


## Environmental Health Protection and Development Service Plan 2022-2023

**1 April 2022 – 31 March 2023**

<b>Head of Service signature</b>	
<b>Date</b>	09/02/2022
<b>Peer Review signature</b>	For Audit purposes please ensure this is signed.
<b>Date</b>	Click or tap to enter a date.
<b>Director signature</b>	For Audit purposes please ensure this is signed.
<b>Date</b>	Click or tap to enter a date.

## CONTENTS

1.	Introduction .....	3
2.	How does our Service contribute to community planning outcomes and PEOPLE priorities? .....	10
3.	Key activities for 2022/2023 .....	11
4.	Risks .....	18
5.	Resources .....	22
6.	Monitoring and Review .....	27
7.	Conclusions.....	27
8.	Appendix 1 PESTLE.....	28
9.	Appendix 2 SWOT analysis.....	31

## 1. Introduction

<b>Name of Service</b>	Environmental Health Protection and Development
<b>Included Service Units</b>	<p><b>Food Control and Consumer Protection, which comprises</b>  Food Hygiene, (Cleanliness and practices in food businesses)  Food Standards, (Compositional standards and labelling)  Infectious disease control (as defined by the Public Health Act (NI) 1967)  Consumer protection (standards and safety of consumer goods)  Drinking Water Quality</p> <p><b>Health and Safety, Noise, Petroleum and Licensing Service Unit, which comprises</b>  Health and Safety of workplaces.  Noise nuisance  Coronavirus Restrictions Regulations.  Petroleum Licensing  Caravan Sites Licensing  Response to Planning on Environmental Matters.  Industrial Pollution Control.</p> <p><b>Public Health and Housing Service Unit, which comprises</b>  General Public Health  Housing  Pest Control  Property Certificates  Air Quality (Administered by us and shared with Lisburn and Castlereagh CC)  Radiation Monitoring (On behalf of Eastern Northern Ireland)  Bathing Water Quality</p> <p><b>Health and Wellbeing</b>  Affordable Warmth.  Home Safety (Also on behalf of Lisburn and Castlereagh CC and Newry Mourne and Down DC)  Tobacco Control (Also on behalf of Lisburn and Castlereagh CC and Newry Mourne and Down DC)  Age Friendly strategy for ANDBC  Health and Wellbeing projects for Employees, Business and the Community including Community Planning Partnerships  Student training</p>
<b>Directorate</b>	<b>Community and Wellbeing</b>
<b>Purpose of Service</b>	<p>The stated vision of the Corporate Plan 2020-24 is: -  As an outward focused Council, we adopt and promote the vision outlined in the Big Plan, namely that Ards and North Down will be “a vibrant, connected, healthy, safe and prosperous place to be”</p> <p>enabling all people in Ards and North Down to:</p> <ul style="list-style-type: none"> <li>• Fulfil their lifelong potential</li> <li>• Enjoy good health and wellbeing</li> <li>• Live in communities where they are respected, are safe and feel secure</li> <li>• Benefit from a prosperous economy</li> <li>• Feel pride from having access to a well-managed sustainable environment</li> </ul> <p><b>EHP&amp;D</b>  The role of the Environmental Health Protection and Development is to ensure a better quality of life for all.</p>

Environmental Health cover every aspect of living – the air we breathe, the water we drink, the food we eat, the products we use, the places we work and play, and the homes we live in. In essence, we are “preventative medicine” – we protect the public health and contribute **directly** to all 5 stated outcomes of the Corporate Plan.

**Key customers/ stakeholders and their needs**

Stakeholder	Contact	Needs	Plan
Residents	Around 2500-3000 service requests in a “normal” year Circa 4000 requests in 2021-22	Assistance with Public Health, Pollution, noise, pest control, housing standards food standards and all other aspects of council statutory control	Continue to provide the highest level of service possible within the resources provided. Continue to innovate to ensure the best value for money.
Residents/PHA LCCC/NMDDC	Service to households with under 5’s or over 65’s or other vulnerable adults for home safety check scheme	Provide home safety advice and support to households with under 5’s, over 65’s and other vulnerable adults as referred to the service.	Provide high quality service to ANDBC, LCCC and NMDDC residents and meet the requirements of the Service Level contract with PHA
Residents/PHA LCCC/NMDDC Business Community	Regulate smoke free legislation and the sale and advertisement of tobacco in the three Council areas	Advice to business on: maintaining smoke free environments; making sales legally; and protecting under 18’s from purchasing tobacco and associated products.	Provide high quality service to ANDBC, LCCC and NMDDC residents and businesses; Regulate non-compliances to protect public health; and meet the

		Advice on new Smoke-free cars with children legislation	requirements of the Service Level contract with PHA
Residents/DfC/NIHE	Around 300-400 households per year	Affordable Warmth scheme to improve thermal performance and energy efficiency of low-income households	Provide a high-quality service to the public and meet the requirements of the DfC service level agreement.
Residents/ Employees Business community Visitors	Approximately 4000-4500 businesses affected by statutory controls	High quality safe businesses that will help the population enjoy good health and wellbeing. Assist businesses to trade within an increasingly complex regulatory environment.	To provide the best help and assistance possible to businesses to ensure they meet the highest standards. Regulate non-compliant businesses to protect employees' residents and visitors.
Visitors	<i>26 Caravan Sites, 50+ Hotels and B&amp;B's and over 600 catering establishments</i>	Clear assistance and direction regarding licensing requirements and compliance particularly in relation to Ongoing Covid protection measures.	Support the local economy by ensuring high standards of Safety and Food Hygiene in businesses forming part of the Ards and North Down tourism offer.
Corporate EIR/FOI Requests	53 (2020/21)	Get data and information to Compliance	Maintain information in the most

		section to expedite requests	accessible format. Publish as much information as is practical.
Elected Members	Around 500 contacts per year	Information and advice in relation to inquiries from the public	Provide timely and informed guidance to members
CLT/Host/Colleagues	On-going	Support and assistance to deliver the corporate plan and community plan	Actively seek to assist CLT and colleagues to meet corporate objectives
Spatial Planning	Response to 300+ Planning Inquiries Per year	High Quality responses in relation to potential environmental issues within 21 days	Continue training and development of staff responding to consultations to provide high quality responses in a timely manner.
External Funders	PHA, DfC. Food Standards Agency, DAERA, DoJ, DWI, OPSS	High quality intervention in relation to Food Safety, Home Safety, Tobacco Control, health & wellbeing of business community (MBB project) Affordable Warmth, Air Quality and drinking water and bathing water quality, the Safety of Consumer	Continue to meet the requirements of the various SLAs with the departments to ensure continued funding and high-quality services to residents and visitors.

