

Agenda Item	7
Report No	CP/4/23

THE HIGHLAND COUNCIL

Committee: Communities and Place Committee

Date: 23 February 2023

Report Title: Environmental Health Performance 22/23 and Operational Plan to 23/24

Report By: Executive Chief Officer, Communities and Place

1. Purpose/Executive Summary

- 1.1 This report sets out the Environmental Health Operational Plan, describing the range of proactive and reactive work involved.
- 1.2 The plan details the objectives for the whole of the Environmental Health team, expanding on the service priorities set out in the Communities and Place Directorate Service Plan. The report is published to provide Councillors, members of the public and businesses with information on the services provided by the team.

2. Recommendation

- 2.1 Members are asked to:
 - i. note the Environmental Health performance in 22/23 to date including delivering statutory duties to over 6000 properties on private water supplies, over 5000 food businesses, and responding to 12,000 annual service requests on a wide range of public health, nuisance, licensing, safety, dog control, animal health and incivility issues;
 - ii. consider and approve the Environmental Health Operational Plan to 31 March 2024 as detailed in Appendix 1;
 - iii. note that the team is preparing annual reports on local Environmental Health team performance for Area Committees in 2023.

3. Implications

3.1 Resource

As reported previously to Committee, the resources available to Environmental Health have to be prioritised, focusing on areas of greatest public health significance. Where

statutory responsibilities require a higher level of service standard, the team continually explores ways to delivering services more efficiently and within affordability including reviewing associated income streams, working with Cosla regarding resource allocation and seeking efficiencies in working practice and team structure.

- 3.2 **Legal** – As a regulatory service the Environmental Health team have a wide range of statutory duties. The team have an Enforcement Policy in place and officers follow the five principles of better regulation: regulation should be transparent, accountable, consistent, proportionate and targeted.
- 3.3 **Community (Equality, Poverty and Rural)**
The Environmental Health team provide services across urban and rural communities. Any policy changes are subject to equalities screening and adjustments where required.
- 3.4 **Climate Change / Carbon Clever** – The increase in remote working by the team over recent years has reduced business travel and associated carbon emissions.
- 3.5 **Risk** - The pressures on the environmental health profession and challenges in workforce planning have been noted by Cosla and the Scottish Government. Work is ongoing with the Royal Environmental Health Institute of Scotland (REHIS) and the Society of Chief Officers of Environmental Health in Scotland (SoCOEHS) to increase resilience of the service and a sustainable workforce. A new format of the BSc course at University of the West of Scotland which includes an integrated placement with Councils should encourage greater update of new EHOs. The Council are participating in the scheme to assist with our workforce planning.
- 3.6 **Gaelic** – There are no Gaelic implications arising from this report.

4. Background

- 4.1 Members will be aware that this Committee in August 2022 approved the Communities and Place draft Directorate Service Plan which sets out the general objectives for the Service. The Environmental Health's operational plan aims to provide Members with information on the objectives for the whole of the Environmental Health function in detail. The report is also published to provide members of the public and businesses with background information on this key service.
- 4.2 Environmental Health carries 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 which includes communicable disease investigation (e.g. Food-borne / waterborne disease, Covid19 and legionnaires Disease), private water supplies, statutory nuisances (e.g. foul odours, accumulations, premises in a poor state), smoking in public places, radon, airport and seaport health;
 - b) Food Safety covering food hygiene, food labelling, food export certification and food import checks;

- c) Health and Safety including regulatory role in Local Authority enforced premises, accident at work investigations, business advice and complaint investigations.
- 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 which includes 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 & Welfare which can include dealing with Rabies control, Foot & Mouth disease, Anthrax, Avian Influenza and Bluetongue;
- h) Licensing duties which include a general enforcement role for activities licensed under the Civic Government legislation. This includes the licensing of short term lets. The team also undertake the administrative and enforcement role for licensing of caravan sites, venison dealers, animal boarding establishments, zoos, cinemas, riding establishments, sports grounds, dangerous wild animals, pet selling, operating certain animal welfare establishments (including rehoming centres and animal sanctuaries), engaging in other animal rehoming activities and dog, cat and rabbit breeding;
- i) Dog Control, Pest Control, Dog Fouling, Litter education & enforcement, fly-tipping, waste duty of care, abandoned vehicles.

5. Environmental Health Performance

5.1 Following the challenges of the Covid 19 pandemic and the transition through EU Exit, the team have continued recovery of statutory duties in 2022/23. This has included implementing new regulatory and operational requirements including:

- New regulations on **short term lets licensing** which commenced on 1 October 2022. The team have a key role in the new licensing scheme as a consultee on applications, assessing compliance at licensed premises and responding to complaints. The team have progressed 658 application consultations to date, averaging around 70-80 per week. It is estimated that there could be up to 10,000 short term let properties within Highland. The Scottish Government are currently considering extending the deadline for applications to 1 October 2023. Environmental health and the licensing team are liaising with the Scottish Government on the possible implications of this change.
- Significant work was undertaken in 2022 to support the UK and Scottish Government resettlement schemes for **Ukraine refugees**. Environmental Health's role is to complete onsite property standards checks on properties offered as accommodation for Ukrainian refugees. The team have had 819 enquiries which resulted in 534 property inspections going ahead across the whole of Highland

(April 2022 to January 2023). Funding on a cost recovery basis is being claimed for the completion of these inspections.

