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**Service Director – Legal, Governance and
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Tuesday 17 September 2024

Notice of Meeting

Dear Member

Environment and Climate Change Scrutiny Panel

The **Environment and Climate Change Scrutiny Panel** will meet in the at **2.00 pm** on **Wednesday 25 September 2024**.

This meeting will be live webcast. To access the webcast please go to the Council's website at the time of the meeting and follow the instructions on the page.

The items which will be discussed are described in the agenda and there are reports attached which give more details.

A handwritten signature in cursive script, appearing to read "S Lawton".

Samantha Lawton
Service Director – Legal, Governance and Commissioning

Kirklees Council advocates openness and transparency as part of its democratic processes. Anyone wishing to record (film or audio) the public parts of the meeting should inform the Chair/Clerk of their intentions prior to the meeting.

The Panel members are:-

Member

Councillor Andrew Cooper (Chair)

Councillor David Longstaff

Councillor Will Simpson

Councillor John Taylor

Councillor Matthew McLoughlin

Councillor Susan Lee-Richards

Jane Emery (Co-Optee)

Garry Kitchin (Co-Optee)

Agenda

Reports or Explanatory Notes Attached

Pages

1: Membership of the Panel

To receive apologies for absence from those Members who are unable to attend the meeting.

2: Minutes of the Previous Meeting

1 - 10

To approve the Minutes of the meeting of the Panel held on the 14th August 2024 and the 10th September 2024

3: Declaration of Interests

11 - 12

Members will be asked to say if there are any items on the Agenda in which they have any disclosable pecuniary interests or any other interests, which may prevent them from participating in any discussion of the items or participating in any vote upon the items.

4: Admission of the Public

Most agenda items take place in public. This only changes where there is a need to consider exempt information, as contained at Schedule 12A of the Local Government Act 1972. You will be informed at this point which items are to be recommended for exclusion and to be resolved by the Panel.

5: Deputations/Petitions

The Panel will receive any petitions and/or deputations from members of the public. A deputation is where up to five people can attend the meeting and make a presentation on some particular issue of concern. A member of the public can also submit a petition at the meeting relating to a matter on which the body has powers and responsibilities.

In accordance with Council Procedure Rule 10, Members of the

Public must submit a deputation in writing, at least three clear working days in advance of the meeting and shall subsequently be notified if the deputation shall be heard. A maximum of four deputations shall be heard at any one meeting.

6: Public Question Time

To receive any public questions.

In accordance with Council Procedure Rule 11, the period for the asking and answering of public questions shall not exceed 15 minutes.

Any questions must be submitted in writing at least three clear working days in advance of the meeting.

7: Food Safety Service Delivery Plan 2024 13 - 56

The Panel will consider the Food Safety Service Delivery Plan 2024.

Contacts:

Leanne Perry, Environmental Health Group Leader, Public Protection,
Environmental Health

8: Statutory Health & Safety Service Plan 24-25 57 - 78

The Panel will consider the Statutory Health & Safety Service Plan 24-25.

Contact:

James Kaye, Environmental Health Group Leader, Environmental Health,

9: Work Programme 2025/25 79 - 88

The Panel will consider the work programme 2024/25

Contact:

Jodie Harris, Principal Governance and Democratic Engagement Officer

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Public Document Pack Agenda Item 2

Contact Officer: Jodie Harris

KIRKLEES COUNCIL

ENVIRONMENT AND CLIMATE CHANGE SCRUTINY PANEL

Wednesday 14th August 2024

Present: Councillor Andrew Cooper (Chair)
Councillor David Longstaff
Councillor Will Simpson
Councillor John Taylor
Councillor Susan Lee-Richards

Co-optees Garry Kitchin

In attendance: Will Acornley, Head of Operational Services
Neil Conway
Nick Jenkin
Graham West, Service Director - Highways & Streetscene

Observers:

Apologies: Councillor Matthew McLoughlin

- 1 Membership of the Panel**
Apologies were received from Councillor Matthew McLoughlin.
- 2 Minutes of the Previous Meeting**
The Panel considered the Minutes of the meeting of the Panel held on 27th March 2024

RESOLVED: That the Minutes of the previous meetings be approved.
- 3 Declaration of Interests**
Councillor John Taylor declared an interest relating to item 6 as the alternative director for SUEZ Recycling and Recovery Kirklees LTD
- 4 Admission of the Public**
All items were considered in the public session.
- 5 Deputations/Petitions**
No deputations or petitions were received.
- 6 Public Question Time**
No public questions were received.

7 Cleansing Performance Update

The Panel considered an update on 'Cleansing Performance' which was presented by Will Acornley, Head of Operational Services – Highways and Street scene who explained that:

- The update had been provided as requested by the Panel in response to reported missed bin collections and set out the measures implemented within the waste collection service to improve performance.
- Following the implementation of measures, (i.e. strong governance, the monitoring of performance data and the introduction of area-based working in the North) the situation had improved and the target percentage for collections had been achieved as per the previous reporting week.
- The improvement journey was continuous and there were still challenges particularly relating to restricted access.
- This was due to several very narrow roads in Kirklees, alongside an increase in the number of parked vehicles (due to home-working) and overhanging vegetation from 3rd party owned land.
- Additionally, the current narrow track vehicles which were relied on for harder to reach areas were not offered during the tendering exercise and were being phased out by the only supplier.
- To combat restricted access there were plans to:
 - Investigate different ways of working, including engaging with other local authorities, to understand best practices.
 - Review how we communicate access issues alongside colleagues from comms and IT as the council move to a digital first model for customer interaction.

There had also been several lessons during the improvement journey and the next steps included:

- The Rerouting of rounds in the south of the district to the area based working model to achieve the following key benefits;
 - Increased accountability for crews,
 - Consistent availability to return for blocked access and missed bins.
 - Allows crews to learn the geography of their area.
 - Easier to spot pressures through new house building.
 - More targeted approach to customer communications.
- Reviewing the market to understand how technology and new systems can support service improvement.
- Using best practice knowledge to understand how to best serve harder to access locations.
- Work with comms and IT to look at a digital first approach, and how best to use non digital solutions in a cost-effective way.

In the discussion to follow questions and comments were invited from the Panel, with the following issues being covered:

Environment and Climate Change Scrutiny Panel - 14 August 2024

- In relation to engagement with elected members, it was found that local ward Councillors had been helpful in passing messages between the Council and communities about missed collections and restricted access (i.e.- advising residents when to move vehicles etc...) This was noted to be particularly effective, and it was agreed that thanks be given to the ward councillors involved for their support.
- In relation to re-routing the South, it was requested that Councillors be made aware of changes in advance to help support the dialogue with residents.
- As well as learning from neighbouring local authorities it was important to also consider the best performers nationally in waste collection. This information may be accessible through the Local Government Association (LGA).
- In relation to housing growth, the Panel highlighted that there would come a point where increases in housing made waste collection unmanageable within existing budgets and it was important to consider the trigger point and communicate this.
- In relation to the narrow track vehicles, the Panel suggested that work be undertaken with neighbouring local authorities to investigate the potential of a joint tender which created better outcomes for all parties.
- with residents the importance of understanding why a bin collection had been missed and feeling heard was noted.
- In relation to improving communications it was suggested that the Council should aspire to an approach like successful delivery companies such as DPD or Amazon in the long-term (i.e.- immediate updates via SMS/email).
- In relation to improving communications, it was noted that there were limited resources, and in the mid-term, it was important to set realistic expectations about what the service could confidently deliver. It was explained that a wider communications campaign around vehicles blocking access on the end of roads/ adjoining roads was to be developed to help engage residents and increase understanding of the challenges.
- In relation to the long-term strategy for addressing the challenges of ageing vehicles it was advised that the Vehicle Replacement Programme had been signed off and it was confirmed that this was on the Panel's 2024-25 work programme for consideration.
- In relation to the performance data, the Panel recommended the use of a heat map to track missed collections by area.
- In relation to reducing contamination, it was advised that the recent trial showed that contamination rates had reduced from 60% to between 20-24% depending on the ward area. This was a large improvement but was still above the target.
- In relation to archiving contamination reduction targets, it was advised that discussions were ongoing with SUEZ to investigate the role of modern technology in making further improvements.
- In relation to behaviour change, the next phase of the Waste Strategy focused on education, and where areas of high levels of contamination were identified a Waste Advisor's would be targeted to those areas.
- In relation to all steps taken to reduce contamination the Panel requested that an update be added to the Panel's work programme.

Environment and Climate Change Scrutiny Panel - 14 August 2024

- In relation to the workshops held with elected members, it was advised that these were delivered at the end of April 2024 and the start of May 2025. These were noted to be successful, and the offer for any member to request to review the performance data with officers was made.
- In relation to changes to the Environment Act and the potential impact it was advised that some clarification had been given on Simpler Recycling (reforms to household and business bin collections) but there was still little clarity on revenue and as a result the focus was on work/changes that could be implemented between now and 2028.
- In relation to brown bins collections, it was advised that this was a paid service and that refunds were given where service was compromised.
- In relation to assisted collection, it was confirmed that the use of concrete pads was being explored.
- In relation to the discussion around communal collection points the Panel highlighted the importance of using elected members as a resource.
- In relation to the student population, it was noted that where young people were managing households independently for the first time, that there was opportunity for education at freshers fairs, as well as working with student agencies to ensure the proper management of waste.
- In relation to the challenges in introducing food waste collection such as the cost, carbon impact and the volume of material, it was noted that there may be opportunities to engage on the issue further through the LGA.
- In relation to behaviour change it was highlighted that there was value in helping residents understand what happens to a resource after recycling (i.e. showing the journey of a recycled item from bin to reuse demonstrating to the individual the impact they had though recycling and recycling correctly).

RESOLVED: The Panel noted the report **Cleansing Performance Update** and recommended that:

1. Thanks be given to the ward councillors involved for their support to the council and the public around missed collections.
2. When re-routing the South Councillors should be made aware of changes in advance to help support the dialogue with residents.
3. Learning should be taken from the best performers in waste collection across all Local Authorities.
4. The possibility of a joint tender for narrow track vehicles be investigated with neighbouring local authorities.
5. A heat map be used to monitor performance and track missed collections by area.
6. An update be presented to the Panel on the steps taken to reduce contamination.
7. Opportunities for Education for the Student population be explored (i.e.- Freshers Fairs) and working with students agencies to best support their management of household waste.
8. Opportunities for engagement around the introduction of Food Waste Collection be explored through liaising with the Local Government Association.

Environment and Climate Change Scrutiny Panel - 14 August 2024

9. A communications/education campaign be used to show the journey of a recycled item from bin to reuse demonstrating to the individual the impact they had through recycling and recycling correctly.

8 Draft Work Programme 2024/25

The Panel reviewed its Draft Work Programme for the 2024/25 municipal year. It was agreed that:

RESOLVED:

1. An update report on reducing contamination be added to the work programme.

The draft work programme be approved for submission to the Overview and Scrutiny Management Committee

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Contact Officer: Jodie Harris

KIRKLEES COUNCIL

ENVIRONMENT AND CLIMATE CHANGE SCRUTINY PANEL

Tuesday 10th September 2024

Present: Councillor Andrew Cooper (Chair)
Councillor Susan Lee-Richards
Councillor David Longstaff
Councillor Matthew McLoughlin
Councillor Will Simpson
Councillor John Taylor

Co-optees

In attendance: Councillor Mark Thompson
Councillor Elizabeth Smaje
Councillor Joshua Sheard (online)
Councillor Lisa Holmes
Councillor Caroline Holt
Councillor Munir Ahmed
Councillor Moses Crook
Councillor Mohan Sokhal
Councillor Cahal Burke
Councillor Tyler Hawkins
David Shepherd, Strategic Director, Growth and Regeneration
Graham West, Service Director Highways and Street scene
Will Acornley, Head of Operational Services - Highways and Street Scene

Apologies: No apologies were received.