			Products, and the regulation of fireworks displays and MSER	
	Central Govt./NGO's Other regulators	PHA, DfC,DfE,DfI, DoJ. Food Standards Agency, HSE NI NIHE, DAERA, DWI, OPSS etc.	40+ statutory returns and monitoring reports and Direct service provision as outlined above.	Demonstrate activity levels and service in line with statutory requirements.
	Other Councils direct.	Shared service lead with LCCC and NMDDC for tobacco control and home safety, with LCCC for air quality. On-call service shared equally with LCCC for infectious disease control and food incidents. Liaise with other 10 Councils in NI with regards to consistent application of regulatory controls	Service level to satisfy requirements for funded managed services to LCCC and NMDDC and remaining councils as outlined. Participate in technical forums to ensure consistent application of statutory controls across Northern Ireland.	Provide high quality service to partner Councils in line with service level agreements with those Councils and the PHA/FSA. Provide high quality shared service to all 11 Councils in relation to the provision of home safety information systems and radiation incident early warning
<b>Context, challenges &amp; key assumptions</b>	<ol style="list-style-type: none"> <li>1. The statutory framework in relation to environmental health is likely to change significantly because of EU EXIT. It is unlikely that regulation will reduce if the UK still wants to sell into the EU and will therefore have to comply with EU regulation and the NI Protocol is in place requiring business to comply with two regulatory frameworks. During the last 12 months', addition resource has been granted by the Office of Product Safety and Standards for us to assist affected groups and to respond to the changing situation regarding EU Exit for consumer goods. (See detailed PESTLE analysis at Appendix 1).</li> <li>2. See Appendix 2 for a SWOT analysis pertaining to the above.</li> </ol>			

	<i>Insert a brief list of any assumptions in relation to your service and its plans for the period of the plan</i>
<b>Reflection on previous performance – successes and lessons learned</b>	<p>Key points to note:</p> <p>Routine commercial premises inspection work has been greatly affected by Covid lockdowns and the requirement to divert resources to Covid related enquiries and service requests. To put this in perspective service requests for year 2019-20 were 2584 and for 2020-21 the total was 4261 which is a 66% increase in service requests.</p> <p>Key achievements:</p> <p>At the start of the last financial year, we were just over a year into the Covid-19 emergency and the service had already dealt with numerous changes to the regulations and three lockdowns because of Covid-19. We had already provided an online document detailing all our local food businesses that were offering a delivery service and pharmacy arrangements, to help those shielding. This was quickly followed by the establishment of a Care Call befriending service which utilised both the Home Safety and Affordable Warmth databases to help identify some of the most vulnerable in our community. Over 600 older people were contacted to check they had access to food and medicine, were offered nutritional and physical activity advice, provided with home accident prevention information, and offered a regular (usually weekly) phone call. Staff were redeployed from other non-essential duties throughout the council to assist EHP&amp;D with this and the Community Food Parcel scheme. By April 2021 the vaccine roll out was in full swing and we had to dismantle the apparatus set up in the previous year and get back to services that more closely resemble “business as usual” as the Covid-19 regulations and public confidence allowed while servicing a vast increase in demand led work as outlined above.</p> <p>EHP&amp;D were recognised as key workers and continued to deliver statutory services within the safety restrictions imposed by the pandemic, striving to provide the highest level of response and support despite the obvious difficulties. There was a marked increase in complaints to EHP&amp;D, particularly in noise and public health &amp; housing, and numerous enquiries from both commercial and domestic sectors regarding Covid restrictions, adapting or starting up food businesses, etc. Officers had to quickly adapt to new ways of working – all visits were initially paused but resumed quickly as easing of restrictions permitted and when necessary, changes were made to procedures and protocols. These were regularly reviewed and updated as the weeks and months moved on.</p> <p>One area impacted by the inability to access dwellings initially was in investigating Noise complaints and the Department introduced the use of the Noise App as a means of complainants recording evidence which could be used to assess whether further investigation was warranted. This continues to prove invaluable in triaging noise complaints and deploying limited resources effectively.</p> <p>The majority of staff worked from home, with excellent support from Business Technology, but Admin Officers maintained a physical presence in Church Street on a rota basis, as did the Managers, and therefore all statutory notices and written communication was sent out within the normal response targets. Officers made arrangements to call to the office to collect files, equipment, etc and safety protocols were devised and maintained for both office and off site working.</p>



The responsibility for both advice in relation to and enforcement of the Coronavirus restriction regulations fell largely to the H&S and Licensing officers with the knock-on effect being that focus was shifted from planned inspections of premises based on risk ratings allocated on the departmental data management system, to dealing with complaints, queries, and requests for advice in relation to this novel legislation. The focus in the past year has been on assisting open businesses to comply with social distancing requirements; monitoring and advising closed businesses; and issuing advice on operating safely. As restrictions have reduced there has been a growing focus from government on the ventilation of buildings to reduce the spread of the virus. Officers from the department have been developing help and guidance for business at a local, regional, and national level to assist businesses in mitigating the Covid pandemic.

Similar work has been undertaken to support businesses through EU Exit, which continues to place demand on staff resources.

