

Agenda Item	19
Report No	EDI 15/19

## HIGHLAND COUNCIL

**Committee:** Environment, Development and Infrastructure Committee

**Date:** 31 January 2019

**Report Title:** Environmental Health Improvement Plan

**Report By:** Director of Community Services

### 1. Purpose/Executive Summary

- 1.1 This report updates members on the Environmental Health workforce plan and details further redesign and improvement projects to improve effectiveness and efficiency and reduce the workload burdens on staff.

### 2. Recommendation

2.1 Members are invited to:

- i. note the updated Environmental Health improvement plan, and
- ii. agree the proposals for redesign and improvement projects.

### **3. Background**

- 3.1 As Members are aware, Environmental Health carry out a wide range of statutory duties on behalf of the Council with the general remit to protect and improve public health. This includes:
- a) Public Health Protection, including private water supplies, nuisances, smoking in public places, port health, communicable disease investigation (e.g. Food-borne / waterborne disease, legionnaires Disease);
  - b) Food Safety covering food hygiene, food labelling, and food export certification;
  - c) Enforcement and advisory role for Health & Safety at Work legislation;
  - d) Private Sector Housing including sub-standard housing, improvement and repairs grants, closing and demolition orders, Houses in Multiple Occupation and housing defects;
  - e) Pollution Control, including Noise Control and local Air Quality management;
  - f) Contaminated Land covering the regulatory role for contaminated land prevention through development control, advisory role to other council services on asset transfer and development;
  - g) Animal Health and Welfare which can include dealing with Foot and Mouth disease, Anthrax, Avian Flu and Bluetongue;
  - h) Licensing duties which include:
    - i. a general enforcement role for activities licensed under the Civic Government legislation, and
    - ii. an administrative and enforcement role for licensing of caravan sites, venison dealers, animal boarding establishments, pet shops, zoos, cinemas, riding establishments, theatres, sports grounds and dangerous wild animals; and
  - i) Dog Control, Pest Control, Litter education & enforcement, fly-tipping, waste duty of care, abandoned vehicles.
- 3.2 The team is facing significant demands and is unable to meet all of these within existing resources. The team has prioritised these demands on an informal basis, and are working extremely hard to maintain current performance levels. This plan aims to improve effectiveness and efficiency and reduce the workload burdens on staff. However, continuing to meet stakeholders' expectations with existing resources will remain challenging.

### **4. Background on workforce planning**

- 4.1 The environmental health team carried out a significant workforce planning exercise in 2015 which was implemented in 2016. This reviewed the approach to management arrangements across the team. Changes also occurred during the voluntary

redundancy process. Overall the 2016 changes resulted in significant savings with 5.6 posts being deleted and savings of £292,000 (12.5% of team's salary budget) being realised.

4.2 The changes in Full Time Equivalent posts (FTE) between 2015 and 2018 are provided in **Appendix 2**.

4.3 A number of comments can be made on the changes:

- a) the changes from 2015 to 2018 shows overall drop of 3.99 FTE in the environmental health team (excluding changes to shellfish sampling team and dog/pest team). This includes a reduction of operational Environmental Health Officers (EHO) of 1.5 FTE;
- b) there were 2 further significant changes with:
  - i. the Council losing the Official Control Shellfish sampling contract resulting in loss of 4.5 FTE HC05 posts. In addition to their core sampling function these officers assisted in general environmental health duties; and
  - ii. the Assistant Community Works Officers/Education and Enforcement officers returning to the environmental health team. The return of these officers was welcomed but it must be noted the transfer of the 9 officers (an 18% increase in overall team size) did not include any transfer of management resources. This has placed an additional workload on the Senior EHOs;
- c) the changes have had significant impact on some offices particularly Lochaber where EHOs dropped from 3.2 to 1.6. A Food Safety Officer post has been recruited to help reduce the burden in this area but the operational FTE is less than in 2015; and
- d) the table shows a small increase in specialised staff dedicated to priority work with 0.6 FTE in food safety and 1.9 FTE in private water supplies.

