consultation resulting in the replacement of the section 18 Guidance by the National Local Authority Enforcement Code. The Code sets out what is meant by "adequate arrangements for enforcement". The Code sets out four objectives of a LA enforcement service:
 - a) clarifying the roles and responsibilities of business, regulators and professional bodies;
 - b) outlining the risk-based regulatory approach that LAs should adopt:
 - c) setting out the need for the training and competence of LA Health & Safety regulators; and
 - d) explaining the way that LA can give an assurance on meeting the requirements of the Code.
- 1.3 The Code provides direction to Local Authorities on meeting the requirements and reporting on compliance. It is given legal effect as HSE guidance to LAs under section 18(4)(b) of the Health & Safety at Work etc. Act 1974.
- 1.4 In July 2013 the Department for Business, Innovation and Skills published the Regulators' Code. This replaced the previous discretionary Regulators' Compliance Code. LAs must have regard to the Regulators' Code when developing policies and operational procedures that guide their regulatory activities. This Code sets out six standards of any regulatory service to which it applies:-
 - 1. Regulators should carry out their activities in a way that supports those they regulate to comply and grow;
 - 2. Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views;
 - 3. Regulators should base their regulatory activities on risk;
 - 4. Regulators should share information about compliance and risk;
 - 5. Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply;
 - 6. Regulators should ensure that their approach to their regulatory activities is transparent.

- 1.5 In August 2013 the Environmental Health Service amended its Business Friendly Scheme which contains details of the many ways that the Environmental Health Service can meet the needs of businesses locally and the requirements of the Regulators' Code.
- 1.6 A draft revised Health & Safety Intervention Plan was published for consultation in October 2013 based on these documents amongst other information. The draft Plan was published on the Council's website together with a brief on-line questionnaire. An email was also sent to 54 businesses business forums inviting them to comment on the draft plan. Paper copies were made available in the Customer Services areas of the three Council offices.
- 1.7 A total of 2 on-line responses were received and one paper response. The report is attached in the Appendix to this report. Paragraph 3.4, 3rd bullet point, was felt to adequately cover the response made.
- 1.8 In November 2013 the Local Government Association published its final version of a shared vision for local regulation entitled "Open for Business". A previous draft of this document had been taken into account in the preparation of the Intervention Plan and the Business Friendly Scheme.
- 1.9 In summary, the three guiding documents have the effect of requiring local authorities to move away from traditional inspections towards more supportive regulatory action. This has been adopted in the draft Intervention Plan and expanded in the Environmental Health Service's Business Friendly Scheme.

2.0 LINK TO COUNCIL PRIORITIES:

2.1 The implementation of this plan will contribute to the aim of putting our customers first and providing access to high quality, value for money services that meet the needs of our communities by aiming to ensure safe places of work.

3.0 RISK ASSESSMENT:

3.1 There are no significant risks associated with this Plan.

4.0 FINANCIAL IMPLICATIONS:

4.1 Implementation of the Health & Safety Intervention Plan will be within existing budgetary provisions.

5.0 LEGAL IMPLICATIONS:

5.1 The Local Authority has a duty to enforce the provisions of the Health and Safety at Work etc. Act 1974 and its associated legislation. This plan sets out how this Council will comply with its duty

6.0 EQUALITY/DIVERSITY ISSUES

6.1 The Health and Safety Intervention Plan contributes to overall service objectives to protect and improve people's living and working environment, air, food and water and our physical surrounds and contribute to the reduction in health inequalities.

7.0 **RECOMMENDATION:**

7.1 That the Health and Safety Intervention Plan 2014-2016 be approved.

MICK JEWITT

Background papers: Health & Safety at Work etc. Act 1974

National LA Enforcement Code. HSE. May 2013

Regulators' Code. BIS. July 2013

Open for Business. LGA. November 2013

Business Friendly Scheme. Environmental Health Service. 2013

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HAMBLETON DISTRICT COUNCIL ENVIRONMENTAL HEALTH SERVICE

HEALTH AND SAFETY INTERVENTION PLAN

2014 - 2016

Version Control

Version No.	Amended by	Date
1.0	Philip Mepham	25/7/2013
1.1	Philip Mepham	2/10/2013
1.2	Philip Mepham	9/12/2013
1.3	Philip Mepham	20/12/2013

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1. SERVICE AIMS AND OBJECTIVES

1.1 Commitment, Priorities and Interventions

Hambleton District Council is committed to improving health and safety outcomes. In particular the Council aims to improve and protect the health, safety and welfare of persons working within Hambleton and also of others affected by their work activities, by cooperating and working with other organisations and individuals to ensure risks in the changing workplace are managed properly.