Emerging issues:

Several challenges arose in relation to the COVID-19 pandemic and as business re-emerge from lockdown, they will continue to need support to help protect the public. The Northern Ireland protocol creates challenges for businesses trading with Great Britain and the EU. The protocol and uncertainties surrounding it, increase workload in relation to the regulatory activities of Councils regarding foodstuffs and in relation to the safety of Non-food consumer goods.

Action to be taken:

There is much capacity building and training to be done with Environmental Health Protection and Development staff to ensure that the needs of business in relation to the covid emergency are met, not least in the assessment of satisfactory ventilation.

Additional funding has been forthcoming from the Food Standards Agency (FSA) and the Office of Product Safety and Standards to support changes as a result of EU Exit. However, there is no indication whether this assistance will be on-going.

## 2. How does our Service contribute to community planning outcomes and PEOPLE priorities?

The *Environmental Health Protection and Development Service* can be expected to have a direct impact on the following:

Community Planning Outcome	PEOPLE priority	Our focus for 2022/2023
Outcome 2,3 and 5	Life, Environment, Economy	To deliver core Environmental Health services (Food, Consumer Protection, Health & Safety, Public Health, Pollution, Noise, Pest Control and Tobacco Control)
Outcome 4	Life, Environment, Economy, Opportunity	Support local business in achieving compliance with legislative requirements and Health and Wellbeing objectives.
N/A	Performance, Economy	Propose a reasonable budget and demonstrate operation within allocated finances. Budget will be as low as is practicable without compromising service provision, customer expectation or statutory requirements.
Outcomes 1, 2 and 3	Economy, Life, Opportunity	In conjunction with PHA, DSD, LGSC and partner Councils to deliver high quality customer focussed services to improve the mental and physical health & wellbeing of the public and employees.
Outcome 2	Life, Environment, Economy	To protect the public from unsafe workplaces and working practices.
Outcome 2	Life, Environment	To meet Council's Statutory duties under Integrated Pollution Prevention and Control Legislation.
Outcome 2	Economy, Life, Environment	To protect the public from risks arising from unsafe conditions arising at Caravan Sites and storing and dispensing Petroleum.
Outcome 5	Performance, Life, Environment, Pride	Deliver high quality customer focussed services to Council Planning, businesses and the public regarding environmental Issues affecting planning decisions
Outcome 2	Life, Economy, Environment	To protect the public from the risk of unsafe food and consumer goods.
Outcome 2 and 3	Life, Performance	To process Private Tenancies inspections in a timely manner/Protect tenant from Harassment and threat of eviction.
Outcome 2	Life, Environment, Performance, Opportunity	To ensure local Air Quality meets national objectives and does not adversely affect the health of residents. Ensure insulation and home heating is affordable for the lower income groups in the borough.

### 3. Key activities for 2022/2023

<b>SERVICE:</b>	<b>Environmental Health Protection and Development Service</b>		
<b>Community Plan Outcome:</b>	1,2,3,4 & 5		
<b>Corporate Plan PEOPLE priority(ies):</b>	<b>Performance, Economy, Opportunity, Pride, Life, Environment</b>		
<b>Council KPI(s):</b>	See Performance Measures Points 1-4		
<b>Service Objective:</b>	To deliver core Environmental Health services (Food, Consumer protection, Health & Safety, Public Health, Pollution, Noise, Pest Control and Tobacco Control)		
<b>What difference will it make?</b>	Improve the air we breathe, the water we drink, the food we eat, the products we use, the places in which we work and relax and the homes where we live.		
<b>Underpinning strategies:</b>	Statutory Compliance and five steps to wellbeing.		
<b>Business as Usual activities we will deliver in 2022/2023 (actions)</b>			
	<b>Due Date</b>	<b>Lead Officer(s)</b>	<b>Who do we need to help us? (Internal/External partners)</b>
*(a) Provide a prompt and effective core Environmental Health service to the public and other stakeholders.	March 2023	Gareth Kinnear, Hazel McKee, Julie Neill, Jennifer Parkinson	IT Support/Internal Admin/Telecoms/Elected members Other Depts i.e., NET, Planning.
(b) Provide information events/workshops/seminars to groups of businesses whose compliance would benefit.  Provide support to businesses by establishing links with Economic Development.	March 2023	Gareth Kinnear, Hazel McKee, Julie Neill, Jennifer Parkinson	FSA, HSENI, DAERA, NIFMG, translation services, Economic Development, Internal IT support and admin
(c) Review previous service activities and prepare a budget within which to achieve proposed outcomes.	March 2023	HOS, Gareth Kinnear, Hazel McKee, Julie Neill, Jennifer Parkinson	Finance
(d) Carrying out housing fitness inspections in a timely manner. Continue to carry out 'discovery checks' to ensure all relevant properties are identified and inspected.	March 2023	Gareth Kinnear	DfC & NIHE
(e) Continue to monitor air quality in the borough and produce reports to DAERA within target timescales.	March 2023	Gareth Kinnear	DAERA
*(f) Carry out inspections of premises licensed under Petroleum and Caravans legislation.	March 2023	Hazel McKee	DfC