- 1 Membership of the Panel**
No apologies were received.
- 2 Declaration of Interests**
Councillor John Taylor declared an interest relating to item 6 as the Alternative Director for SUEZ Recycling and Recovery Kirklees LTD.
- 3 Admission of the Public**
All items were considered in public session.

4 Call-in of Executive Director Decision in relation to Waste Disposal Contract - Household Waste Recycling Centre Efficiency Savings

The Scrutiny Panel considered the grounds of a call-in request, in respect of the final decision taken by the Executive Director – for Place, Growth and Regeneration on 16th August 2024 in relation to the Waste Disposal Contract – Household Waste Recycling Centre Efficiency Savings

The three decision making areas which were the focus of the call-in review meeting were;

- Consultation: No consultation was carried out with ward councillors or residents in relation to the closure of the Nab Lane site prior to the decision being taken.
- Openness – Issues related to the clarity of the potential closure of a HWRC site and a lack of public openness. Information contained in the Budget report and subsequent report to Cabinet, providing a delegation to the Executive Director for Place Growth and Regeneration, did not reference potential closure of a HWRC site being considered.
- Options: No details of the alternative options considered and the reasons for them being discounted were given.

At the review meeting the Scrutiny Panel considered verbal submissions from councillors who were signatories to the call in and views from ward councillors affected by the decision. The Panel also considered the response of the Executive Director for Place, Growth and Regeneration, as the decision maker, along with Senior Officers of from Highways and Streetscene.

The Panel considered everything that had been submitted in writing and verbally at the hearing. This included the background reports, information that had informed the decision and the responses to questions relating to the reasons for the decision being taken, consultation, alternative options and the reasons for them being discounted as well as issues around the clarity of the delegation agreed by Cabinet on 9th April 2024.

The Panel considered the three decision options set out in the Council's Constitution, that were available to it:

1. To take no further action and free the decision for implementation
2. To refer it back to the Decision Maker with recommendations for amendment
3. To refer it back to the next Council, if the Panel considered that the decision was not made in accordance with the budget or policy framework.

RESOLVED: That the decision taken in relation to Waste Disposal Contract – Household Waste Recycling Centre Efficiency Savings be referred to the Decision Maker with the following recommendations in relation to the areas of focus as follows:

1. (Openness) That the Decision Maker be requested to refer the matter to Cabinet for determination due to the Panel's view that there was a lack of openness and

Environment and Climate Change Scrutiny Panel - 10 September 2024

understanding at the time when the delegation was made to the Executive Director for Place Growth and Regeneration (Cabinet 9th April 2024) and it wasn't clear that closure of a site was an option being considered.

2. (Consultation) The Panel resolved that there was a lack of engagement with Ward Councillors and service users and that more consultation with all relevant stakeholders must take place in the future.
3. (Options) That all alternative options and the reasons they were disregarded be shared as part of the decision-making process in future.

The Panel also highlighted the following learning points:

- i. That consultation with ward members should take place earlier in the process and in confidence, if necessary, in future.
- ii. That where information has been shared outside of the control of the decision maker, that the decision be paused to allow a consultation to take place if needed in future.

KIRKLEES COUNCIL

COUNCIL/CABINET/COMMITTEE MEETINGS ETC

DECLARATION OF INTERESTS

Environment & Climate Change Scrutiny Panel

Name of Councillor

Item in which you have an interest	Type of interest (eg a disclosable pecuniary interest or an "Other Interest")	Does the nature of the interest require you to withdraw from the meeting while the item in which you have an interest is under consideration? [Y/N]	Brief description of your interest

Signed:

Dated:

NOTES

Disclosable Pecuniary Interests

If you have any of the following pecuniary interests, they are your disclosable pecuniary interests under the new national rules. Any reference to spouse or civil partner includes any person with whom you are living as husband or wife, or as if they were your civil partner.

Any employment, office, trade, profession or vocation carried on for profit or gain, which you, or your spouse or civil partner, undertakes.

Any payment or provision of any other financial benefit (other than from your council or authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses.

Any contract which is made between you, or your spouse or your civil partner (or a body in which you, or your spouse or your civil partner, has a beneficial interest) and your council or authority -

- under which goods or services are to be provided or works are to be executed; and
- which has not been fully discharged.

Any beneficial interest in land which you, or your spouse or your civil partner, have and which is within the area of your council or authority.

Any licence (alone or jointly with others) which you, or your spouse or your civil partner, holds to occupy land in the area of your council or authority for a month or longer.

Any tenancy where (to your knowledge) - the landlord is your council or authority; and the tenant is a body in which you, or your spouse or your civil partner, has a beneficial interest.

Any beneficial interest which you, or your spouse or your civil partner has in securities of a body where -

(a) that body (to your knowledge) has a place of business or land in the area of your council or authority; and

(b) either -

the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or

if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, or your spouse or your civil partner, has a beneficial interest exceeds one hundredth of the total issued share capital of that class.



Report title: Food Safety Service Delivery Plan 2024

Meeting	Environment & Climate Change Scrutiny Panel
Date	25th September 2024
Cabinet Member (if applicable)	Cllr Munir Ahmed
Key Decision Eligible for Call In	No No
<p>Purpose of Report To report to members of the Environment & Climate Change Scrutiny Panel on the activity and performance of the Food Safety Team, within Environmental Health and present the Food Safety Service Plan for 2024, adopted by Cabinet in July 2024, that incorporates a review of the performance of the Food Safety Team against the priorities set in the Food Safety Service Plan 2023/24 and identifies the priorities for 2024/25.</p>	
<p>Recommendations It is recommended that the Environment & Climate Change Scrutiny Panel note the Food Safety Service Plan that accompanies this report.</p>	
<p>Resource Implication: Existing budget to the Food Safety Team, no additional budget required.</p>	
<p>Date signed off by <u>Strategic Director</u> & name</p> <p>David Shepherd, Executive Director, Place, Growth & Regeneration</p> <p>Is it also signed off by the Service Director for Finance? Yes</p> <p>Is it also signed off by the Service Director for Legal Governance and Commissioning? Yes</p>	<p>Give name and date for Cabinet / Scrutiny reports Food Safety Service Plan 2024/25 Cabinet 9th July 2024- signed off and agreed Scrutiny Panel 25th September 2024</p> <p>16th September 2024</p> <p>Yes – John Bartlett, for Kevin Mulvaney 26.06.24</p> <p>YES – David Stickley, Principal Lawyer, for Samantha Lawton, Service Director 25.06.24</p>

Electoral wards affected: All Wards

Ward councillors consulted: N/A

Public or private: Public

Has GDPR been considered? Yes, no personal data included, and any sensitive data anonymised.

1. Executive Summary

The Food Standards Agency (FSA) has a key role overseeing local authority activities concerning food safety enforcement. As a result, the FSA is proactive in setting and monitoring standards and auditing local authorities' enforcement activities, in order to ensure enforcement is effective and undertaken on a more consistent basis, nationwide. Powers to enable the FSA to monitor and audit local authorities are contained in the Food Standards Act 1999.

Food Safety Service Plans are a requirement of the FSA Framework Agreement and the Food Law Code of Practice and are seen by the Agency as an important part of the process to ensure that national priorities and standards are addressed and delivered locally. These priorities and standards are set by the Food Standards Agency with the LA identifying some local priorities based on compliance and local needs. The FSA Framework Agreement provides local authorities with a service plan template which is designed to ensure that local authorities include in their service plans:

- Information about the services they provide and how they are delivered.
- The means by which they will provide those services, and the financial resources required to deliver food safety official controls, in line with the Food Law Code of Practice.
- The means by which they will meet any relevant performance targets or performance standards set out under, for example, National Indicators (NI). This includes managing performance and making performance comparisons.

The Food Safety Service Plan reviews the excellent work the Food Safety Team has carried out over the previous 12 months up to 31 March 2024, in:

Fully complying with the Food Standards Agency Codes of Practice, with reference to the completion of food official controls, as follows:

- 1329 food hygiene inspections were undertaken.
- 136 Revisits completed
- 466 food and environmental samples taken from food businesses.
- 139 businesses provided with education or advice (in addition to that given during inspections).
- 85 Food Hygiene Rating Reassessment Inspections.
- 243 'low risk' interventions in lower risk food businesses.
- 490 complaints relating to food and/or food premises dealt with.

Complying with its legal duties and worked to ensure that food manufactured and sold within the district is as safe as it can be. The following enforcement actions were taken:

- 9 voluntary closures of businesses
- 6 Hygiene Emergency Prohibitions of businesses
- 1129 written warnings
- 54 hygiene improvement notices
- 1 suspension/revocation of approval
- 1 seizure of food

- 4 remedial action or detention of food notices
- 3 completed prosecutions and 4 pending
- 1 simple caution issued.

Met its priorities for 2023/24 as follows:

- Delivered and expanded the low-cost food hygiene workshop - Steps to Success.
- Continued to share expertise across West Yorkshire through the Food Lead Officers Group.
- Continued to monitor performance.
- Maintained staffing levels as per the budget.
- Increased business resilience through the adoption of the FSA online registration.

The Food Safety Service Plan 2024 sets out the continued, and new priorities for the delivery of the food safety function of Environmental Health over the plan period April 2024 to March 2025, to ensure that the Food Safety Team meets all the necessary, statutory requirements for the delivery of official controls. Furthermore, it continues the good work, up to press, and continues to further develop and expand low-cost training to businesses as well as other initiatives with aim to ameliorate food safety standards across the district. For example, develop a communications strategy around the ways people like to access information; and greater place-based working, in areas where there is a correlation between poor food hygiene standards and areas of high deprivation.

2. Information required to take a decision

In developing the plan, consideration has been given to a balance of enforcement measures depending on prevailing circumstances, level of risk, stakeholder engagement, and other external influences.

The Food Safety Service Plan for 2024/25 is attached.

The Food Safety Service Plan for 2024/25 will summarise main actions and outcomes as of 31 March 2024, as well as providing an outline of future work priorities and direction.

The Plan has identified requirements for local authority food safety teams to meet, in relation to their food hygiene inspection programmes including the ongoing impacts of the Covid-19 pandemic (backlog of Category D inspections).

Since the last service plan was completed (2023), the Food Safety Team has undergone a number of personnel changes, with the loss of 1.5 FTE (through one retirement and one resignation). However, staffing levels are stable following successful recruitment of one FTE, Environmental Health Officer. The current number of FTEs is deemed adequate to fulfil all the Team's statutory duties and to deliver on the priorities set in the Plan.

The Food Safety Team continues to follow the advice issued by the Food Standards Agency and through the Food Law Code of Practice and Practice Guidance, to ensure that the delivery of official controls is being undertaken in accordance with the statutory frequencies and with reference to the guidance and regulatory requirements in a consistent manner.

3. Implications for the Council

3.1 Council Plan and Priorities

3.1.1 Address our financial position in a fair and balanced way

The Food Safety Service Delivery Plan outlines the scope and function of the Food Safety Team and identifies the official controls that will be required to be undertaken, during the 12-month period, the staffing levels within the Team and an assessment of whether the resources are adequate to undertake the necessary official controls. The Plan also identifies the priorities for the period of the Plan. The Plan is based upon the existing budget for Food Safety and does not request additional funding, so therefore will achieve a fair and balanced budget. Please note that budget details are provided in section 3.2.

3.1.2 Strive to transform council services to become more modern, efficient, and effective.

The Food Safety Team continues to deliver official controls in accordance with the requirements of the Food Law Code of Practice and is obliged to undertake these official controls within the guidelines. However, to achieve greater compliance with food safety requirements, without the need for formal action, the Team is committed to providing advice to food businesses; this may involve carrying out a visit to assist food businesses to comply with food hygiene legislation. With implementation of the Steps to Success workshop and the limited resources, following Council priorities, we've placed greater information and detail on the Kirklees website, which, coupled with information available on the FSA website, gives prospective businesses all the information they require. This aims to enable businesses to inform themselves and improve their food hygiene standards without the need for resource intensive, formal enforcement action.