Any interventions, investigations and enforcement actions taken will be determined and carried out in accordance with the Environmental Health Service Enforcement Strategy and Policy and specific Health & Safety Enforcement Policy. The Environmental Health Service is committed to helping business to improve compliance with their health & safety responsibilities.

1.2 <u>Links to Corporate Aims and Objectives</u>

Hambleton District Council's Business Plan 2011-2015 was revised in 2013. The Council's priorities were described in relation to five themes –

- Customer Services
- Housing & Planning
- Leisure & Health
- Corporate Services
- Resource Services

The EHS falls within the Leisure and Health service cluster. Further information is available from the Council's website.

1.3 <u>Links to Health & Safety Executive and Yorkshire Local Authorities</u>

- By utilising targeted enforcement and interventions, promoting sensible risk management and offering support and guidance to businesses the Health and Safety Intervention Plan directly contributes to the Health and Safety Executive's strategy 'The Health and Safety of Great Britain//Be part of the solution' which was launched in June 2009.
- This builds on previous strategies where the Council has worked in partnership with the Health and Safety Executive. This partnership arrangement took a further step in 2011 by working with the Health and Safety Executive and other Yorkshire Local Authorities under flexible warrant (4.3) arrangements enabling partners to take part in joint interventions to greater effect.
- The National LA Enforcement Code was launched on 29th May 2013 for implementation with immediate effect. Supplementary Guidance was published in September 2013 to help LAs to understand and meet the requirements of the Code. The guidance reinforced the principles of the Code by providing guidance on:-
 - The range of regulatory interventions and the role of inspection:
 - o Dealing with matters of evident concern;
 - o Delivery of local and national priorities;
 - o Provision of advice and support to businesses; and
 - Identification of poor performers.

Regard has been had to the advice in the Code and Supplementary Guidance in the preparation of this Intervention plan.

1.4 Status of this Intervention Plan

This Intervention Plan meets the requirements set out in the National Local Authority Enforcement Code and Supplementary Guidance published in June 2013. The Code is given legal effect as HSE guidance to Local Authorities under section 18(4)(b) of Health and Safety at Work etc. Act 1974 and gives direction to Local Authorities on meeting the requirements and reporting on compliance.

2 Background

2.1 Profile of the District

87,300 population
131,117 hectares
44 Local District Councillors
177 Parishes
78 Parish Councils
5 market towns
2 Parliamentary Constituencies

The District is a mixed area of urban and rural landscape. Predominant employment is associated with rural/farming, tourism and the service sector.

2.2 <u>Organisational Structure</u>

Under the Constitution of the Council the Director has delegated authority for all enforcement including health & safety.

This Health and Safety Intervention Plan is reported to the HDC Licensing and Environmental Protection Committee whose minutes are approved by the Council.

2.3 Scope of the Health & Safety Service

The District has an Environmental Health Service based at Richmondshire which also provides services to Hambleton District Council under the terms of a Service Level Agreement. As a District Council the Authority is responsible for the enforcement of full range of duties under the Health & Safety at Work etc Act 1974 and associated legislation. The service also deals with the registration of all premises offering cosmetic treatments (ear piercing, tattooing, cosmetic piercing, semi-permanent skin colouration, electrolysis and acupuncture) and the registration of animal welfare premises (including pet shops, animal boarding establishments, riding establishments, zoos, dog breeding premises and dangerous wild animals) as these have implications for health and safety at work. The service aims to provide a comprehensive service to consumers and businesses by:

 Undertaking an annual programme of targeted risk-based Health and Safety interventions in such a way as to maximize the improvement of health and safety outcomes and in line with the Better Regulation agenda. This includes:

- Securing action by dutyholders to manage and control the health and safety risks of their work activities
- Targeting dutyholders who are best placed to control risks, whether they be employers or others
- Targeting interventions at organisations and stakeholders who can influence risk reduction
- Targeting interventions at activities which give rise to serious risk or where the hazards are least well controlled
- Stopping those that seek economic advantage through non-compliance
- Complying with national guidance on interventions and priority programmes
- o Taking part in selected local, regional and national programmes
- Carrying out investigations of accidents and incidents in accordance with the Health and Safety Executive's national selection criteria guidance
- Investigating complaints, and respond to requests for service in regards to working conditions, activities, hazards or risks in a proportionate manner.
- Responding to urgent requests for service including advice to businesses
- Investigating all statutory notifications in regards to Lifting equipment and Pressure vessels
- Investigating/advising on all notification of Asbestos works within the Districts
- Recording all notifications of cooling towers and evaporative condensers
- Providing advice and information and facilitate training to business owners, managers or stakeholders.
- Establishing the Council as an independent reliable sources of advice and information.
- Registration of certain cosmetic treatment businesses
- Licensing of animal welfare premises
- Promotion and enforcement of smokefree legislation
- Liaison with other Yorkshire local authorities and the Health and Safety Executive
- Promotion of sensible risk management in practice by example, and via newsletters and all contacts with employers
- Carrying out other interventions as a consequence of intelligence received or through local initiative such as the Business Friendly Scheme.

2.4 Demands on the H&S Service

2.4.1 There is a mix of businesses throughout the District from high street to industrial estate including retail, wholesale, warehousing .and catering. There are relatively few large employers in the area and many are small and medium sized enterprises which tend to have limited support/knowledge in relation to health & safety requirements.

2.4.2 Labour Market Profile

The following information has been obtained from Nomis – official labour market statistics:-

Subject	Number of people
Total population (2008)	87,300
Working age population	50,900
Employees	33,800
Self employed	6,600
Manufacturing employees	3,700
Construction employees	2,600
Services	29,300
Tourism-related	3,700
VAT registered businesses	4,675

2.4.3 Local Requirements

The Council is responsible for the enforcement of health & safety in a range of premises and activities. The premises profile (as on 1st April 2013) was as follows:-

Type of premises	Number of premises
1. Retail shops	673
2. Wholesale	134
3. Offices	186
4. Catering, restaurants and bars	716
5. Hotels, camp sites and other short-	150
stay accommodation	
6. Residential care homes	35
7. Leisure and cultural services	216
8. Consumer services	256
9. Other premises (not classified above)	74
Total	2,475

2.5 Enforcement Policy and Decision Making

Hambleton has a written policy which relates to all enforcement activity. An associated policy contains the detailed approach of the health & safety service. Both are based on the HSE Enforcement Policy Statement HSE41 (rev1) (2009). Any enforcement decisions are informed by the Enforcement Management Model. The model was produced by HSE as a tool to aide consistent, proportionate and transparent responses to health and safety related issues.

2.6 Sensible Risk Management

The Council believes that risk management should be about practical steps to protect people from real harm and suffering - not bureaucratic back covering. Health and safety is not about stopping any activity that might possibly lead to harm. This is not our vision of sensible health and safety - we want to save lives, not stop them.

Our approach is to seek a balance between the unachievable aim of absolute safety and the kind of poor management of risk that damages lives and the economy. Our approach to all facets of the service will be guided by this philosophy.

Sensible risk management is about:

- Ensuring that workers and the public are properly protected
- Providing overall benefit to society by balancing benefits and risks, with a focus on reducing real risks – both those which arise more often and those with serious consequences
- Enabling innovation and learning, not stifling them
- Ensuring that those who create risks manage them responsibly and understand that failure to manage real risks responsibly is likely to lead to robust action.
- Enabling individuals to understand that as well as the right to protection, they also have to exercise responsibility

3 Service Delivery

3.1 <u>Health & Safety Premises Interventions</u>

The Environmental Health Services operates from the following premises:

Hambleton District Council Civic Centre Stone Cross NORTHALLERTON North Yorkshire DL6 2UU

Tel: 0845 12 11 555 Fax: 01609 767228

Email: ehts@hambleton.gov.uk Website: www.hambleton.gov.uk

The Council maintains a computer database of all premises using Uni-form software. The interventions are carried out in accordance with a risk rated inspection programme.