* (g) Deliver high quality customer focussed services to Council Planning Dept, businesses and the public regarding environmental issues affecting planning decisions	March 2023	Hazel McKee	Planning service, applicants, agents.
* (h) Inspect premises within the Borough included in the scope of Integrated Pollution Prevention and Control legislation, inspect relevant premises and issue permits where applicable.	March 2023	Hazel McKee	DAERA
* (i) Deliver a programme of targeted inspections via initiatives, identified in partnership with HSLG and assessed as being applicable locally. Improved compliance to protect the public from unsafe workplaces and working practices	March 2023	Hazel McKee	HSENI & HSLG
* (j) Work with PHA, DfC, partner Councils and others to deliver high quality, customer focussed services to improve the mental and physical health & wellbeing of employees and the public through activities detailed in service level agreements.	March 2023	Jennifer Parkinson	PHA, DfC, NIHE, partner Councils (LCCC & NMDDC), Employee Health & Wellbeing Group, Local Gov Staff Commission (LGSC) Human Resources, Trusts, Schools, Leisure, Community Services, other Council Service Units
* (k) Carry out inspection of high risk food businesses	March 2023	Julie Neill	FSA & DAERA
(l) Prioritise food hygiene and food standards inspections in line with the FSA Recovery Plan	March 2023	Julie Neill	FSA
(m) Provide written advice to new food businesses.	March 2023	Julie Neill	Admin, IT, online registration platform for food businesses
(n) Based on the information gathered from a survey carried out in 2019 of businesses within the Borough supplying goods for the first time (manufacturers, distributors, etc.) a work plan, informed by intelligence and government initiatives, will be devised and implemented in respect of Consumer Safety.	March 2023	Julie Neill/Sarah Kinnear	Admin, IT, OPSS and other councils in NI.
* (o) Undertake Market Surveillance as required, as a result of the implementation of the NI Protocol to ensure the safety of consumer products placed on the market in NI and Beyond	March 2023	Julie Neill Sarah Kinnear	OPSS, NI Consumer Protection Subgroup, Admin, IT
(p) Respond to requests to Supporting Health Attestations for fish/fish products, egg/egg products, fish and egg composite products on behalf of DAERA	March 2023	Julie Neill	Admin, IT, DAERA, FSA

(q) Ongoing survey of stakeholders in relation to customer satisfaction and quality of service.	March 2023	Gareth Kinneer	Admin, IT
*Key performance indicators - The others are targets that are internally managed (put an Asterix at the points that are going to be KPIs and list these in performance measures.)			

## Service Development / Improvement

What service development/improvement will we undertake in 2022/2023?	Which of the specified aspects will this improve?	Rationale	Due Date	Lead Officer(s)	Who do we need to help us? (Internal/External partners)
Establish a market surveillance programme for construction products in line with new legislation and informed by intelligence and Government initiatives	Service Quality, Service Availability, Fairness	As a result of the Grenfell disaster new legislation is being introduced to ensure safety of construction products	March 2023	Julie Neill	OPSS, NI Consumer Protection Subgroup IT, Admin
Produce Business Case for approval and recruit additional support in Health & Wellbeing, utilising existing budget.	Service Availability, Service Quality, Service Efficiency, Innovation	Currently under resourced and therefore unable to provide community health & wellbeing support and deliver community planning objectives.	June 2022	Jennifer Parkinson	HR, IT, Finance
*Key performance indicators - The others are targets that are internally managed (put an Asterix at the points that are going to be KPIs and list these in performance measures.)					

**Service activities being stopped / changed:**

What service / activities will we be stopping / changing in 2022/2023	Reason for stopping / changing activity	Savings	Impact on Performance	Impact on the Public	Impact on staffing
Planned programme of inspecting premises for CP	Due to shift of work in relation to intelligence led market surveillance.	None	More targeted rationale to service provision	Greater protection against unsafe goods placed on the market	Depending on Market Surveillance required and demands of the EU oversight as part of the NI Protocol and OPSS funding possible additional resource required
Planned programme of inspecting premises for H&S based solely on Risk rating from Tascomi Database	Due to re-allocation of resources in response to Covid-19, to assist businesses in re-opening recovering and compliance.	None	More targeted inspections in locally focussed initiatives.	Focussed inspections to provide greater protection for public against risks including transmission of Covid-19 in workplaces	Current staff have already been re-allocated to deal with Covid-19 issues and will cover H&S inspections depending on continuing demand / resource

## Performance Measures:

Performance Measures (should include those for the Business as Usual and Service Improvement actions outlined above and relevant measures from Community, Corporate and Statutory)	Is the measure Statutory, Corporate, Existing or New?	Reporting frequency	2016/17 Actual	2017/18 Actual	2018/19 Actual	2019/20 Actual	2020/21 Actual	2021/22 To date	2022/23
1. % Staff attendance	Corporate	Quarterly							95%
2. % Spend against budget	Corporate	Quarterly							95%
3. % Staff reporting regular receipt of team briefings	Corporate	Quarterly							100%
4. Pride in Performance Conversations	Corporate	Annually (to be reported at end of Q2)							95%
5. 94% of service requests responded to within 2 working days	Existing	Quarterly			92%	96%	97%	97%	94%
6. 90% of High-Risk Food Premises Inspected	Existing	Annually		100%	93%	89%	82%	75%	80%
7. Complete three CP Market Surveillance exercises	Existing	Annually						100%	100%
8. 90% Customers satisfied with service upon completion of service request (PH&H Team)	Existing	Annually						96%	90%
9. 90% of PTO applications completed within 180 days	Existing	Quarterly			72%	90%	95%	N/A COVID impact	90%



<b>Performance Measures</b> (should include those for the Business as Usual and Service Improvement actions outlined above and relevant measures from Community, Corporate and Statutory)	<b>Is the measure Statutory, Corporate, Existing or New?</b>	<b>Reporting frequency</b>	<b>2016/17 Actual</b>	<b>2017/18 Actual</b>	<b>2018/19 Actual</b>	<b>2019/20 Actual</b>	<b>2020/21 Actual</b>	<b>2021/22 To date</b>	<b>2022/23</b>
10. 100% targets achieved for PHA & DfC SLAs	Existing	Quarterly				100%	100%	90% (Covid impact)	100%
11. Complete 3 H&S targeted inspection initiatives	New	Annually						30%	100%
12. 90% of Caravan Sites inspected annually	Existing	Annually			96%	100%	100%	100%	100%
13. 100% Petroleum Sites inspected, and annual licences issued	Existing	Annually			77%	100%	100%	100%	100%
14. 90% Priority premises inspected, and permits issued	Existing	Annually						Target not met - Covid impact Noise and Staffing Issues	90%
15. 90% Planning comments made within 15 working days	Existing	Annually			77%	75%	90%	87%	90%