## 5. **Current Delivery model and challenges**

5.1 The workload can be simplistically split into **proactive** (programmable) work and **reactive** work.

### 5.2 **Proactive work**

The team carry out proactive/programmable work under certain legislation such as food safety, private water supplies, health and safety at work, dog control and animal health and welfare. The work is risk based and intelligence driven. Resources are being prioritised only on areas of highest risk and there has been an overall significant reduction in proactive work.

### 5.3 **Reactive work**

5.3.1 The team deal with significant numbers of routine service requests from the public and businesses and is also required to respond to incidents and carry out major investigations.

5.3.2 A year on year increase of routine service requests has been noted:-

Year	2013	2014	2015	2016	2017
Total requests	4413	5314	5391	6568	8779

5.3.3 The team has also had considerable workload challenges due to investigations of significant incidents. These take considerable time to investigate and conclude as often complex issues are involved. This included complex noise investigations, extreme animal welfare cases resulting in taking possession of animals, complex dog control cases and a number of prosecution reports relating to contraventions of Health and Safety, Food Safety, and Housing and Animal Health legislation. In preparing a report to the Procurator Fiscal for prosecution, it can take the equivalent of 4 weeks of one officer's time to investigate including interviewing witnesses and then to prepare a detailed case for submission.

### 5.4 **Management**

The five Senior EHOs have both a functional lead and management role. They are required to be a specialist officer leading on specific environmental health functions on a Highland wide basis, including reviewing policy and strategy development, providing operational assistance and project management for specific environmental health functions. They are also required to manage environmental health staff in the appropriate area offices including allocating work and managing performance and the application and implementation of Human Resource practice.

### 5.5 **Current Challenges**

In 2018, the EH management team have reviewed the implementation of the workforce changes and ongoing challenges. These include:

- a) limited staff in area offices to cover both proactive and the increasing reactive workload. Providing support staff from other area offices proving problematic due to travel time, distances and officer own workloads;
- b) ensuring consistency throughout the different areas offices in terms of service delivery due to varying levels of staff availability;
- c) ensuring consistency in the levels of business support provided in area offices, and trying to minimise administration burden on operational officers;
- d) ensuring sufficient capacity available to cover food export health certification with the resultant knock-on effect to other workload. There is potential for this demand to significantly increase with Brexit;
- e) having flexibility and capacity to adapt to changing and increasing legislative demands being placed on the Service (i.e. new private water supply requirement;

changes to approach to food safety);

- f) ensuring that the IT systems and Civica APP database are being utilised to their full potential to improve Service delivery;
- g) the current financial challenges that the Council faces has reduced the scope for changing the Service's establishment. This, combined with difficulties in recruiting to offices outwith Inverness and Dingwall, has limited the Service's ability to meet demand, particularly in outlying areas; and
- h) in November and December 2018, Food Standards Scotland (FSS) carried out a full 'Capability and Capacity' external Audit of the service as regards our statutory responsibilities for food safety. The full report is awaited and a proposed action plan will be reported to a future meeting of this Committee. However, we are aware that FSS were positive about the professionalism and competence of our officers, but were concerned about their capacity to deliver an appropriate inspection programme of food businesses.

## **6. Improvement proposals**

- 6.1 Building on the previous workforce plan, a number of options have been identified to address the challenges facing environmental health and these are listed in **Appendix 2**.
- 6.2 Recognising the reduced capacity to implement projects whilst maintaining service delivery, the team have prioritised proposals for service improvement for 2019 in **Appendix 3**.

## **7. Implications**

- 7.1 Resource – No implications.
- 7.2 Legal – As reported previously to Committee, resources do not permit all statutory responsibilities to be implemented as per statutory/official guidance. This presents a legal and reputational risk for the Council. The team improvement plan will assist in ensuring resources are committed on areas of greatest public health significance with work being appropriately prioritised.
- 7.3 Community (Equality, Poverty and Rural) – Further prioritisation of service requests will result in
  1. Longer response times for the public and businesses for lower priority work.
  2. An increase in proactive inspections and fewer inspections of non-high risk activities

Changes to the delivery of some functions will result in the public and businesses being directed to alternative means of resolving their complaints or addressing their service request including the need for them to take their own action.

