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REPORT TO: ENVIRONMENTAL SERVICES

AGENDA ITEM: 13

DATE OF MEETING: 14 February 2002

CATEGORY: DELEGATED

REPORT FROM: ENVIRONMENTAL HEALTH MANAGER

OPEN PARAGRAPH NO:

MEMBERS' CONTACT POINT: Carl Jacobs 595717

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SUBJECT: Health and Safety Audit of S.D.D.C.'s Health and Safety Inspection frequency / Systems undertaken by the Health And Safety Commission Local Authority Unit and proposed reply to that report

REF:

WARD(S) AFFECTED: All

TERMS OF REFERENCE:ES13

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## 1.0 Recommendations

- 1.1 That the Committee approves the reply and action plan.

## 2.0 Purpose of Report

- 2.1 To seek members approval for an action plan attached as (Annex 1) and the basis of the reply to be forwarded to the Health & Safety Commission following an Audit undertaken by the Local Authority Unit of the Health & Safety Executive.

## 3.0 Executive Summary

- 3.1 The executive summary of the Health & Safety Auditor are as follows the highlighted area is taken directly from the report: -

### ***Executive Summary***

- 2.1.1 The council has effective systems in place to ensure that officers are trained and competent and that action taken is in accordance with documented policies and procedures. The audit also highlighted a number of serious deficiencies where the council is failing to make adequate arrangements to comply with its statutory duties as set out in the HSC's Section 18 guidance. Key shortcomings were found in relation to the delivery of a planned inspection program and systems for managing information (premises database and performance monitoring). Although arrangements were in place for measuring and monitoring the LA's performance, the systems in place were found to be on the whole ineffective.***

**2.1.2 The council had recently undergone a significant restructuring resulting in the retrenchment of some 40 posts (a 12.5% reduction in staff numbers). The council recognised that it was not meeting its statutory obligations for health and safety enforcement although a number of improvements had been implemented in the last 18 months. It is recognised that there is a commitment from officers to improve the service.**

**2.1.3 An assessment of the LA's level of compliance with Section 18 guidance was made. Using the 'compliance matrix' attached at Annex 1, the LA was adjudged to be at the level 1 standard, that is, it was only partially complying with the HSC's Section 18 guidance. Although arrangements to ensure the competency of staff were very good and systems were being put into place for enforcement policies and procedures, it was felt that the failure to deliver a risk-based planned inspection program was serious enough to warrant the level 1 rating. By large, most of the other main areas of Section 18 guidance were being carried out to a level 2 (or 3 - competency) standard. It is noted that the council is improving its health and safety enforcement service and that the Environmental Health Division has requested an additional enforcement officer to help it achieve compliance with its statutory obligations.**

**The LA has been asked to prepare and implement an Action Plan to ensure that its service achieves a minimum standard of level 3 compliance. HELA will review progress against the Action Plan in 12 month's time. The council is asked to send a progress report to HELA\* after a period of six and 12 months. Recommendations**

**\* HELA – Health & Safety Executive/Local Authority Enforcement Liaison Committee**

#### Comments on the Auditors Summary

- 3.1 Improvements to the service have been made over the last 18 months, which was recognised by the auditor. He has clearly stated that there is a lack of resources within the section, which has strengthened a budget proposal, made within the 2002/2003 budget for an additional E.H.O. within the Commercial Section to undertake Health & Safety Inspections and a new Environmental Health Computer System.
- 3.2 Works commenced prior to the Audit on determining the total number of premises that the Authority needs to inspect per year for both Health & Safety and Food Inspections. This is continuing but is being undertaken manually.
- 3.3 The present computer system used for Food and Health & Safety Inspections was devised and maintained by a 'gifted amateur' (an E.H.O. in the Commercial Section). It was adequate several years ago for its purpose but now is totally incapable of providing, measuring and monitoring performance of officers to any degree of provable accuracy. It cannot be brought up to a standard that will provide a planned inspection programme in accordance with HSC's Section 18 guidance.
- 3.4 As a consequence the 2002/2003 budget proposals include the provisions of a new computer system which will provide both a planned inspection programme and performance monitoring.

3.5 Action plan prepared and attached (Annex 1)

#### 4.0 Detail

4.1 An inspection and audit of the Health and Safety activities of the Environmental Health Section was undertaken by Nick O'Donnell of the Local Authority Unit of the Health & Safety Executive between the 27 and 28<sup>th</sup> November 2001. This was as a direct result of SDDC 2000 / 2001 yearly statistical return to the Health & Safety Commission which revealed that we were in the lowest sector of performing Authorities in regard to Health and Safety Inspections in the Country.