## 4. Risks

Ref:	Risk Description	Gross Risk			Current controls	Residual Risk			Risk Status	Further Action Required	Action Due by	Risk Owner	Notes to explain rationale for scoring, etc.
		I	L	R		I	L	R	Tolerate / Action				
	Persistence of Covid-19 in the community creating additional risk to staff and clients	5	5	25	Risk assessment for buildings and action taken to ensure social distancing, hand washing and wearing of face masks. Working from home if possible. Risk assessment and protocol for carrying out visits to Businesses and Domestic premises.	5	3	15	Tolerate	Manage residual risk in line with latest guidelines and change risk assessments and protocols in line with latest guidance	ongoing	HOS sums Corporate H&S	Risk cannot be totally mitigated, and service must continue to be delivered.
	Failure to implement the requirements of the NI protocol for Food and Non-food consumer goods	5	5	25	Training and resource in place funded by FSA and OPSS to ensure businesses can receive quality information in a timely manner	5	3	15	Tolerate	Develop resources and expertise to assist businesses	ongoing	HOS and SUMS	Risk cannot be totally mitigated and is predicated on continued funding from the FSA and OPSS
	Changes in external funding arrangements leading to a reduction in shared service for Air Quality, Tobacco, Home Safety and Age Friendly services.	5	4	20	Maintain relationship with funders on service arrangements	5	2	10	Action	Manage external funding changes and relationships	March 2022 -April 2023	JP, GK	PHA Reviewing support for Shared Services indicating support to Maintain the services as a shared resource. DAERA looking at further tranche of work on Air Quality.

Inadequate Office Space, Parking, Public interview space, quiet space, meeting rooms	5	4	20	Hot Desking, use of Director and HOS offices	5	3	15	Action	Plan for Office Space to assess Service needs for coordination, communication and monitoring of consistency. Ongoing use of Home working, Remote working, & Mobile working where operationally practicable.	March 2023	HOS SIB HR&OD	Most of the changes required are Estates/HR&OD based Some concerns alleviated by home working arrangement and online meetings
Failure to secure resource leading to inability to fully provide service	5	3	15	Committed resource to cover statutory functions. External Funding in place. Funding requirements cases for wellbeing initiatives	3	1	3	Tolerate	Business Case Maintain Relationship with external funders	March 2023	HOS SUMS	Additional health & wellbeing work required with greater involvement in community planning
External Impact causing service to be altered or abandoned	4	3	12	Services planned based on committed resource. Potential to seek additional funding for external impacts i.e. Food Export arrangements in relation to EU Exit	4	2	8	Action	Ensure robust priority based operational plans are in place. Identify priority services to maintain business continuity	on-going	HOS SUMS	
Low staff morale causing poor service performance	4	4	16	Team briefings and timely communication to ensure buy in to the service moving forward	4	3	12	Action	Explore transformation process for staff to improve career development. Approved by CLT. Implement by April 2022	April 2022	HOS SUMS	
Failure of ICT infrastructure, Data Protection GDPR, causing reduced service quality service, cost and negative PR.	5	4	20	Training, maintenance contract, support from ICT, Changes to the program by Software Vendor	5	2	10	Tolerate	Departmental ICT procedures. Software Changes by Tascomi	March 2023	HOS	
Physical safety of Council staff whilst performing their	5	3	15	Lone worker protocol, personal safety training.	5	2	10	Action	Ensure GPS enabled phones are available for all staff. Lone worker	March 2023	HOS Sums	Risk assessments and Lone worker protocol

	duties off Council premises									protocols/ Buddy System Has been reviewed and personal safety training has been updated. Guardian 24 to be contacted to suggest an IT system. Monitor use of safety systems. Investigate identifying at risk activities and individuals			developed. Needs to be rolled out with suitable IT personal safety solution.
	Inadequate Business Continuity Planning	4	2	8	Transfer operations off site paper-based systems on line database management system	4	1	4	Tolerate	Looks at online and offline business systems in ICT review	March 2023	HOS Sums	Protocol to be developed.
	Non-compliance with Health & Safety legislation and inadequate risk assessment process	5	2	10	Risk assessment of officer roles Training for SUMS	5	1	5	Action	Training for SUMS completed. Documented H&S assessments complete and under review.	On-going	HOS Sums	
	Inability to Assist planners in achieving targets for EH consultation	4	4	16	Dedicated Resource obtained – 1 officer covering this function	4	2	8	tolerate	risk mitigation by assistance of additional officers when required. Training required for additional staff to support officer in this role	On Going	HOS HMCK	
	Issues around export of foods from the Borough to other parts of the EU through GB post Transition following EU exit and other food	5	4	20	Requirement to support DAERA in delivering export controls if required to other parts of the EU through GB.	4	4	16	Action	Liaison and training with DAERA as negotiation outcomes develop. Prioritisation of food based work with FSA and DAERA partners.	On Going	HOS JN	

	aspects of the NI Protocol											
	Issues around imports of non-compliant foods into the Borough from GB as a result of the implementation of the NI Protocol	5	4	20	Products are required to be pre-notified on TracesNT prior to arrival at the Border Control Post along with the production of documentation where applicable prior to arrival in NI	4	4	16	Action	Liaison with colleagues based in BCP and provide advice and support to local businesses to ensure compliance	On Going	HOS JN

## 5. Resources

Are all actions resourced within the current (2021/22) budget plan? Yes  No

Will additional resources be required?

Yes  No

(If no please comment in Section A below how the actions will be funded, ie Staff Resources, Equipment, Revenue Budget, Capital Budget.)

(If yes please detail additional resources in Section B below.)

