

Meeting of:	Shared Regulatory Services Joint Committee
Date of Meeting:	Tuesday, 28 June 2022
Relevant Scrutiny Committee:	Homes and Safe Communities
Report Title:	Shared Regulatory Services Health and Safety Enforcement Service Plan 2022/23
Purpose of Report:	To seek approval for the Health and Safety Enforcement Service Plan for the Shared Regulatory Service for 2022/23
Report Owner:	Miles Punter - Director of Environment and Housing
Responsible Officer:	Christina Hill - Operational Manager Shared Regulatory Services
Elected Member and Officer Consultation:	No Elected Members have been consulted. The following officers have been consulted ; Assistant Director, Cardiff Council, Head of Legal and Regulatory services, Bridgend County Borough Council
Policy Framework:	This is a matter delegated to the Joint Committee
Executive Summary:	<ul style="list-style-type: none"> The report appraises the Committee of the work of the Health and Safety team and requests approval for the Health and Safety Enforcement Service Plan for the Shared Regulatory Service for 2022/23.

Recommendations

- 1.** Approve the 2022/23 Health and Safety Enforcement Service Plan.
- 2.** Authorise the Head of the Shared Regulatory Service to make administrative amendments to the 2022/23 Health and Safety Enforcement Service Plan should the need arise.

Reasons for Recommendations

1 & 2

To ensure the Shared Regulatory Service has robust arrangements in place to deliver its obligations as an enforcing authority under the Health and Safety at Work Act 1974 and comply with statutory guidance.

1. Background

- 1.1** The Shared Regulatory Service, together with the Health and Safety Executive is responsible for the enforcement of Health and Safety at Work Act 1974.
- 1.2** The Councils have a duty, which is delegated to Joint Committee to enforce the Health and Safety at Work Act 1974.
- 1.3** Section 18 of the Health and Safety at Work Act requires Local Authorities to produce a Health and Safety Service Plan setting out the arrangements in place to discharge these duties. This Health and Safety Enforcement Service Plan is produced in response to that requirement and is designed to inform residents, the business community of Bridgend, Cardiff and the Vale of the arrangements the Councils have in place to regulate health and safety.
- 1.4** A Copy of the draft Health and Safety Enforcement Plan for 2022/23 has been attached to this report as Appendix 1.
- 1.5** The Service Plan details the aims and objectives of the service in respect of Health and Safety enforcement, which are determined annually. The plan details:
 - the demands on the service,
 - the risk based work programme and
 - the resources available to deliver the required work
- 1.6** The plan explains the Health and Safety Executives expectations of Local Authorities along with some achievements from 2021/22 and the challenges envisaged in the year ahead.

2. Key Issues for Consideration

- 2.1** Local authorities have a duty to produce a Health and Safety Enforcement Service Plan that is endorsed by elected members and makes clear their arrangements for contributing to current Health and Safety Commission priorities.
- 2.2** The plan seeks to take account of local needs while addressing the national priorities as set out by the Health and Safety Commission in its strategic plan. The service plan must identify both reactive and proactive work and include details of planned promotional and educational events.
- 2.3** The Health and Safety Executive require each Local Authority to complete an annual return detailing the work activities undertaken in the previous year, details of which can be found within the Health and Safety Enforcement Service Plan contained in Appendix 1.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1** The Well-being of Future Generations Act requires the SRS to underpin decision making by contributing to the seven well-being goals of the Act, following the five ways of working, and consequently undertaking actions that will have a positive impact on people living in the future as well as those living today. Consequently SRS seeks to work in the following ways:
 - Looking to the long term
 - Taking an integrated approach;
 - Involving a diversity of the population in the decisions affecting them;
 - Working with others in a collaborative way to find shared sustainable solutions
 - Acting to prevent problems from occurring or getting worse.

4. Resources and Legal Considerations

Financial

- 4.1** The Participants' contribution towards the Shared Regulatory Service is recharged on a quarterly basis, based upon the approved budgets for 2022/23. Accounting for the full year is reported to the Committee at the Annual General Meeting.

Employment

4.2 There are no immediate employment implications associated with this report.

Legal (Including Equalities)

4.3 The Council has a statutory duty to provide a Health and Safety Enforcement Service Plan. Under the Health and Safety at Work Act 1974 section 18(4) all local authorities have a legal duty to make adequate arrangements for the enforcement of statutory provisions and any other duties imposed upon them under the guidance of the Health and Safety Commission (HSC). The guidance issued, commonly known as "Section 18 guidance" is mandatory.

5. Background Papers

- Appendix 1 - Draft Health and Safety Enforcement Service Plan 2022/23.
- The Shared Regulatory Services Business Plan 2022/23

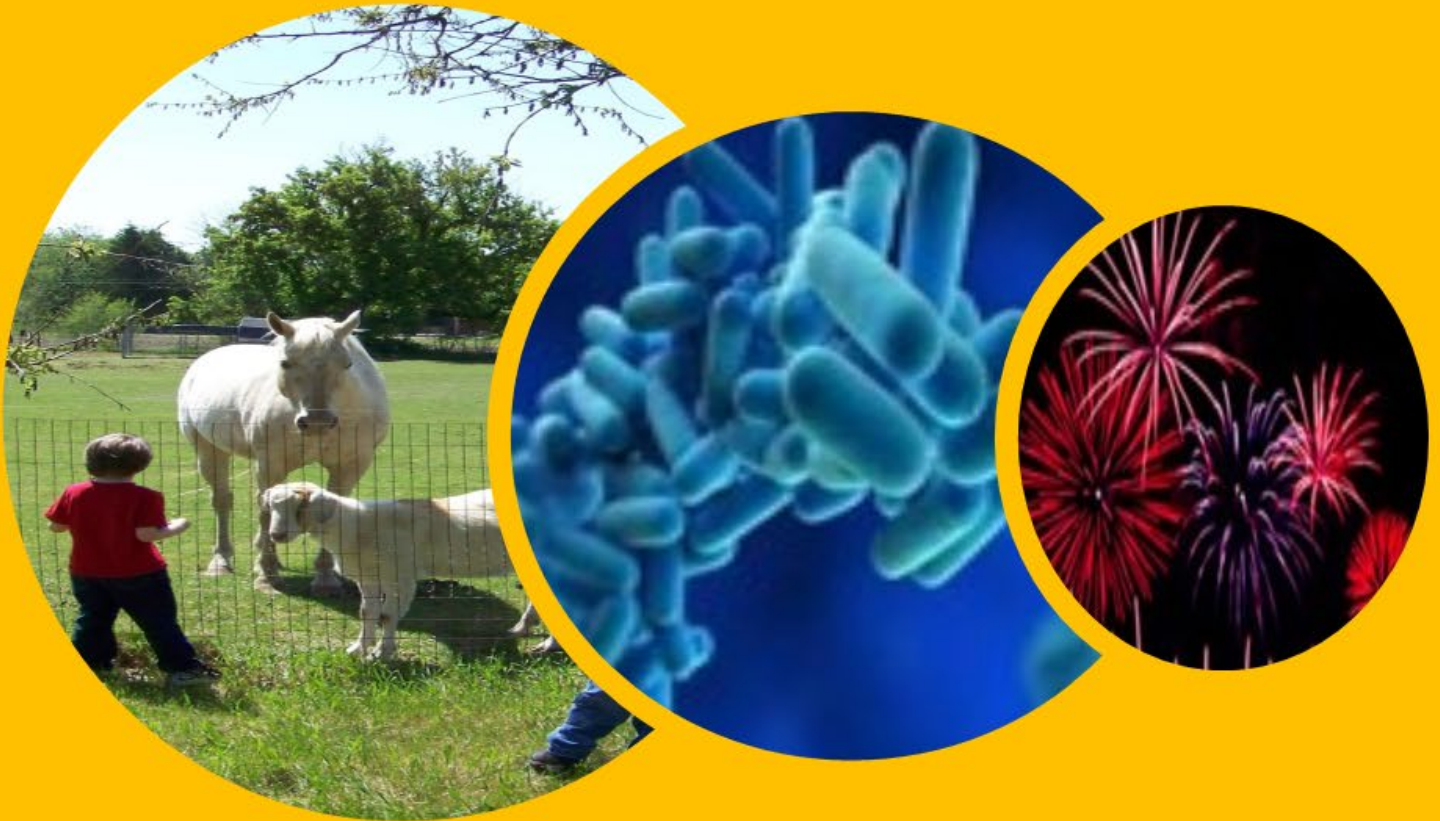
Shared Regulatory Services

Health & Safety Enforcement

Service Plan 2022/23



Health and
Safety at Work



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Introduction

Shared Regulatory Services (SRS) is an innovative collaborative service formed between Bridgend, Cardiff and the Vale of Glamorgan Councils on 1st May 2015. The Service delivers a fully integrated service under a single management structure for Trading Standards, Environmental Health and Licensing functions with shared governance arrangements ensuring full elected member involvement.

The Health and Safety at Work etc. Act 1974 places a duty on Local Authorities to enforce this legislation and are required by Section 18 of the Act to set out the arrangements they have in place to discharge that duty. This Service Plan is produced in response to that requirement and is designed to inform the business community and the wider audience, of the arrangements Bridgend, Cardiff and the Vale of Glamorgan has in place to regulate health and safety in the workplace. It also shows how these activities contribute to and support others in delivering Corporate and statutory objectives to the community as a whole.

The Service Plan contains two elements:

- The arrangements, supporting structures and controls that enable these interventions to be delivered.
- An Intervention Plan which details the type, method and number of interventions to be used in order to fulfil the major purpose of working with others and to contribute to the reduction in the number of fatal and major injuries and ill health in people in work and those affected by work activities.

It is therefore designed to meet both the requirements laid down by the Health and Safety Executive under LAC 67(2) revision 11 and to clearly show how, through the enforcement of regulation and provision of guidance, advice and support, workplace health, safety and welfare will be assured across the SRS region within the resources available to the service.

The plan will illustrate how by various methods and teams, the service will meet the objectives of the Health and Safety at Work etc. Act 1974, and:-

- Secure the health, safety and welfare of persons at work;
- Protect persons other than persons at work against risk to health or safety arising from work activities.

As we move into the new financial year, we do so mindful of the challenges presented by the COVID-19 pandemic and the uncertainty of what Variants of Concern could emerge during the winter of 2022/23. The last 24 months have required the service to rapidly adjust to new ways of working in order to respond to the pandemic, resulting in the prioritisation of Test, Trace and Protect work alongside COVID-19 compliance

Whilst the current aim for 2022/23 is a return to our 'business as usual' modus operandi, we recognise that our priorities and plans may need to dynamically change as the year progresses. This service plan therefore outlines our current arrangements and proposed interventions and actions to be delivered during the year. Whilst these may be subject to change, we remain committed to protecting and improving the health and safety of people across the region.

Christina Hill, Operational Manager Commercial Services

1. Service Aims and Objectives

1.1 Service aims and objectives

Shared Regulatory Services is committed to improving health and safety outcomes by ensuring the highest health and safety standards are maintained throughout the region in order to protect employees, the self-employed and members of the public. To demonstrate this, the Service has adopted the following aims and objectives.

The overall aim of the Service is:-

To work with others to protect people's health and safety by ensuring risks in the changing workplace are managed properly.

To achieve this, the service has adopted the following 5 key delivery priorities:-

- To target activity in accordance with national guidance, to manage the risk in high risk businesses or business activities.
- Contribute to the delivery of the HSE's National Strategic programme 'Helping Great Britain Work Well' through the application of proactive 'face-to-face' and 'non face-to-face' interventions based on risk and informed by evidence.
- Investigate notified work-related injuries, occupational disease and dangerous occurrences in accordance with the Accident Investigation Policy.
- Respond to all service requests received as complaints from employees, unions, safety representatives or members of the public in accordance with the Complaint Investigation Policy.
- To respond in a timely manner to service requests on matters such as asbestos notifications, statutory notifications for lifting equipment and pressure systems, licensing applications etc.

1.2 Links to Corporate Objectives, national and local plans

As a regional organisation providing regulatory services across three local authority areas, we place the **corporate priorities** and outcomes of the three councils at the heart of all that we do (Appendix 3). In developing our own strategic priorities for Shared Regulatory Services, we have considered the priorities of all the three authorities, together with the needs and aspirations of our partners and customers so they translate into priorities that meet local needs.



SRS priorities particularly relevant to the delivery of this plan are:-

Improving
health and
wellbeing

Amongst other factors impacting on health, the service works with others to contribute to the reduction in the number of fatal and major injuries; incidence of ill health and support the well-being of people in work, and those affected by work activities.

Safeguarding
the vulnerable

The enforcement of health and safety legislation in some occupational settings has a positive impact in protecting vulnerable sectors of our society, for example: residential care homes; nurseries and early years' settings and service sector businesses such as tattooists; semi-permanent make-up practitioners; beauty therapists and cosmetic body piercers who target young people. Using a range of proactive interventions and engaging with these industry sectors supports protection of our vulnerable citizens.

Supporting the
local economy

The provision of timely advice, and education, on health and safety issues to businesses, stakeholders, and other local authorities and bodies can benefit the economic viability of businesses. The equitable enforcement of regulations helps to maintain a level playing field, allowing businesses to compete on equal terms. The implementation of non-inspection interventions outlined in LAC 67/2 (revision 11) facilitates achievement of this objective.