All are carried out by suitably qualified officers who are authorised and satisfy the requirements to work within the National Local Authority Enforcement Code, Approved Code of Practice, Guidelines and follow in-house procedures.

Local Authority Circular LAC 67/2 (rev4) was published in December 2013. This provides local Authorities with guidance and tools for priority planning and targeting interventions to enable us to meet the requirements of the National Local Authority Enforcement Code published in May 2013.

A Summary of national planning priorities 2014-2015 is shown in Annex A of LAC 67/2 (rev4). Annex B provides information sources to assist the development of this Intervention Plan. These sources help in the development of local priorities. Annex C gives examples of intervention types including proactive and reactive interventions.

3.1.1 Risk Rating System

The rating process consists of evaluating four different elements as they relate to a work activity and assigning and recording a score. The elements considered are:

- Confidence in management
- Safety performance
- Health performance
- Welfare compliance gap

The score is used to categorise premises into A, B1, B2 and C where A is highest and C lowest.

3.1.2 Proactive Interventions

A list of activities/sectors for proactive inspections by Local Authorities has been published by the HSE. These will be the only activities, falling within these sectors or types of organisation, which will be subject to proactive inspection. They include:-

- Premises with cooling towers/evaporative condensers
- Premises (including caravan parks) with buried metal LPG pipework
- Open farms/animal visitor attractions
- Some tyre fitters/motor vehicle repairs as part of car sales
- Warehousing/distribution
- Industrial retail/wholesale premises in relation to injuries and industrial diseases
- High volume warehousing/distribution
- Large scale public events/sports/leisure facilities e.g. motor sports
- Commercial catering premises using solid fuel cooking equipment
- Premises with vulnerable working conditions

Within these types of premises, specific high risk activities will be targeted.

3.1.3 Reactive Interventions

- a) Investigation of complaints and accidents will be undertaken in accordance with the prioritisation schemes using the HSE accident selection criteria and HSE's risk based approach to complaints handling.
- b) LOLER notifications will be investigated on all occasions
- c) Matters of evident concern identified during food premises or other inspections or audits.

3.1.4 Revisits

Following a planned or unplanned intervention, items of evident concern may be identified within the business. This will result in a clear and unambiguous identification in writing of the legal requirements as distinct from advice or recommendation.

Where Improvement or Prohibition Notices have been served, serious risks identified or a risk of serious personal injury identified, in such circumstances an officer will revisit the premises after a reasonable period to ascertain if compliance has been achieved. If compliance has not been achieved further

action will be taken which is in accordance with the enforcement policy. In other cases the businesses will be advised to notify the relevant officer when work required for compliance has been completed.

3.2 Complaints About Work Activities

The H&S Service has a target to respond to all work related complaints in accordance with service standards. This target includes complaints or requests for service related to it including unsafe conditions, unsafe work practices, or welfare conditions

	Service requests
Requests for Service received in 2010/11	143 (HDC & RDC)
Requests for Service received in 2011/12	88
Requests for Service received in 2012/13	97

Complaints received by the service are actioned within three days and enforcement action taken in accordance with the enforcement policy and departmental procedures.

The introduction of a Whistleblowing Policy in relation to employees of businesses, where the Council has an enforcement responsibility, will be promoted to ensure employees have a voice and can raise their concerns about standards or activities at their workplace without fear. This will help provide intelligence to support work planning.

3.3 Primary Authority Scheme/Lead Authority/Local Authority Partnership Scheme

The Health & Safety Service currently has no Primary, Lead or Partnership agreements in place but will now promote this concept. There have been no local requests for such an arrangement. The service will participate in the Primary Authority arrangements managed by the Better Regulation Delivery Office, part of the Department of Business, Innovation and Skills (BIS).

3.4 Advice to Business

The District has a priority of supporting economic development and being "Business Friendly". The Environmental Health Service has developed a Business Friendly Scheme which builds on previous support and advice offered to businesses and develops further initiatives, working together with other services especially colleagues in Economic Development.

The initiatives are designed in the groups:-

- Providing information and guidance, both proactively and reactively;
- Working together
- Improving our information
- Publicising compliant businesses
- Providing or arranging training
- Improving environmental performance
- Healthy employees, healthy business
- Improving the work environment
- Helping to create a level playing field

Helping young people new to employment

We will implement the Regulators' Code in relation to health & safety enforcement activities. We will also implement the advice and initiatives included in the Local Government Association's publication "Open for Business: A shared vision for local regulation".