3.1.3 Continue to deliver a greener, healthier Kirklees and address the challenges of climate change.

The Food Safety Team, as part of Public Protection, follows the Council's Travel Hierarchy for business travel. The team is now working in more of a hybrid way (mixture of working from home and the office) and as part of this, officers have access to some council vehicles. Officers are encouraged to do multiple visits in a locality to maximise productivity as well as resources and to minimise emissions.

The Food Safety Team has been significantly involved in the 'Healthy Holidays' programme, which provides free activities and a meal during the school holidays to children who qualify for free school meals. Their involvement has been through vetting and inspecting all the individual schemes to ensure that food is being prepared safely for our children and young people. The team has worked closely with other Council teams who administer this programme, including Public Health colleagues and therefore contributes to this important public health work.

3.1.4 Continue to invest and regenerate our towns and villages to support our diverse places and communities to flourish.

The food safety function is required to follow the Food Law Code of Practice, which requires that all businesses be risk rated according to a national scoring system. This risk-based approach means that the businesses that pose the highest risk (whether that is because of undertaking high risk activities or due to poor levels of compliance) are inspected the most frequently. This targets resources to those areas which pose the greatest risk, based on intelligence and information.

Furthermore, the review of food hygiene ratings data, has identified a correlation between areas of high deprivation and poor food hygiene standards. To support our diverse places and helping communities to flourish, the team in 2024/2025 will continue to review data on poor levels of food hygiene compliance and localities, to identify and focus resources appropriately. This will include continuing the 'Steps to Success' workshop in these localities. This has the significant potential to address inequalities within communities, through the provision of this low cost, targeted food hygiene training in the areas with the highest levels of non-compliance. This continued focus will aim to improve health in these localities through improved food safety. The impact on food hygiene compliance of the Steps to Success workshop, will continue to be assessed and the approach reviewed, should it not result in the desired improvements in food hygiene standards. This will also aim to improve engagement from businesses within these localities and to also provide them with an opportunity to be supplied with other useful information regarding the Council and other relevant services. Greater engagement will also aim to identify the barriers to compliance, within these localities and assist the Team in reviewing its approach, to attempt to support these businesses effectively.

3.2 Financial Implications

The Food Safety Service Plan outlines the scope and function of the Food Safety Team, the staffing levels within it and identifies the priorities for the period of the Plan. The Plan is based upon the existing budget for Food Safety and does not request additional funding. The Team budget for 2024/25 is as follows:

	2024/25
Expenditure	Food Team Budget
Staffing	£663,908
Training	£2000
Travel and other subsistence	£3083
Supplies and services	£1702
ICT	£0
Sampling	£2783
Total Expenditure	£673,476

The funding for the Team's budget is based on the following funding streams:

- Government Grants £484,000
- Council Tax/Business Rates £165,000
- Fees and charges £24,000

3.3 Legal Implications

Section 2 of the Food Law Code of Practice (2023), (with reference to the Framework Agreement on Official Feed and Food Controls by Local Authorities), details that food safety service plans should be submitted to the relevant member forum for approval, to ensure local transparency and accountability.

Kirklees, along with all Local Authorities, signed up to a framework agreement with the Food Standards Agency for the regulation of food premises and delivery of 'official controls. In accordance with this agreement, the Local Authority has a duty to appoint a sufficient number of authorised officers to carry out the functions required by the Food Law Code of Practice (England).

In cases where local authority failure is identified (i.e., failure either to discharge functions adequately or failure to meet statutory obligations to apply the law), the agency has legal powers of intervention of direction and default.

The Food Safety Service Plan 2024 does not identify any resourcing or other issues for the period of review of 2023/24 and the forward-looking period of 2024/25, which would place the Authority in default of its legal obligations, nor does it require additional financial contributions to its revenue budget or staffing resources.

It should be noted however, that due to the current recruitment and budgetary constraints of Kirklees there has been an overall reduction in staffing levels of the Food Safety Team during the previous financial year. This has been through vacancy management and due to budget constraints, these posts will not be recruited to. An assessment of the impact of these reductions in headcount has been carried out by the responsible Head of Service and Operational Manager, and with the assessment of the delivery of official controls for 2024/25, it is considered not to materially affect the plan's outcomes. However, this situation will be kept under review to ensure that all statutory requirements are met.

3.4 Other (e.g. Risk, Integrated Impact Assessment or Human Resources)

The Food Safety Service Plan does not provide any material change to the delivery of official controls in relation to food businesses and food activities within Kirklees. Rather, it is a review of the delivery of official controls during the financial year 2023/24 and an assessment of the required resources for 2024/25. The findings of the Food Safety Service Plan are such that the delivery of official controls has and should continue to be undertaken in accordance with all statutory requirements. It does not, therefore, pose any new or greater risks for Kirklees Council, nor its residents. There is also no change to the risk register or Corporate Risk Matrix.

The review of staffing resources and other elements that might impact on the delivery of official controls has been considered, based on the predicted number of official controls that are anticipated, based on the number of inspections that will be due during the financial year 2024/25, and the estimation of the number of new businesses that will require an official control during the period (based on data from previous years). There is no new or greater risk identified from this assessment.

The Food Safety Service Plan does not materially change the service delivery of the Food Safety Team and there are no significant budgetary changes/implications associated with it. There is no, identified, impact on persons with protected characteristics as the delivery

of official controls is a statutory function, to be undertaken in accordance with the relevant Food Law Code of Practice. An Integrated Impact Assessment (IIA) has been completed.

It is, however, hoped that the priorities identified within the plan, specifically those aimed at improving businesses' access to information and guidance (including through the delivery of a low-cost food hygiene workshop) will have a positive impact on food hygiene compliance that will result in:

- An increase in safe food within Kirklees, that in-turn will be conducive to improved health and wellbeing for all residents.
- Reduce the number of enforcement activities that are necessary where there is non-compliance – this will result in less officer time taken up with enforcement action and less impact on staffing resources.
- Less pressure on staffing resources will ensure that there is no new or increased risk to Kirklees Council failing to meet its statutory obligations, with regards to the delivery of official controls. The priorities may, indeed result in a reduction to this risk.

4 Consultation

No formal consultation has been undertaken as the Food Safety Service Plan is a statutory report, which is required to follow a prescribed format to detail the delivery of official food safety controls and identify priorities to ensure the statutory obligations are met by Kirklees Council. The Plan is reporting on progress against the priorities set in the Food Safety Service Plan 2023 and sets new priorities for 2024/25. As the priorities are, in the main, statutory obligations, these are set within the Food Law Code of Practice and therefore formal consultation is not required. However, in determining the priorities, beyond the statutory requirements, discussions/consultations have taken place with: colleagues in our neighbouring WY authorities (as part of the West Yorkshire Lead Officers Group); Public Health colleagues – e.g., the Healthy Activities and Food and UK Health Security Agency in relation to infectious diseases; and are also based on feedback from food business operators.

5 Engagement

No engagement has been undertaken for the reasons stated in relation to consultation, above.

6 Options

6.1 Options Considered

The Food Safety Service Plan 2024/25 was adopted by Cabinet in July 2024 and has been published on the Council's Website.

6.2 Reasons for recommended Option

It is recommended that Environment and Climate Change Scrutiny Panel notes the Plan and that it recognises the excellent work, undertaken by the Food Safety Team in 2023/2024, to comply, in full, with the Food Standards Agency Codes of Practice 2023. Furthermore, as detailed in the Plan, the Food Safety Team aims to build on new initiatives such as low-cost training to businesses to further improve food hygiene standards in the borough.

7 Next steps and timelines

– Following the review of the Food Safety Plan 2024/5 by the Environment and Climate Change Scrutiny Panel., the Food Safety Team will work to the actions detailed in the report and the outcome of those actions as well as our day-to-day regulatory activity will be reported in the Food Safety Service Plan 2025/26 in summer 2025.

8 Contact officer

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Email: leanne.perry@kirklees.gov.uk

9 Background Papers and History of Decisions

Food Standards Agency Service Plan Template
Food Law Code of Practice June 2023

10 Appendices

Food Safety Service Plan 2024

11 Service Director responsible

Katherine Armitage – Service Director Climate Change and Environmental Strategy

Kirklees Council

Food Safety

Service Plan 2024/25





CONTENTS

1. INTRODUCTION

- 1.1 Aims and Objectives
- 1.2 Links to Corporate Objectives and Plans
- 1.3 Sustainable Economy

2. BACKGROUND

- 2.1 Profile of the Local authority
- 2.2 Organisation Structure
- 2.3 Scope of the Food Service
- 2.4 Demands of the Food Service
- 2.5 Regulation Policy

3. SERVICE DELIVERY

- 3.1 Interventions of Food and Feeding Stuffs Establishments
- 3.2 Food and Food Premises Complaints
- 3.3 Compliance and Enforcement Action
- 3.4 Advice to Business
- 3.5 Food Sampling
- 3.6 Control and Investigation of Food Related Infectious Disease and Outbreaks
- 3.7 Food Safety Incidents
- 3.8 Liaison with Other Organisations
- 3.9 Home Authority Principle and Primary Authority Scheme
- 3.10 Food Safety Promotional Work and Non-Official Controls Intervention

4. RESOURCES

- 4.1 Financial Allocation
- 4.2 Staffing Allocation
- 4.3 Staff Development Plan

5. QUALITY ASSESSMENT

- 5.1 Quality Assessment and Internal Monitoring

6. REVIEW

- 6.1 Review against the Food Service Delivery Plan 2022
- 6.2 Identifications of Any Variation from the Service Delivery Plan 2022
 - 6.2.1 Inspections
 - 6.2.2 Requests for a Revisit under the National Food Hygiene Rating Scheme (FHRS)
 - 6.2.3 Revisits to Non-compliant Premises
- 6.3 Areas of Improvement for 2023/24

Appendix 1 – Organisational Structure

Appendix 2 – Food Hygiene Rating Scheme, Number of Compliant or Failed Premises

Appendix 3 – Infectious Diseases Data

FOOD SAFETY



1. SERVICE AIMS AND OBJECTIVES

Introduction

The Food Standards Agency (FSA) is an independent government body which has an oversight of how public health and consumers are protected with respect to food in England, Wales and Northern Ireland. The FSA's Food Law Codes of Practice and associated guidance, together with the Framework Agreement on Official Feed and Food Controls by local authorities, clearly sets out what is expected of local authorities in performing their regulatory role. This service plan details the food safety work of Kirklees Council's Environmental Health Food Safety Team for 2024/25. The plan follows the format set out by the FSA Framework Agreement and will also include a review of the previous year's activity and performance information.

Following the COVID-19 pandemic, the Food Standards Agency issued guidance to local authorities. Due to the pause of inspection programmes, a significant backlog developed. In 2023/2024 the Food Safety Team successfully completed the majority of the backlog inspections, along with inspecting a high volume of newly registered food businesses.

1.1 AIMS AND OBJECTIVES

To ensure that all food prepared, offered or exposed for sale is what it says it is and that it is safe and will not cause ill health.

To deliver the planned interventions as set out in this service delivery plan in accordance with Food Law Codes of Practice (England) including all unrated premises (new registrations).

To respond to food and hygiene complaints, considering the risks to public health. In accordance with the Kirklees Council's enforcement policy and the regulators code.

Investigate food poisoning notifications and/or other food safety alert incidents to ensure the protection of wider public health.

To provide support and advice to local businesses so they can comply with legal requirements and best practice.

To continue using the Food Hygiene Rating Scheme (FHRS) to promote and improve food safety compliance with food businesses.