Nationally the service also contributes to the [National Enforcement Priorities for Wales](#) for local regulatory delivery which highlight the positive contribution that regulatory services, together with local and national partners, can make in delivering better outcomes:-

- **Protecting individuals from harm and promoting health improvement**
- Ensuring the safety and quality of the food chain to minimise risk to human and animal health
- Promoting a fair and just environment for citizens and business
- Improving the local environment to positively influence quality of life and promote sustainability

'Helping Great Britain Work Well' – the Health and Safety Executive Strategy published in February 2016 sets out 6 themes for the whole of the Great Britain health and safety system. Local authorities, as workplace regulators, are a key part of this system and are expected to play a role in:

- Encouraging and recognising improvements, being increasingly joined up to deliver improved outcomes and minimise unnecessary burdens on businesses;
- Continuing to promote the risk-based, goal-setting regulatory regime that has served health and safety in Great Britain so well;
- Working with partners in the system to make workplaces safer and healthier, providing a level playing field for responsible employers with regulators and co-regulators, by advising, promoting, and where necessary, enforcing good standards of risk control;
- Using proportionate, risk-based regulation to support better outcomes, innovation and the safe use of new technologies;
- Developing services and products that contribute to improved management and control of risks, sharing our knowledge, and;

- Continuing the dialogue and conversation with stakeholders to make the system better, always looking to provide simple, pragmatic advice and support

The Local Public Health (medium term) Plan 2020-2023 - Published as part of the Local Public Health Strategic Framework the Local Public Health Plan provides details of how local Public Health teams work in partnership to improve and protect the health and well-being of the local population. A number of themes detailed in the public health work programme dovetail with work being undertaken by the Communicable Disease, Health and Safety service as part of its proactive and reactive work (*e.g. delivering the Healthy Options Award scheme; providing appropriate infection control advice when interviewing confirmed cases of communicable disease; enforcement of current smoke-free legislation across the region*).

2. Overview of the Service

2.1 Area profile

Shared Regulatory Services covers the Council areas of Bridgend, Cardiff and the Vale of Glamorgan and serves over 650,000 residents. Extending from St Mellons in the East of Cardiff to Maesteg in the west, the area encompasses Cardiff, the capital City of Wales with its array of cultural, financial and commercial organisations and the rural areas of Bridgend and the Vale of Glamorgan with their vibrant tourist and agricultural economies.

Bridgend is situated on the south coast straddling the M4 corridor. It comprises an area of 28,500 hectares and a population of just over 140,000



residents. To the north of the M4, the area consists of mainly ex-coal mining valley communities with Maesteg as the main centre of population. To the south of the M4, the ex-market town of Bridgend is the largest town, the hub of the economy and its employment base. To the south west on the coast lies Porthcawl, a traditional seaside resort with a high proportion of elderly residents, which is subject to a major influx of tourists during the summer period.



Cardiff is the capital city of Wales and is continuing to grow faster than any other capital city in Europe. In population terms, it is the largest city in Wales with a population of 360,000.

Measures of population however, belies Cardiff's significance as a regional trading and business centre. The population swells by approximately 70,000 daily with commuters and visitors. Cardiff is the seat of government and the commercial, financial and administrative centre of Wales. Cardiff boasts one of the most vibrant city centres in the UK and on a typical weekend, Cardiff's night time economy can attract over 40,000 people and sometimes more than 100,000 when the City's Principality Stadium hosts international events.



The Vale of Glamorgan is bounded to the north by the M4 motorway and to the south by the Severn Estuary. It covers 33,097 hectares with 53 kilometres of coastline, and a population of over



130,000 residents. The area is predominantly rural in character, but contains several urban areas of note such as Barry, Penarth, Dinas Powys and the historic towns of Cowbridge and Llantwit Major. Barry is the largest town, a key employment area and popular seaside resort. The rural parts of the Vale provide a strong agricultural base together with a quality environment, which is a key part of the area's attraction. The area includes Barry Docks area and Cardiff International Airport.

2.2 Organisational structure

Health and safety enforcement services are mainly provided by the Commercial Services arm of Shared Regulatory Services, with some distinct pieces of work being delivered by Enterprise and Specialist Services. The teams largely comprise of Environmental Health Officers providing services across the three local authority areas. The Vale of Glamorgan Council acts as host authority for the Service, with functions associated with this Plan being delegated to the Shared Service Joint Committee. Commercial Services deal with the majority of health, safety and well-being activities within Shared Regulatory Services, whilst Enterprise and Specialist Services support this function through the provision of advisory (paid for) visits; Primary Authority Partnership work; overseeing public safety at large outdoor events and assisting with major investigations as they arise. Operational functions within the Service are illustrated in the following table with those that have responsibility for health and safety issues highlighted in darker blue.

Shared Regulatory Services Organisational Chart



2.3 Scope of the Health and Safety Enforcement Service

Shared Regulatory Services is responsible for providing a comprehensive health and safety service combining education, advice and enforcement. The enforcement of Health and Safety at Work legislation is shared with the Health and Safety Executive (HSE) and division of responsibilities is laid down by regulation. The Service is responsible for enforcement in premises such as offices, retail premises, wholesale/retail warehouses, consumer services used by members of the public, places of entertainment and leisure, hotels and some residential accommodation and catering establishments. There are approximately **10,236** premises across the region that require a range of health and safety interventions such as inspection, survey, monitoring, advice and enforcement and activities are categorised as reactive and proactive and include proactive health and safety inspections/interventions; based on both national priority topics and local intelligence. The full scope of the health and safety function includes:-

Reactive

- Investigating reported accidents, occupational diseases and dangerous occurrences;
- Responding to complaints and requests for service, including smoking in public places;
- Permissioning activities including skin piercing registrations, asbestos activities and lift reports;
- Responding to consultations from Licensing, Planning, Building Control etc.;
- Providing advice and information to new businesses;
- Securing safety standards at outdoor sporting, cultural and entertainment events through the Events Liaison Panel and ESAGs;
- Prioritised and targeted health and safety promotional campaigns.

Proactive

- Planned proactive health and safety interventions which focus on national priority topics;
- Undertaking targeted initiatives based on local intelligence and evidence of risk;
- Evidence-based education of employers, employees and contractors through guidance and information;
- Promoting proportionate and sensible health and safety through business engagement and partnership working;
- Undertaking and participating in health and safety promotion campaigns;
- Liaising with other internal and external organisations including:- Planning, Building Control, Licensing, Trading Standards, Wellbeing Team, Corporate Health and Safety Team, HSE, other Technical panels; Commissioning Teams; Local Health Board; Care Inspectorate Wales.
- Devising material to help businesses comply with the law and promote good practice.

All reactive and proactive work is underpinned by local, regional and national liaison. This is an appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations. The main liaison arrangements are as follows:-

- Working in partnership with HSE Wales;
- Complying with HELA and other guidance;
- Participation in the Directors of Public Protection Wales (DPPW) Regional Liaison Group via Environmental Health Wales and Expert Panels;
- Participation in the South East Wales and South West Wales Health and Safety Task Groups and the All-Wales Health and Safety Expert Panel;
- Liaison with, and complying with, any advice and guidance from the HSE;

- Working with organisations and stakeholders to promote health and safety;
- Working with other services within the respective authorities such as Licensing, Planning and Building Control, Parks and Leisure, Corporate Health and Safety, Social Services and Events Teams;
- Liaison with and commitment to Local Government Regulation (formerly LACORS);
- The Office for Product Safety & Standards (BEIS) for Primary Authority work;
- Welsh Government;
- Local Government Data Unit.

Service delivery points

Health and safety services are delivered from all 3 regional hubs which operate office hours from Monday to Friday. Weekend and out-of-business hour duties are carried out as the need arises. The service also operates an out-of-hours duty officer scheme for emergency situations.

SRS.wales

Tel: 0300 1236696



@SRS_Wales



<http://www.srs.wales>

Bridgend

Civic Offices
Angel Street
Bridgend
CF31 4WB

Normal offices hours:

Monday to Thursday: 8.30am to 5.00pm
Friday: 8.30 am to 4.30pm

Cardiff

Level 1
County Hall
Cardiff
CF10 4UW

Normal office hours:

Monday to Thursday: 8.30am to 5.00 pm
Friday: 8.30 am to 4.30pm

Vale of Glamorgan

Civic Offices
Holton Road
Barry
CF63 4RU

Normal offices hours:

Monday to Thursday: 8.30am to 5.00pm
Friday: 8.30am to 4.30pm

Responsibility

Responsibility for health and safety activities in SRS is broken down as follows:-

Team	Responsibility
Health and Safety Enforcement Team (Commercial Services)	Health and Safety proactive inspections and project interventions
	Investigation of complaints and service requests
	Investigation of accidents; occupational disease & dangerous occurrences
	Permissioning activities (<i>as detailed above</i>)
	Business engagement and partnership working
	Targeted promotion and education with businesses
Trading Standards Teams	Firework safety Product safety

Enterprise and Specialist Services Team (Industry)	Health and Safety at large outdoor events
	Coaching and paid for advice visits at the request of business
	Training and targeted education
	Primary Authority partnership work
	Petroleum licensing
Major Investigations and Safeguarding	Assisting with major investigations

2.4 Enforcement Policy

Fair and effective enforcement is essential to protect the economic, environmental and social interests of the public and business. Decisions about enforcement action and in particular the decision to prosecute, has serious implications for all involved and for this reason, the Shared Regulatory Service has adopted a Compliance and Enforcement Policy, with Annex 3 specifically in relation to health and safety.

The Compliance and Enforcement Policy sets out the standards that will be applied by the Service when dealing with issues of non-compliance, and what residents, consumers and businesses can expect. Such a policy helps to promote efficient and effective approaches to regulatory inspection and enforcement, and balances the need for improvement in regulatory outcomes with minimising unnecessary burdens on business.

Traditionally based upon the principles of the Enforcement Concordat and the Regulators Compliance Code, local authority Enforcement Policies must now reflect the Regulators Code of 2014 and the regulatory principles required under the Legislative and Regulatory Reform Act 2006

The Regulators Code is based upon six broad principles:

- Regulators should carry out their activities in a way that supports those they regulate to comply and grow;
- Regulators should provide straightforward ways to engage with those they regulate and hear their views;
- Regulators should base their regulatory activities on risk;
- Regulators should share information about compliance and risk;
- Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply;
- Regulators should ensure that their approach to their regulatory activities is transparent

2.5 Challenges for the year ahead

COVID-19 – The trajectory of COVID-19 case rates for Autumn/Winter 2022/23 remains unclear but it is highly probable that other Variants of Concern will emerge and rapidly circulate throughout households and communities, particularly as restrictions on national and international travel are removed. It remains to be seen if the UK population will continue to ‘live with COVID’ and experience less severe health consequences as a result of the successful vaccination programme roll out. If the service is required to support external stakeholders navigate a period of escalating case numbers, this will impact of the delivery of the planned interventions detailed in this report.

Staffing of the service – The incredible efforts of SRS staff throughout the COVID-19 pandemic over the last 2 years has ultimately resulted in an exhausted workforce. Expectations of service delivery for the immediate future will need to recognise this as SRS looks to instigate its recovery plan.

The service continues to manage staff vacancies and the last year has seen a significant number of staff changes as colleagues retired, moved onto new challenges and temporary contracts came to a natural end. The forthcoming year will see new team members settling into their roles and for less experienced staff to develop their health and safety competencies.

Delivering the SRS in the future - We continue to deliver the SRS with a reducing resource. Our current three year financial programme involves changes to working practices. We have to examine and introduce new ways of prioritising our services which may result in a reduction in service provision, or the charging for some services and difficult decisions about the level of service provision. These efforts will help reduce the impact of reduced funding, but maintaining performance in light of budget cuts may affect the service ability to maintain delivery at existing performance levels. We will however seek to measure activities and outcomes to ensure performance is managed effectively and in a meaningful way.

Major events - SRS plays an important role in the successful staging of major events across the three local authority areas. Major events staged through the participant Councils go through a detailed planning process via the respective Events Safety Advisory Group in Bridgend and the Vale of Glamorgan, and in Cardiff via the Events Liaison Panel. SRS plays a role throughout the planning stages with respect to food safety, health and safety and brand protection. All of this has an impact on the Shared Service in terms of meeting demand from other areas of responsibility, at a time of diminishing staff resource, and in covering weekend and evening work. It is anticipated that 2022/23 will be a particularly busy season for events as the industry seeks to re-schedule concerts and festivals that had to be postponed earlier in the COVID-19 pandemic.

Cardiff's City Status - Cardiff is the capital city of Wales, and the largest Local Authority in the country; its population of 360,000 swelling by approximately 70,000 each day from commuters, students and visitors. The popularity of the city as a leisure, entertainment and sporting event destination continues to grow and it's anticipated that visitor numbers throughout 2022/23 will increase as COVID-19 restrictions become fully removed.

New legislation - It is now predicted that implementation of the all-Wales licensing regime for special procedures (*tattooing, cosmetic piercing, acupuncture and electrolysis*) in accordance with the Public Health (Wales) Act 2017 will be delayed until mid-2023 / 2024 as a consequence of the COVID-19 pandemic.

This licensing regime will replace the existing registration scheme with a more robust system that will require a personal licence and premises approval to be renewed at 3 yearly intervals. Each applicant will be required to complete a level 2 infection control training course, and professional assessment, before a licence can be issued. The full impact of this new regulatory regime on resources has yet to be determined; however, officers will need to deliver the level 2 infection control course; carry out professional assessments with practitioners and undertake unannounced inspections at all premises subject to approval at least every 3 years. Whilst costs will be recoverable, at the present time it is challenging to forecast how current resources will be able to match the demands of this piece of work until further details are made available by Welsh Government.

Since SRS has the largest number of registered skin piercing practitioners and premises throughout all of the Welsh Authorities, it will likely experience the greatest impact from this new legislative regime.

Part 3 of the Public Health (Wales) Act 2017 enacted the Smoke-Free Premises and Vehicles (Wales) Regulations 2020 which came into force on 1st March 2021. The legislation widens the range of smoke-free premises to include outdoor care settings for children; school grounds; hospital grounds and public playgrounds. SRS has already been in discussion with Local Health Board partners concerning smoke-free strategies in hospital settings across the region, with officers currently identifying what interventions can be realistically effected to positively impact the level of compliance.