- Continuing the implementation of Licensing of residential caravan sites and the implementation of Licensing of pet selling, operating certain animal welfare establishments (including rehoming centres and animal sanctuaries), engaging in other animal rehoming activities and dog, cat and rabbit breeding.
- Continuing EU exit related activities including undertaking inspections / audits of exporting food businesses to verify legislative compliance; provision of Export Health Certification; liaison with UK and Scottish Government on proposed import controls (Border Control Points); and processing new registrations of the local fishing fleet to enable the catch to be sold within the EU.
- Implementation of the Single-use plastic ban from August 2022 in conjunction with Trading standard colleagues.
- Engaging with NHS Highland and colleagues in Argyll and Bute Council on a shared and proportionate approach to the implementation of legislation on establishing Smoke-Free Perimeters around Hospital Buildings.
- Engaging with the Scottish Government and Cosla on the possible implications for Animal Health function within Councils following proposals to create a Scottish Veterinary Service (SVS)

6. Environmental Health Operational Plan 23/24

6.1 The Operational Plan through to 31 March 2024 is provided in **Appendix 1**.

6.2 The plan contains challenging objectives for Environmental Health to contribute to the aims of a healthier and safer Highlands. These are listed in **Appendix 2** of the plan. Key objectives are summarised below:

1. Continue workforce planning activities including review of student and modern apprenticeship opportunities.
2. Implement of new legal requirements for short term lets licensing.
3. Complete a review of resource demands and current charging regime for statutory private water supply monitoring to look at sustainable workforce going forward and improve performance in monitoring programme.
4. Implement the relevant priorities for Highland Council Environmental Health from the latest Joint Health Protection Plan.
5. Continue liaison with the Scottish Government and Cosla on the proposals to create a Scottish Veterinary Service (SVS)
6. Continue engagement with Scottish Government on the new national litter and fly tipping strategy and the linked review of litter and fly tipping enforcement activities.
7. Continue to work with Food Standards Scotland on the review of the approach to Food Safety Law following the pandemic.

8. Implement the new national approach to inspection of Approved Establishments (Official Control Verification (OCV)) from 1 April 2023 and review any resource implications (expected additional workload for the premises interventions).
9. Improve performance in key Performance Indicators on food safety and private water supplies.
10. Continue service improvements:
 - a. Performance: Review and develop improved methods of monitoring performance across all areas of work as part of the development of the C&P performance framework, linked to resources;
 - b. Supporting Procedures: Clear & consistent work procedures to improve efficiency and avoid duplication of effort;
 - c. ICT & Business Support: Continual improvement in use of technology & reducing administrative burdens. Advance mobile working methods and solutions across the service. Successful trials held in 2022 on use of tablets for inspections.
 - d. Officer Development: build capacity by improving learning and development process for officers;
 - e. Outcomes: Continue to demonstrate benefits and improve profile of work undertaken with greater use of opportunities of case management system reporting.
 - f. Savings & Income: Increase income & identify further commercial opportunities, linked to the development of improving external income achievement across the C&P service;

Designation: Executive Chief Officer, Communities and Place

Date: 3 February 2023

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Communities and Place Service

Environmental Health

Operational Plan 2023-24



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Background and Context

1. Purpose, Timeframe and monitoring

- 1.1 The Environmental Health team of the Communities and Place Service provides regulatory and advice functions within the Highland Council area. This Operational Plan outlines the Environmental Health approach to delivering all aspects of regulatory and advice functions through to 31st March 2024. The plan forms an important part of the Service's processes to ensure national priorities and standards are addressed and delivered locally.
- 1.2 The plan aligns with the Council's vision of being ambitious, sustainable and connected, the Council's Corporate Plan and the Communities and Place Directorate Service Plan.

2. Structure and resources

- 2.1 Environmental Health has 69 posts with a full-time equivalent of 64.92. This includes 5 fixed term/temporary posts. A structure diagram is provided in **Annex 1**.
- 2.2 The Service operates 3 operational areas and works through 7 offices throughout the area as shown below:

Operational Area	Offices
North Team – Caithness, Sutherland	Wick, Golspie
West Team – Skye and Lochaber	Portree, Fort William
Mid-Highland Team – Ross & Cromarty, Inverness, Nairn, Badenoch and Strathspey	Dingwall and Inverness

- 2.3 The Service has a revenue budget of £2.329m for 2022/23.