To play an active role in the Food Standards Agency plans under the Achieving Business Compliance programme to review and update how food safety is regulated in the UK in a post Brexit world: [Achieving Business Compliance \(ABC\) programme | Food Standards Agency](#)

1.2 LINKS TO CORPORATE OBJECTIVES AND PLANS

The Council's vision is for Kirklees to be a district that combines a strong, sustainable economy with a great quality of life – leading to thriving communities, growing businesses, high prosperity and low inequality where people enjoy better health throughout their lives. This vision is underpinned by the council's shared outcomes which are:

[Well](#) [Best start](#) [Independent](#) [Aspire and achieve](#) [Clean and green](#)
[Sustainable economy](#) [Shaped by people](#) [Safe and cohesive](#) [Efficient and effective](#)

In addition, the Joint Strategic Needs Assessment identifies food and nutrition as one of its priorities. Furthermore, the link between unsafe food and public health is clear, and therefore, it is important to ensure that food processed, produced and sold in Kirklees is safe and fit for human consumption.

Timely, programmed and risk-based interventions will ensure that food businesses are inspected, and where necessary, proportionate enforcement action is taken. This approach will aim to ensure that problem premises are dealt with before their practices and procedures can have a detrimental impact on public health.

Climate Emergency is a key strategic priority for the council. Climate change has the potential to significantly impact on food security due to negative impacts on food production (both crops and livestock). It may also have a detrimental impact on food safety through the increased growth and proliferation of pathogenic foodborne micro-organisms both in the UK but also in developing countries where foods may be imported from. It will be necessary for the Food Safety Team to remain vigilant and aware of any new evidence which indicates food safety issues because of climate change. This should also incorporate increased sampling of imported foods in a more regular and programmed way.

Another significant impact on food supply and the delivery of official controls in relation to food safety is the UK's exit from the EU. From 31 December 2020, the UK has been a 'third country' and some food exports are required to meet EU imported food entry checks.

It also means that some foods coming from the EU now need to meet third country import checks in the UK. This means that imported foods coming into the UK (from Europe and other 'third' countries) require physical, documentary and identity checks at the border. These have now been introduced, for medium risk goods imported from the EU. Although a reduction of checks has been implemented a baseline of 3% for EU imports and 5% for non-EU imports. The UK Government will also begin to simplify imports from non-EU countries - this will include the removal of health certification and routine checks on low-risk plants and plant products from non-EU countries.

These additional controls on imports and exports of certain foods, may also impact on businesses within Kirklees and their ability to operate. This is because there were previously no import/export restrictions on their goods between the UK and EU. Significant work was undertaken in 2019, to contact all food manufacturers within Kirklees and signpost them to the relevant places for information on import/exports to and from the EU, in preparation for UK's withdrawal from the EU.

To date, there have not been any significant impact in Kirklees from the UK leaving the EU but not all import controls for food coming from the EU are in place. Although Kirklees is not a port of entry, there remains the potential risk of imported foods to impact on our Food Safety Team. This would be when issues are identified with imported foods that have not been checked at the port of entry. Kirklees Food Safety Team may need to detain and/or dispose of, destruct, or return any such goods. This will require appropriate staffing resources.

In 2023/24 Kirklees Food Safety Team did not see an increase in requests for 'food safety for export' certificates from manufacturers located in Kirklees.

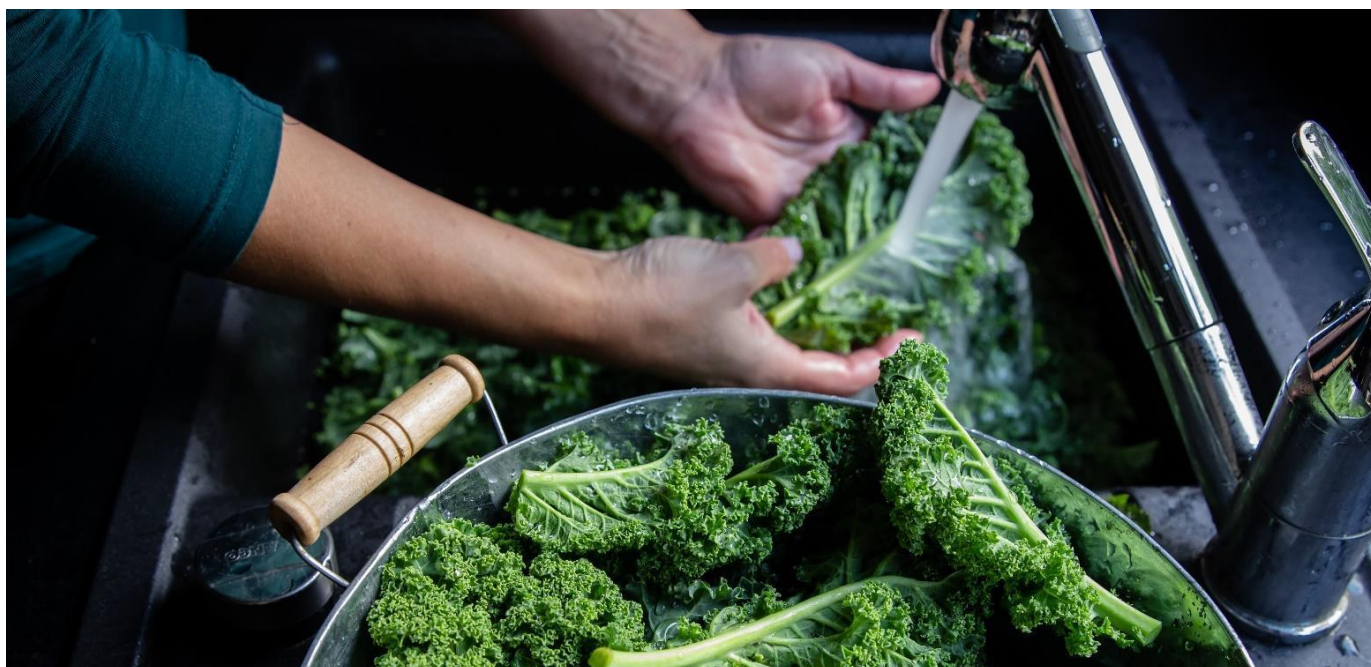
1.3 SUSTAINABLE ECONOMY

The Food Safety Team recognises the importance of engaging with business and how successful business can impact and increase local and council wide economic development. A consistent approach to food safety ensures a level playing field, with compliant businesses receiving recognition (through higher food hygiene rating scores) and failing businesses requiring a reasonable, proportionate, risk-based enforcement action to secure compliance. The Public Protection Enforcement Policy outlines this approach by ensuring the full range of enforcement options are considered and using the hierarchy of enforcement options. Only using formal options where informal options have not achieved the desired outcome (graduated approach). This has been prepared in-line with the Regulators' Code.

Given the increase in awareness of food safety, and food hygiene rating scores, it is anticipated that customers complaints regarding businesses will increase. Similarly, it is anticipated that a consistent approach to enforcement will, in the longer term, ensure greater compliance and reduce the need for enforcement action.

The Service works closely with the UK Health Security Agency (UKHSA) and undertakes a food sampling programme that focuses on national/international food safety concerns and trends. We continue to work with colleagues from the Public Health Team (formerly NHS Kirklees) in relation to infection prevention and control.

The Food Information and Nutritional Education (FINE) team was previously positioned within the Public Protection Service and worked with the Food Safety Team on a number of projects to promote healthy eating. One such project was 'Healthy Holidays' that was introduced during the COVID-19 pandemic in response to the problem of children not being at school and therefore some school children not being able to access a nutritionally balanced lunch due to school closures and poverty. This project has continued during school holidays since and the Food Safety Team ensure that providers are compliant with food hygiene legislation and are providing safe food.



Since 1st April 2022, the FINE Team has now moved under the Public Health Directorate, however the joint working on Healthy Holidays continues, as will future projects, where appropriate.

The Food Safety Team maintains its links with the Consultant in Public Health Medicine in infectious disease control, particularly in connection with food poisoning and foodborne illness. Links have also been maintained with the Consultant in Public Health Medicine in infectious disease control, particularly in connection with food poisoning outbreaks and surveillance, including quarterly operational and strategic meetings, which aim to identify and adopt solutions to larger, more regional issues. Officers from Kirklees Infection Prevention and Control Team also sit on these meetings.

Food Safety (and other Public Protection) officers worked closely with Kirklees Infection Prevention Control officers during the COVID-19 pandemic to investigate outbreaks of COVID-19 in workplaces, particularly those associated with food businesses. The links developed during that period, have been maintained and will ensure continued collaborative working between the departments.



2. BACKGROUND

2.1 PROFILE OF THE LOCAL AUTHORITY (KIRKLEES COUNCIL)

Kirklees is the third largest Metropolitan District with an area of 157 square miles (40,860 hectares) and measured in population terms is the fourteenth largest local authority (in the UK) with a population currently estimated to be 437,000 (2022 estimate, following the 2021 Census our population estimate was revised to a lower figure).

Kirklees is an area of diverse communities, topography, settlement and industrial development. Current ONS figures suggest that 23.3% of the total population are from minority ethnic groups (compared to 19.5% nationally), the largest group being Asian or British Asian (16% of total population).

Under the political structures, the principal executive decision-making body of the council is a cabinet of councillors, which includes the Leader, and the Lead Members for the Service groupings.

The council employs approximately 6,946 Full-time Equivalent (FTE) staff, as of August 2023. (This excludes schools).

Kirklees is a very large food authority and currently supports over 4,100 food premises.

2.2 ORGANISATIONAL STRUCTURE

The Food Safety and Infectious Diseases team sits within Public Protection. Please see appendix 1 for the organisational structure. In accordance with the Food Law Code of Practice (England) we have appointed the UK Health Security Agency Food, Water and Environmental Microbiology Services Laboratory in York as our food examiner and through West Yorkshire Joint Services, Lancashire Analytical Services as our food analyst, both of whom are suitably qualified.

2.3 SCOPE OF THE FOOD SERVICE

The food safety and infectious disease function is dedicated wholly to food related activities and sits alongside the other core environmental health functions of pollution and noise control and health and safety.

The food safety and infectious diseases team is responsible for undertaking the following work activities:

- Programmed food hygiene interventions
- Provision of advice to food businesses
- Food sampling (including milk and dairy products)
- Investigation of food complaints
- Investigation of food poisoning and outbreak control
- Responding to food standards agency food alerts
- Inspection of food
- Monitoring licensed/approved premises
- Imported food control



West Yorkshire Joint Services are responsible for food standards, feed hygiene and inspection of primary production premises in the Kirklees area.

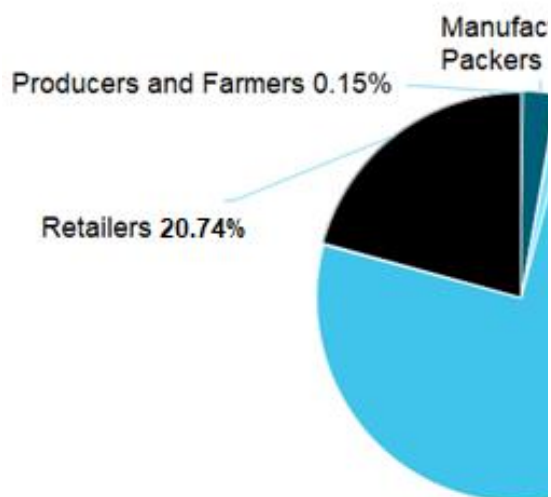
Kirklees Council's Animal Health Team support the Food Safety Team through the inspection of farms and small holdings; the investigation of animal welfare complaints; and attendance at livestock markets etc.

2.4 DEMANDS ON THE FOOD SERVICE

As of 1st April 2024, there were 4164 food businesses registered with the Food Safety Team.

The pie chart below shows the number of food businesses registered with Kirklees Food Safety Department on the 1st April 2024.