We will develop and provide advice specifically for new businesses.

3.5 Asbestos Work Plans

Asbestos remains one of the highest causes of work related deaths and research indicates that it will remain so for some considerable time. Those most at risk are in the manual trades - plumbers, builders etc.

Prior to any licensable work with asbestos, contractors are obliged to notify the local authority of its intentions no later than 14 days prior to the work commencing.

The authority will vet their method statement, health records and other pertinent records. A decision to visit the site is based on the number of conditions applied to the contractor's licence which may indicate a poor performer or where evidence from examination of method statements produced by contractors shows that they may lack experience or the method statements are inadequate. There may also be evidence of lack of skills such as working without an enclosure. A report is submitted to the Asbestos Licensing Unit who use such information to determine furture licence periods.

We will encourage the use of the Decision Flow Chart for non-licensed work with asbestos.

3.6 Liaison with other organisations

- 3.6.1 The District is a member of the North Yorkshire H&S Technical Group. This group meets regularly with the purpose of ensuring consistency of action within the County. It is a sub-group of North Yorkshire Chief Environmental Health Officers Group which approves the Annual Action Plan and monitors the delivery of those actions.
- 3.6.2 The Service is currently consulting with businesses in order to determine the most efficient and effective means for liaison with businesses and the voluntary sector. The concept of helping businesses to help themselves in relation to all Environmental Health functions, within the context of the Enforcement Policy, is supported by the service.
- 3.6.3 The Council also liaises regularly with other authorities, the Health and Safety Executive through the West and North Yorkshire Health and Safety Liaison Group, Public Health England, the Director of Public Health and other stakeholders in designing and delivering work based health interventions.

3.7 Health & Safety Promotion

Promotion of the service is undertaken alongside other services within the Council, in order to determine the needs of businesses and how the Environmental Health Service can meet those needs. We will use existing networks to communicate with businesses and ensure those legitimate needs are taken into account. This will be promoted through the implementation of the Business Friendly Scheme and through links with colleges and schools in order to access the next generation of workers.

4. Resources

4.1 Capacity and Performance Management

- 4.1.1 The current capacity of the service stands at approximately 1 f.t.e. The service is delivered alongside other services by the Commercial Team with support from EHOs in the Residential Team. This will be reinforced during 2014 to expand the resources available.
- 4.1.2 A monitoring system, including checks of inspection records, accompanied inspections and questionnaires to business is in place to assess compliance with statutory requirements, guidance, internal procedures, good enforcement and customer care practice. Quarterly performance reports are also produced to compare performance against service plan targets and performance indicators and these are reviewed through the Service's line management at monthly 1-1 and performance management meetings.

This is supplemented on an individual level with a corporate annual performance appraisal scheme which produces individual work plans and development plans. Progress is reviewed at 1-1 meetings as describe above.

- 4.1.3 Hambleton District Council operates a performance management process whereby key performance indicators are monitored. The satisfaction of businesses with the service is routinely monitored and reported via performance monitoring systems to the Council.
- 4.1.4 The Service Plan is displayed on the internet where achievements can be monitored by Councillors and Senior Managers.

4.2 <u>Staff Competency</u>

The H&S service has adopted the BRDO Regulators Development Needs Analysis Tool and utilises it as a benchmark to assess officer competency. This analysis directs development needs which are fed in to the Personal Development Review process.

All EHOs are authorised under the Health & Safety at Work etc Act 1974 and their activity restricted according to their technical competence. The ongoing staff development is undertaken in parallel with the intervention programme so they are kept up to date on the aspects of enforcement in which they are currently engaged.

Competency is monitored by a number of mechanisms including shadowing, monitoring of reports and letters. These are detailed in service procedures.

4.3 Joint Working and Partnership including Flexible Warrants

The H&S service will seek to increase capacity by utilising other agencies were possible to deliver interventions on our behalf. Such interventions may include workshops, training, healthy workplace interventions.

Flexible warranting enables officers from one Authority or Agency to be authorised to take action in the area of another Authority or Agency. We will continue to participate in this scheme but understand that the HSE intend to discontinue this initiative after 2016.