3. Roles and responsibilities

- 3.1 Environmental Health is the branch of public health which deals with all aspects of the natural and built environment that may affect public health, together with animal welfare and licensing duties. The main functions include:



- **Public Health Protection** which includes Water supplies (private supplies and mains water issues e.g. lead), Nuisances, Smoking in Public Places, Port Health, Communicable disease investigation e.g. Food-borne / Waterborne disease, Covid 19, Legionnaires Disease;
- **Food Safety** covering enforcement and advisory role for food hygiene, food labelling, export certification, and imported food checks;
- **Health and Safety at work** including regulatory role in Local Authority enforced premises, accident at work investigations, business advice and complaint investigations;
- **Private Sector Housing** including sub-standard housing, improvement and repairs grants, closing and demolition orders, Houses in Multiple Occupation and housing defects, and radon;
- **Pollution Control** which includes Noise Control and local Air Quality management;
- **Contaminated Land** covering the regulatory role for contaminated land prevention through development control, advisory role to other council services on asset transfer and development;
- **Animal Health & Welfare** which can include dealing with Foot & Mouth disease, Anthrax, Avian Flu, Bluetongue and Imported Pets;
- **Licensing** duties which include a general enforcement role for activities licensed under the Civic Government legislation. This will include the proposed licensing of short term lets. The team also undertake the administrative and enforcement role for licensing of caravan sites, venison dealers, animal boarding establishments, zoos, cinemas, riding establishments, sports grounds, dangerous wild animals, pet selling, operating certain animal welfare establishments (including rehoming centres and animal sanctuaries), engaging in other animal rehoming activities and dog, cat and rabbit breeding;
- **Dog Control, Pest Control, Dog fouling**, Litter education & enforcement, fly-tipping, abandoned vehicles;
- **Assisting with Civil contingencies** and emergency planning, with specific responsibilities regarding recovery from incidents.

3.2 Much of the work is preventative and the team has an important role in ensuring the Highlands maintains its reputation of a safe and healthy place in which to live, work and holiday. We aim to support local businesses by providing advice on appropriate regulations and ensuring any regulatory activity follows the five principles of better regulation: Proportionate, Consistent, Accountable, Transparent and Targeted.



3.3 An approximate summary of officers allocated against function is provided below:

Function	Full time equivalent
Food Safety	11.2 (inc. 1 temp post)
Health & Safety at Work	1.8
Private Water supply	6.3
Animal Health & welfare	2.8
Licensing (including Short Term Lets)	9 (inc. 4 temp posts)
Public Health & general Env Health	9.1
Housing	5.8
Pollution control (including air quality and contaminated land)	5.3
Litter, dog and pest control, abandoned vehicles	9
General management	4
Dedicated IT support	1.2
Total	65.5

4. Demands

4.1 The workload for the environmental health team can be simplistically split into proactive (programmable) work and reactive work.

4.2 Proactive work

4.2.1 The team carry out proactive/programmable work under certain legislation. The work is risk based and intelligence driven. Often specific proactive work is carried out in Partnership with other agencies such as Police Scotland, Scottish Fire and Rescue Service, HSE, SEPA, and Home Office Immigration Enforcement.

A summary of the some of the **proactive** demands is provided below.



4.2.2 **Food Safety**

Responsible as statutory Food Authority for approximately 5700 food businesses in Highland. Resources allow around 800 programmed inspections of premises in Highland per year focussed on those presenting highest risk. During the COVID Response phase sampling was paused and is only now starting to commence again. Plans are to return to post COVID sampling levels of approximately 150 proactive food samples as part of national surveys along with additional targeted sampling as part of the Official Controls Verification process.

4.2.3 **Private Water Supplies**

In Highland the population served by private supplies is estimated at 17%. There are currently 1080 "Regulated" supplies (commercial or large private water supplies) that are registered and subject to mandatory risk assessment and monitoring and intervention by the Council.

These supplies serve 3806 properties and an estimated population of 31507. The proactive programme aims to ensure each supply is visited annually to check they meet the required standards.

There are also 1584 domestic smaller private water supplies registered whereby our duty is to offer advice and assistance and discretionary powers in respect of sampling. These supplies serve 2532 properties and an estimated population of 15500.

4.2.4 **Health & Safety at Work**

Enforcement of health and safety at work legislation is divided between the Health and Safety Executive and local authorities. HSE is responsible for workplaces including factories, farms, building sites, schools, hospitals and offshore installations. The Council cover businesses including offices, shops, hotels, leisure premises, caterers, nurseries and clubs. In Highland the Environmental Health team have responsibility for over 5000 businesses.