### Section A:

### Section B:

1. Additional resource required in 2022/2023 to implement the transformation of EHP&D to better align it with service needs as referred to in section 4 (Risks) above. This has been reported to Corporate Leadership Team.
2. The Health & Wellbeing SU has allocated resources to deliver agreed SLAs for funded projects (Tobacco Control, Home Safety and Affordable Warmth) but only 0.6 FTE EHO to deliver on the rest of the work including the SLA for Mind, Body, Business, leading on Employee Health & Wellbeing, delivery of the annual Bee Safe event and assisting the Manager with some of the Corporate Health issues such as Mental Health Charter, Smoke Free, etc and the Community Planning actions including Community of LifeSavers, Breastfeeding Friendly businesses, promotion of smoke free environments alongside work on food, fuel and period poverty, etc. High turnover of staff on agency contracts for funded projects also raises capacity issues. Communication of the activities of the team and the wider EHP&D department needs improved, particularly in terms of updating information on the website and social media. Currently the Council receives funding from PHA to cover the deployment of a senior EHO to manage the shared service for tobacco control and this equates to 40% of their salary. By utilising this money to fund a lower grade post, under the direction of the Manager, a greater number of hours can be bought but the objectives can still be delivered. The new post would be able to continue with the work on internal employee health and wellbeing, allowing the 0.6 FTE EHO post to move towards more community-based work (currently identified as a gap in service delivery and of increasing importance in relation to the Big Plan)
3. With the end of the Transition Period on 31<sup>st</sup> December 2020 and the introduction of the Northern Ireland Protocol, Local Authorities will be required to satisfy the Competent Authority (Department for Business, Energy & Industrial Strategy) that adequate market surveillance will be undertaken in relation to the safety of

consumer products. The Office of Product Safety and Standards (OPSS) has highlighted that we must have capability and capacity to undertake this role and have therefore allocated funds of approximately £50,000 for additional resource up to 31<sup>st</sup> March 2023 with additional funding available for work in relation to construction products. If this funding does not continue, additional resources will be required to maintain the level of service. Due to the complexity of this work a business case has been submitted to make the temporary Principal EHO a permanent position.

4. The additional work required following EU Exit in relation to Supporting Health Attestations (SHA) has not been finalised and it is not yet clear if the cost of such additional work will be fully met by central government. It is possible that there will be a shortfall in resources to carry out the normal functions as they may be taken away to be used for SHAs
5. Business Case submitted for budget to provide 1 additional EHO for the noise, IPPC and planning team. The increase in noise complaints received over the past 2 years has impacted on the ability of the officers to carry out their statutory duties and respond to service users in a timely manner. The resource is required to meet the KPI's of the EHPD Service which in turn fulfil each of the 5 outcomes of the corporate Plan. The Council has statutory functions under the Clean Neighbourhoods and Environment Act (NI) 2012 and the Pollution Prevention and Control Regulations (NI) 2003 as amended which are currently not being covered due to lack of resource.
6. Business case submitted to increase Officers hours in Food Control Service. Each year, the Food Service plan identifies a shortfall of resource required to meet its obligations. The current plan has identified a deficit of 380 hours in 21/22. By increasing a part time officers hours by one day a week, this would add an additional 350 officers' hours and go a long way to bridging the gap.

**Staff:**

1. Transformation using existing staff.
2. One new post within the Health and Wellbeing service unit.
3. Continuation of one new post within the Food and Consumer Protection service unit, created in 2020. Funded by OPSS. Temporary post of Principal EHO to be made permanent.
4. Resource requirements unknown at this stage as altered agreement has not been finalised.
5. One additional officer for the Noise, IPPC and planning team.
6. Increase in part time officers hours in Food Control Service by one day a week.

**Financial:**

1. Estimated £9,600 in 2022/2023
2. This can be resourced within current budget.
3. Nil impact in 2022/2023.
4. Unable to predict demand.
5. Estimated £42,800 in 2022/2023
6. Estimated £9566 in 2022/2023

**Other:**

1. Approval from Corporate Leadership Team.
2. Continued funding from PHA and DfC.
3. Continued funding from OPSS.
4. Funding may be required from DAERA regarding Supporting Health Attestations.
5. Approval from Corporate Leadership Team
6. Approval from Corporate Leadership Team

**If the required additional resources are NOT available, please state:**

What is the likely impact on performance?

1. Currently there is excessive pressure on the team to deliver a wide range of activities with difficulty prioritising, particularly when Notices of Motion arise. Without support, performance is likely to suffer. Within the current structure SUM's do not have the capacity to provide the level of support to the Head of Service to enable the Department to focus on efficient working and to collaborate internally to deliver efficiency savings and improve the quality of service delivered to the ratepayer.
2. The 0.6 FTE EHO post is stretched to capacity and can only deliver on the PHA funded MBB project and internal employee health and wellbeing. As increasing workload arises from the community planning process, with the resultant demand for actions, it will not be possible to deliver in all areas. There is no room for innovation, and no option to explore partnership opportunities for community-based initiatives.
3. N/A



4. The workplans may not be completed and obligations set by the Food Standards Agency may not be met.
5. The number of Service Requests in relation to noise increased from 281 in 2019-20 to 712 in 2020-21. 469 service requests were received in the first 6 months of 2021-22. An additional officer is required to continue to meet the Statutory requirement on the Council to investigate Noise Complaints under the Clean Neighbourhoods and Environment Act 2011. The noise team has continued to meet the KPI for making an initial response to service requests and has adopted the use of the Noise App for gathering initial evidence and triaging requests. Due to the volume of complaints and the limited available staff resource however, it has not been possible to apply a target or KPI to the progression of the investigation process, with requestors waiting at times for up to 6 months for the installation of noise monitoring equipment. Additionally, resource which should be allocated to other functions such as inspection and permitting of premises under the Pollution Prevention and Control Regulations (NI) 2003 and responding to consultations in relation to planning applications has been diverted to deal with the demand led noise control service. Without the allocation of additional resource these KPI's will not to be met.
6. Over the past 18 months there has been a significant increase in new food business registrations with this year's registrations set to be 35% up on the previous year is putting additional pressure on the service. The amount of food complaints received is also increasing year on year tracking a similar % increase to that of new business registrations. In addition, new legislation has been introduced in relation to providing additional labelling information on products that are prepacked for direct sale which places further challenges on local businesses. In order to provide businesses with the support they need to achieve compliance in this area, more time is required by officers engaging and supporting these businesses on top of their other duties.