3. Service Delivery

3.1 Intervention Plan

All local authorities are required to base their approach to health and safety enforcement and thus their Intervention Plan on the:

- National Local Authority Enforcement Code and
- Local Authority Circular (LAC) 67/2 (rev 11): “Setting Local Authority Priorities and Targeting Interventions”

The National Local Authority Enforcement Code, developed by HSE, sets out Government expectations for a risk based approach to targeting health and safety regulatory interventions. It provides a principle based framework that recognises the respective roles of business and the regulator in the management of risk. Importantly the Code is designed to ensure that Local Authorities take a more consistent and proportionate approach to their regulatory intervention. Local Authority Circular 67/2 (rev 11) provides guidance under Section 18 of the Health and Safety at Work etc. Act 1974 and gives LAs a steer and tools for priority planning and targeting their interventions to enable them to meet the requirements of the national Enforcement Code. In March 2011, the Minister of Employment published ‘Good Health and Safety, Good for Everyone’. The focus of which was for LAs to concentrate on higher risk industries and tackle serious breaches of the rules. In May 2011 the Local Government Group (LGG) and HSE produced further guidance ‘Reducing Proactive Inspections’ for LAs to determine their proactive interventions. In simple terms, inspections are now limited to the highest risk premises only. In addition, a range of other proactive interventions should be applied to other premises to improve awareness and management of health and safety. Selection of an intervention type will be either based on agreed national priority topic areas or local-level intelligence.

All interventions are evidence based and typically include:-

- **Targeted, Planned Inspections (Proactive) where:**
 - a) The use of warranted powers under health and safety legislation would, if necessary, be used to gain entry or otherwise regulate part or all of a business activity, and
 - b) The reason for the inspection was to specifically target occupational health and safety issues at these premises.

Proactive inspection should only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and LAC 67/2 (rev 11), or where there is local intelligence of failure to manage risk. Commonly, these premises are identified on an annual basis by local historical accident and complaint trends, local and national industry and accident data and the findings of local accident investigations. Recent workplace activities which have been subject to proactive inspections are detailed within this business plan.

- **Non-inspection interventions:**

Local authorities are required to make proper use of non-inspection interventions where they are considered capable of achieving better overall outcomes than inspections alone although their delivery will require similar level of resources. These include business forums and targeted non face-to-face interventions, specifically:

- **Any visit/face-to-face contact** to educate, advise or engage duty holders, employees or other bodies such as trade associations e.g. awareness days, business forums, targeted training and advisory support visits.
- **Any other targeted contact (not face-to-face)** to educate, advise or engage duty holders, employees or other bodies such as trade associations e.g. raising H&S awareness by providing information packs.

Previous interventions have included:

- Level 2 health and safety training courses
- Paid for advice visits to support local businesses
- Mail shot self-assessment questionnaires to organisations

Matters of evident concern - when inspecting premises officers are also required to consider matters of “evident concern”. Matters of “evident concern” in the workplace could include not only a complete failure of health and safety management arrangements but a history of accidents or complaints, or a failure to identify well known and understood sector risks and repeated enforcement action on common themes. Where there is “evident concern” the scope of the inspection will widen to include whatever aspects of workplace health and safety is necessary.

Since the publication of LAC 67/2 (rev 6) there is no longer a requirement for Local Authorities to report the risk rating of premises visited (this requirement has been removed). However, HSE advises that risk rating premises based on a duty holder’s health and safety performance is still useful information to assist in the determination of relative intervention priorities. The service will therefore strive to adopt this approach wherever possible to facilitate an intelligence-led approach to health and safety enforcement.

Accident and Incident Investigation

All accident notifications received are assessed against specified criteria in the SRS Accident Notification and Investigation Procedure, which has regard to the incident/accident selection criteria in LAC 22/13. This ensures that resources are targeted at the more serious and significant incidents which are likely to be the result of inadequate health and safety arrangements being implemented by the duty holder. The most commonly reported accidents relate to: slips, trips and falls; falls from height; manual handling; or being struck by moving object. The core objectives of accident investigation are to:

- Identify the relevant duty holder(s) and witnesses
- Establish the key facts relating to the causes of the incident
- identify immediate and underlying causes
- identify any lessons learned
- ensure appropriate remedial action is taken to prevent a recurrence
- identify the relevant law and whether there are any breaches
- form a view about appropriate further action using the EMM framework (Enforcement Management Model)

An investigation may range from an enquiry by a single officer about a minor incident to a notification of a fatality, or specified injury, involving a team of officers. As a result, the timeliness and thoroughness of the investigation, and the quality of the evidence collected, are critical to its successful outcome.

Advice to businesses

SRS assists businesses wherever possible by providing health and safety advice and information in a variety of ways, including:

- Advice provided during the inspection process;
- Responding to permissioning activities;
- Responding to complaints and requests for service;
- Leaflets; posters and newsletters;
- The provision of training and business forum seminars;
- Participation in national events, such as European Health and Safety Week.
- Through the SRS website.

3.2 Intervention Plan 2022/2023

An intervention plan confirming the programme of interventions for 2022/2023 has been developed to demonstrate how, through reactive and proactive work, the service will secure improvements to health and safety standards in workplaces throughout Bridgend, Cardiff and the Vale of Glamorgan. This plan has been developed after considering the priority topic areas listed in LAC 67/2 (rev 11); local based intelligence and following discussions at the All-Wales Health and Safety Expert Panel and regional health and safety task groups.

The intervention plan has also been devised on consideration of staffing levels, competencies and resources available within the Communicable Disease, Health and Safety Enforcement Team for 2022/2023.

Intervention Plan 2022 -2023		
	Reactive work activity	Activity detail
1.	Accident investigation	Receive notifications of all reportable injuries, occupational disease and dangerous occurrences from the HSE website, or employees / members of the public, and investigate in accordance with Accident Investigation Policy.
2.	Complaint investigation	Receive and investigate all complaints (service requests) from employees, members of the public and others in line with service request and complaints policy.

3.	Permissioning Activities	Respond to licence and registration applications for skin piercing and tattooing activities, statutory examination reports, and asbestos notifications in a timely and effective manner				
Proactive inspections – national priority projects		Activity detail	Target No. of premises			Total no. of interventions
			B	C	V	
1	Legionella management associated with hot tubs and spas pools on display and available for use	Continues to be an Annex A priority topic area in LAC 67/2 (rev 11). Officers will primarily consider those spa pools/hot tubs that are operational whilst on display, but also include commercial hot tubs considered to present a higher risk. Aim of intervention is to raise awareness of the risks and assessment of controls in place (in accordance with L8 Approved Code of Practice)	5	10	5	20
2	Solid fuel and gas safety in commercial catering	Gas safety in commercial catering premises continues to be an Annex A priority topic area in LAC 67/2 (rev 11) and the risk of carbon monoxide poisoning associated with commercial solid fuel cooking equipment remains an Annex B activity identified for proactive inspection. The last gas safety in catering intervention identified a number of commercial appliances with either inadequate or faulty ventilation, together with a number of gas leaks. Officers also dealt with problems associated with solid fuel cooking appliances and elevated levels of carbon monoxide. The 2022/2023 project will examine both elements in order to reduce risks to employees and non-employees in commercial catering establishments.	20	20	20	60
3.	Indoor trampoline parks and indoor adventure parks with large inflatable amusement devices	Trampoline parks continue to be an Annex A priority topic area in LAC 67/2 (rev 11) and SRS has investigated a number of specified major injuries to customers as a consequence of the inadequate delivery of safety messages and inadequate supervision of the equipment. During 2022/23, Officers will continue scrutinising compliance with the PAS 5000 standard in indoor trampoline park settings across the region. Annex A of LAC 67/2 (rev 11) also includes inflatable amusement devices as a national priority topic area so the intervention will also capture an indoor adventure park with large inflatable devices. The aim is to ensure compliance with BS EN 14960 and the PIPA scheme.	1	4	0	5

Proactive inspections – local intelligence led projects		Activity detail	Target No. of premises			Total no. of interventions
			B	C	V	
1.	Indoor leisure & soft play facilities	The service received a number of complaints about soft play facilities during the COVID pandemic relating to poor cleaning and disinfection arrangements. Complaints have also been received about injuries received by users of such facilities. Since indoor soft play centres users are generally young children, and more vulnerable members of the community, SRS is seeking to visit a number of facilities during 2022/23 to assess: IP&C measures; compliance with the PIPA scheme and relevant British Standards, and overall compliance with health and safety requirements.	5	8	4	17
Non inspection led interventions - National Priorities		Activity detail	Target No. of premises			Total no. of interventions
			B	C	V	
1.	Safety of hired inflatable amusement devices	Targeted mail shot, with guidance, to companies that hire inflatable amusement devices to raise awareness about their legal responsibilities and recent changes to BS EN 14960.	3	10	3	16
		Targeted mail shot, with guidance, to venues likely to hire out smaller inflatable amusement devices for parties (such as community and leisure centres)	19	29	30	78
2.	Electrical safety in hospitality settings	Annex A of LAC 67/2 (rev 11) includes this new priority topic to improve standards of compliance, particularly in outdoor areas. The Authority will disseminate assessment forms and guidance to targeted premises across the SRS region to ensure fixed installations and electrical appliances are inspected by a competent person at appropriate intervals and maintained in a safe condition.	50	50	50	150
Non inspection led interventions – Local intelligence led		Activity detail	Target No. of premises.			Total no. of interventions
			B	C	V	
1.	Legionella management and control – hot and cold water systems in residential care homes	To complete the review of Legionella controls in residential care homes across Bridgend, Cardiff and Vale of Glamorgan to ensure that the risk of infection in a vulnerable population is being effectively managed.	3	2	3	8

The content of the Intervention Plan is reflected in the Service’s Action Plan 2022/23 in Appendix 1.

4. Resources

4.1 Financial and staffing allocation

Financial allocation

The expenditure directly involved in providing the Health and Safety Service for 2022/23 is included in the Service budget and is considered adequate to ensure the effective delivery of the service.

Staffing allocation

The table below indicates the actual number of staff working on Health and Safety enforcement and related matters (in terms of full time equivalents FTE).

Position	Function	FTE
Operational Manager Commercial Services x 1	Public Protection including the management of health and safety.	0.2
Team Manager x 1 (Equal split between health and safety and communicable disease functions) Substantive TM remains on WG secondment	Communicable Disease, health & safety.	0.5
Team Manager x 1 (Industry)	Management of the health and safety aspects delivered by the Enterprise & Specialist Services (Industry) Team	0.1
Commercial Services Officers x 6 1 CSO post acting up as TM so substantive post vacant (interviews pending) – equal split H&S:CD 1 CSO works 4 days a week (equal split H&S : CD) 1 CSO post is full time and equal split H&S : CD 1 CSO post is full time and has a 30/70 H&S : CD split 2 CSO posts are full time and have a 80/20 H&S:CD split	All aspects of health and safety enforcement (plus communicable disease work)	4.3
Commercial Services Officers x 2 (Industry) Both officers are part time and make up 1 FTE post	Health and safety enforcement (large events), advice and training.	1.0
Commercial Services Officer x 1 (Major Investigations Team)	Lead officer for major investigations	0.1
Commercial Services Technical Officer x 2 (Equal split between health and safety and communicable disease work)	All aspects of health and safety enforcement (plus communicable disease work).	1.0
Business Support Officer	Administrative support.	0.2

The Communicable Disease, Health and Safety Team has seen further changes in personnel throughout 2021/22 due to staff retirement and staff leaving the service. The team continues to carry a vacancy into quarter 1 of the 2022/2023 year in addition to having a number of less experienced members of staff following several phases of recruitment.

4.2 Staff Development and Competency

Operating a Shared Regulatory Service across three distinct areas presents many challenges for the Service and its workforce. We aim to use our Workforce Development Plan to ensure our officers have the right mix of experience, knowledge and skills required to fulfil our goals. Our Plan illustrates how we want to encourage and support our officers to develop new skills and work in different ways. Investing in people is a fundamental element of our maximising resources priority. The Workforce Development Plan provides a framework to blend:-

- Organisational culture
- Leadership and management
- Core skills
- Recruitment, retention and progression
- Communication and employee engagement
- Employee performance management

Workforce development is supported by regular performance reviews where line managers and employees identify, and adapt, personal objectives in line with personal objectives and training needs. Officers are also expected to satisfy the continual professional development requirements of their accredited professional organisation, and are supported to enable them to achieve this.

The Service also recognises the need for full technical support to be available to all health and safety enforcement officers and this is achieved through a variety of ways, namely:-

- Internet subscription and library.
- HSE liaison.
- External Specialist services.

The Shared Regulatory Service operates systems to appoint, authorise, train, monitor and maintain a competent inspectorate. Part of this approach uses the framework developed jointly by HSE, CIEH and LG Regulation which focuses on generic inspection skills as well as specific technical knowledge needed in health and safety enforcement. In addition the Service ensures that competency is secured by appointing appropriately qualified and experienced personnel to health and safety enforcement duties. There are specific job descriptions and person specifications for all employees of Shared Regulatory Services and all appointments are made in accordance with the procedures for recruitment and selection.

5. Review

5.1 Quality Assessment

Shared Regulatory Services recognises the need to measure the effectiveness of its health and safety enforcement duties and strongly supports the ethos of continuous improvement. The Service therefore participates in, and undertakes, a number of activities to ensure that work is of a high standard and opportunities to identify and implement improvements are taken.

Documented procedures

To ensure the quality and consistency of our activities, processes, procedures and work instructions for health and safety enforcement activities are documented and published electronically.

Documented procedures identify responsibility for the work carried out and ensure that all changes identified through audit are undertaken in accordance with improvement procedures. Activities such as inspections, administration, accident investigation and complaint administration can be accessed by all staff via Sharetree and the shared H&S Enforcement folder, and are audited internally for compliance.

Assessment and audits

The monitoring of the quality and delivery of our policies and procedures are assessed in a number of ways, namely:-

- All proactive health and safety projects require officer training, a shadow visit and a validation visit to ensure a consistent approach and assessment of technical knowledge.
- All officers are subject to annual reviews for proactive and reactive visits.
- Monthly reviews of officer targets.
- Customer consultation and feedback.
- Corporate complaints and compliments about the service.
- Peer review audits (informal and formal) by other local authorities, in accordance with the Section 18 standard may be undertaken.