4.2 A final report from the inspection was received by the Chief Executive on the 11<sup>th</sup> January 2002. This requires the Local Authority to reply to the Audit with time scales of completion for specified works.

4.3 The information directly below is the basis of the proposed reply of this Authority to the HSE Auditors report, if approved. The numbering system relates directly to the auditors report for ease of comparison with that report. The items in italics and bold are extracts from the Auditors original report.

#### *Introduction*

*The monitoring of local authorities' (LAs') health and safety enforcement services is part of the Health and Safety Commission's (HSC's) arrangements to ensure that LAs are complying with their statutory duties. The HSC has asked the Health and Safety Executive / Local Authority Enforcement Liaison Committee (HELA) to monitor the performance of LAs more closely and report back to it on their findings.*

*The attached audit report examines the health and safety enforcement service of South Derbyshire District Council. The assessment includes local arrangements in place for the enforcement of the Health and Safety at Work, etc. Act 1974 (HSWA) in premises defined by the Health and Safety (Enforcing Authority) Regulations 1998.*

*Section 18 of the HSWA requires that LAs perform their duties in accordance with guidance from the HSC. This guidance is mandatory.*

*Section 18 (4) states it shall be the duty of every local authority:*

- to make adequate arrangements for the enforcement within their area of relevant statutory provisions; and*
- to perform the duty imposed on them by the above paragraph and any other functions conferred on them by any of the relevant statutory provisions in accordance with such guidance as the HSC may give them.*

*The HSC has recently issued revised Section 18 guidance to LAs. This sets out the broad principles that the HSC wishes LAs to adopt in enforcing health and safety legislation. It sets out the framework in which LAs should operate.*

*HELA audits assess LAs' compliance with Section 18 guidance together with the opportunity to identify and disseminate good and best practice. The audits are designed to compliment the Government's Best Value regime and the achievement of best practice.*

## **Scope of the audit**

- 1.2 The audit covered South Derbyshire District Council's health and safety enforcement service. It took place at the council's offices at the Civic Centre, Swadlincote on 27 and 28 November 2001.**
- 1.3 The audit assessed the council's compliance with the HSC's Section 18 guidance using the HELA audit protocol for the management of LAs' health and safety enforcement. The protocol was issued to LAs in June 2000. A revised copy of the protocol and supporting guidance will be issued to LAs in January 2002.**

## **Organisation**

- 1.4 The council's Elected members operate under a committee structure. Health and safety is covered by the Development Service Committee.**
- 1.5 The Environmental Health Section forms part of the Community Services Directorate. It consists of three sections - Environmental Health (Commercial), Environmental Protection and Private Sector Housing. Each of these three sections is headed by a team manager.**
- 1.6 In addition to health and safety enforcement, officers from the Environmental Health (Commercial) Services Section are also responsible for delivery of a range of subjects including food hygiene enforcement, licensing, infectious disease control, public entertainment, Private Water Supplies and animal welfare.**
- 1.7 The Environmental Health Division organisation chart showed that there were seven officers in the commercial team. Of these, the Environmental Health Manager, 2 EHOs, 1 Technical Officer and 1 Safety Officer carried out some health and safety activity. Two of the EHO's and the Technical Officer predominantly carried out food safety enforcement, whilst the Safety Officer divided his time equally between health and safety enforcement and corporate health and safety. The authority estimated that it had about 1.5 full-time equivalent number of enforcement officers carrying out health and safety regulatory activity.**

## **2.2 The Authority's Strengths**

- 2.2.1 Systems to ensure the training and competency of staff were very good. Each officer had a training development plan to ensure that they achieved the core skills and competency considered necessary to do their job. All officers were regularly appraised and their performance was monitored by the Commercial team manager to ensure that they were achieving the required standards.**
- 2.2.2 Effective systems were in place to ensure all officers were fully informed of latest health and safety issues. There were frequent team meetings to discuss common issues and an extensive library of relevant information (guidance, journals, etc.).**

**2.2.3 The council had developed comprehensive internal procedures for dealing with all aspects of enforcement activity. These had been in place for food safety and were about to be introduced for health and safety activity. The procedures should help to ensure consistency and ensure that enforcement action was targeted and proportionate. A period of monitoring would be required to ensure that all officers were implementing them effectively.**