In line with national guidance proactive work is carried out based on the HSE identified priorities for targeted interventions. These are focussed on those sectors and activities with the most serious risks or where the risks are least well-controlled based on national statistics and local intelligence. Initiatives have looked at gas safety in commercial catering premises, riding establishments, risk of infection at animal petting farms, nail bars and trampoline parks. Around 40-60 targeted inspections are carried out per year in addition to general awareness raising campaigns



4.2.5 **Animal Health and Welfare**

Officers carry out proactive inspections of animal markets and other sales, and Assembly Centres to ensure compliance, in particular with biosecurity (vehicles, premises and people), livestock identification, welfare, transport, licensing and record keeping. Around 140 inspections are carried out per year. The team also investigate allegations of illegally imported pets from both the EU and third countries.

4.2.6 **Dog fouling and littering patrols**

Officers prioritise and focus our patrols in the worst affected areas to maintain a visible profile and issue fixed penalty notices. Officers will also speak to dog walkers on best practices regarding dog control. Current resources only allow limited pro-active patrols to be carried out and these are targeted at the worst affected areas based on feedback from communities and members.

4.2.7 **Local Air Quality Management**

Officers fulfil the Councils duties in terms of the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act 1995 and the relevant Policy and Technical Guidance documents. The LAQM process places an obligation on all local authorities to regularly review and assess air quality in their areas, and to determine whether or not the air quality objectives are likely to be achieved. An Annual Progress Report (APR) is prepared and submitted to Scottish Government. This APR report is a summary of the work being undertaken by The Highland Council to improve air quality and any progress that has been made.

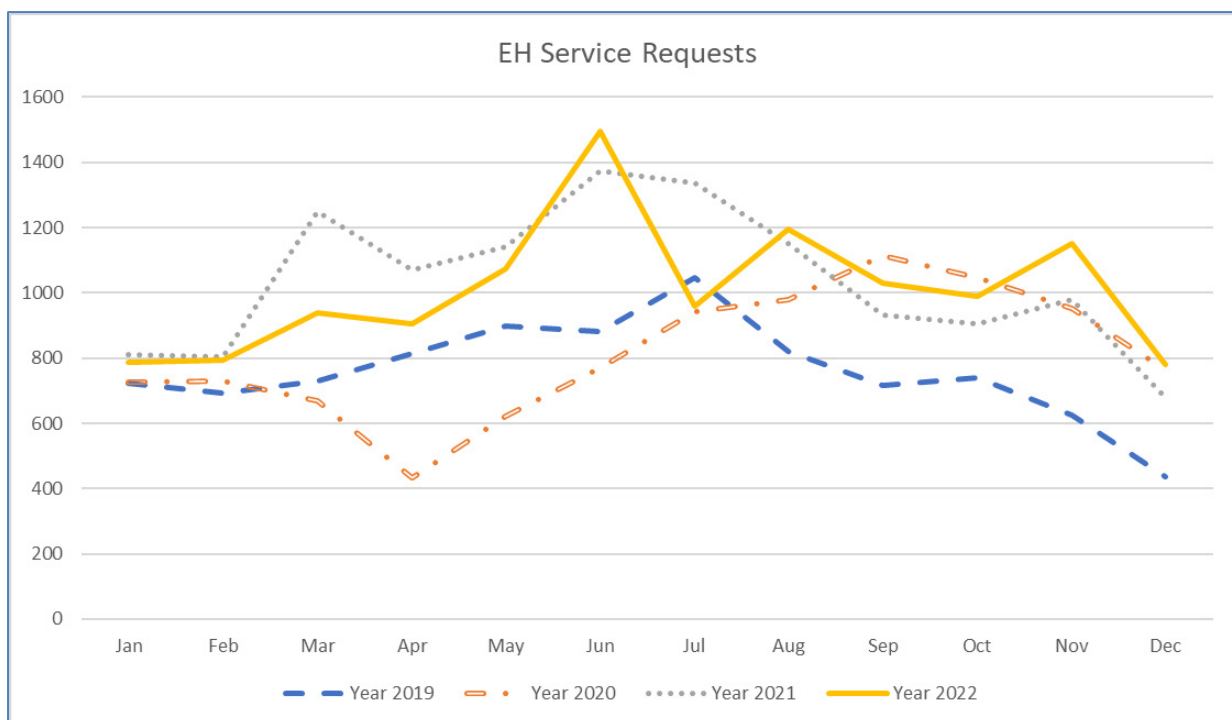
4.3 **Reactive work**

4.3.1 The team deal with significant number of incidents and major investigations in addition to the more routine service requests from the public and businesses.

The numbers of requests have been generally increasing year on year, with a slight decrease in 2022 compared to 2021.

Year	2018	2019	2020	2021	2022
Total requests	8524	9123	9747	12438	12084





The table below provides examples of the range of service requests received by the team in a year (based on 2022 data).