Shared Regulatory Services is committed to continuous improvement using various management tools for identifying opportunities for improvement. The Service has used 'lean management' techniques to review processes and procedures which require the mapping out and examination of processes to identify more efficient and effective working practices

5.2 Review against the Service Plan

In order to ensure continuous improvement it is essential that performance is regularly monitored. Shared Regulatory Services has an effective performance management infrastructure in place for developing, delivering, monitoring and reviewing interventions which is undertaken through the following mechanisms:-

- The Joint Committee for the Shared Regulatory Service approves this Service Plan which sets out the work programme for the service and reviews performance against the programme on an annual basis.
- Performance of the service is considered at team and management meetings on a monthly basis.
- Team meetings allow for the effective management of local and national projects and are also one of the routes of communication that allow individual and team involvement in the development and delivery of interventions.
- Performance of individuals is further strengthened through the Personal Development Review Scheme #Itsaboutme.
- Procedures and work instructions are managed through SRS Sharetree and the responsibility of the Team Manager to review and improve as appropriate.

Performance and activity measures

The health and safety service uses the Tascomi database to record details of premises, inspections (visits), complaints and other activities, including assessment of risk rating, which can be used to assist in targeting interventions and designing the work programme.

All premises records, incident notification and reporting information and project management systems are digitised and held on the Council's IT systems. Records can be accessed directly or via the Tascomi database.

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work and performance. The following sections identify those planned interventions due at the beginning of 2020/21 and reports on the delivery of those interventions together with information on enforcement activities.

Programmed Proactive interventions

In terms of performance, in relation to the completion of national or local intelligence led proactive programmed interventions/inspections, the target for completion is 90% of the programme. In 2021/22 the service was unable to fully deliver its intended proactive intervention programme as a direct consequence of the COVID-19 pandemic and the team being re-focused on managing cases and outbreaks across the care sector. The team was only able to deliver 18% (26 out of 141) of its overall planned proactive intervention programme: 100% (6) of all open farm/animal contact visits; 22% (10) of all gas safety in catering visits and 33% (10) of all duty to manage asbestos visits. In addition to this, officers carried out targeted inspection visits to 5 care homes to review Legionella management arrangements in more detail following receipt of inadequate risk assessments and written schemes of control.

Programmed Non-inspection led interventions

Performance in relation to the completion of national, or local, intelligence led non-inspection interventions is measured against a target of 85% completion of the programme. The service was able to carry out all 4 of the planned desk-top assessments of cooling towers in Cardiff but only 32 of the 40 planned desk-top reviews of the Legionella management arrangements in private residential care homes across the SRS region. However, in addition to this programmed work, the service also completed 5,876 COVID compliance/advice visits during 2021/22 (Bridgend 3514; Cardiff 860; Vale 1502) which was not originally planned for during the business year.

LAE1 – Local Authority Health and Safety Annual Return – Under the Code, all Local Authorities are required to ensure that they have a means of monitoring, capturing and sharing health and safety intervention, enforcement and prosecution activity. This information must be made available to HSE via the annual LAE1 return which allows the preparation of national data. The LAE1 is limited to the capture of occupational health and safety regulatory activity required by HSE and is recorded in a standardised format. Information on enforcement and health and safety activity over the last three years can be found below.

Despite the continuation of the COVID-19 pandemic throughout 2021/2022, and the significant re-deployment of Local Authority resources to the national Test, Trace and Protect effort, Authorities have been required to submit a LAE1 return for the 2021/2022 financial year. HSE further directed

that COVID-19 work should not be included in the statistical return since interventions would have been initiated under specific public health legislation; not health and safety legislation.

Business feedback

Whilst duty holder feedback is sought from all businesses involved in any of the health and safety project interventions, this information is inherently difficult to obtain; especially if escalated enforcement action has to be taken.

Due to the continuation of the COVID-19 pandemic, only a limited number of proactive health and safety project work took place during 2021/22. Whilst all duty holders were invited to provide feedback via the link <https://www.srs.wales/en/Tell-Us-What-You-Think/Tell-us-what-you-think.aspx> following their visits, none of the duty holders elected to provide any comments.

Intervention Plan - Activities 2021/2022

The 2021/2022 work plan was developed to continue to meet the needs of each of the local authority areas and to ensure a consistent approach to implementation.

In 2021/2022, **10,236** businesses within SRS were logged on the Tascomi database as falling under the Local Authority remit for health and safety enforcement.

- Bridgend **2,561** (25%)
- Cardiff **5,729** (56%)
- Vale of Glamorgan **1,946** (19%)

The following table provides a summary of enforcement activity during the last 4 years across Bridgend, Cardiff and the Vale of Glamorgan.

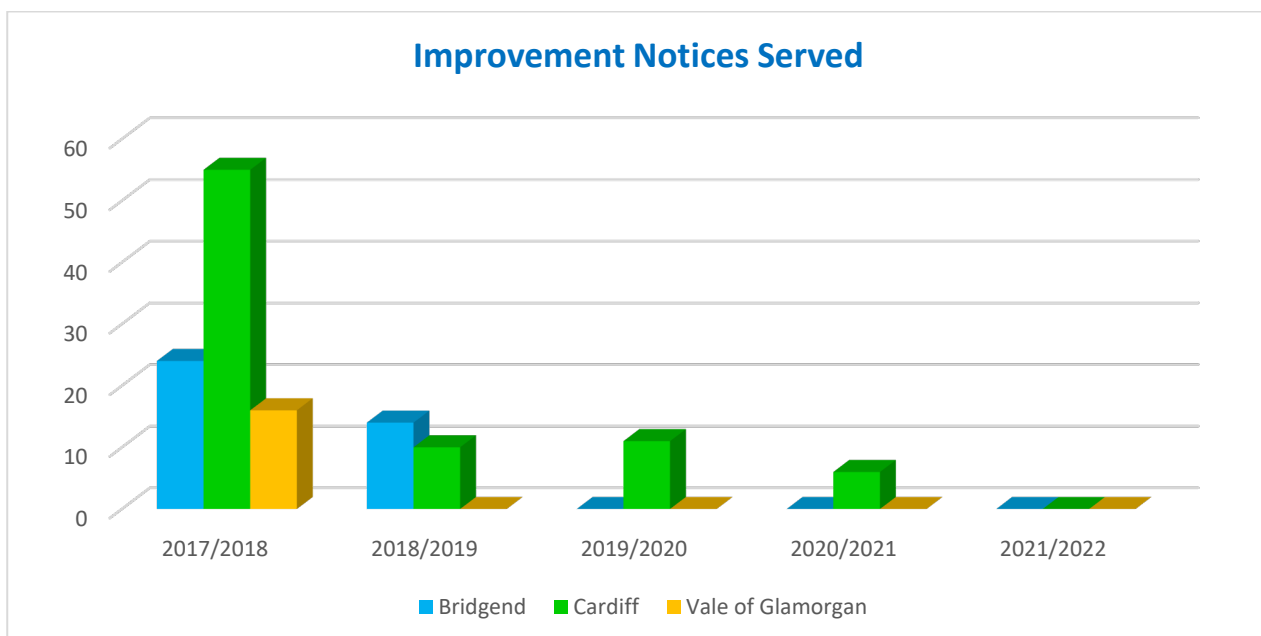
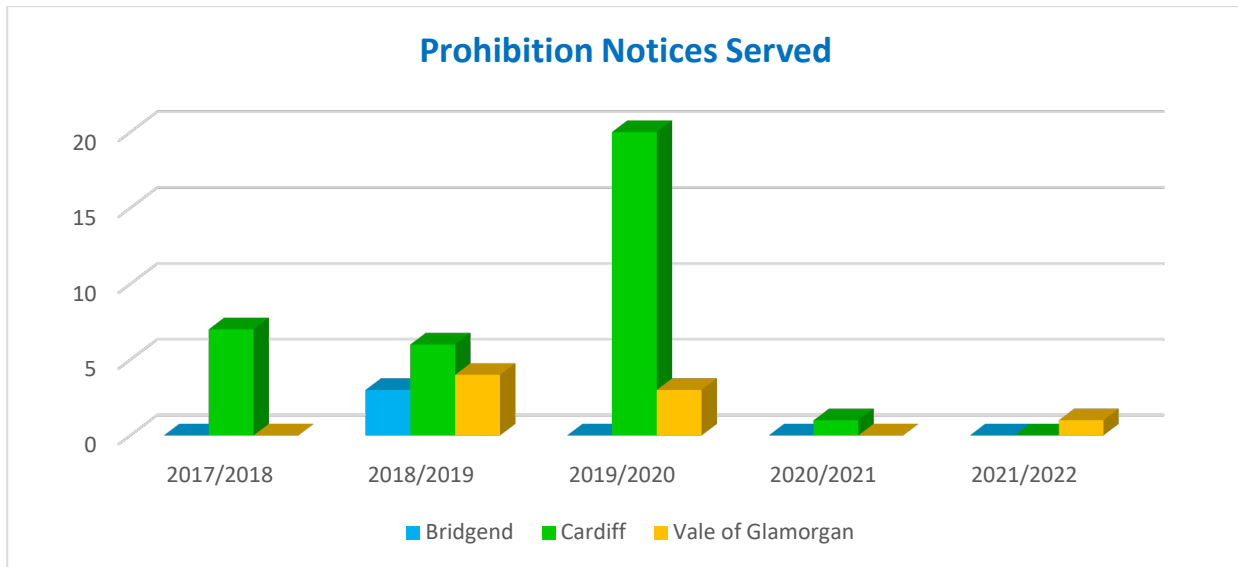
Type	2018/19			2019/20			2020/21			2021/22		
	B	C	V	B	C	V	B	C	V	B	C	V
No. of workplaces.	2388	5314	1792	2436	5386	1816	2546	5640	1911	2561	5729	1946
Total No. of proactive interventions	108	359	122	206	314	193	1266	1361	2194	3590	964	1600
No. of proactive intervention visits	63	144	74	107	155	99	1181	1229	2098	3525	876	1506
No. of non-face-to-face interventions*	0	136	0	61	73	62	82	128	88	54	68	84
No. of other face-to-face contacts**	45	79	48	38	86	32	3	4	8	11	20	10
Total No. of reactive visits	107	234	60	90	274	91	109	226	62	701	559	587
No. of accident and complaint/service request visits	70	174	47	75	188	75	66	180	45	674	485	563
No. of Permissioning requests	37	60	13	15	86	16	43	46	17	27	70	23
No. of revisits	5	23	6	4	29	10	0	0	0	0	4	1
No. of formal cautions	0	0	0	0	0	0	0	0	0	0	0	0
No of H&S improvement notices	14	10	0	0	11	0	0	6	0	0	0	0
No. prohibition notices	3	6	4	0	20	3	0	1	0	0	0	1
No. of prosecutions	0	2	1	0	6	0	0	2	0	0	0	0

* Includes desk top assessments; provision of advice by phone or email; responding to FOI requests from solicitors

** Includes provision of training/education; attendance at ESAG/ELP meetings and outdoor events; Primary Authority work; paid for advice visits; business forums

Total number of reactive visits = accidents/complaints/service requests/permissioning requests/revisits

Only 1 health and safety Prohibition Notice was served during 2021/22 after Officers visited an independent kebab takeaway and found the gas boiler inadequately secured to the wall and the flue not seated in the correct position. No health and safety Improvement Notices were served during 2021/22; primarily due to Officers being unable to deliver the projected proactive intervention work due to being re-assigned to COVID-19 regional response work.



The Intervention Plan table illustrated below provides specific details on how the team performed against targeted planned work in Bridgend, Cardiff and Vale of Glamorgan for 2021/2022.

Intervention Plan 2021 -2022										
Reactive work activity		Activity detail								
1.	Accident investigation	<p>Receive notifications of all reportable injuries, occupational disease and dangerous occurrences from the HSE HELEX website; employees; other enforcement agencies or members of the public and investigate in accordance with the SRS Accident Investigation Policy. A total of 67 notifications were investigated during 2021/2022 in accordance with the accident investigation procedure: Bridgend (11); Cardiff (49); Vale (7).</p> <p>Four of these notifications related to occupational disease – 2 for Hand Arm Vibration in main car dealerships; 1 a confirmed case of Carpel Tunnel Syndrome associated with computer use; 1 being a confirmed cases of COVID-19 in the workplace.</p> <p>Two referrals received from the Police concerned falls down staircases in public houses by members of the public who sustained life threatening injuries.</p> <p>A total of 448 RIDDOR notifications were received between 01/04/21 and 31/03/22 – Bridgend (67); Cardiff (319) and Vale (62).</p>								
2.	Complaint / Service Request investigation	<p>Receive and investigate all complaints and service requests from employees, members of the public; referrals from other enforcement bodies and others. A total of 1,655 complaints/service requests/referrals were investigated during 2021/2022: Bridgend (663); Cardiff (436); Vale (556)</p> <p>Complaints and service requests also include smoke-free complaints; the investigation of matters of evident concern referrals and investigation of COVID-19 complaints</p>								
3.	Permissioning Activities	<p>Respond to licence applications for skin piercing activities, statutory equipment/plant reports, and asbestos notifications in a timely and effective manner. A total of 120 permissioning requests were dealt with by Officers during 2021/2022. 91 (76%) of these applications were skin piercing registration requests which require at least 1 Officer visit: Bridgend (24); Cardiff (48); Vale (19).</p>								
4.	Outdoor events	<p>The Enterprise & Specialist Services Team are lead officers for specified outdoor events and lead the Council's response to public safety matters at outdoor events via the Events Liaison Panel (ELP) and ESAG mechanisms.</p> <p>During 2021/2022, a total of 33 ESAG/ELP meetings were attended by Officers (Bridgend 11; Cardiff 13; Vale 9).</p> <p>8 actual events were visited and monitored for health and safety compliance reasons (Cardiff 7; Vale 1)</p> <p>98 desk top exercises for other events were conducted (Bridgend 30; Cardiff 10; Vale 58). The latter involved scrutiny of event management plans and risk assessments, and the provision of feedback and advice to event organisers.</p>								
Proactive work activity		Activity Detail					No. of premises			
							T = Target A = Actual			
							Bridgend		Cardiff	
		T	A	T	A	T	A			
1.	All applicable explosive storage premises.	Inspect all applicable premises that store explosives including fireworks.	-	9	-	10	-	5		
2.	Petroleum storage premises	Inspect all premises that store petroleum or have stored petroleum.	-	9	-	16	-	14		