Food businesses registered with the Food Safety Team on 1 April 2024

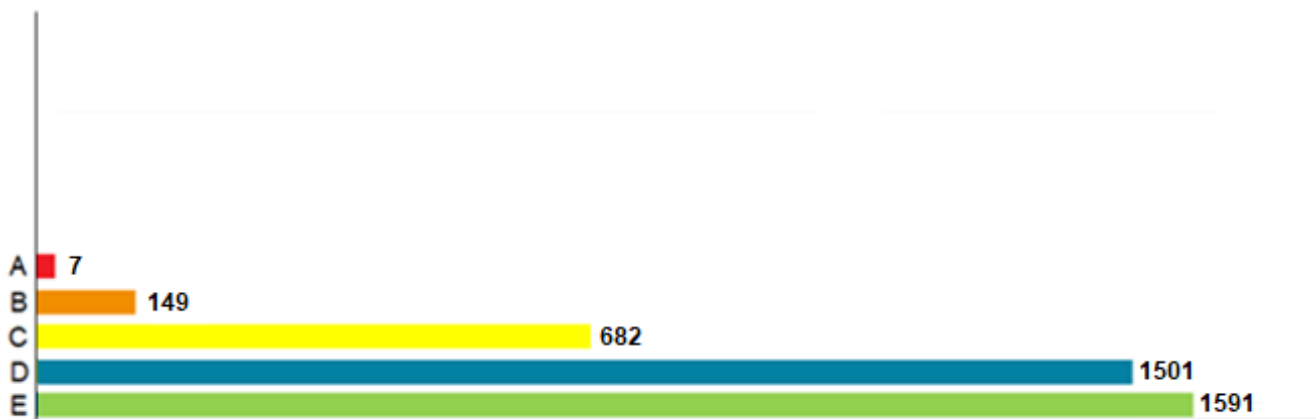


The risk rating relative to the number of food business is provided. The table below shows a breakdown of the number of food businesses that fall into the different risk categories A to E, as detailed within the Food Law Code of Practice. Businesses in risk category A are deemed the highest risk and are therefore inspected the most often; through to category E premises that are deemed the lowest risk and are therefore inspected the most infrequently.

Rated premises profile 1st April 2024

Type of Risk	Type of Premises	Number
A		7
B		149
C		682
D		1501
E		1591
Outside programme		4
Unrated premises		192
Approved premises	Meat/minced meat or meat preparations products	12
	Fishery Products	2
	Cold Stores	8
	Egg Packing	3
	Dairy products	8
Specialist processes	On-Farm pasteurisers and dairy products	5
	Bottled water producers	1 on 2 sites

Rated Premises Profile 1 April 2024



Kirklees Council currently has 38 premises that manufacture or process products of animal origin that require statutory approval. This also includes five on farm pasteurising dairies that we have specifically trained officers to deal with. Two officers will always attend approved premises interventions, this is due to risk and complexity of these types of premises. As each inspection can take two-to-three hours of officers' time and as Kirklees Council have 38 approved premises, this can equate to a minimum of 240hrs of officers' time. Therefore, the resources required for the delivery of official controls, in relation to approved premises, is greater. It is estimated that this would equate to around 120 food hygiene inspections in a catering establishment, such as takeaways/restaurants.

Furthermore, sampling and environmental swabbing is undertaken by Kirklees Council's food safety officers at all approved premises, at least once per year. This is approximately a further 120 hours of officer time, consistent with approximately 50-60 inspections/official controls in catering establishments.

There are also 8 approved cold stores within Kirklees District. In the past these types of premises have been perceived to be classed as low risk food hygiene premises. Following the horse meat scandal in 2013 and other high profile food safety cases, this highlighted the need to reconsider the risk associated with these types of premises and food fraud continues to be a national issue.

In summary, when considering the resources required to undertake all official controls in Kirklees, resources equivalent to an additional 150 interventions shall be factored in for increased demand associated with the regulation of approved premises. This is in addition to the number of interventions due under the food inspection programme each year and the estimate of new businesses registering in the calendar year (usually approximately 500 new businesses). The number of estimated interventions shall be considered with reference to the number of FTE food hygiene inspectors required to undertake official controls.

The budget allocated to delivering the Food Safety and Advice function is shown in section 4.1 and staffing allocation in section 4.

Environmental Health operates from Civic Centre 1, High Street, Huddersfield, HD1 2NF.

Opening hours are Monday to Thursday from 8.45am to 5.15pm, Fridays from 8.45am to 4.45pm.

The public may also access the service from Customer Service Centres located in Huddersfield and Dewsbury.

2.5 REGULATION POLICY

The Enforcement Policy was reviewed and updated in 2019 and incorporates the Enforcement Concordat.

The Policy may be viewed on the Council's website at:

<https://www.kirklees.gov.uk/beta/planning-enforcement/pdf/enforcement-policy.pdf>





3. SERVICE DELIVERY

The Food Safety intervention programme undertaken by Kirklees Council operates in accordance to the Food Law Code of Practice (CoP) and any associated guidance/policy. The CoP sets out a range of interventions to support local authorities target resources more effectively on those premises that pose the highest risk. These official controls include inspections, audits, sampling, monitoring and verification.

We continue to follow an alternative intervention approach for low risk, category E premises, which have previously been inspected, whereby a 'low risk survey' form is sent to a business asking the food business operator about the types of foods handled and what food safety procedures are in-place at the business. From this, an assessment will be made of the food safety risk. Where there has been a change in food business operator, or if the information provided indicates an increase in risk, an on-site intervention shall be undertaken. Where the form is not returned, an officer will call the business to complete the assessment or will visit to assess the risk. These will also result in a full inspection, should the information indicate an increase in the food safety risk.

The following tables shows the number of interventions undertaken during the 2022/23 and 2023/24 and these are listed according to the type of intervention.

Interventions undertaken 2022/23

The following table shows the number of interventions undertaken during the 2022-2023 financial year and these are listed according to the type of intervention.

In 2022/23, the Food Safety Team significantly increased its delivery of official controls and not only met the Food Standards Agency's Recovery Plan minimum requirements at every milestone but exceeded the expectations. The numbers of interventions completed are also above pre-pandemic levels.

Intervention type	Number
Inspection or audit	1434
Re-Visits	259
Verification or surveillance (including onsite visits and some remote assessment)	289
Sampling*	487
Advice or education (remote only)	N/A
Information/intelligence gathering	1
Food Hygiene Rating re-assessments	77
Category E Low Risk interventions	1047

Interventions undertaken 2023/24

The table shows the number of interventions undertaken 2023-24 financial year and these are listed according to the type of intervention.

Intervention type	Number
Inspection or audit	1329
Re-visits	136
Verification or surveillance (all onsite visits)	153
Sampling*	466
Advice or education **	139
Information/intelligence gathering	2
Food Hygiene Rating re-assessments	85
Category E Low Risk interventions	243

*Sampling number = the total number of samples taken

** This includes number of businesses that have attended Steps to Success workshop.

3.1 INTERVENTIONS OF FOOD AND FEEDING STUFFS ESTABLISHMENTS

During 2023/24 all inspections were undertaken by Environmental Health staff (rather than contractors). We place high value in the importance of consistency in our approach and amongst officers, which is better supported using in-house staff.

From the 1st April 2024, we have continued to carry out due interventions for establishments that are back in line with the routine inspection programme, in accordance with the frequencies set out in the Food Law Code of Practice 2023. This is in line with the expectation in the FSA Recovery Plan that establishments should revert to Code frequencies, once subject to an intervention, as part of the Plan. We have worked towards realigning with the provisions set out in the Code from 1 April 2023 using the full range of flexibilities already offered by the Code. Over the last 12 months we have continued to exercise a risk-based approach to the requirements set out in the Code based on available resource and will continue to do so over the coming 12 months.

The following table shows the number of programmed interventions that are due to be completed up to the 31st of March 2025:

<u>Risk Category of Establishment</u>	<u>Number of premises due inspection in this category to 31.3.25</u>
A	4
B	140
C	402
D	864
E*	286
Unrated	83

* Please note that category E businesses will usually receive a low-risk survey either by post or conducted over the phone. Where this identifies that there have been no changes to the businesses and the risks are not deemed to have increased, then an on-site visit is not undertaken. Where there has been a change of food business operator or a change in their business operation an on-site inspection will be undertaken.

There are currently 6.86 Full Time Equivalent (FTE) officers who are fully authorised to undertake all official controls and enforcement activities. There are a further 2 FTE with restricted authorisations (Category C to E premises interventions) and 1FTE in training, who undertakes information/intelligence gathering visits etc. The total FTE for food safety is 9.86 FTEs plus 1 FTE Group Leader.

In 2023/24, requirements of the FSA Recovery Plan were comfortably met but Kirklees Food Safety team also received 725 new business registrations, which required inspection. In addition to meeting the FSA's minimum requirements, it was a priority for the on-site inspection of category D premises that are broadly compliant be undertaken. It was aimed (the same as last year) that at least 50% of these businesses would be inspected. As of the 1st April 2024 Officers completed 556 category D rated premises inspections (65% of the actual outstanding total). This was an excellent achievement to ensure the inspection programme is back in line with the FSA Codes of Practice.

There was also a number of revisits planned, to ensure that businesses who were less than broadly compliant have made the required food safety improvements. In 2023/24, 136 revisits were completed.

The Food Safety Team has also continued to prioritise the allergen requirements in food businesses, during on-site inspections. These requirements came into force in 2021 and are commonly known as 'Natasha's Law' require businesses who wrap food for sale (pre-packed for direct sale e.g., packaged sandwiches) must provide ingredients and allergen information on the packaging to inform consumers. This has been a significant change in the requirements relating to allergens and therefore emphasis is being placed on this during inspections to assist businesses in complying and to keep consumers safe.

Staff resources are organised on a north/south district basis. In addition, some staff have responsibility for specialist areas of work including infectious diseases, meat and dairy products premises etc.

We continue to operate the national 'Food Hygiene Rating Scheme' (FHRS). The scheme is supported and promoted nationally by the Food Standards Agency. It helps consumers choose where to eat out or shop for food, by giving them information about the hygiene standards in food premises at the time they were inspected to check compliance with legal requirements, and through this, it encourages businesses to improve their standards.

The map "Food Hygiene Rating Scheme, Number of Compliant or failed Premises" in Appendix 2 shows that there appears to be a correlation between areas of worst deprivation and low food hygiene ratings.

This is an area of work we plan to look at more closely, to try and identify some of the reasons for this and to focus resources to attempt to work with businesses/communities to improve food hygiene ratings in these most deprived areas and also to raise awareness of the food hygiene rating scheme amongst consumers, so that they can make informed choices about the businesses they buy food from.

To try to support businesses with poor food hygiene ratings to improve and maintain their hygiene rating, in January 2023 we held a pilot workshop called 'Steps to Success' for food businesses with a low food hygiene rating, 15 Food Business Operators attended the workshop. The workshop covered the areas which are most frequently associated with poor food hygiene ratings, as follows: food safety documentation requirements, cleaning, cross contamination, pest control and what to expect when an Officer is completing a food hygiene inspection.

The workshop's facilitators have received positive feedback from all food businesses that attended. In 2023/24 we facilitated these workshops every 6-8 weeks in venues throughout North/South Kirklees. The workshops have taken place in localities where there is a concentration of poor food hygiene ratings to make the training as accessible as possible. An impressive 84 businesses have attended the Steps to Success workshops, with a total of 134 individuals. A review of the subsequent inspections' Food Hygiene Rating (FHR) data, of attending businesses, has been analysed to identify whether attending the workshop leads to improvements in the businesses' FHR/compliance with legislation has been achieved. Of the 84 businesses attending the data shows 82 business are now compliant and have achieved a FHR of 3 (satisfactory) or above. The FHR data will continue to be analysed to identify if the increase has a long-term impact of the businesses' compliance with legislation.