Category	count
Animal Health & Welfare	545
Dog fouling & general dog enquiries	193
Stray dogs	72
Aggressive dogs/dog bites	206
Planning & general consultation	1024
FOI request	204
Abandoned vehicles	484
Litter, fly-tipping	133
Inverness Trade waste request	21
Accident reports	92
H&S complaints	243
H&S request for info	105

Category	count
National Assistance Burial enq	24
Home Burial enquiry/request	1
Housing grant enquiry	637
Housing general enquiry	28
Housing complaint – dampness	22
Housing complaint – structural	11
Housing complaint – other	11
Housing visit for immigration	2
Request for Housing Condition survey	84
Ukraine Refugee enquiry/Property Check	803
Pest control requests	300
Food Premises Registration	519



Smoking ban complaint	1	food safety enquiry	496
Licensing enquiry	310	Fish/Shellfish Export Cert	682
Licensing Consultation	640	Food (non Fish/Shellfish) Export cert	682
Licensing complaint	34	Approval/Lic/Auth application	7
STL licensing consultation	486	Shellfish Registration Document	80
Noise enquiry	109	Shellfish sites closure	28
Noise complaint	1084	Fishing Vessel inspection request	20
Public Health house complaint	47	Food safety Alert/FSS reports	54
Foul Odours	91	Complaint – Food (Unfit)	100
Dust Complaint	6	Complaint – Hygiene of Premises	124
Smoke Complaint	100	Complaint – Food Standards (e.g. labelling)	28
General Nuisance – Other	73	Infectious disease enquiry/rep	10
Light Nuisance	9	Infectious disease notification	57
Insect Nuisance	2	Outbreak investigation	3
Choked/Defective Drain / Sewer	74	Covid notification/HPT request	50
Choked/Defective Septic Tank	25	Ship Sanitation Certificate Request	44
Blue Green Algae Alert	6	Ship/aircraft request for sample	2
Plant cmplt/query (injurious weeds)	11	Private water supply enquiry	455
Whale/animal carcass	26	Private water supply request for sample	111
Air quality query or complaint	12	Private water supply other	43
Public Health Incidents (e.g. pollution/flooding)	5	Public water supply query/complaint	34

4.3.2 Significant incidents can take considerable time to investigate and conclude as often complex issues involved. For example, a prosecution can take the equivalent of 4-6 weeks of one officer's time to investigate including interviewing witnesses and then to prepare a detailed case for the Procurator Fiscal.



In recent years the team have referred cases for offences under food safety, animal health, housing and health & safety legislation. The health & safety cases have followed investigations of fatalities or serious accidents.

Complex cases have included:

- Significant animal welfare investigation undertaken in 2017 which included emergency slaughter of poultry and 42 pigs being seized. The case was heard in 2022 with Director of firm sentenced to imprisonment for 2 years, 3 months and banned from keeping animals for 15 years and a former employee was given a Community Payback Order. The Director was found guilty of both animal health and food safety offences.
- major noise nuisance investigations at electric substations, and sawmills
- Two prosecution reports submitted to the Procurator Fiscal for breaches of health and safety legislation following serious workplace incidents.
- Illegal Houses in Multiple Occupation (HMOs)

5. Risk Management

- 5.1 The team manages significant risks in relation to the consequences of serious foodborne or waterborne disease outbreak. This is identified in the Service Risk Register.

Priorities and Objectives

6. Priorities and challenges

- 6.1 Over the next period the team will be taking forward a range of projects and these are listed in in **Annex 2**.

7. Reporting and performance indicators

- 7.1 Annual reports on local environmental health team performance in 2022 are being prepared for reporting to the City and Local Committees.
- 7.2 Environmental Health currently has two key performance measures in the corporate performance framework and these are summarised below:



Additional Service Commitment	Ensure high risk food premises are inspected for food hygiene purposes.
Key Performance Results	95% of high risk food businesses inspected for Food Hygiene purposes (IPI)

Additional Service Commitment	Ensure Risk Assessment and sampling of all relevant Private Water Supplies to reduce risk of water borne disease.
Key Performance Results	95% of high-risk Private Water Supplies inspected and sampled (IPI)

7.3 Key Performance Results:

Target	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
95% of high risk food businesses inspected for food hygiene ¹	92%	85%	97%	91%	13%	No comparable data ³
95% of high risk private water supplies are inspected and sampled (Regulated supplies)	87%	93%	84%	71%	17%	42%

Note:

¹ **2016-2021:** High risk based on Category A & B food hygiene premises, **2021 onwards:** High risk definition expanded following introduction of new national approach to business risk categorisation. Revised definition includes Category A & B [*Food Hygiene*], Category A & B [*Food standards*] and Category E & D premises [*Food Law*]

² Note programmed work in 2020/21 severely impacted by Covid19 restrictions.