Project based activity – National projects		Activity Detail	No. of premises					
			Bridgend		Cardiff		Vale	
			T	A	T	A	T	A
1.	Legionella management associated with hot tubs and spa pools on display	A new (and continuing) Annex A priority topic area since LAC 67/2 (rev 9) in addition to being an appropriate local intervention following the cluster of Legionella cases in Barry during 2018-2019. Officers will only consider those spa pools/hot tubs that are operational whilst on display. Aim of intervention is to raise awareness of the risks and assessment of controls in place (in accordance with L8 Approved Code of Practice)	10	0	10	0	10	0
2.	Solid Fuel and gas safety in commercial catering	The last gas safety in catering intervention identified a number of commercial appliances with either inadequate or faulty ventilation, together with a number of gas leaks. Officers also dealt with problems associated with solid fuel cooking appliances and elevated levels of carbon monoxide. The 2021/22 project will examine both elements in order to reduce risks to employees and non-employees further. Gas safety in commercial catering continues to be an Annex A priority topic area in LAC 67/2 (rev 10) whilst carbon monoxide poisoning from solid fuel cooking equipment is an Annex B activity suitable for proactive inspection.	15	4	15	5	15	1
2.	Duty to manage asbestos	Continues to be an Annex A priority topic area in LAC 67/2 (rev 10). This project has had an impact on raising standards, and awareness, throughout businesses in SRS since the initial pilot project in 2016/17. The duty to manage asbestos will be included in the solid fuel and gas safety in commercial catering visits as a 'bolt on' topic, where applicable.	10	4	10	5	10	1
Project based activity – Local projects		Activity detail	No. of premises.					
			Bridgend		Cardiff		Vale	
			T	A	T	A	T	A
1.	E.coli and Cryptosporidium infection control at open farms and animal visitor attractions.	Undertake visits to open farm/animal petting settings to ensure that the risk of infection from biological hazards is being effectively mitigated and duty holders are fully aware of the updated industry guidance document. This topic area was selected following an increase in the number of reported cases of E.coli, Cryptosporidium and Campylobacter across the SRS region as COVID restrictions eased.	2	2	2	2	2	2
2.	Indoor trampoline parks; Ninja Warrior leisure facilities & indoor soft play facilities	Officers will continue scrutinising compliance with the PAS 5000 standard in indoor trampoline park settings; effective management of risk in leisure settings such as ninja warrior/indoor soft play. Provision of advice about cleaning/disinfection and managing the risk of cross-infection will also be covered.	10	0	10	0	10	0

Non Inspection led interventions – National Priorities		Activity detail	No. of premises.					
			Bridgend		Cardiff		Vale	
			T	A	T	A	T	A
1.	Preventing injury to members of the public from large commercial waste and recycling bins	Officers will disseminate the SRS guidance sheet to all relevant businesses as a 'bolt on', non-inspection intervention for all premises subject to a proactive inspection (where large waste receptacles are used)	10	0	10	0	10	0
Non Inspection led interventions – Local Intelligence Led		Activity detail	No. of premises.					
			Bridgend		Cardiff		Vale	
			T	A	T	A	T	A
1.	Inspections to monitor business compliance with COVID-19 restrictions.	Inspections to businesses across the SRS region to monitor compliance with the Health Protection (Coronavirus Restrictions) (Wales) Regulations; review risk assessments and assess reasonable measures in place to mitigate the risk of transmission of COVID-19.	-	3514	-	860	-	1502
2.	Legionella management – cooling towers	Whilst this has been removed from the LAC 67/2 document, SRS dealt with a long-standing cluster of Legionella cases in the Barry area during 2018-19, and the risk of Legionella has significantly increased during the COVID-19 pandemic with the mothballing and less frequent use of buildings. Review of all cooling towers in Cardiff will be completed during 2021/22 to ensure control measures remain robust and in accordance with the L8 Approved Code of Practice. Duty holders will initially be required to complete and return a self-assessment questionnaire.	-	-	4	4	-	-
3.	Legionella management and control – hot and cold water systems in residential care homes.	To undertake a review of Legionella controls in residential care homes across Bridgend, Cardiff and Vale of Glamorgan to ensure that the risk of infection in a vulnerable population is being effectively managed. 5 site visits did take place after the desk top assessment had been completed due to concerns noted with documentation provided.	13	10	17	15	10	7

Reactive Interventions

Reactive interventions include responses to, and investigations of: reportable accidents; dangerous occurrences; occupational diseases; complaints; service requests; permissioning activities and requests for advice from businesses.

Accidents, Complaints and Service requests

Due to workload pressures associated with supporting the regional response for COVID-19, Officers had to rigorously prioritise what reactive work could be followed up and how that response could be achieved in a more efficient way. Priority was placed on the most serious injuries and events

requiring escalated enforcement, with other work being managed by non-face-to-face methods such as via TEAMS; email and undertaking desk top reviews of internal investigations and processes.

Examples of significant accidents and complaints investigated by Officers during 2021/2022 are outlined below:

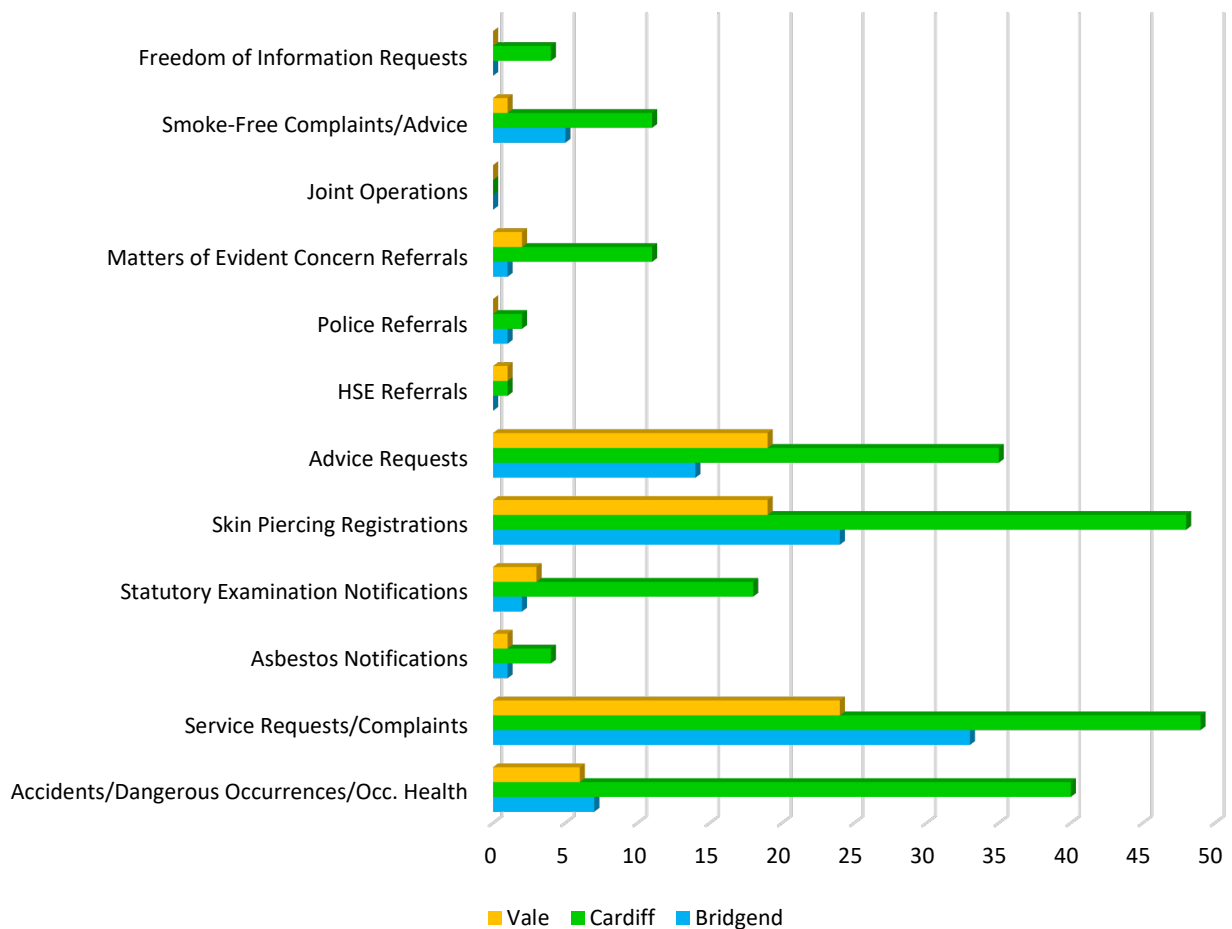
Significant accident & complaint investigations during 2021/2022
<ul style="list-style-type: none">• Investigation of infection control measures, and sampling of equipment, at a Vale based tattoo studio when a member of the public developed Sepsis after having a tattoo.• Investigation of 2 separate incidents where members of the public sustained life threatening injuries after falling down staircases in Public Houses (1 in Cardiff; 1 in Bridgend)• Gas leak at a multi-occupancy commercial premises after a third party contractor cut a gas pipe connected to a sub-meter and reconnected the pipe with tape.• Investigation of cases of occupational disease; including hand arm vibration in main car dealerships and carpal tunnel syndrome associated with computer use.• Assessment of traffic management arrangements on an industrial park following a road traffic collision between a vehicle and pedestrian.• Electrical concerns in food businesses, including an incident where an electrical contractor lost consciousness after sustaining an electric shock during the repair of a display fridge.• Investigation of unsafe working practices associated with deep fat fryers.

All of the above were fully investigated by officers, with appropriate enforcement action being taken.

Permissioning requests relate to high-risk work activities that demand a form of approval from the Health and Safety Enforcement Service before the activity can proceed. These include registration applications for tattooists and skin piercers; notifications from contractors wishing to carry out specific work on asbestos (*ASB5 submissions; Notifiable Non-Licensed Work submissions*) and statutory examination reports (*lifting equipment, pressure systems*) which identify technical defects which could cause a danger to users. All permissioning requests require officer intervention, which includes both desk-top assessments and visits.

Due to the significant volume of confirmed cases of COVID-19 in the care sector throughout January to March 2022, the team had to temporarily pause the receipt of skin piercing registrations since the Communicable Disease, Health and Safety Team did not have capacity to undertake site visits to assess compliance with bye-law conditions.

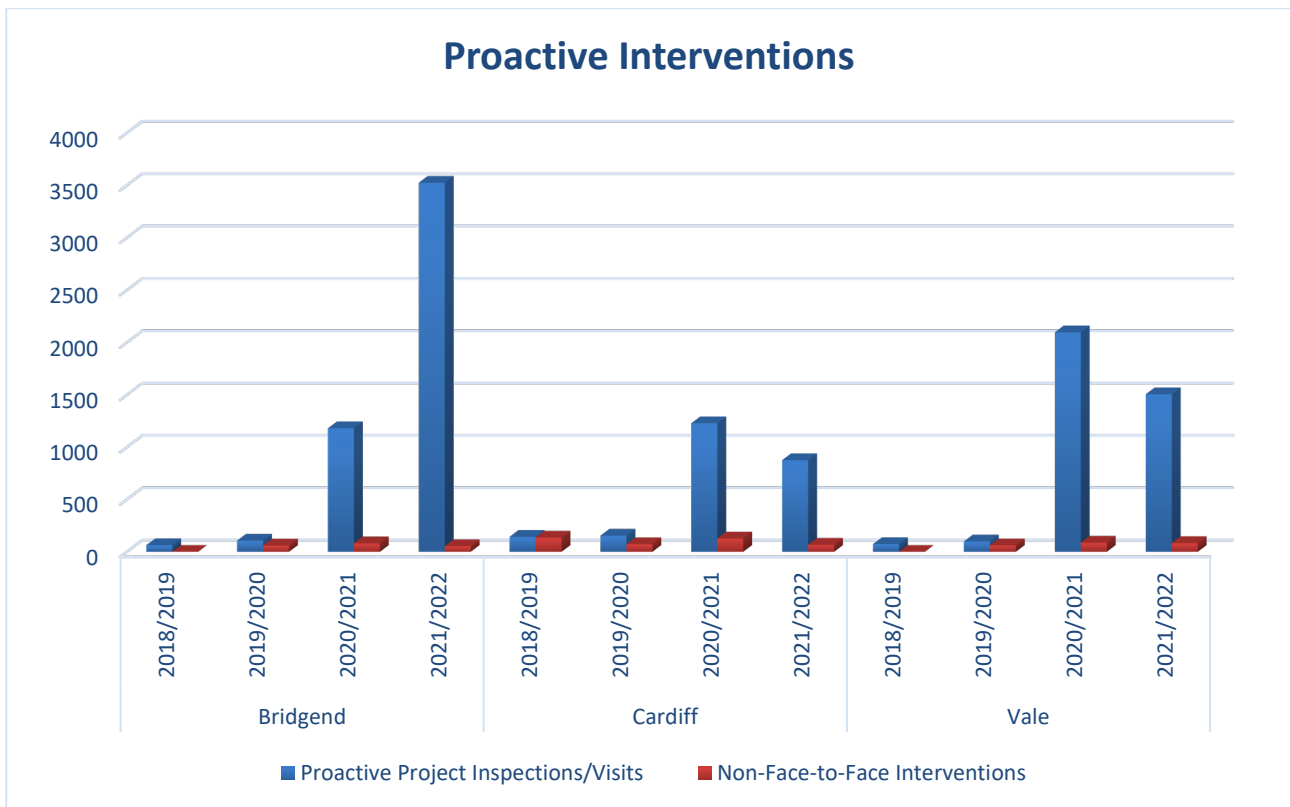
Health & Safety Reactive Work 2021/22



Proactive Interventions

Proactive Interventions include **proactive project inspections**, which are either local intelligence led or based on national priority topic areas, and **non-inspection led interventions** which include targeted mail shots, educational/business engagement workshops and more formal business forums.

The graph below compares the number of proactive interventions in Bridgend, Cardiff and Vale of Glamorgan for 2021/2022 against the average number of proactive interventions for the previous 4 financial years (*visits made in relation to petroleum and explosives are excluded since they are not in-scope of the annual LAE1 return*).