Food team officers have been specifically authorised to enforce legislation relating to Imported Food. There are no ports of entry within Kirklees. There are two External Temporary Storage Facilities (ETSF) in Kirklees (ETSFs are HMRC controlled warehouses where foods may be stored until import clearance is given), but neither of these currently receive food goods; therefore, there is only a low level of work involved.

Officers look for imported food on inspections and take appropriate action if required. In 2024/25 officers will undertake imported food sampling to check the safety of imported foods being sold in Kirklees. This is a requirement for Food Safety Departments to undertake the sampling of imported foods as part of their sampling programme as it provides important surveillance of imported foods which ensures the safety of foods being imported to the UK.

Primary producers (food growers) are inspected in West Yorkshire by West Yorkshire Joint Services Feed and Food Standards officers. Additional support for this is undertaken by animal health officers in conjunction with their farm inspections.

Since the introduction of smoke-free legislation in 2007 premises and vehicles are also assessed for compliance at each inspection and the necessary action(s) taken.



3.2 FOOD AND FOOD PREMISES COMPLAINTS

It is the policy of the food team that complaints received by the Service in relation to food and food premises are investigated in accordance with the relevant guidelines and Public Protection Enforcement Policy.

Complaints which are of a minor nature, and therefore, unlikely to result in formal action receive a limited response.

When a complaint is, or may be, associated with the business' central policies or procedures, where appropriate, the primary, home and/or originating authority are contacted for advice if it is outside Kirklees.

Any complaints received relating to food standards issues are referred to West Yorkshire Joint Services.

In 2022/23 the Food Safety Team received 666 complaints relating to the condition of either food or food premises. In 2023/24 the Food Team has received 490 complaints relating to the condition of food or food premises were received (this is a 26% decrease from the previous year). The type of complaints varied, ranging from bits of plastic in food to complaints of rats in premises. All complaints require a degree of investigation. However, those considered to pose the greatest risk to public health are afforded more time and resources.

The resources allocated to the Food Safety Team are sufficient to enable all complaints relating to food or food premises to be triaged and action taken according to risk and our work instructions regarding such complaints.

3.3 COMPLIANCE AND ENFORCEMENT ACTION

The tables below detail the enforcement action undertaken by the Food Safety Team during 2021/22 and 2023/24.

ENFORCEMENT ACTIONS 2021/22

Enforcement Action type	Number
Voluntary closure	13
Seizure of food	0
Suspension/revocation of approval/licence	0
Emergency prohibition	0
Simple caution	3
Improvement notices	93
Remedial action and detention notices	2
Written warnings	972
Prosecutions	1

ENFORCEMENT ACTIONS 2022/23

Enforcement Action type	Number
Voluntary closure	3
Seizure of food	0
Suspension/revocation of approval/licence	0
Emergency prohibition	9
Simple caution	3
Improvement notices	104
Remedial action and detention notices	1
Written warnings	1240
Prosecutions	10

ENFORCEMENT ACTIONS 2023/24

Enforcement action type	Number
Voluntary closure	9
Seizure of food	1
Suspension/revocation of approval/license	1
Emergency prohibition	6
Simple caution	1
Improvement notices	54
Remedial Action and detention notices	4
Written warnings	1129
Prosecutions	3 completed (4 pending)

The above data on enforcement actions taken, reflects the impacts of the COVID-19 Pandemic with the return to more frequent inspection/intervention in 2021/22 and 2022/23 there has been a significant increase in the numbers of enforcement actions. The data for 2023/24 is consistent with or higher than data from the pre-pandemic period and also the ongoing impact the cost-of-living crisis is having on food businesses. Officers are continuing to find a decline in food hygiene standards in food businesses and this is resulting in an increase in enforcement actions.

The enforcement option used depends very much on the risk present at the time of the inspection, and varies from a simple report, outlining corrective actions needed, to the service of a hygiene emergency prohibition notice, which requires the business to close immediately. Enforcement, in accordance with the Food Law Code of Practice and Public Protection Enforcement Policy, follows a graduated approach.

In line with Kirklees Enforcement Policy and the graduated approach, prosecution will only be used when all other enforcement options have been exhausted. However, where very serious and high-risk contraventions are identified, prosecution may be taken without following a graduated approach. Kirklees Council's Enforcement Policy can be accessed at the following link:

<https://www.kirklees.gov.uk/beta/planning-enforcement/pdf/enforcement-policy.pdf>

3.4 ADVICE TO BUSINESS

The Food Safety and Infectious Diseases Team is committed to providing advice to food businesses; this may involve carrying out a visit to assist food businesses to comply with food hygiene legislation. During the 2023/24 period, 139 requests for advice were received, this is an increase on the previous year (74) with implementation of the Steps to Success workshop and the limited resources, following Council priorities, we've placed greater information and detail on the Kirklees website, which, coupled with information available on the FSA website, gives prospective businesses all the information they require.

For unique/high risk businesses, officers still visit and provide the advice needed. Ultimately, however, the responsibility to operate and produce food safely remains with the business.

We have also begun to provide advice to food businesses when they register a new business with us. This is done by sending the food business operator an email with advice on how to comply with the legal requirements, with links to further sources of information. The intention is to provide them with the information they need to make sure they are complying with the main elements of food safety law, including the need for documented food safety management procedures. The aim is that this will enable them to get things in place before the inspection so that they can achieve the highest food hygiene rating possible and, of course, to produce safe food.

As part of our commitment to support new food business, the Food Safety team has now signed up to the Food Standards Agency Register a Food Business Service (RAFB). Registration is a legal requirement and is the foundation of food business operator (FBO) data that is used by those delivering official food controls. The FSA RAFB will ensure that information captured is accurate and in a consistent way through out LAs and that the right information is obtained at the point of registration. The Food Safety Team will continue to be responsible for the registration of food businesses. The RAFB service aims to improve the overall effectiveness, efficiency and consistency of registering food business establishments across England, Wales and Northern Ireland. In 2024, the FSA are reviewing the RAFB and hoping to include some further information such as an addition of three risk-based questions to help local authorities triage and prioritisation of newly registered food businesses. Along with a date of birth field for the FBO to complete. It is a user-friendly process that captures relevant data from food business operators (FBOs). In addition to it being easier and quicker for food businesses to register, they also receive links to relevant information and guidance to help them comply with safety and standards regulations. Later versions of the service will provide links tailored to the type of business registering.



As part of our commitment to supporting food businesses and from reviewing our data regarding food business compliance and localities, it has been identified that there is a significant correlation between poor levels of food hygiene compliance and businesses being located in areas/wards with high levels of deprivation (please see Appendix 2 – Food Hygiene Rating Scheme, Number of Compliant or Failed Premises). As previously mentioned, we are therefore, refocusing our resources to supporting these businesses by continuing with a low-cost training workshop that was piloted in 2022/23 on businesses that are less than broadly compliant, particularly those with food hygiene ratings of 0, 1 or 2 and has been a success of 2023/24.

The 'Steps to Success' (STSS) workshops have now taken place in localities where compliance is low and so that the workshops are easy to access and provide an opportunity for the food business operators to get one-to-one help and advice. Each business that attended also received a printed copy of the Safer Food, Better Business pack along with a 1-hour re-visit from an officer to check ongoing standards/ improvements. Due to receiving positive feedback, STSS workshops will be facilitated every 6 weeks within numerous localities, following a place based working approach.

3.5 FOOD SAMPLING

It is the policy of the food team to carry out routine sampling and to take samples where problems with food production have been identified. Other sampling is linked to our food premises interventions programme and where problems associated with high-risk foods are anticipated or are revealed during routine inspections. There is also a focus on sampling at premises that pose a higher risk due to the type of food and the quantities of food produced, e.g., approved premises that manufacture meat/dairy products etc.

This sampling of both food and environmental swabbing provides reliable information regarding the hygiene standards in premises and the safety of food products.



Due to the number of farm dairies in Kirklees, we offer an economical chargeable service for the collection and analysis of dairy products on their behalf. This is considered to be an important area of work given past experience of infections in milk and the high-risk nature of the product. In 2022 we started to expand this service to other approved premises and manufacturers of high-risk food, such as meat products premises, to assist such businesses in verifying that their food safety management procedures (based on the HACCP principles) are effective. Due to a reduction in the availability of local food microbiology services, we see this as an important area of work that requires development. We have been successful in gaining 2 new commercial contracts and will be looking to further expand these in 2024/25 to support businesses.

The Food team also participates in cross regional and national surveys organised through UKHSA. In addition, samples are taken following referrals of sample failures from other local authorities; by officers following or during routine inspections; and/or in response to complaints. All sampling is undertaken by officers in accordance with quality procedures and relevant sampling protocols. Formal samples are taken in accordance with the Food Law Code of Practice. Samples are submitted to either the UKHSA Food and Water Laboratory or Lancashire Analytical Services Laboratories.

In 2022/23, 483 samples were taken in total (95% increase on the previous year). In 2023/24 466 samples were completed. We will continue with our sampling programme for surveillance purposes due to having additional staffing resources available in the form of 3 officers undertaking studies to become Environmental Health Officers/Senior Technical Officers who, once competent, will undertake sampling as part of our surveillance of food hygiene standards and food safety at businesses.

3.6 CONTROL AND INVESTIGATION OF FOOD RELATED INFECTIOUS DISEASE AND OUTBREAKS

The Food Safety Team's policy concerning investigation of food poisoning notifications and outbreak control is contained in a joint procedure manual, produced in conjunction with UKHSA and other West Yorkshire Authorities. The document is known as the "Protocol for investigation and management of sporadic cases and outbreaks" and "Kirklees Infectious Disease Outbreak Protocol".

Communicable diseases investigations up to the years 2024 can be found in Appendix 3.

In the event of a serious outbreak, staff resources are utilised from the food team and across the whole Service if necessary. In 2023 we investigated one suspected outbreak of food poisoning. In 2022/23 we had not received any suspected outbreaks of food poisoning. During instances of suspected food poisoning outbreaks, we work closely with UKHSA and Kirklees Public Health colleagues. There is also a Memorandum of Understanding (MOU) between the West Yorkshire authorities that would permit colleagues from neighbouring authorities to assist us, should there be the need.

The incidence of food poisoning follows a national pattern, with *Campylobacter* being the most prevalent cause of reportable food poisoning. However in the last 2 years *Salmonella* cases are on the rise.

3.7 FOOD SAFETY INCIDENTS

Procedures for dealing with Food Alerts and food safety incidents are clearly documented in a specific quality guideline in order to comply with the Food Law Code of Practice (England). All food officers are required to be signed up to the FSA Smarter Comms system, whereby officers will receive food alerts directly. Those food alerts that are 'for action' will be acted upon by officers and the Food Lead Officer will co-ordinate the response and direct officers to take appropriate action should a food alert be received that relates to food or premises located within Kirklees.

Where the Food Safety Team are contacted directly by the FSA in relation to a food incident, relating to a business within Kirklees, action will be taken immediately. This will also extend to responding to urgent food standards issues, in order to assist West Yorkshire Joint Services in responding quickly to an issue. This will be to identify whether the affected item is present and to take steps to remove it from sale etc.

Where a significant food safety incident occurs, all of the Food Safety Team would be made available to respond. This might include a national recall etc. However, these incidents are generally infrequent and, as such, all necessary resources are available. Should this not be the case, other officers from Environmental Health would be called upon to assist and/or other West Yorkshire colleagues would be requested to assist under the MOU.

3.8 LIAISON WITH OTHER ORGANISATIONS

This authority has liaison arrangements with other West Yorkshire authorities through the West Yorkshire Food Lead Officers Group (WYFLOG) and also at Chief Officer level with West Yorkshire Authorities.

The Environmental Health Group Leader attends the WYFLOG meetings on a six-weekly basis. Other agencies also attend these meetings, namely: UKHSA Food, Water & Environmental Microbiological Laboratory; Food Standards Agency (FSA) Imported Food; and FSA Relationship Manager and West Yorkshire Joint Services (Trading Standards).