³ New Food Programme nationally commenced Sept 2021 – partial year

7.4 Other performance measures and outcomes

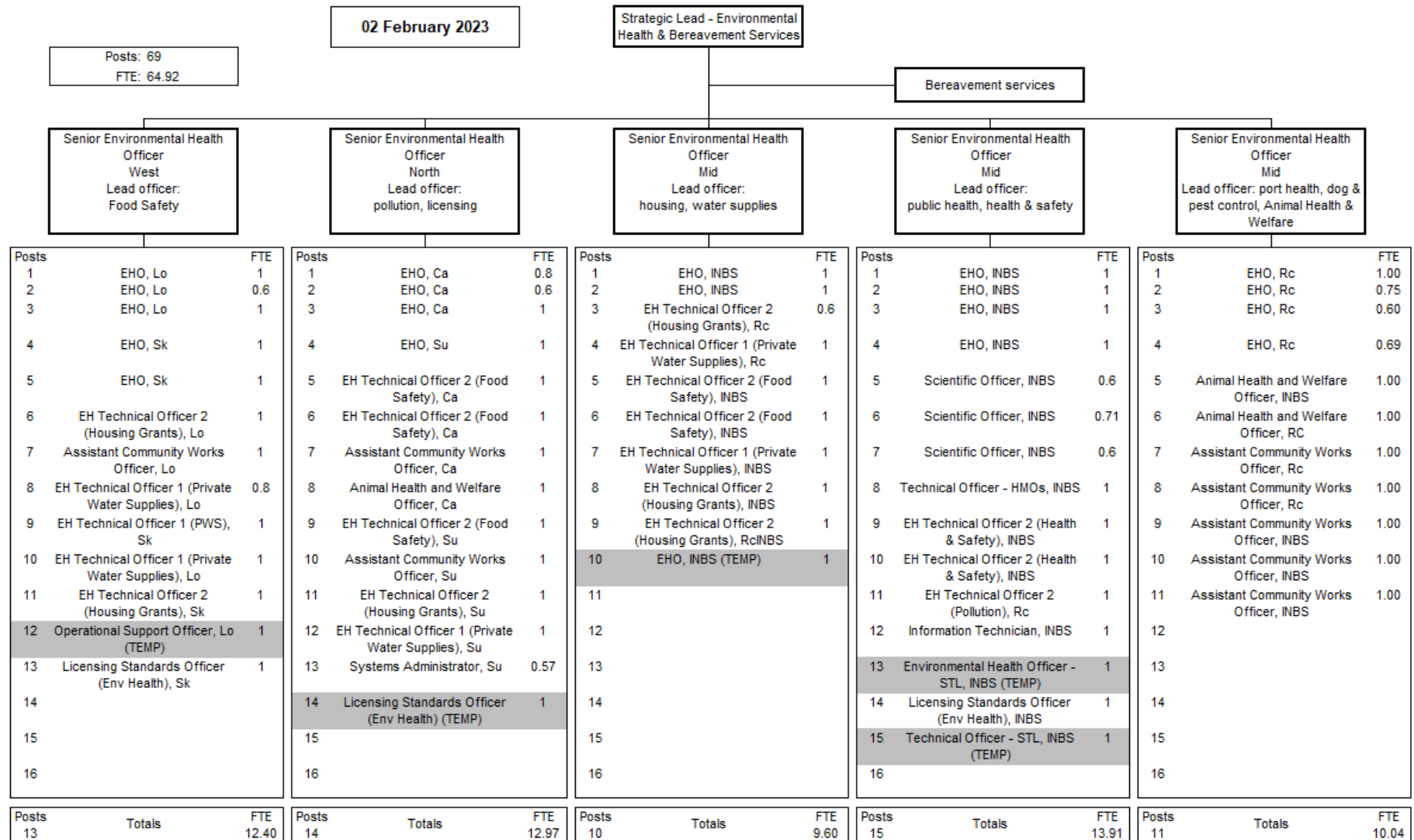
As a mainly preventative service, it is challenging to demonstrate the impact of all statutory interventions. The team are working with APSE on benchmarking and other appropriate performance measures for the future. This will contribute to the development of the CP Service performance framework.



- 7.6 For food safety, the inspection programme is designed to check food hygiene standards and staff will take appropriate enforcement action, including closure of premises, where poor standards are found. These interventions are required under the statutory Code of Practice and will contribute to Food Standards Scotland (FSS) strategy for reducing foodborne illness. FSS have previously estimated the burden of foodborne disease in Scotland annually at 43,000 cases of illness, with 5,800 cases presenting to GPs and 500 cases requiring hospital treatment.
- 7.7 For Health and Safety at Work, interventions are intelligence led in liaison with the HSE. In addition to the direct impact of any workplace injury on the individual and their family, the HSE estimated the wider cost to society as £39,700 for each case of 7 day or more absence due to work related ill health, £34,400 for each case of 7 day or more absence due to work related non-fatal injury, and £1.7m for each workplace related fatality.
- 7.8 In Highland, since 1/4/22 our officers have investigated 77 RIDDOR reported cases relating to workplace injury and ill-health, and in the last 5 years have investigated 5 workplace fatalities. The benefits to workers, their families and the Highland economy of maintaining health and safety interventions are demonstrable.
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Annex 1 – Environmental Health team structure



Annex 2 - Specific functional projects

1. Health & Safety at work

- 1.1 To devise and deliver a programme of health and safety interventions based upon Local Authority Circular (LAC67/2) (rev10) and the list of national priorities published by the HSE. The programme shall consist of work to deliver those national priorities set by HSE, work to deliver local priorities and an inspection programme that meets the requirements of the National Local Authority Enforcement Code.