- 7.4 Climate Change / Carbon Clever – No implications.

- 7.5 Risk – Operational improvements will assist in controlling risk associated with item CMS1 in the risk register ‘Consequences of serious food and water borne disease outbreak’.
- 7.6 Gaelic - No implications.

Designation: Director of Community Services

Date: 11 January 2019

Author: Alan Yates, Environmental Health Manager

APPENDIX 1

		2015	2018	Difference 2018 compared to 2015
Post	Scale	FTE	FTE	FTE
EH Manager	HC13	1	1	0
AEHM	HC12	3	0	-3
PEHO	HC11	2	0	-2
Senior EHO	HC11	0	5	5
SAHWO	HC10	1	0	-1
EHO	HC10	17.8	16.3	-1.5
SO (CL)	HC9	4.6	1.91	-2.69
TO2 – food	HC7	3.6	4.2	0.6
TO2 - H&S	HC7	3	2	-1
TO2 – grants	HC7	6	6	0
TO2 - Env.	HC7	1	1	0
TO1 – water	HC6	2.2	4.1	1.9
AHWO	HC6	2	2	0
IT	HC6	1.57	1.57	0
TO – HMO	HC5	1	0.7	-0.3
		<b>49.77</b>	<b>45.78</b>	<b>-3.99</b>
ACWO (dog/pest)	HC5	0	9	9
Shellfish SO	HC5	4.5	0	-4.5

**Environmental Health Improvement Projects**

	<b>Overall goal</b>	<b>Options</b>	<b>Comments</b>
1	PRIORITIES: Ensure team have clear goals and priorities	<ul style="list-style-type: none"> <li>• Review the prioritisation of EH functions and identify those with most benefit to public health, the community and local businesses.</li> <li>• Introduce realistic response time targets to assist in managing consumer expectations.</li> <li>• Reduce demand – look to stop functions or alternative ways to deliver particular functions &amp; signpost alternatives. Aim to provide increased capacity within the area offices to cover both the pro-active and reactive workload in these areas by focussing only on prioritised work.</li> <li>• Ensure clear outcome and performance indicators identified. Will also demonstrate benefits and improve profile</li> </ul>	<ul style="list-style-type: none"> <li>• Team plan 18/19 contains overall public health priorities</li> <li>• Timescales for responding to high volume and priority service requests to be agreed and put in Civica APP. Can also be provided via website to public</li> <li>• Consider triage service requests:               <ul style="list-style-type: none"> <li>○ Level 1 - Immediate response.</li> <li>○ Level 2 - requires a response in the next 5 working days where resources allow.</li> <li>○ Level 3 - requires a response in the next 10 working days where resources allow.</li> <li>○ Level 4 - requires a response in the next 20 working days where resources allow.</li> <li>○ Level 5 – noted for future intelligence. No further action.</li> </ul> </li> </ul>



	<b>Overall goal</b>	<b>Options</b>	<b>Comments</b>
2	<p><b>RESOURCES:</b> Ensure team structure in place that:</p> <p>(1) can manage performance to meet demands and achieve objectives of service plan;</p> <p>(2) has capacity to consider strategic issues and capacity to respond to serious incidents;</p> <p>(3) has clear roles, and responsibilities.</p> <p>(4) has flexibility and methods of delivery to meet demands of priority functions in all geographical areas;</p>	<ul style="list-style-type: none"> <li>• Review operational team structures and methods of delivering specific functions throughout the area offices. Aim to provide increased capacity within the area offices to cover both the pro-active and reactive workload in these areas.</li> <li>• Consider specialised officers to deliver pro-active food workload, licensing and planning consultations.</li> <li>• Review role of EHOs and technical officers to lead and support on topics and projects</li> <li>• Workforce planning – continue work on student EHOs and modern apprentices</li> </ul>	<ul style="list-style-type: none"> <li>• Some EHOs and technical officers already supporting and leading on particular work areas.</li> <li>• Need for capacity to be provided for other EHOs and technical officers to assist.</li> <li>• Particular need to develop for food safety lead roles.</li> <li>• Consider delivery of licensing and planning</li> <li>• Consider best methods to deliver proactive programmes</li> </ul>