The additional resource would enable to Food Control Service to keep up with the increasing pressures that the service is being subjected to by inspecting newly registered premises in a timely manner (28 days from date of registration) ability to deal with food complaints without having as much of an impact of the inspection programme as it currently is therefore reducing the backlog of inspections.

What is the likely impact on the public?

1. The impact of disbanding the Group system has continued to place a burden on staff resource particularly in relation to coordination, research, expert advice and support planning, liaison & dissemination of information. In practical terms the impact has resulted in some core functions being covered only in relation to responsive work; with numbers of planned inspections falling and insufficient time available to satisfactorily deal with service requests including complaints and requests for advice. The proposed transformation would allow the Senior EHO's to act as specialised officers and focussed contacts for stakeholders including the

public, improving the ability to provide a timely service including advice and visits focussed on local priorities.

2. Currently there is limited capacity to deliver health and wellbeing initiatives outside the organisation and to businesses. There is no capacity to deliver to the community, which is at the heart of the community planning process and an expectation from the actions that have been developed in The Big Plan.
3. Confidence in the safety of consumer goods.
4. Potentially food safety could be compromised, and the public put at risk.
5. The noise team will be unable to provide a satisfactory service to requestors with unacceptable delays in progressing investigations to the point of installation of noise monitoring equipment. Statutory duties in relation to inspection and permitting of premises under the Pollution Prevention and Control Regulations (NI) 2003 will not be met with potential environmental impacts.
6. There is a serious risk that we would not be able to fulfil our duties in relation to delivery of Official Controls and intervention may be required by the Food Standards Agency. In addition, we would not be able to provide a satisfactory service for Food Business Operators and members of the public.

What is the likely impact on staffing?

1. The workload on EH Managers does not permit time to lead their team on technical matters and provide support to develop junior officers. SUM's have been subject to increasing workloads not only in relation to corporate management functions but also as they each manage multiple disciplines. They do not have the capacity to take on the role of specialists in the diverse core functions of Environmental Health while handling these increased workloads and focussing on strategic issues such as continuous improvement and aligning our key performance indicators with the desired outcomes of the Big Plan and Corporate Plan. These time pressures have been highlighted during PIP conversations over several years.

The current flat structure does not provide any opportunity for highly qualified and skilled officers to progress in their chosen vocation, or to develop managerial skills that would allow them to apply for any vacant SUM posts within the Service. With the Council's commitment to the IIP Framework, there has been significant investment in improving skills and knowledge of EHO's and the establishment of enhanced roles would make better use of the technical, leadership and managerial skills that have been developed. In addition to the return for the council in investing in training individuals, staff would be better motivated should their skills and experience receive recognition and, better placed to mentor and support staff working in their specialist area therefore building capacity in multiple levels. These issues have been raised by officers during their PIP conversations over several years

2. Whilst a new post would be created, it would be within existing budgets and helping to backfill the resource allocated to the management of tobacco control.
3. Additional staff required to carry out this role. Lack of a principal EHO in the area would cause additional pressure on other staff who are already working at capacity.
4. Although the need or amount of this work is unable to be foreseen at the present time, it would be anticipated that there would be a need for additional staff.
5. Due to the steep rise in service requests the Noise, IPPC and Planning team have been working under an excessive amount of pressure. This has been exacerbated by the fact that they are working from home, where this is possible, in compliance with DoH guidance and are facing a growing number of requests where either the requestor or the source are experiencing mental ill health. The approval of an additional officer, along with the creation of two enhanced roles within this team, would allow the team to; improve the level of service offered; alleviate some of the pressure that they are working under; resume statutory duties in relation to inspection and permitting of premises under the Pollution Prevention and Control Regulations (NI) 2003; and allocate a level of cover to the officer responding to consultations from the planning service in relation to planning applications with a potential environmental impact. This would be subject to the ability to recruit staff to fulfil this role of qualified EHO and a stabilising of the number of service requests, as should the high level of complaints continue or additional demands fall to the service, these could require redirection and prioritisation of any additional resource approved.
6. Due to the steep rise in service requests and new business registration along with the introduction of new food labelling legislation, the Food Control team have been working under an excessive amount of pressure. The approval of additional officer hours, along with the creation of one enhanced role within this team, would allow the team to improve the level of service offered, alleviate some of the pressure that they are working under.

## **6. Monitoring and Review**

The plan will be monitored through Quarterly reports to committee and Council. Statutory returns will be processed and targets within these will be acted upon. Performance management is a standing item in regular meetings with SUM's and their meetings with staff and is monitored through the departments database management system. Performance review is inherent to the pride in performance conversations.

## **7. Conclusions**

The forgoing provides the basis for the provision of the continued service by the department. If resources are directed to unplanned activities as they frequently have been in

2021/22, then the remaining activities of the department will be prioritised to best protect the Public and Council.

## 8. Appendix 1 PESTLE

<i>Factor</i>	<i>Current</i>	<i>Impact</i>	<i>Anticipated</i>	<i>Impact</i>
<i>Covid-19</i>	<i>Sustained High level of Covid-19 cases</i>	<i>Huge increase in workload for the department in relation to changes in regulation for business/public and increase in demand for services in a domestic context wrought by more people being at home.</i>  <i>Impact on planned enforcement activity by department as required by legislation</i>	<i>Anticipated that the pace of change will not abate for some time meaning that staff are unable to settle into new work patterns.</i>  <i>Government id currently pinning its hopes in improved ventilation in commercial premises to reduce Covid Spread.</i>	<i>Increased difficulty in delivering services. Fast changes in legislation and requirements with no notice. Increasing demands on workforce from public/businesses and the huge backlog of postponed planned work increasing stress on the system and individuals.</i>
<i>Political</i>	<i>Covid-19</i>	<i>Funding issues</i>	<i>NI Govt</i>	<i>Reduced funding opportunities</i>  <i>Implementation of NI Protocol and adaptations required to meet its requirements</i>
			<i>EU Exit</i>	<i>Agri-foods</i>  <i>Consumer goods</i>