All pro-active health and safety work is targeted in accordance with the HSE priorities or where local intelligence identifies any health and safety related issue.

1. **Nail Bars:** Following a recent increase in the number of nail bars within the Highlands and several local concerns having been identified with respect to levels of staff training, a lack of suitable and sufficient risk assessments and lack of controls when using chemical substances, our Service wish to raise awareness of Health and Safety requirements in this sector and to ensure suitable health and safety arrangements are in place
2. **Minimising Infection at Animal Petting/open farms:** One of the HSE priorities is to reduce the risk of infections associated with animal petting farms (i.e E.coli, campylobacter etc). One of the principal controls is to ensure adequate handwashing facilities are available and readily accessible at such premises. Highland Council want to raise awareness of Health and Safety legislative requirements within this activity sector and ensure suitable and sufficient handwashing facilities.
3. **Trampoline Parks** – improved information provision and supervision of users
Over the past few years there has been an increase in the number of accidents occurring at the parks, involving both children and adults, which resulted in a specified major injury (fracture) as well as a small number which resulted in life-changing injuries. Analysis of RIDDOR reports suggests a lack of user understanding of the risks accompanied by reckless, unchallenged behaviour plays a factor in the number of injuries reported by this sector.
4. **Commercial Gas Safety.** One of the HSE priorities is to improve gas safety within commercial kitchens. It is important that all gas equipment is properly maintained by a competent Gas Safe engineer and that all employees are trained in the use of equipment. Highland Council want to raise awareness of



Health and Safety legislative requirements within the catering industry with respect to gas safety.

2. Licensing enforcement and administration

- 2.1 To implement the licensing scheme for short term lets.
- 2.2 To implement the Licensing of pet selling, operating certain animal welfare establishments (including rehoming centres and animal sanctuaries), engaging in other animal rehoming activities and dog, cat and rabbit breeding.

3. Private Water Supplies

- 3.1 Review the charging fees for private water supply related work.
- 3.2 Continue to use a risk-based system approach to the prioritising of the PWS monitoring and risk assessment programme.
- 3.3 The impact of legislative changes in 2017 and statutory obligations on the Council to monitor and regulate private water supplies in its area has placed additional workload and resource requirements on the team. An increase in the size of the PWS Register as a result of Short Term Let Licencing has been noted. A review of workload and resources to be completed in 2023 to identify the resources needed to meet our obligations and provide a sustainable workforce going forward.
- 3.4 Continue to work in partnership with NHS Highlands concerning reports of illness with links to PWS.
- 3.5 Advise, educate and promote the private water supply grant funding scheme so that supplies are improved to provide safer drinking water.
- 3.6 Review the Council's PWS Grant Policy to look at the eligibility criteria for hardship and consider enhanced funding for supplies that experience prolonged water scarcity and/or lead contamination
- 3.7 Complete digitisation of all PWS paper files onto the environmental health case management system



4. Food Safety

- 4.1 Continue to work with Food Standards Scotland on the review of the approach to Food Safety Law following the pandemic. Officers are engaged in a new national project to review the approach to food safety law to provide assurance in public health protection, with sufficient and sustainable resources to deliver the required work. The review may include a new approach to publication of inspection information currently covered in the Scottish Food Hygiene Information Scheme.
- 4.2 Implement the new national approach (Official Control Verification (OCV)) to the inspection of Approved Establishments from 1st April 2023 and review any resource implications (expected additional workload for the premises interventions). Approved Establishments are manufacturers of products of animal origin.

4.3 Food Safety – inspection priorities

It must be noted that investigations, or enforcement action, significant to public health will take priority over the targets specified below.

Priority 1: Routine programme

To inspect the following on time for the due date (*or within 28 days subject to Senior EHO approval*):

- Food Hygiene: 100% target for high-risk premises:
 - Food Hygiene: (Category A&B Approved Premises)
 - Food Law (Category E&D Premises)
- Food Law: 100% target for Food Law Category 1C;
- Food Standards: 100% target for Category A;
- Food Standards: 100% target for Category B that are manufacturers where resources permit.

Priority 2: Unrated food hygiene premises

Senior EHOs and officers to ensure all food hygiene premises that are Unrated premises are given priority and inspected according to the service procedure and the area list of unrated food hygiene premises is reviewed monthly.