**2.2.4 There were comprehensive systems for dealing with investigation of complaints and accidents. All investigations and requests for service were considered initially by the commercial team manager.**

Recommended reply to part of the report: -

#### Authorities Strengths (Reply to comments 2.2 – 2.2.4)

It was gratifying to find that you considered that systems had improved over the last 18 months and that there was a commitment from officers to improve the service. What you have already outlined is that Health & safety is only one facet of the work we undertake, and these improvements have also been needed in the other work areas of the section. The section had put in place systems that ensured competency of new and existing staff and that training undertaken by staff was relevant and that core training was achieved. The Team has developed comprehensive internal procedures, which are now coming on stream. All officers are fully informed of the latest health and safety issues via regular team meetings, comprehensive and an up to date library of relevant information etc. Monitoring of staff activity and performance is an essential part of management, and with the provision of a new computer system this will be achieved to a greater degree than has been possible to date. In regard to the Procedures, a system of monitoring them will be undertaken which ensures that they are followed and any deviation from them will be recorded. An essential factor to procedures is the ownership of them by staff and this is why any changes etc to the procedures will be agreed and generally generated by the staff.

### **2.3 Key areas for improvement**

**2.3.1 Prioritised planning system - officers considered that there was an incomplete prioritised planning system. Although the council's LAE1 return for 2000/2001 indicated that all premises had been risk-rated, officers expressed concern about the accuracy of the data on the premise database. Many of the premises had been risk-rated several years ago and some of these were considered to be incorrect. Officers remarked that a review of the risk-ratings was necessary to ensure that visits would be prioritised according to risk.**

**2.3.2 Programme of planned inspections - the council should carry out all inspections that are due according to its risk-based priority planning system. The LAE1 for 2000/2001 showed that 25 preventive inspections were carried out - less than 20% of the total planned. A vast majority of the inspections carried out were joint food safety inspections. The section's premises database systems shows that the number of overdue inspections is 364.**

**2.3.3 Database/computerised software system and performance monitoring - Data on accidents and complaints were recorded on a separate database and were not shown electronically in the premises' history. Following changes to the database to provide the FSA with additional data, the authority had been unable to produce a detailed schedule of planned inspections or monitor performance against inspection targets since the beginning of the year. An accurate and complete database is essential to support and manage the authority's inspection and enforcement activity effectively and to assist the authority to manage and monitor its own performance and activity.**

**2.3.4 Sufficient resources allocated to health and safety enforcement - the Division Service Plan for 2002/2003 outlined that the authority would be unable to meet its statutory duties for either health and safety or food safety enforcement (or both).**

Specific comments to the report: -

The present database, which is maintained and operated by an officer within the Commercial Team, is incapable of providing a programme of Planned Inspections in accordance with HELA 67/1. As a consequence a budget approval request has been placed before the appropriate Council Committee's to purchase a new Environmental Health Computer System. The final decision regarding the expenditure of this money will be made at full committee and the decision will be known at the end of March 2002.

Work had already commenced on obtaining information to determine the accuracy of the database prior to your inspection. A list of commercial premises has been obtained from business rates and we are presently checking on comparability of these premises, with our list on the computer system. We have additionally been in discussion with the Health & Safety Executive and Derbyshire Trading Standards Department, regarding information held on their computer systems.

A desktop exercise will then take place to provide suitable risk rating scores for those premises, which are known to officers and presently do not have such a rating. Those premises, which are not known to officers, will receive a questionnaire with questions suitable for us to allocate a suitable risk rating upon their return. Once this has been achieved we will be able to operate a risk based planned inspection programme. However without a new computer system we will be unable to provide a continuing programme of planned inspections without manually going through the records every year.

In order to maintain an up to date data base we are attempting to obtain more information from the Business Rates Section but so far we are falling foul of the Data Protection Act. Meetings have been arranged with Environmental Health, Legal and Business Rates in order to alleviate this problem.

Additionally I have made arrangements for all officers in the commercial team to have access to [www.yell.co.uk](http://www.yell.co.uk) and we will during the year take entries from the system and check them against the Commercial data base.

The present lack of resources within the Health & Safety Section has been the subject of a Committee report, which has highlighted the need for an additional officer to undertake duties within the Commercial team. The final decision regarding the expenditure of this money will be made at full committee and the decision will be known at the end of March 2002.