				<p><i>Transportation</i></p> <p><i>Implementation of NI Protocol</i></p> <p><i>Increased inspection/controls of exported imported foods/goods. Potential major impact on staff resources/prioritisation on the basis of government advice on the NI Protocol, in the period after Transition following EU Exit</i></p>
<i>Economic</i>	<i>Increased Inflation</i>	<p><i>Reduced real earnings</i></p> <p><i>Increased number in food/fuel poverty</i></p>	<i>Tax changes for landlords</i>	<p><i>Lower income for landlords, higher rent for tenants</i></p> <p><i>Note: in ANDBC, tenants use 40% of income on rent, higher than any other NI Council area.</i></p>
<i>Social</i>	<i>Universal Credit</i>	<p><i>Rise in rented sector</i></p> <p><i>Increased number in food/fuel poverty</i></p> <p><i>Increase in public demand generally</i></p>	<i>Changes to PIP/Universal credit and relationship to accessing funded schemes</i>	<i>Greater demand and reliance on funded services/support and voluntary support</i>
<i>Technological</i>	<i>GDPR</i>	<i>Changes to software and processes for data capture, transfer and retention</i>	<i>Increased mobile &amp; home working</i>	<p><i>Reduction on pressure on office space/car parking</i></p> <p><i>Changes in working practices and procedures to enable efficient flexible working particularly from home</i></p>

<i>Legal</i>	<i>Introduction of Landlord registration by Councils licencing</i>	<i>Increased workload for Dept and Council</i>	<i>Coordination required by 11 Councils</i>	<i>Increased Workload for Housing team</i>
			<i>EU Exit</i>	<i>Changes to UK legislation – consultation demands, training, enforcement, procedures, etc Requirement to meet challenges in relation to consumer good and the Office of Product Safety and Standards</i>
	<i>GDPR</i>	<i>Introduction of new procedures. Increased workload to implement.</i>		
	<i>Food Standards Agency Achieving Better Compliance</i>  <i>New Structure for Enforcement of food Legislation</i>	<i>Changes to Policies, Procedures and Practice</i>	<i>Changes in the model on compliance monitoring may lead to potential decrease in funding</i>	<i>The risk ratings of existing 1900 food businesses will have to be re-assessed by ANDBC staff.</i>
<i>Environmental</i>	<i>Cramped office space, lack of car parking, lack of meeting/ interview rooms for public, no quiet spaces</i>	<i>Inefficient working conditions – poor service to public, decreased productivity, lower staff morale.</i>	<i>Results of SIB review of Council accommodation and changes to increased mobile and home working</i>	<i>Better working conditions, improved amenities increased use of homeworking and flexible working.</i>

## 8. Appendix 2 SWOT analysis

<p><b>Strengths</b></p> <p>High quality service</p> <p>Recognition of local service needs and the value of local delivery.</p> <p>All Services contribute to the Corporate Plan and are closely linked with Big Plan objectives.</p> <p>Well, educated, trained and empathetic workforce with a good understanding of individual needs</p> <p>Officers have problem-solving skills over a broad spectrum of functions</p> <p>Officers have a proven record regarding partnership working within and outside the Council</p> <p>Regional and sub-regional collaboration for the service, leading to consistency of approach</p> <p>Readiness to adopt and deliver new functions and to adapt to change</p> <p>Good communications across the service internally and externally</p> <p>Statutory nature of many functions</p>	<p><b>Opportunities</b></p> <p>Services all Linked to the Corporate Plan and Big Plan aspirations in terms of environmental social and economic needs e.g.: safe, energy efficient housing, air quality, safe food products and workplaces, business compliance support contributing to prosperity.</p> <p>IT- potential for greater flexibility (e.g., mobile and home working) and more efficient service, meeting the needs of internal audit.</p> <p>Long experience of working at the forefront of the quality and consistency agenda</p> <p>EH well-placed to provide linkages in the future delivery of health and wellbeing to meet the needs of the Big Plan.</p> <p>Ability to link service with partners e.g., FSA, PHA, DfC, HSENI, to address identified health needs and to deliver service.</p> <p>Ability to support Covid-19 recovery requirements in relation to the public and businesses.</p> <p>Ability to adapt to new/changed legislation and processes arising out of EU Exit and the NI protocol and assist businesses with meeting these challenges</p> <p>New functions in relation to HMO's</p> <p>Increasing demand for services</p>
<p><b>Weaknesses</b></p> <p>Inadequate recognition of the strengths of EH. Under-selling ourselves (not strong enough voice?)</p> <p>Though the service has a wide reach and is appreciated by Councillors, it is not usually seen as politically sensitive or influential, in the same way as some other council functions.</p> <p>Limited resources to aid in adopting and delivering new functions (resources, structures)</p> <p>Lack of succession planning management opportunities for staff against skills shortages in certain areas and ageing workforce</p>	<p><b>Threats</b></p> <p>Continued disruption due to the Covid-19 pandemic and EU Exit will create additional workload. This will require more resource and might impact on the delivery of service for a period. That is some work might have to be sacrificed to ensure needs arising from Covid-19 EU Exit and the Northern Ireland Protocol are met.</p> <p>New statutory functions arising without resource</p> <p>Non-statutory funded basis for some functions may change very quickly! As evidenced by the recent issues around local devolution.</p>

<p>Perception that EH is simply a regulatory service</p> <p>Lack of office space meeting rooms interview rooms and parking for residents and staff near the Church Street offices.</p>	<p>Wide EH remit can dilute resource and make it difficult to do everything “well”.</p> <p>Increased public impatience about regulatory processes making progress with investigations difficult.</p> <p>Increased FOI, EIR and legal requests in relation to the regulatory process increasing resource demand which is diverted from dealing with the case load.</p> <p>Changes because of welfare reforms are likely to increase demand on the service.</p> <p>Officers have noted that they are increasingly in contact with clients suffering with mental health issues and challenging behaviours requiring new skills, training, and safeguarding.</p> <p>Large number of Big Plan leads and very little resource.</p> <p>Review of food regulation may reduce FSA funding for this function</p>
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