This enables consistency between the five West Yorkshire authorities, which is particularly important for businesses who may have outlets in more than one of the West Yorkshire authority areas to ensure that there is consistency in enforcement. To this end, all five authorities use the same aide memoire and other documentation for inspections, including approved premises to ensure consistency.

Regular liaison takes place with the Council's Licensing department in response to proposals for new food premises, whereby licensing officers notify us of any changes to licensees at food businesses.

There are also close links established with the UKHSA colleagues and internally, with Kirklees Public Health, in relation to communicable diseases and infection prevention and control.



3.9 HOME AUTHORITY PRINCIPLE AND PRIMARY AUTHORITY SCHEME

There are a number of large food manufacturing businesses within Kirklees' borough that distribute foodstuffs nationally and some internationally. There are also a number of food businesses that operate multiple outlets. However, there are currently no primary authority agreements, relating to food safety, between Kirklees Council and businesses.

We do, however follow the Home Authority Principle, in that we provide assistance to other competent authorities in relation to facilitating the sharing of intelligence or investigating any concerns regarding a product produced within Kirklees or by a company located within Kirklees.

The Food Safety Team follows the Home Authority (HA) principal when undertaking regulatory duties and would contact the HA should there be any concerns regarding the food safety compliance at the business or in relation to a complaint.

The Food Safety Team also verifies whether there is a Primary Authority Agreement in place at businesses, prior to undertaking official controls and would verify whether there were any relevant assured advice/inspection plans etc. to be considered prior to on-site visit. Any proposed enforcement action would be considered following consultation with the primary authority, except in emergency situations where there was an imminent risk to health.

The lack of any food safety Primary Authority Agreements means that this area does not currently require any resource. The Service would openly consider establishing a primary authority partnership should it be approached.

Resourcing both the Home Authority Principle and Primary Authority Scheme does not require significant resource at this time, as officers undertake their duties with reference to these principles when undertaking official controls at businesses.



3.10 FOOD SAFETY PROMOTIONAL WORK AND NON-OFFICIAL CONTROLS INTERVENTIONS

The service takes part in a variety of food safety promotion activities in order to raise awareness of food safety in the home and in businesses.

Such promotions include:

1. Maintenance of the Food Safety section on the council Website
2. Publishing the food hygiene ratings of food businesses on the FSA national website: [Search for ratings | Food Hygiene Ratings](#)
3. Steps to Success Workshops
4. Fee paying service for businesses seeking bespoke advice
5. Identification of opportunities for engaging in the wider Public Health Agenda
6. Promote any FSA campaigns such as Food Safety Week, safe summer BBQ's and Christmas Messages.

In relation to non-official controls interventions, the Service also undertakes compliance interviews with businesses that have been found to be failing over a period of time. The aim is to try to achieve an improvement in standards, without the need to take enforcement action. The focus of the interview is to discuss the food hygiene contraventions with the Food Business Operator (FBO), away from the business where they have time to discuss and understand the issues at the business and for food safety officer and Environmental Health Group Leader (EHGL) to understand the reasons for the contraventions and for the FBO to provide some pledges as to how they intend to rectify the problems and to maintain an hygienic and compliant business. These pledges are recorded at the time of the interview and both the FBO and the EHGL both sign the agreement. Should future interventions identify that the business has failed to implement the required improvements or maintain previous improvements, then formal enforcement action will be taken.



4. RESOURCES

4.1 FINANCIAL ALLOCATION

The Service has, as have all local authorities continued to face financial constraints. The team continue to focus limited resources in a proportional risk-based approach. The budget allocated to delivering the Food Safety and Infectious Disease functions for 2021/22 and 2022/23 is shown below.

Expenditure	2022/23	2023/24	2024/25
Staffing	£615,102	£659,965	£663,908
Training	£2000	£2000	£2000
Travel and other subsistence	£3083	£3083	£3083
Supplies and services	£702	£1702	£1702
ICT	£0	£4368	£0
Sampling	£8650	£2783	£2783
Total Expenditure	£629,537	£673,900	£673,476

In 2021/22 the budget was reprofiled to provide extra resources for this important area of work. This has since continued with a view to finalising recruitment and to assist with staff retention. In the last 12 months we have had 1.5 EHOs take retirement or leave the service but another 2 EHOs join therefore, it is hoped that this will bring the FTE more in-line with the national average (average number of food premises to Full Time Equivalent officers (FTE's) the generally accepted national guidance is that:

- 250 premises per FTE is a well-resourced LA
- 350 or more premises per FTE is a stretched LA
- 450 or more premises per FTE is an LA which is likely to flounder and not deliver all the statutory functions.

Kirklees current staffing resource stands at 9.86 FTE which is 422 premises per FTE; however low risk premises (category E) do not always require an onsite, official control and have an alternative intervention. When excluding the number of low risk rated premises the number of food premises per FTE is 260 and therefore it is believed that this resource is adequate.

It should be noted that due to the Food Law Code of Practice (CoP) qualification and Competency Framework requirements for food safety inspectors, it is very difficult to recruit suitably qualified and experienced officers. In considering this, Kirklees will continue to train and develop in-house members of staff to meet these recruitment needs. This is also part of the wider workforce and succession planning, in response to expected retirements in the coming years. There are currently three officers training to be either EHOs (2) or an STO (1). The current staffing resources are satisfactory in order to deliver the estimated food official controls for 2024/25, in line with the requirements of the CoP.

Due to the national shortage of suitably qualified food safety officers, the FSA are currently reviewing officers' qualification and competency framework as part of a Local authority resourcing project. The FSA are aware of the following issues LA are facing:

1. Insufficient number of students working towards qualification
2. Current qualification routes and training programmes do not provide early career professionals competent to deliver official controls.

3. Early career professionals require significant levels of support, which some LAs do not have the capacity to provide.
4. A lack of practical experience provided (or required) by the current qualification and training routes.
5. Current qualification routes perceived to be too linear and take a long time to achieve.

The sampling element within the above budget information, relates to sampling income from undertaking the sampling service that is provided for dairies and other 'approved' premises.

We receive sampling credits from the UK Health Security Agency's Food, Water and Environmental Laboratory in relation to sampling as part of surveillance or as part of a formal investigation, which enables the Food Safety Team to undertake good levels of sampling. As previously described in Section 3.5, sampling levels have returned to pre-Pandemic levels.



4.2 STAFFING ALLOCATION

The current staff resources covering Food Safety and Infectious Diseases work at 1st April 2024:

1 Environmental Health Group Leader (Food Lead Officer)

1.86 Full Time Equivalent Senior Environmental Health Officers (SEHO)

6 FTE Environmental Health Officers (EHO)

2.0 FTE Senior Technical Officer (1 officer in training and not able to undertake official controls at the time of writing)

1 Business Support Officer

The staffing resource to the Food Safety Team has increased in recent years and, as can be seen in 4.1 above, the ratio of food businesses per food safety officer has significantly reduced.

The food safety team have 9.86 FTE delivering official controls, which is deemed adequate to ensure the appropriate delivery of official controls. The performance of the Team, with regards to completing all necessary official controls will continue to be monitored on an, at least, quarterly basis. This is discussed further in Section 6 – Review.

4.3 STAFF DEVELOPMENT PLAN

Each individual staff member has an annual appraisal meeting with their line manager (plus a six-monthly review) to evidence individual contributions in achieving our stated goals and identifying any development needs. This is in addition to regular, ongoing 1-2-1s.

Nationally, food safety officers are required to be competent according to the Food Law Code of Practice and the FSA's Competency Framework, which identifies the key areas of skills and knowledge that a food safety officer must have in order to be deemed competent for the delivery of official controls. The Competency Framework covers a wide range of food safety disciplines, with officers now requiring authorisation for each specific section.

The new competency framework is a fluid document, requiring regular updates but also acting as a guide as it identifies development and training needs to ensure officers remain competent in relevant areas. Officers are required to review this document at least annually, usually prior to their annual appraisal. The new Competency Framework in the Food Law Code of Practice and associated Practice Guidance was first published in June 2023 and all officers who were not deemed 'competent' before 1st March 2021 have been through the new competency framework. Their knowledge and skills have been assessed by the Food Lead Officer through discussion and from observation during accompanied visits and where this has been identified as satisfactory, they have been deemed competent and authorised accordingly. Competency requirements were further reviewed in 2023, following the release of an updated CoP and Practice Guidance in June 2023.

As part of the competency framework and requirements of the Food Law Code of Practice, all officers are required to maintain at least 20 hours Continuing Professional Development (CPD). This is also reviewed at the annual appraisal.

Importance is given to the need to ensure continuing professional competence in technical areas of work. Training/development was challenging due to the Pandemic; however, CPD has been maintained through online training and from in-house training.

In-house training consists of regular consistency meetings as well as undertaking training focused on specific areas of official controls, e.g., inspection of approved premises. These training sessions are led by the Food Lead Officer or other senior members of staff to impart their knowledge and experience to colleagues.

Regionally organised training also takes place, twice a year, focusing on national drivers as well as regional training needs and requirements. e.g., UKHSA undertake microbiology training for the five West Yorkshire authorities at least annually. There is also £2,000 allocated towards staff training in the budget.

Officers Training needs are met by:

- a) Courses to achieve specific qualifications.
- b) Attendance at technical seminars.
- c) In-house training
- d) Cascade training by officers that have attended relevant courses.
- e) Accompanied inspections.
- f) On-line training provided by the Food Standards Agency/UKHSA

Training Program 2024

Kirklees council will provide 10 CPD hours relating to food matters directly related to official controls for authorised officers. In 2024 the following training will be provided:

- a) Approved premises, meat preparation and meat products. (WYFLOG Approved Premises Working group to cascade)
- b) Outdoor Events Management
- c) Listeria
- d) VAC Pack and Sous Vide (Internal Exercise)



5. QUALITY ASSESSMENT

5.1 QUALITY ASSESSMENT AND INTERNAL MONITORING

In addition to training, the Food Lead Officer and/or Senior EHOs ensure the competency of officers delivering official controls, through accompanied visits (minimum annual frequency) and ongoing by conducting monthly audits of officers' work.

These monthly quality checks comprise the supervisor reviewing 10% of an officer's completed worksheets and assesses them against several parameters, focusing on consistency and accuracy in the application of legal requirements, updating of information and consistency in the application of the Food Hygiene Rating Scheme and risk rating of businesses. Where inconsistencies are identified, these will be discussed with the officer and training provided. This process may also identify a wider training need within the team and will inform the subject area for internal or external training.

In addition, 'accompanied visits' are also undertaken to ensure officers are undertaking the role in accordance with the Code of Practice and that actions are consistent with our Enforcement Policy.

The Food Safety Team also takes part in the FSA's National Food Hygiene Rating Scheme Consistency Exercises. The Team's findings have always been in-line with the published results. This supports our internal checks that officers are correctly administering the Food Hygiene Rating Scheme.

During the first year of the COVID-19 pandemic, routine food hygiene inspections were temporarily suspended. This significantly affected the percentage of the inspection programme achieved for the period 2020/21 as can be seen below. Following the Pandemic, the Food Safety Team followed the FSA's Recovery Plan during 2021 to 2023 and met its obligations in relation to this. Therefore, the percentage of the inspections completed, during this period were 100% of the FSA Recovery Plan. As detailed in point 6.1, the food safety team had another successful year in 2023/24 with the inspection outcomes.



6. REVIEW

6.1 REVIEW AGAINST THE FOOD SAFETY SERVICE PLAN 2023

The Food Safety Group Leader (FSGL) monitors performance on a quarterly basis and shall be documented. The Information is provided to the Environmental Health Operational Manager and Head of Public Protection. A review of performance is undertaken at the Food Safety Group Leader's one to one meetings and yearly appraisals. The relevant performance data is also submitted to the FSA data team, in accordance with their requirements.