- 4.4 Continue to engage with partners in Scottish Government and Industry to ensure EH Service is structured and financed to best facilitate the needs of the export market and appropriate arrangements are in place for imported food including Border Control Points if required.



- 4.5 Continue to support the national working groups, such as the high-risk foods working group, tasked with providing clear and consistent guidance for service delivery.

5. Private Sector Housing (PSH)

- 5.1 To assist the Housing Policy team in undertaking a LEAN review of the Scheme of Assistance policy that provides funding for improvement and adaptations in private sector housing.
- 5.2 To review the allowances that are detailed in the Scheme of Assistance policy.
- 5.3 Where resource permits, work with other Council teams and external housing organisations/partners (e.g. Under one Roof, Shelter, Landlord Registration) to provide opportunities to engage with home owners and landlords on housing standards and signpost to available support

6. General Public Health Protection

- 6.1
1. Implement the relevant priorities for Highland Council Environmental Health from the latest Joint Health Protection Plan.
 2. Public health controls enforced at airports and ports in Highland;
 3. Maintaining the Councils temporary mortuary equipment to support NHS Highland and local funeral directors in case of additional deaths.

7. Local environment issues (dog control, pest, abandoned vehicles, litter)

7.1 Abandoned vehicles:

- a) Complete the procedure review for abandoned and nuisance vehicles and update the Highland Council Website to provide advice and information to the public on the service provision of Highland Council.
- b) If resources permit, provide information of the number of vehicles uplifted by Highland Council onto the Highland Council website for freedom of information enquiries.
- c) If resources permit, carry out a focused enforcement initiative of unlicensed vehicles in collaboration with Police Scotland and DVLA within Highland Council.



7.2 **Litter, fly tipping and Dog Control:**

- a) Continue engagement with Scottish Government on the new national litter and fly tipping strategy and the linked review of litter and fly tipping enforcement activities.
- b) Review the operational requirements for the provision of dog control and litter control staff within Highland Council to ensure suitable provision of enforcement through the area.
- c) Where resources permit, carry out focused litter control initiatives with Police Scotland within Inverness city centre.
- d) Where resources permit, carry out dog fouling initiatives in collaboration with local communities.
- e) Where resources permit, provide information to the Highland Council website on the number of notices issued for dog control and littering for freedom of information enquiries.

7.3 **Seagulls**

- a) Review and where necessary update information provided to the public on seagulls (website & information leaflet)
- b) If resources permit, develop further campaign material on not feeding gulls in targeted areas affected by foraging gulls.

8. **Pollution**

8.1 **Local Air Quality Management:**

- a) Continue work on Local Air Quality Management Area Action Plan
- b) Review local air quality issues in Queensgate, Inverness and wider Local Air Quality Management strategy.
- c) Maintain monitoring facilities at Queensgate, Inverness, Telford Street, Inverness, Strath Viach and An Aird, Fort William.
- d) Prepare and submission of annual Local Air Quality Progress Report to the Scottish Government

8.2 **Contaminated land:**

- a) Review information and reports submitted in support of Planning Applications and to liaise with Planning and Building Control Officers to ensure sites are safely redeveloped through the planning process.
- b) Promote ways of providing contaminated land advice in-house to other Services within the Council in order to minimise spend on external consultants.



- c) Continue to provide support and assistance to other Council departments regarding the development of the Longman site.
- d) Assist and advise when consulted on sites being considered under the Vacant and Derelict Land Fund.
- e) Continue to advise relevant authorities regarding non-radioactive contamination during the decommissioning of the Dounreay Nuclear Facility.

9. Animal Health and Welfare

- 9.1
 - a) Continue liaison with the Scottish Government and Cosla on the proposals to create a Scottish Veterinary Service (SVS)
 - b) Participate in the Animal Health & Welfare Framework agreement.
 - c) Provide support, through advice and enforcement, to agricultural industry on animal disease issues of concern.

10. General management

- 10.1 Continue general review of approach to work to improve effectiveness and efficiency (redesign). Including:
 - a) Performance: Review and develop improved methods of monitoring performance across all areas of work as part of the development of the C&P performance framework, linked to resources;
 - b) Supporting Procedures: Clear & consistent work procedures to improve efficiency and avoid duplication of effort;
 - c) ICT & Business Support: Continual improvement in use of technology & reducing administrative burdens. Advance mobile working methods and solutions across the service. Successful trials held in 2022 on use of tablets for inspections.
 - d) Officer Development: build capacity by improving learning and development process for officers;
 - e) Outcomes: Continue to demonstrate benefits and improve profile of work undertaken with greater use of opportunities of case management system reporting.
 - f) Savings & Income: Increase income & identify further commercial opportunities, linked to the development of improving external income achievement across the C&P service;