Proactive Project Inspections/Visits

Due to the COVID-19 pandemic, the proactive health and safety intervention plan for 2021/22 had to be significantly reduced as the team were tasked with managing cases of COVID across the care sector and in homeless accommodation. The team was able to complete 100% of all open farm/animal contact visits; 22% of all gas safety in catering visits and 33% of all duty to manage asbestos visits.

Staff from other teams across SRS were tasked with undertaking COVID support, monitoring and enforcement visits, and these have been logged as the proactive (COVID) project visits for the 2021/22 business year.

Major Outdoor Events – supporting the local economy

Officers from the Enterprise and Specialist Services Team attended a total of **33 Event Safety Group/Events Liaison Panel meetings** across Bridgend (11), Cardiff (13) & Vale of Glamorgan (9) during 2021/2022. A total of **8 site visits** were made during which Officers worked with event organisers to resolve matters of evident concern that could impact on public safety. A further **98** events received **desktop reviews** to assess event management plans, site plan layouts and risk assessments. Event Organisers were subsequently provided with constructive feedback to bolster the robustness of their event management arrangements.

Achievements for 2021/2022

The Achievements Section highlights a range of work activity including:

- Notable prosecutions
- Work undertaken in addition to the programmed work plan
- Programmed work which has resulted in a significantly positive impact within that industrial sector

Proactive Intervention – Monitoring Compliance with Coronavirus Legislation

SRS staff continued to play a pivotal role in the monitoring and enforcement of the Health Protection (Coronavirus Restrictions) (Wales) Regulations throughout 2021/22 (including returning travellers); investigated workplace clusters of COVID-19 across the SRS region; participating in regional TTP work across 2 Local Health Board regions; and provided businesses with support and advice to ensure they were COVID-secure and operating in accordance with rapidly evolving Welsh Government legislation and guidance. **A total of 130 Notices were issued; 1517 service requests were investigated, and 5876 inspections and visits were undertaken.**

Covid Notices	Bridgend	Cardiff	Vale of Glamorgan	Total
Premises Improvement Notice	44	45	26	115
Premises Closure Notice	0	5	1	6
Compliance Notice	0	0	9	9
Totals	44	50	36	130

Covid Service Requests	Bridgend	Cardiff	Vale of Glamorgan	Total
Service requests	624	365	528	1517

Covid Inspections and Visits	Bridgend	Cardiff	Vale of Glamorgan	Total
Inspections and visits	3514	860	1502	5876

Supporting the Test, Trace and Protect Scheme – Regional Team Work

The Test, Trace and Protect (TTP) service in Wales was set up in each Health Board region in June 2020. During the initial waves of the COVID-19 pandemic, a significant number of staff across the Shared Regulatory Service structure were redeployed to support the regional Test, Trace and Protect (TTP) response across 2 Local Health Board (LHB) areas. Whilst early Spring 2021 witnessed a declining number of confirmed cases of COVID-19 across the SRS region, which was reflected in the easing of Welsh Government restrictions, a significant number of factors subsequently impacted the projected delivery of the Section 18 work plan throughout the remainder of the financial year. In July 2021, Public Health Wales (PHW) ‘pulled back’ resources from the management of COVID-19 outbreaks in care homes and handed this function over to Local Authority partners. SRS had to quickly review its work plan and resources for the remainder of the year to prioritise the safeguarding of this vulnerable cohort in the community.

Whilst it was hoped that COVID-19 cases would abate as the year progressed, the Autumn and Winter months of 2021/22 saw the emergence of more transmissible Variants of Concern, namely Delta and Omicron, which caused confirmed case numbers to soar, even in fully vaccinated populations in the care sector. SRS staff continued to provide support and infection prevention and control advice to care sector settings and manage the oversight of outbreaks of COVID-19 in care homes, as a priority during this period so opportunity to complete any substantive work was very limited. **A total of 5,710 confirmed cases of COVID-19 in the care and homeless sectors were followed up during the 2021/22 business year.**

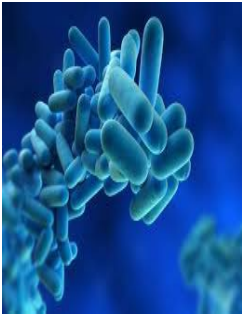
Proactive Intervention - Firework Safety

The Commercial Services Trading Standards Team is responsible for the enforcement of the law on storage of explosives in retail premises, sales of fireworks, the safety of fireworks and age-restrictions on sales. There are various regulations and guidance on the subject, all designed to minimise the risk of uncontrolled fire or explosion and thereby staff and customers and the general public as safe as possible. The Explosives Regulations 2014 came into effect on the 1st October 2014. There are three main aims to the regulations:

- ✚ To prevent fire or explosion
- ✚ To prevent communication of any fire or explosion, and
- ✚ To protect people from the effects of fire or explosion

In 2021/2022 Commercial Services Trading Standards officers carried out **24** inspections of premises across **Bridgend (9)**, **Cardiff (10)** and the **Vale of Glamorgan (5)** that applied for a licence to store and sell fireworks and explosives.

Managing the Risk of Legionella in Water Systems – Improving health and wellbeing; safeguarding the vulnerable; maximise the use of resources



The first year of the pandemic dramatically affected care homes across the SRS region with many settings experiencing almost concurrent outbreaks of COVID-19. Not only did this impact the resilience of the substantive workforce in the care home sector, but also limited the opportunity for third party contractors to access settings for carrying out routine maintenance and cleaning; including the hot and cold water systems. Due to the vulnerability of residents in residential care homes, there was concern that the risk of respiratory illness from Legionella would significantly increase as the pandemic continued.

During 2021/22 SRS committed to undertake a desk top review of Legionella assessments; written schemes of control and monitoring records for all private residential care homes across Bridgend, Cardiff and the Vale of Glamorgan to ensure that control measures remained robust during the COVID-19 pandemic. A total of 32 desk top assessment were completed; 10 in Bridgend, 15 in Cardiff and 7 in the Vale of Glamorgan. Where duty holders were unable to evidence the implementation of adequate control measures, Officers undertook site visits to ensure that the risk of Legionella was being effectively mitigated. In total Officers carried out 5 site visits; 1 in Bridgend and 4 in Cardiff. Escalated enforcement action did not need to be taken following these visits as appropriate action was instigated by the Responsible Individuals concerned.

Officers also carried out a desk top review of completed self-assessment questionnaires from 4 cooling tower operators across the Cardiff area during 2021/22 year. Only 2 of the 4 systems were operational at the time and the completed assessment forms indicated that control measures being implemented with aligned with HSE Approved Code of Practice L8 and HSE guidance HSG 274 Part 1. One of the systems had been decommissioned and was running as a dry system only whilst the remaining system had been temporarily taken out of use for refurbishment. The operator of the latter system will be followed up during the 2022/23 business year once the cooling towers are recommissioned and operational.

5.3 Areas for Improvement

The following improvements are to be continued during 2022/2023:

- Cost effective implementation of proactive project interventions (*including bolt-on interventions where appropriate; utilising non-face-to-face strategies for communicating key messages and engaging with external stakeholders*).
- Developing Officer competency in key topic areas being considered for proactive work so that all SRS customers receive the best possible level of service.
- Engaging with Primary Authority Partners so that improvements to health and safety policies, procedures and practices target a wider audience.

Appendix 1 – Action Plan 2022/2023

There are four Strategic Priorities relevant to the delivery of the Health and Safety Enforcement Function:

1. Improving health and wellbeing
2. Safeguarding the vulnerable.
3. Supporting the local economy
4. Maximising the use of resources.

Relevant Strategic Priorities	Objective	
1, 2, 3, 4	Q1	Commence work on the Section 18 Health and Safety Service Plan
1		Commence visits to commercial catering businesses to assess how the risk of exposure to carbon monoxide from natural gas and solid fuel cooking appliances is being controlled. Electrical safety to be a bolt-on theme as a priority topic area.
1, 2		Commence visits to indoor trampoline parks across the SRS region to assess compliance against the PAS 5000 standard and health and safety management arrangements.
1, 4		Complete mail shot to the hospitality sector to raise awareness about electrical safety, particularly in outdoor areas.
1, 2, 4		Complete mail shot to companies that hire out inflatable amusement devices on a commercial basis to advise of the recent changes to BS EN 14960 and reiterate their legal duties under health and safety legislation.
1, 2, 4		Complete mail shot to community and leisure centres that may hire inflatable amusement devices for small events to advise of the recent changes to BS EN 14960 and highlight key safety measures that should be followed.
1, 3, 4		Identify opportunities where the LA can raise awareness of the work-related stress and mental health campaign 'Working Minds' with businesses
1, 2, 4		Complete the review of Legionella controls in private residential care homes across Bridgend, Cardiff and Vale of Glamorgan to ensure that the risk of infection in a vulnerable population is being effectively managed
1, 2, 3, 4	Q2	Secure approval from SRS Joint Committee for the 2022/23 Section 18 Health and Safety Service Plan
1		Continue visits to commercial catering businesses to assess how the risk of exposure to carbon monoxide from natural gas and solid fuel cooking appliances is being controlled. Electrical safety to be a bolt-on theme as a priority topic area.
1, 2		Complete visits to indoor trampoline parks across the SRS region to assess compliance against the PAS 5000 standard and health and safety management arrangements.
1		Commence proactive intervention to assess how the risk of Legionella is being managed in premises displaying/using hot tubs and spas across the SRS region.
1, 3, 4		Identify opportunities where the LA can raise awareness of the work-related stress and mental health campaign 'Working Minds' with businesses

<p>1</p> <p>1</p> <p>1, 2</p> <p>1, 3, 4</p>	<p>Q3</p>	<p>Continue visits to commercial catering businesses to assess how the risk of exposure to carbon monoxide from natural gas and solid fuel cooking appliances is being controlled. Electrical safety to be a bolt-on theme as a priority topic area.</p> <p>Complete proactive intervention to assess how the risk of Legionella is being managed in premises displaying/using hot tubs and spas across the SRS region.</p> <p>Commence project visits to indoor soft play facilities (including premises with indoor inflatable amusement devices) across the region.</p> <p>Identify opportunities where the LA can raise awareness of the work-related stress and mental health campaign 'Working Minds' with businesses</p>
<p>1</p> <p>1, 2</p> <p>1, 3, 4</p>	<p>Q4</p>	<p>Complete visits to commercial catering businesses to assess how the risk of exposure to carbon monoxide from natural gas and solid fuel cooking appliances is being controlled. Electrical safety to be a bolt-on theme as a priority topic area.</p> <p>Complete project visits to indoor soft play facilities (including premises with indoor inflatable amusement devices) across the region.</p> <p>Identify opportunities where the LA can raise awareness of the work-related stress and mental health campaign 'Working Minds' with businesses</p>

Appendix 2



Open Farms and Animal Visitor Attractions Project 2021/2022



Assessment of health and safety compliance at open farms and animal attractions in Bridgend, Cardiff & Vale of Glamorgan between June - September 2021



Introduction

Visits to open farms and petting attractions have increased in popularity over recent years with an estimated 20 million people visiting animal attractions every year. These types of settings are commercial operations where visitors, mainly families with young children and organised children's groups, are actively encouraged to have direct contact with a range of different animals.

All animals naturally carry a number of micro-organisms, some of which have no ill effect in the animal itself but can be transmitted to humans and induce illness. Diseases passed from animals to humans are known as zoonoses; the most common pathogens associated with open farms and animal visitor attractions being *E. coli* O157 and *Cryptosporidium parvum* (*C. parvum*).

E. coli O157 is an organism most commonly carried by ruminants such as cattle, sheep and goats. It can also be found in other animals, particularly mixed species often present at visitor attractions, such as pigs, chickens, horses, donkeys, deer, llamas and alpacas. Farm dogs, wild rabbits and birds such as wild geese can also pick up infection from a contaminated environment. The main route of transmission is via contact with animal faecal material and/or their bedding and subsequent poor hand hygiene.

Contact with saliva derived from animal grooming activities has also been associated with transmission.

C. parvum is a parasite that lives in the intestines of calves, lambs, deer and goats; transmission is often associated with direct contact with animals and/or their bedding and inadequate hand hygiene thereafter. The main problem with *C. parvum* is that it can survive in the environment for long periods of time.

Zoonotic diseases such as E. coli O157 and *C. parvum* can cause a range of symptoms: from mild diarrhoea to kidney failure in humans that could be fatal. Infection can result from exposure to very low numbers of the micro-organisms, with young children and the elderly being most at risk.

Between 1992 and 2017 Public Health England identified 105 outbreaks of gastrointestinal (GI) diseases across England and Wales connected to open farms and petting attractions. The outbreaks resulted in 1,676 people becoming infected; 130 of whom required hospitalisation. The majority of these recorded GI outbreaks were caused by *C. parvum* (56%) or *E. coli* O157 (42%).

Factors that were found to contribute to these outbreaks was direct contact with young animals and their faeces, and inadequate hand washing facilities. Of note, investigations identified that thumb-sucking children and sole reliance on the use of alcohol-based hand gels instead of proper hand washing influenced case numbers in outbreaks. This demonstrated the need for duty holders to provide sufficient and suitable hand washing facilities on site in conjunction with clear information for visitors. Well positioned signage informing visitors of the risks; the importance of

hand washing; how to wash their hands; and the importance of continued supervision of children are key public health messages for mitigating the potential for onward transmission.

Following an Enquiry into a major outbreak of E. Coli 0157 in a Surrey based open farm site in 2009, a recommendation was made to review existing guidance for this type of visitor attraction. The outcome was the publication of a revised Industry Code of Practice (COP) *“Preventing or Controlling Ill Health from Animal Contact at Visitor Attractions” (Version 3)* which provides “sensible, practical and proportionate guidance” to assist open farm and animal attraction businesses prevent, or minimise, risks to visitors associated with animal contact.

The Health and Safety Executive (HSE) has also acknowledged the importance of looking at the risks of E. coli and Cryptosporidium infection linked to open farms/animal visitor attractions by including this activity/sector in Annex B of LAC 67-2 document which identifies priority topic areas for proactive inspections by both HSE and Local Authorities. Revision 10 of the LAC for 2021/2022 continued to highlight the importance of looking at the control measures being implemented by this sector.