	<b>Overall goal</b>	<b>Options</b>	<b>Comments</b>
3	<b>SUPPORTING PROCEDURES:</b> Ensure there are clear & consistent work procedures to improve efficiency and avoid duplication of effort;	Reviewing and improving operational procedures to increase efficiency and consistency in service delivery. Aim to implement documented operational procedures for EH functions.	<p>Procedures are being reviewed to: update; simplify; consider LEAN approach; alternative delivery; approach by other Councils; use of website and integration with Civica APP.</p> <p>The following EH functions are being reviewed</p> <ul style="list-style-type: none"> <li>• Abandoned vehicles</li> <li>• Civic Government licensing – self assessment by applicants</li> <li>• Responding to barking dog noise complaints</li> <li>• Use of noise recording equipment</li> <li>• Miscellaneous Licensing administration</li> <li>• Authorisation of officers</li> <li>• Dog fouling</li> <li>• Dog control notices</li> <li>• Stray dogs</li> <li>• Shellfish Temporary Closure Notices</li> <li>• Dealing with unlicensed HMOs</li> <li>• Caravan site register</li> <li>• Hoarding in houses</li> </ul>
4	<b>IT &amp; BUSINESS SUPPORT:</b> Ensure continual improvement in use of technology & reducing administrative burdens;	<ul style="list-style-type: none"> <li>• Continual improvement in use of technology and ensuring Civica APP is utilised fully in an effort to reduce administrative burdens.</li> <li>• Computer refresh to happen over 2019 and review to be undertaken of each officer IT needs.</li> <li>• Mobile working solutions may bring benefits.</li> <li>• Work with business support colleagues on consistent support over all areas</li> <li>• Review and update the current EH website, including publishing relevant EH data. For example public registers; enforcement notices; national assistance burial figures etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Further use of templates to assist with recording and workload management</li> <li>• Further use of mailmerge to speed up document production, reduce printing and increase use of emailing</li> <li>• Work ongoing on export certification</li> </ul>
5	<b>SAVINGS &amp; INCOME:</b> Increase income & identify further commercial opportunities;	<ul style="list-style-type: none"> <li>• Review EH capacity and opportunities to generate income.</li> <li>• Identify further commercial opportunities</li> </ul>	e.g. Environmental Health currently carry out a servicing and monitoring contract for Government national air quality equipment at 2 locations in Highland

	<b>Overall goal</b>	<b>Options</b>	<b>Comments</b>
6	PARTNERSHIP: Continue to develop partnership and co-ordinated working with internal colleagues, external partners and neighbouring councils	Identify further opportunities for increased partnership/shared working with neighbouring councils and external agencies (i.e. Op Hottah). Such joint working helps increase profile of EH service and increases awareness of enforcement objectives.	<ul style="list-style-type: none"><li>• Consider further protocols and work arrangements with local partners and local agencies e.g. housing, amenities, Police, SEPA.</li></ul>

## APPENDIX 3

### **A. Prioritisation**

- (1) Implement response times for different categories of complaints. Link these to the Civica APP database – Apr 2019

### **B. Delivery**

- (2) Implement outcome of Food Standards Scotland Audit – May 2019.
- (3) Reduce demand and stop or introduce alternative ways to deliver particular functions and signpost alternatives.
  - a. New dog barking policy – Jan 2019;
  - b. New matron noise policy – Mar 2019;
  - c. Hoarding protocol – March 2019;
  - d. Stray Dogs – March 2019;
  - e. Abandoned vehicle policy - May 2019;
  - f. With Housing, develop new approach to pest control and housing estates – May 2019.
- (4) Complete review process for Civic Government licensing – February 2019
- (5) Recruitment of two Graduate Interns to assist in policy development (resources permitting) – June 2019

### **C. Structure**

- (6) Review operational team structures and methods of delivering specific functions throughout the area offices – May 2019.
- (7) Review role of EHOs/TOs to lead and support on topics and projects. Identify topics/projects for 2019/20 - March 2019.