### **3.2 Enforcement policy and procedures**

**3.2.1 The commercial section was in the process of developing an enforcement policy. The draft policy sets out the council's arrangements for enforcing health and safety. The comprehensive policy includes the principles of targeting, transparency, consistency and proportionality. It outlines the occasions when the use of different enforcement action will be taken and officer authorisation. Liaison with lead authorities was only covered in relation to accident investigation. The policy was due to be approved by Members shortly. There are detailed draft policies for inspections, data collection, accident investigations, handling complaints, and the use of different enforcement action. The policies and internal procedures were extremely comprehensive, easy to understand and should help to promote consistency.**

**3.2.2 The council intends to publicise and publish the policy on its website and leaflets. A summary of the policy would be given out when officers carry out visits. This would inform stakeholders of the full policy and outline where they could obtain a copy if they wished. It is suggested that the summary policy might include all the principles of good enforcement (e.g. targeting).**

#### **Recommendations**

**3.2.3 The local authority should ensure that the policy is published and publicised effectively to customers and stakeholders (paragraph 1.4, HSC's Section 18 guidance).**

#### **Reply to 3.2 Enforcement Policy and Report**

The Enforcement Policy has now been out for consultation with all Commercial staff and is being presented at Committee for approval. It is presently exhibited on the council web site for public comment and if approved it will be amended and placed on the web site permanently, with a request for future comments to be forwarded to the Environmental Health Manager (Commercial & Licensing). A summary of the policy has been produced and includes principles of good enforcement i.e. targeting. This will be given out at all inspections initially and members of the public requesting service in regard to Health & Safety. It will subsequently be given to all new premises, where statutory action is taken and to members of public requesting service.

**3.2.4 The council had recently introduced documented policies and procedures for inspections, investigations and enforcement action for its food enforcement work. These procedures were in the process of being introduced for health and safety. A majority of the officers in the commercial section were carrying out both food and health and safety enforcement and so were already familiar with the procedures. The newly qualified Safety Officer was carrying out health and safety activity only and so the council would need to ensure that he was trained in the use of the new procedures to assist consistency.**

#### **Recommendation**

**3.2.5 The authority should ensure that all officers are carrying out enforcement action consistently.**

Reply to 3.24 and 3.25

The Safety Officer only undertakes Health & Safety Inspections and is not fully conversant with the food procedures. However he is fully aware of the Health & Safety Procedures as he assisted in their production and review. It was made an objective of his Review and Development agreement for 2001 / 2002 to do so as part of his induction exercise to develop and or review all the proposed Health & Safety procedures.

New officers taken on by the Authority will undergo a series of accompanied visits reviews prior to them undertaking enforcement on their own. The system is outlined in the procedure core competencies Section 4 – Induction. (Attached as Annex 2)

### ***A review of officer's letters***

***3.2.6 The Commercial manager checks all letters, notices, etc. prepared by the newly qualified Safety Officer. He also checks 10% of the letters prepared by the more experienced staff. All notices are double checked either by the Commercial Manager or another manager and one of the enforcement officers in the team. A number of recent notices were viewed and these were found to be clear and in accordance with the council's policies. However, the council had recently lost an information laid for failure to comply with an improvement notice) in the courts on a technicality as the notes on the reverse of the notice contained a typing error. The council had been using the incorrect notice proforma for the previous nine years. The council becoming aware of this took immediate steps to ensure the correct notes accompanied all Health & Safety Notices..***

### **Recommendation**

***3.2.7 The authority should ensure that the correct format for notices are used.***

Reply to item 3.26 and 3.27

Immediate action was taken and all notices now have the correct format. We are presently looking at purchasing a system which informs us of all amendments to legislation that affect the work of the Environmental Section.

***3.2.8 The files relating to recent visits were observed. A total of 10 letters where checked from a range of officers. In two or three instances, there was no reference to specific health and safety law when giving advice on statutory requirements, or a timetable for completion of the work. The authority may wish to consider adopting these as examples of improved practice.***

Reply to 3.2.8

A discussion regarding compliance times has always been undertaken between the officers and appropriate representative of the company, and these time scales are now included in letters where contravention's are concerned. Officers have been requested to include specific legislation for each offence in all letters