4.4 Maintenance of Database

In any process which relies on information management it is essential that such information is current, accurate and up to date. This is especially important when so much of the work undertaken by the service is risk based and targeted. This is also important as many premises may not have regular contact with us.

To ensure our information remains current the following methods are employed to gather data.

- Trawl planning applications for change of use;
- Database Challenge with local Directories i.e. Thompson & Yellow Pages;
- Monthly reports from Business Rates as to changes in ownership;
- Local Press:
- Business contact visits targeting industrial estates to identify changes in use/new builds/occupancy;
- Request for information from letting agents.

The premises database has been updated recently and this has resulted in an increase of premises for which the District has Health & Safety enforcement responsibility. This is an ongoing task which will rely on the above range of actions to keep up to date. All premises have been allocated an up to date rating.

5 Quality Assurance

5.1 The Environmental Health Service's Quality Management System, designed to meet the ISO 9001:2008 standard, is used to provide a framework for the management of the service. A suite of procedures and accompanying documents are being produced to cover the activities of the Health & Safety service. These are regularly reviewed to ensure that they meet the needs of the service. If practices, at any moment in time, indicate that a procedure is no longer fit for purpose it will be reviewed and amended accordingly. An internal quality auditing scheme is in place in order to verify that procedures are being complied with.

6 Review

6.1 Review Against Drivers

This plan with be reviewed annually against the identified drivers to ensure that the design of the service maintains its focus on delivering the changes in behaviours required.

6.2 Variation to the Plan

Changes to national priorities, national legislation and the results of the review of Local Government enforcement priorities may dictate that actual business plans and service delivery vary from that outlined in this plan. If such a situation necessitates a variation, a review and revision will be undertaken of this plan to ensure that local and national drivers remain to be best served by this plan.

6.3 Service Improvement

The service will investigate and implement electronic capture and storage of information to make more flexible use of the resources. This will include electronic storage of files, capture of information electronically at the point of generation i.e. inspection reports, provision of advice and information and access to services.

6.4 <u>Timetable for review</u>

This plan will be reviewed annually in the light of previous performance, feedback from businesses, other stakeholders and partners. A revised plan will be published for consultation during each autumn prior to subsequent consideration by the Licensing and Environmental Protection Committee.

7 Reporting performance

- 7.1 Official returns of local authority activity are recorded and submitted electronically to the HSE during April/May each year in accordance with Annex G of LAC 67/2 (rev4).
- 7.2 Illustrative information and data about health and safety activities are included in the Environmental Health Service Annual Report.



HEALTH & SAFETY INTERVENTION PLAN CONSULTATION

21 Oct-29 Nov 2013 2 online responses received

Q1	Looking at the 'Scope of the Health and Safety Service' (page 4 in the Intervention Plan), do you think there any other activities that the Council could consider to improve compliance with health and safety legislation by businesses?	
	1 (50.0%)	Yes
	0 (0.0%)	No
	1 (50.0%)	No opinion
	0 (0.0%)	No reply
	Please expan	nd your answer below if necessary:
	Need to be more proactive with Businesses, information packs or online information should be offered to help businesses improve their risk assessments. Environmental Health visits are very useful why can there not be similar scheme for Health & Safety.	

Q2	The 'Advice to Business' section (page 9 in the Intervention Plan) identifies ways we will provide support and advice to businesses. Would you like the Council to consider any other changes in relation to health, safety and welfare in the workplace?	
	1 (50.0%)	Yes
	1 (50.0%)	No
	0 (0.0%)	No opinion
	0 (0.0%)	No reply
	If you ticked 'Yes', please detail those changes below:	
	1) Again	more information for businesses

Q3	The 'Health and Safety Promotion' section (page 10 in the Intervention Plan) mentions how we propose to meet the needs of businesses. Can you suggest what needs businesses may have in relation to health and safety compliance?		
	1 (50.0%)	Yes	
	1 (50.0%)	No	
	0 (0.0%)	No opinion	
	0 (0.0%)	No reply	
	If you ticked	'Yes', please detail those needs below:	
	1) Do no	t know how far to go relating to risk assessments.	

Are there any further comments you would like to make about the Health and Safety Intervention Plan that have not already been covered?
Local seminars would be useful