Project Aims & Methodology

The aims of the 2021/2022 project were threefold:

- To determine duty holder awareness of the updated Industry COP and increase their knowledge and understanding of the requirements.
- To assess how duty holders were effectively managing and controlling the risk of exposure to micro-organisms such as E. coli 0157 and Cryptosporidium parvum (C. parvum) to prevent ill health to both staff and visitors.
- To establish how duty holders aimed to comply with the revised COP and identify what further interventions were needed to adequately mitigate the risks.

The intervention would cover the main themes contained in the revised COP.

Health and safety policy	‘Animal contact’ areas
Risk Assessment	‘Look and See’ areas
Visitor information	Washing facilities
Layout of the premises	Eating and play areas
Staff training	Livestock management
Supervision of visitors / visitor groups	Manure and compost heaps

The premises deemed to be in-scope of the project were dictated by the revised COP and included:

- Farm attractions such as open farms and farm parks.
- Animal contact enclaves within other attractions, including those at zoos.
- City farms or other educational establishments.
- Mobile petting enterprises and any other visitor attractions at which the public have contact with animals.

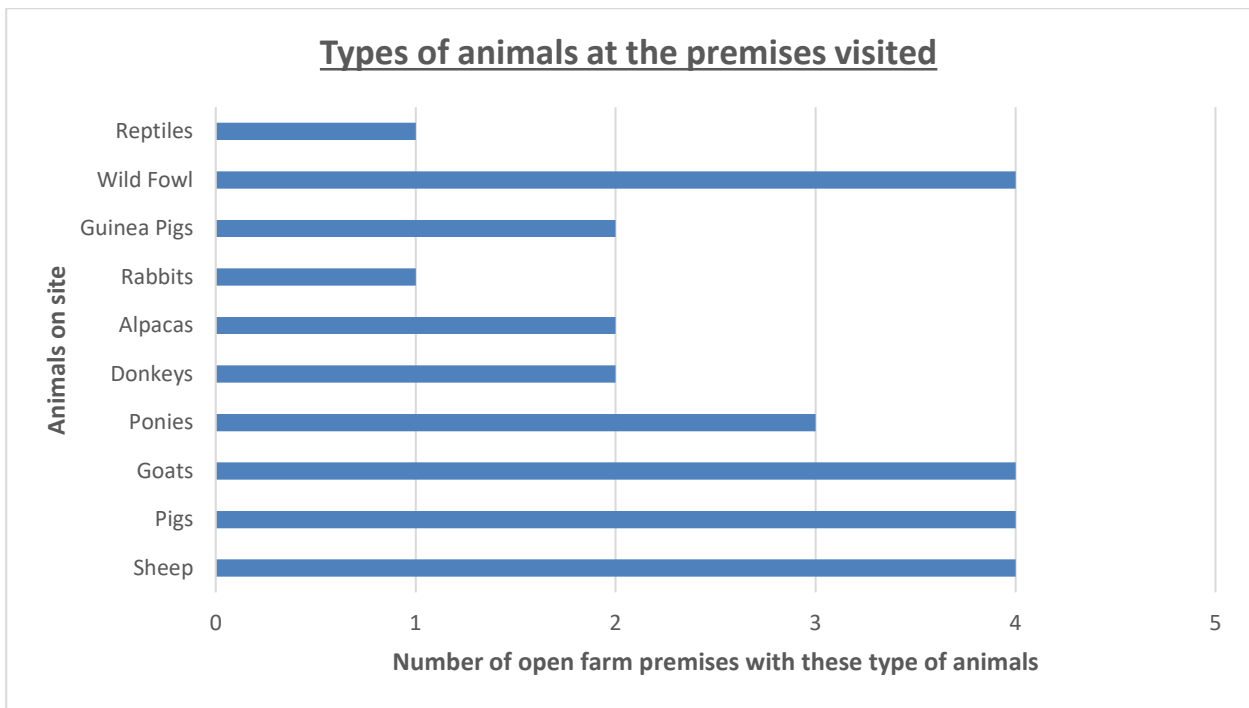
A total of 7 premises across Bridgend, Cardiff and Vale of Glamorgan were deemed to fall in-scope of the project. All duty holders were written to ahead of visits taking place to confirm the reason for the intervention; to provide links to the revised COP and to establish a timeframe during which a visit would take place. Standardised project documentation was developed, and officer training was undertaken to assure a consistent approach to visits.

Results

A total of 6 visits were completed across Cardiff, Bridgend and Vale of Glamorgan between June and July 2021. One animal attraction business initially identified had ceased trading at the time of the Officer visit so had to be discounted.

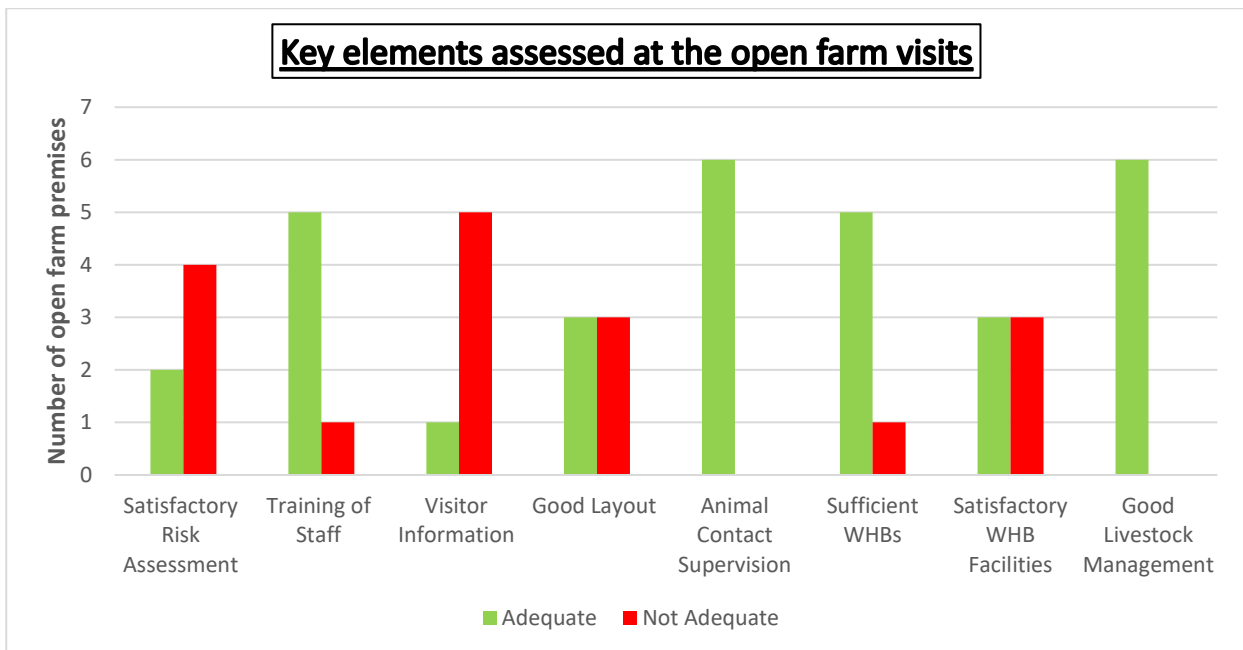
5 of the premises visited were animal attraction sites with 2 (40%) having defined 'animal contact' areas and 3 (60%) with 'look and see' animal areas only. Whilst there were no scheduled animal petting sessions, the two 'animal contact' businesses had areas where the feeding of animals was encouraged. The remaining business visited was a mobile operator who provided animal petting sessions at a variety of settings (e.g. schools, birthday parties) where participants could have direct contact with animals.

The type of animals seen at the premises visited are illustrated in the graph below (Graph 1), with the principal animals being sheep, pigs, goats and wild fowl.



Graph 1: Showing the different types of animals at the premises visited

The key themes assessed for compliance during the visits are illustrated in Graph 2 below. The main areas of concern were associated with the adequacy of risk assessments, provision of visitor information, and premises layout; all of which are discussed in further detail below. The adequacy of hand washing facilities was considered to be poor in a couple of instances and this is also discussed in greater detail below. No significant concerns were identified with staff training arrangements and the supervision of visitors was deemed to be sufficient at the time of the visits based on guest numbers at the time. The mobile operator was the only business visited that would have provided full supervision during pre-arranged animal petting sessions. The Management of livestock was also found to be satisfactory.



Graph 2: Showing the main elements assessed at the open farm visits and whether they were adequately implemented

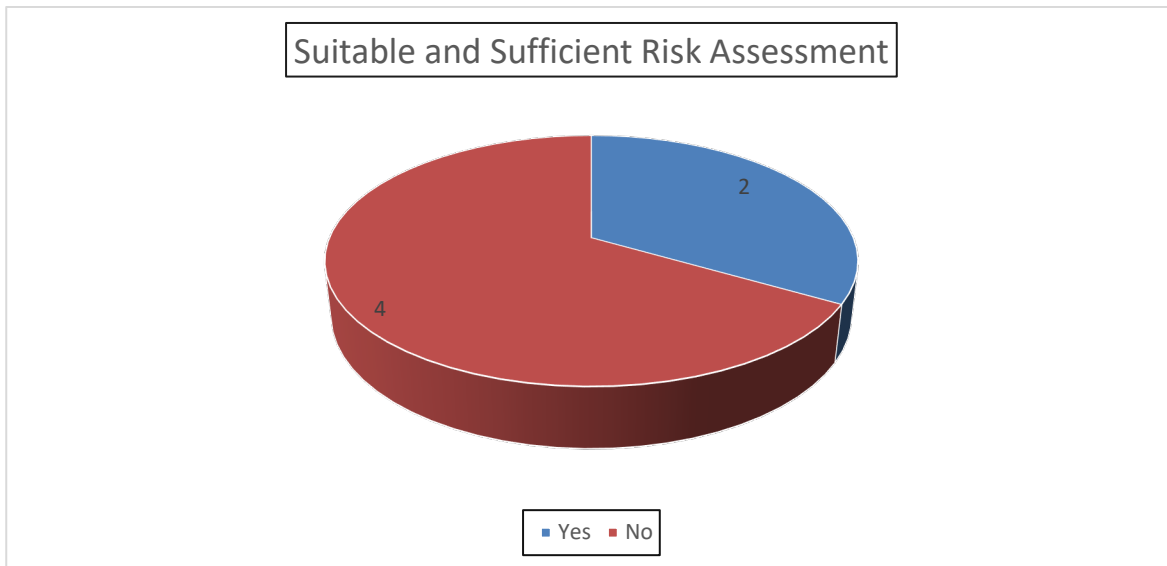
Risk Assessments

Duty holders are legally required to undertake suitable and sufficient risk assessments of workplace activities and hazards in order to identify any significant risks on site, including the risk of infection associated with animal contact. Significant risks must either be removed (through elimination or substitution) or effectively mitigated through the implementation of suitable, and effective, control measures. The risk assessment, and safe system of work developed from the assessment, should reflect what is implemented in practice and acknowledge that all animals may carry micro-organisms that could cause severe health effects in humans; in particular ruminants such as cattle, sheep and goats who are the main reservoirs of E. coli 0157.

Of the 6 premises visited, 3 duty holders were able to produce documented risk assessments and 2 businesses did not have risk assessments recorded since they had fewer than 5 employees and were not legally required to document their significant findings. One business did not have their risk assessment available at the time of the visit and was subsequently required to provide it after the visit as a matter of urgency (See Graph 3 below).

Overall, duty holders had a lack of awareness of the requirement to consider the risks associated with micro-organisms and animal contact and to document significant findings. Consideration of the hazards associated with animal contact on site, and control measures in place, were generally not documented. The open farm businesses were therefore unable to fully evidence that the risk of exposure to significant micro-organisms such as E. coli 0157 and Cryptosporidium was either

prevented or minimised to the lowest level reasonably practicable. Where documentation was lacking, there was some evidence that controls were being implemented in practice; examples of this included: clearly defined routes and designated areas ('animal contact', 'look and see' and 'non-animal contact' areas); suitable and sufficient staff training; adequate supervision based on the level of animal contact, and accessible hand wash facilities.



Graph 3:

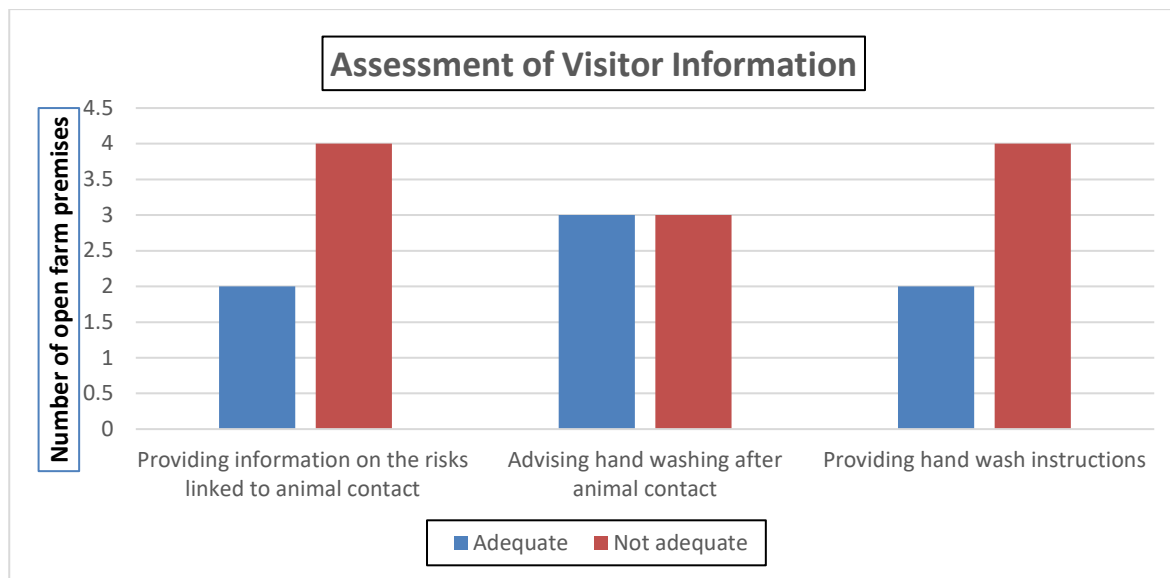
Illustrating the number of premises visited with a suitable and sufficient documented risk assessment

Visitor Information

To ensure the health and safety of visitors it is important they are made aware of, and understand, the risks to them whilst they are at an open farm/animal contact setting. This is particularly pertinent for vulnerable visitors, including pregnant women, who could experience devastating consequences if they become infected with a zoonotic infection through contact with animals or their faecal matter.