### **3.3 Work Programme and Service Plans**

**3.3.1 The Division's Service Plan for 2002/2003 referred to the HSC's revised Section 18 guidance and the requirement that LAs develop a planned Inspections programme and devote sufficient resources to achieve it. The Plan states that staff are fully occupied by the food hygiene inspection programme. Either they fail on the health and safety dictate or the food one, or they put additional resources into the service. The plan also states that performance monitoring and the reliability of activity information should be improved. Best Value auditors had questioned the reliability of information produced. The authority is due to commence its Best Value Review for Environmental Health in April 2003. Progress against the Plan is monitored every six months. Further details of Planned health and safety activity are given in paragraphs 3.3.8 and 3.4.2.**

#### **Recommendation**

**3.3.2 The local authority should develop and implement a service plan in accordance with chapter 3 of Section 18 guidance for 2003/04 onwards. The council is asked to submit a copy of the Plan to HELA.**

#### **Reply to 3.3.2**

As previously stated a service development request has gone before committee for additional resources in regards to an additional Environmental Health Officer. The Local Authority will develop a service plan in accordance with Chapter 3 of Section 18 guidance for the period 2003/2004. This plan will be submitted to HELA. And the Environmental Services Committee of South Derbyshire District

#### ***Planned Inspection Programme***

**3.3.3 The LAE1 for 2000/2001 indicated that the council carried out 25 preventive inspections (approximately 2% of the total number of premises). The number of planned inspections for this period was 128. Furthermore, only one of the 13 planned inspections to high-risk premises had been carried out. Detailed analysis of the 25 visits indicated that only two of these were specific health and safety inspections. The other 23 were joint food/health and safety inspections and carried out as preventive food hygiene inspections according to the required planned food inspection frequency.**

**3.3.4 For the period from 1 April to 27 November 2001, the authority's database recorded that 27 preventive health and safety inspections had been carried out. Of these, 16 also involved a food hygiene inspection. The file records for five of these were observed. For one of these visits (Harrington Arms) the file Recorded that the officer had only carried out a short hazard check of the premises. However, the premises database recorded a full preventive inspection having been carried out. The inter-authority audit carried out as part of the Derbyshire-wide exercise in 1999 also concluded that the authority appeared to be double counting food safety inspections. A programme of inspections to warehouses and tyre centres is being carried out by the recently Safety Officer.**

**3.3.5 A total of 364 premises were overdue a planned inspection. This number may Contain some category C premises (councils should make informed decisions as to whether or not they visit category C premises).**

**3.3.6 At one of the high risk premises (a steel stockholder), there had been a fatality approximately four to five years ago. Despite this, the council had not re-visited the premise since then. The premise was still rated as a high-risk premise and therefore due a preventive inspection each 12 months. This was regarded as a serious omission by the authority.**

**3.3.7 The Service Plan for 2002/03 states that the Division will draw up a programme to achieve all high (and medium) risk health and safety premises in line with the work programmes of HSC, and carry out these inspections by March 2003. Both the Chief Executive and the Chairman of the Development Service Committee expressed their commitment to meeting this target and to ensuring that the authority complies with its statutory duties.**

#### **Recommendation**

**3.3.8 The local authority should ensure that an effective planned programme of risk-based preventive inspections (with sufficient management support and commitment) to visit all high and medium-risk premises which are due a health and safety inspection (including those already overdue) is developed and set systems in place to ensure that all planned inspections are achieved (paragraph 2.1 Section 18 guidance). This is regarded as a high priority.**

#### **Reply to 3.3.3 to 3.3.8**

I refer you to reply re Key Areas of Improvement, Comment 2.3 onwards  
In regards to the steel stock holder this has now received a full inspection and appropriate action taken.

#### **Priority planning system**

**3.3.9 The LAE1 for 2000/2001 indicated that all of the council's 1331 premises have been risk-rated. During the audit, officers remarked that many of these ratings were historical and they questioned whether they were still accurate or not. The newly qualified Safety Officer had been asked to carry out a survey to establish the number of warehouses and tyre centres in the district. Using records from business rates and building applications, he had identified 63 premises. Only 25 of these had been risk rated and were recorded on the premises database. A further five premises have now been risk rated. The remainder are to be risk-rated and included on the database shortly.**

**3.3.10 All the premises need to be risk-rated before the council can operate an effective risk-based planned inspection programme.**

#### **Recommendation**

**3.3.11 The local authority should ensure that all its premises are risk-rated. This will help to ensure that it has an effective system for targeting inspections to those premises that**

#### **Reply to 3.3.9 , 3.3.10 and 3.3.11**

I refer you to reply re Key Areas of Improvement

## Training and Competence

- 3.4.1** *There is a strong emphasis on developing the council's employees as enshrined in the Service Plan. Key corporate task A3 in the Plan sets out an agenda for developing management competencies for individual officers across the Division. Task C5 sets out a commitment to review staff training needs for health and safety enforcement by July the newly qualified Safety Officer confirmed the authority's commitment to staff development. He had a structured training programme which includes all the core competencies considered essential to do the job. During his first few months in the job, he had shadowed the more senior enforcement officers during inspections and when taking enforcement action. Similarly, the officer was then shadowed when carrying out his first inspections and when taking any subsequent enforcement action.*
- 3.4.2** *The section had a detailed and impressive library of health and safety information, guidance, legislation, etc. However, when asked to produce LACs in the 40 series (e.g. responding to complaints about the service, HELA Strategy LAC), the authority had none available. Although the section used the HELA website to download LACs, it had not requested LACs unavailable on the Intranet.*

### **Recommendation**

- 3.4.3** *The authority should ensure it has all relevant guidance available to ensure that officers make informed and appropriate decisions and that the authority considers appropriate guidance when deciding how they will comply with their duties under Section 18 (paragraph 8, Section 18 guidance).*

Reply to 3.41 and 3.42

Following our recent telephone conversation we now have access to the closed web site and have received from you the LAC, which was removed from the HSE Web site by mistake. We now believe that with the addition of these 2 LAC'S that we have all the appropriate information for the enforcement of Health & Safety. More importantly we have a dedicated officer who is willing and able to maintain the system accurately.

### **3.5 Investigations**

- 3.5.1** *The authority has a system in place for handling all accidents, complaints and requests for service. These are recorded on a 'greenie' form and then allocated to individual officer by the Commercial Manager. Details of all investigations are recorded by the manager on a database. Officers experienced difficulties in assessing this information and the LAE1 for 2 2000/2001 showed no data for the number of reported accidents or investigations. This was contrary to paragraph 1.8 of the HSC's Section 18 guidance, which states, LAs should... 'collect, analyse, and disseminate information to improve the effectiveness of processes, law, policy and guidance'.*

## **Recommendation**

**3.5.2 The local authority should collect, analyse, and disseminate information to improve the effectiveness of processes, law, policy and guidance (paragraph 1.8, Section 18 guidance).**

Reply to 3.5 to 3.5.2

There is presently no computerised system for dealing with any accident notifications or any Commercial Complaints from the public. Presently all of these notifications are photocopied by the Commercial and Licensing manager and counted manually. This system will be altered when a new computer system is purchased and all information will then be held on a single database.

Information regarding accidents was not on the return because the Commercial and Licensing Manager was on long term sick when the return was completed, and he held the information in his office manually as no computer system was available. This rather time wasting exercise will be eliminated once a new computer system is installed.

**3.5.3 The council has a detailed policy for investigating accidents. The records observed indicated that action taken following an accident was consistent with the policy. However, no thorough checks were carried out by the auditors.**

Reply to 3.5.3 - None

## **3.6 Performance management and reviews**

**3.6.1 The council had taken part in a Derbyshire-wide inter-authority auditing exercise in 1999. The conclusions of the auditor were that the 'double counting' of food inspections as health and safety inspections may be taking place and that there was not adequately documented management system (or policy) to guide enforcement officers. The issue of enforcement procedures has been addressed. However, the council had failed to take any corrective action to address the non-achievement of the planned targets for inspection activity.**

## **Recommendation**

The local authority should:

**3.6.2 take required corrective action (highlighted by performance monitoring systems) to improve its processes and performance (paragraph 1.8 Section 18 guidance).**

• Reply to 3.6.1 and 3.6.2

I would actually disagree with this comment the practice of double counting Health & Safety Inspections and Food Inspections was discontinued following the Derbyshire Health & Safety Liaison group Audit in 1999. The few occurrences of double inspections were due to officer error. This is primarily the reason why the number of inspections for this year is considerably lower than previous years. Requests have been previously made for extra resources but these unfortunately were unable to be approved because of the financial situation the council found itself in. This matter is now being addressed and both areas of improved performance and monitoring should be achieved.

**5.0 Financial Implications**

5.1 There are no financial implications in replying to this report. However the 2000/2003 budget proposals include for an additional E.H.O. to carry out Health & Safety Inspections and a new computer system for the Environmental Health Division.

**6.0 Background Papers**

Action Plan to Nick O'Donnell of the Local Authority Unit. (Annex1)  
Procedure on Induction (Annex 2)