The visits highlighted a lack of information provided to visitors on the risks associated with animal contact when visiting open farm/animal petting premises. It was identified that 4 of the 6 premises failed to provide adequate information to visitors on the health and safety risks to them when on site; particularly for pregnant women during lambing season. In addition to this, 3 (50%) of the premises did not display suitable signage to advise visitors to wash their hands after possible animal contact or contact with faecal matter. There was additionally a lack of hand washing instructions provided at hand wash stations in 3 of the premises. The mobile operator also failed to consider this type of information when visiting settings and homes (see Graph 4 below).

Failure to inform visitors of the risks associated with zoonotic diseases significantly reduces the effectiveness of the control measures put in place and increases the likelihood of exposure to harmful micro-organisms.



Graph 4:

Illustrating the level of visitor information provided

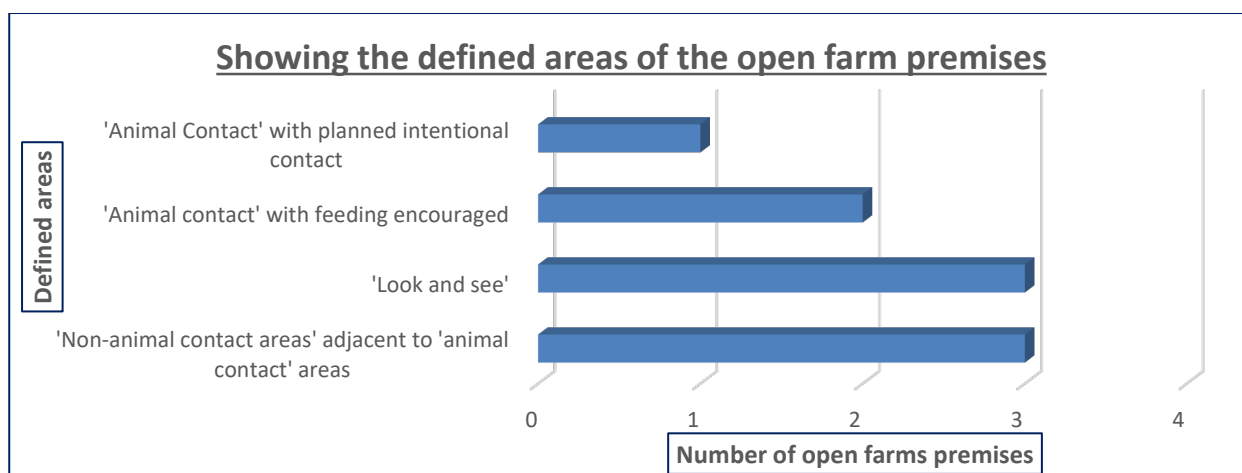
Layout

Open farms and animal attraction sites should be designed to include clearly defined areas: 'animal contact' areas (where animal contact is allowed or intended through direct contact or feeding); 'look and see' areas (where animal contact is not planned but may still be possible) and 'non-animal contact' areas (areas where animal contact must not be possible). The 'non-animal contact' areas must be adequately segregated from 'animal contact' areas, including potential faecal contaminated environments, to ensure the risk of transfer of harmful micro-organisms is either prevented or mitigated. It is also important to have clearly defined walkways and routes around animal attraction sites to ensure visitors keep to designated areas, maintaining control of their movements. Good control measures such as suitable fencing and warning signs need to be strategically placed to prevent visitors accessing high risk areas, such as hazardous areas on working farms.

In 5 out of 6 open farm premises visited there was no areas where animal contact was planned and intentional, such as arranged petting sessions; however, 2 had defined 'animal contact areas' on the basis that feeding was encouraged and 3 had designated animal areas classed as 'look and see' areas. Only the mobile operator provided organised petting sessions with close contact with animals. Of the 5 animal attractions, 3 of them identified concerns about animal areas being adjacent to non-animal contact areas, such as play and picnic locations, and not being adequately

segregated (i.e. with double fencing) (see Graph 5 below). Inadequate separation between possible animal contact areas and places where people can play/eat would significantly increase the potential for cross-infection to occur.

Whilst there were no issues highlighted about visitor routes and gaining access to high-risk areas, Officers did identify concerns about a build-up of animal faeces on paths and walkways, creating a risk of contamination of hands and footwear and the transfer of animal faecal matter to non-animal contact areas. One Officer identified a risk of visitors being bitten by wild fowl that were allowed to wander freely within one of the 'look and see' areas of the premises. Being bitten by animals is one way people can become infected with micro-organisms such as E. coli 0157.



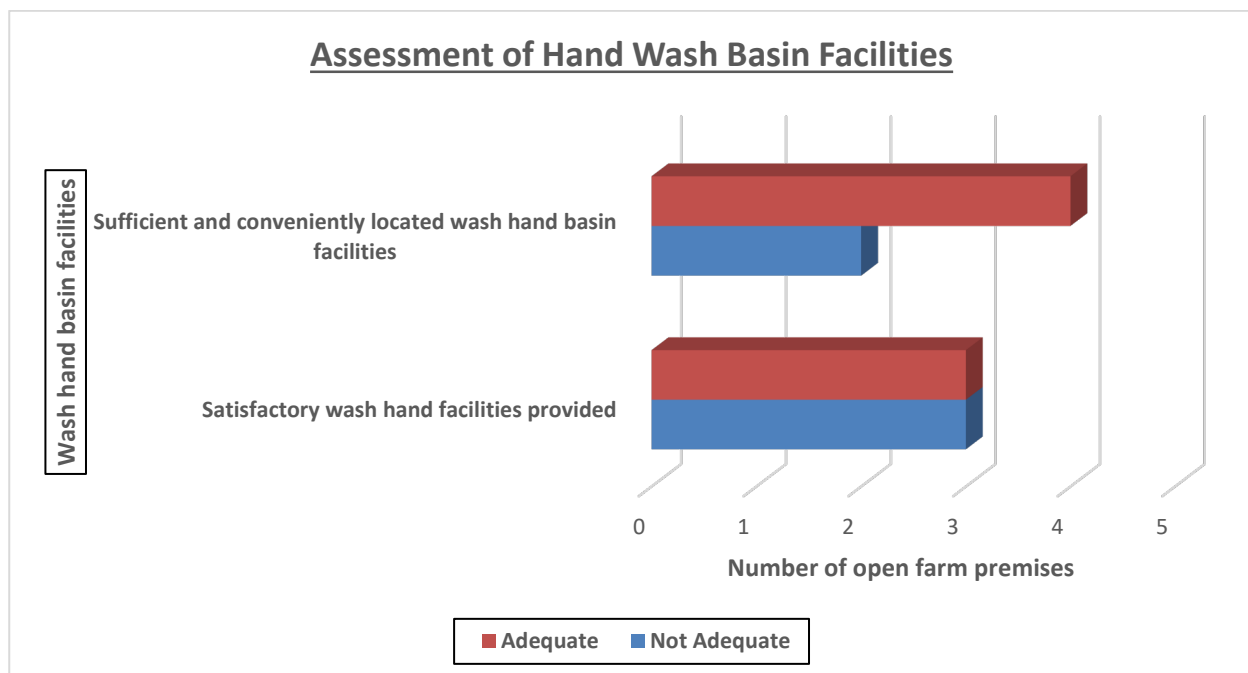
Graph 5: showing the defined areas of the open farm premises

Hand Washing Facilities

Evidence based research has shown that the most effective way to remove dirt and contamination from hands is through thorough hand washing with soap and water; ideally warm water to encourage hand washing for at least 20 seconds. At the time visits were being made, COVID-19 was still at pandemic status across the UK and Officers were conscious that both business operators and the public were likely to be primarily focused on using alcohol-based sanitiser gels for hand cleansing. Hand sanitiser gels are not effective at removing pathogens such as E. coli and Cryptosporidium, so it was essential to ensure that an adequate number of hand washing facilities, suitably located and maintained with liquid soap and a hygienic means for hand drying, were being provided for staff and patrons. Inadequate hand washing facilities has been highlighted by HPA as a significant contributory factor to outbreaks of E. coli 0157 and C. parvum.

Of the 6 premises visit, 2 duty holders had failed to provide sufficient and well-located hand wash facilities to enable staff and customers to effectively remove contamination from hands. Of the 3 premises that did have a sufficient number of conveniently located hand wash facilities, one business could only provide cold water to the basins. Whilst water temperature exhibits no effect on transient or resident bacterial reduction during normal handwashing with soap, thermal comfort factors could influence the duration of the hand washing process.

The mobile operator needed to consider assessing hand washing facilities at venues prior to attending animal petting events (see Graph 6 below).



Graph 6: Illustrating the number of premises visited with adequate wash hand basin facilities

Conclusions

The project targeted all known open farm and animal attraction premises within the 3 Local Authority areas which were within the scope of the amended Industry COP. This only comprised of 6 premises; one of the premises was not operating when visited. The main findings identified in this report were consistent throughout all three locations, nature of business and types of activities undertaken.

The findings of the project indicated a poor awareness of the revised COP and its contents by duty holders. There was also a lack of awareness of the requirement to consider the risk of exposure to biological hazards in the risk assessment process. Consideration of the hazards associated with animal contact on site, and the control measures in place, were generally not well documented.

Notwithstanding the above, all duty holders did have some relevant control measures in place that had been influenced by previous contact with Environmental Health and earlier versions of the COP.

The principal issues that required further attention by duty holders were:

- **For the risk assessment process to consider the risks associated with animal contact (whether deliberate or accidental), and any areas contaminated with animal faecal matter, and identify suitable and sufficient control measures to mitigate the risk of exposure to biological hazards; and**
- **For all operational control measures in place to mitigate the risk of cross-infection to be embodied in documented risk assessments and safe systems of work; and**
- **Providing clear information and messaging to visitors on the health risks associated with animal contact, particularly vulnerable patrons such as pregnant women; and**
- **Providing clear information and messaging to visitors and staff about effective hand hygiene measures; and**
- **Providing adequate, well maintained hand wash facilities that are conveniently located.**

Several premises did need to enhance measures to effectively segregate 'animal contact' and 'non-animal contact' areas (picnic and playing areas). For larger employers this included the installation of double fencing around specific paddocks and curtailing the free roaming of some of the small animals on pathways and within picnic areas.

Where duty holders were micro businesses, the cost implication attached to installing double fencing would not be a reasonably practicable option. In these instances, alternative control measures would need to be relied upon to mitigate the risk of exposure to zoonotic micro-organisms (i.e. hand washing facilities; visitor messaging).

Visitor information and messaging to convey a clear understanding of the risks associated with animal contact, and contact with animal faecal matter, needed improving across the board. Some of the larger duty holders did have health information on their business website but had minimal signage at the actual venue. Smaller businesses tended to have more signage at their venues and less health-related information on their websites. Only 1 duty holder contained a link to NHS information about the risks to expectant mothers associated with lambing activities on their website.

In general, Officer visits have had a positive impact in raising awareness of the amended COP and improving health and safety control measures for mitigating the risk of illness associated with animal contact at open farm/animal petting settings. All duty holders were issued with a formal written warning which clarified what contraventions had to be addressed within a defined timeframe, and any recommendations that were being made. To-date, no Improvement or Prohibition Notices have needed to be issued.

Moving Forward

On consideration of the main findings of this intervention, the following next steps would be deemed to be an appropriate use of resources to reinforce key messages identified through Officer visits.

- Production of a SRS guidance leaflet focusing on risk assessment, key visitor health messages and hand hygiene requirements for businesses where there may be intentional or accidental contact with animals.
- Upload the guidance leaflet to the SRS website.
- Mail shot the guidance leaflet to relevant small businesses (i.e. reptile shops; pet shops).
- Liaise with other departments who may have more regular contact with this type of establishment (e.g. Licensing Departments) to promote key health messages.

Appendix 3 – Corporate priorities and outcomes of partner authorities

Bridgend County Borough Council

Priorities

Outcomes/Aims



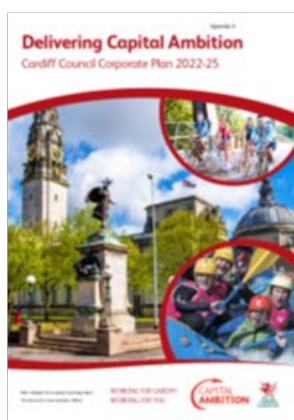
- Supporting a successful sustainable economy
- Helping people and communities to be more healthy and resilient
- Smarter use of resources

- Support local people develop skills and take advantage of opportunities to succeed.
- Create conditions for growth and enterprise
- Create town centre and communities that improve the quality of life for citizens
- Give people more choice and control over what support they receive ...
- Reduce demand through more targeted early help and intervention programmes
- Develop more active, healthy and resilient communities...
- Ensure the Council is financially sustainable over the longer term.
- Improve efficiency and access to services...
- Work collaboratively to make the most of natural and physical assets
- Develop the culture and skills required to meet the needs of a changing organisation

City of Cardiff Council

Priorities

Outcomes/Aims



- Cardiff is a great place to grow up
- Cardiff is a great place to grow older
- Supporting people out of poverty
- Safe, confident and empowered communities
- A Capital City that works for Wales
- Cardiff grows in a resilient way
- Modernising and integrating our public services

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- A Capital City that works for Wales
- Cardiff grows in a resilient way
- Modernising and integrating our public services

Vale of Glamorgan Council

Priorities

Outcomes/Aims



- To work with and for our communities
- To support learning, employment and sustainable economic growth
- To support people at home and in their community
- To respect, enhance and enjoy our environment

A Vale that is:

- Inclusive and Safe
- Environmentally Responsible and Prosperous
- Aspirational and Culturally Vibrant
- Active and Healthy