Should these internal, performance reviews identify any actual or likely failure to meet the FSA/CoP requirements, the FSGL will report this to the Service Director for Environmental Strategy and Climate Change.

A review of the performance data for 2023/24 identifies that the food safety team completed the following:

1. All High-risk Category A- B that were due a programmed intervention were completed (100%)
2. 98% of Category C's were inspected by the 31st March 2024 – not all were completed due to officers not being able to gain access, due to seasonal operation of the business or the premises were closed for Ramadan/Eid. As at the time of writing, the majority have now been completed.
3. Of the Backlog of Category D Rated premises (868) 556 (65%) were completed.
4. 725 new food premises registrations were received. On the 1 April 2024 only 83 were outstanding, however these had been triaged and risk assessed to ensure they did not pose any significant risk.
5. During 2022/23 and 2023/24, the food safety team were trialling a mobile tablet to use when completing inspections. Unfortunately due to practical and technical issues the tablets were not suitable for the needs of the service and have been discontinued.
6. In September 2023, as part of the FSA audit programme, Kirklees Council was selected for audit with a focus on a specific area of local authority feed and food law enforcement - approved premises. Whilst some recommendations have been identified, this report is seen as positive by the management team (including the Head of Service) as it supports the Department's ethos of continuous improvement.
7. The delivery of a low-cost workshop (Steps to Success) 84 Business have attended with all achieving compliance on their following inspection. An average increase of 2.4 in their FHR (max FHR 5 can be achieved)

8. The continued high number of HEPNs and voluntary closures is likely to be as a result of us focusing on high-risk businesses, but also prioritising complaints relating to businesses that have resulted in a business being required to close due to an imminent risk to public health. In the majority of cases, pests were identified to be the imminent risk.
9. Again, a high volume of prosecutions and pending prosecutions, is a reflection that over time we follow a graduated approach to enforcement in line with Kirklees Enforcement policy. In the majority of cases, all informal and/or other enforcement options have previously been used by an officer and the Food Business Operator has continued to fail to implement the necessary actions to rectify any contraventions found.



6.2 IDENTIFICATION OF ANY VARIATION FROM THE SERVICE PLAN 2022

6.2.1 INSPECTIONS

The Food Safety Team undertook 1,329 inspections or audits over the 2023/24 period. This again was a fantastic achievement.

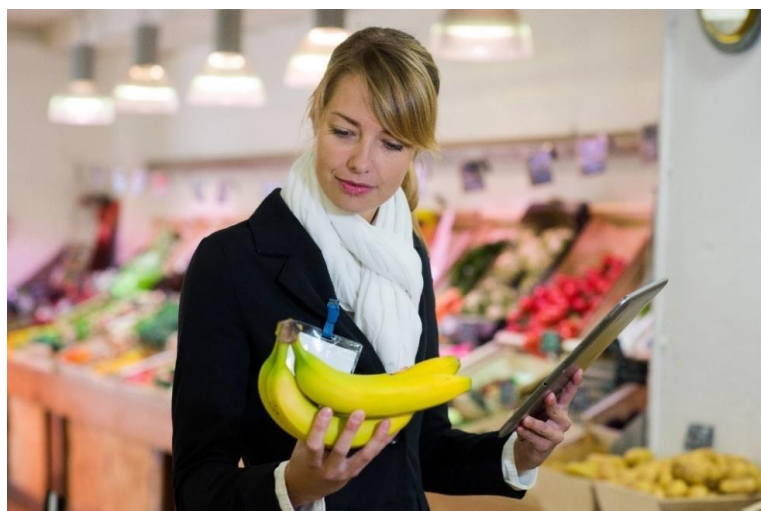
A good number of category E premises were also assessed following our alternative intervention strategy for category E premises.

A total of 490 complaints were received by the Service in 2023/24. All complaints receive some level of response and officers follow a work instruction in relation to when action, including an onsite visit to the premises needs to be taken. As a minimum, complainants will be contacted and be given information about the action that will be taken.

In cases where the complaint is of a low-risk nature (e.g., food being sold beyond its best before date) the complainant will be informed that a note will be placed on the premises file and the officer will look at this at the next routine inspection.

For anything more serious, e.g., contaminated food; poor hygiene practices observed by a customer or undercooked foods then an onsite intervention will be undertaken.

A total of 1129 written warnings were issued to businesses for various contraventions of the hygiene regulations. This is approximately 80% of businesses receiving a written warning, following an on-site intervention.



6.2.2 REQUESTS FOR A REVISIT UNDER THE NATIONAL FOOD HYGIENE SCHEME (FHRS)

In 2023/24, 85 requests for a revisit (reassessment of their food hygiene rating) were received. This demand remains high, as a low food hygiene rating can impact on a business' ability to trade e.g., on online food platforms, such as Just Eat and also from the negative publicity that a low food hygiene rating can attract, particularly on social media or in local media who regularly publish the details of businesses with a 0 or 1 food hygiene rating. At the time of writing all these businesses had received their reassessment inspection.

6.2.3 REVISITS TO NON-COMPLIANT PREMISES

In 2023/24, a total of 136 revisits were undertaken at food premises to ensure compliance with contraventions identified during a previous inspection or complaint visit. Revisits are undertaken in accordance with the Food Law Code of Practice and all businesses that are less than broadly compliant receive a revisit. This high number of revisits reflects the focus of officers in ensuring any risk-related matters are addressed and to ensure that a food business is operating hygienically and is being well-managed.

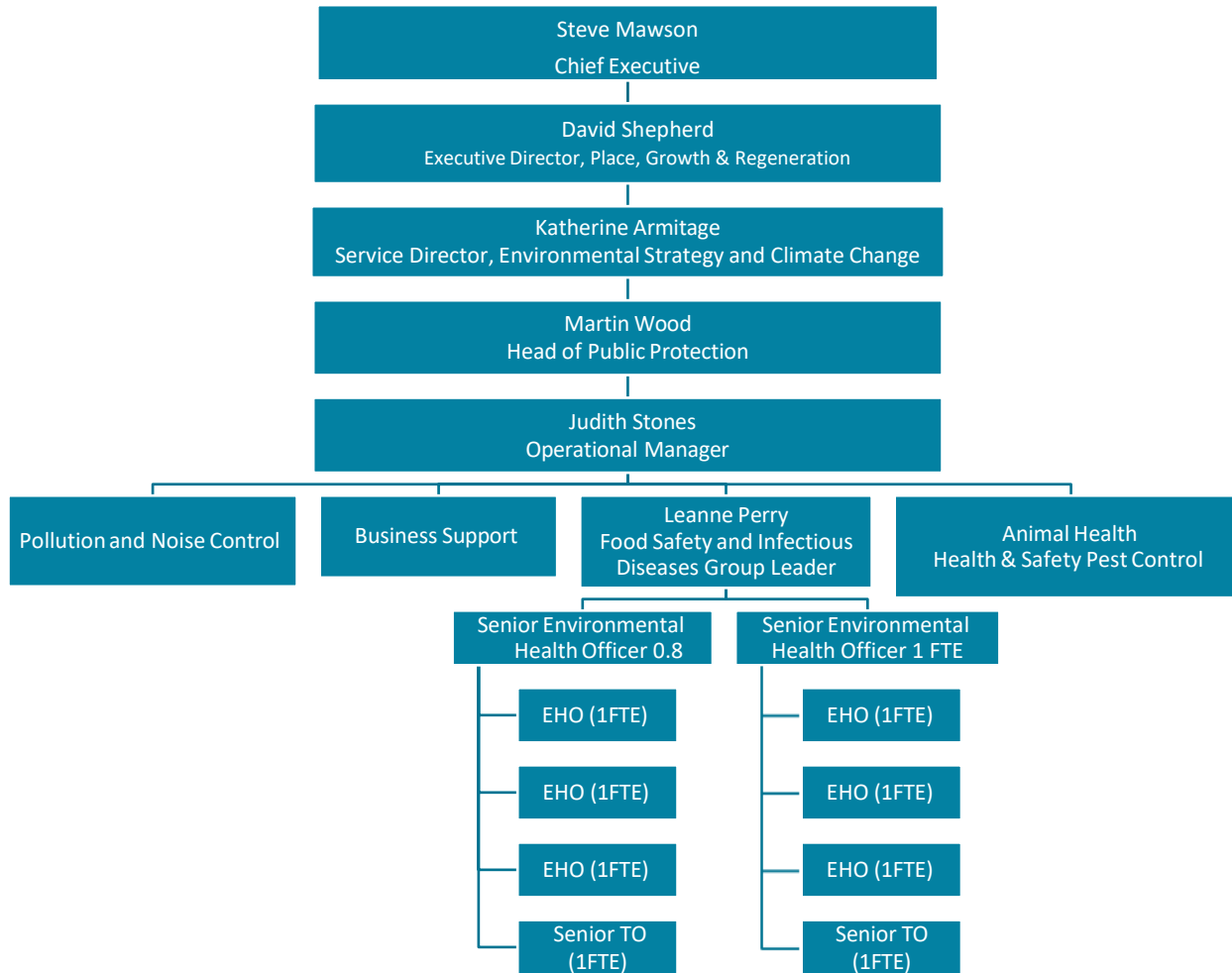
6.3 AREAS OF IMPROVEMENT FOR 2023/24

The following priorities for improvement have been identified for the Food Safety & Infectious Disease Team. They take into account the requirements of the FSA Food Law Codes of Practice and our own ambitions to ensure that food that is produced or sold in Kirklees is safe for our residents and visitors. We will achieve this through improving the hygiene standards at food businesses by better focusing our resources on areas and businesses with low levels of compliance and by providing additional support to such businesses:

1. Continue to delivery official food controls in accordance with the FSA Recovery Plan/Codes of Practice and any other instruction that is received during the year.
2. Maintain the implementation of the National Food Hygiene Rating Scheme and ensure that the requirements of the 'Brand Standard' are followed and that food hygiene ratings are being correctly issued across Kirklees.
3. Review the alternative intervention approach to ensure food official controls are being delivered in line with the Food Law Code of Practice for category C, D and E premises.
4. Maintain staffing levels as per the budget and monitor performance to ensure the delivery of official controls is met.
5. Ensure officer development continues as required in the FSA competency framework and officer authorisations reflect the individual competency matrix.
6. Increase business resilience by improving the information that we have available for businesses on the website and the FSA RAFB.
7. Continue to develop/sharing expertise across WYFLOG.
8. Continue to respond to, and where necessary, lead on FSA issued alerts and requests for action.
9. To Continue to deliver a low-cost food hygiene workshop aimed at food businesses with 0, 1 or 2 food hygiene ratings and further expand it to areas of high deprivation to support businesses in these localities. This will include the continued evaluation of the workshop.
10. To develop a communications strategy to address the declining standards Officers are coming across when completing visits to food premises. To ensure that we design communication around the ways people access information- Twitter/Facebook etc.

11. To develop our place-based working approach through the review of data on poor levels of food hygiene compliance and localities to focus resources appropriately. This will include feedback from businesses in these areas on barriers affecting compliance.
12. To explore and develop potential commercial opportunities in relation to the skills and expertise within the Food Safety Team. E.g., consultancy service work; primary authority agreements etc. This will look to enhance the support to businesses both within and outside of Kirklees.
13. To explore and develop links with local colleges to promote the Environmental Health profession and the roles available and qualifications required to work in Environmental Health, as part of our commitment to workforce planning.
14. To keep informed with the FSA Achieving Business Compliance Programme and attend all LA engagement events: [Achieving Business Compliance \(ABC\) programme | Food Standards Agency](#)

APPENDIX 1 – ORGANISATIONAL STRUCTURE



APPENDIX 2 – FOOD HYGIENE RATING SCHEME, NUMBER OF COMPLIANT OR FAILED PREMISES

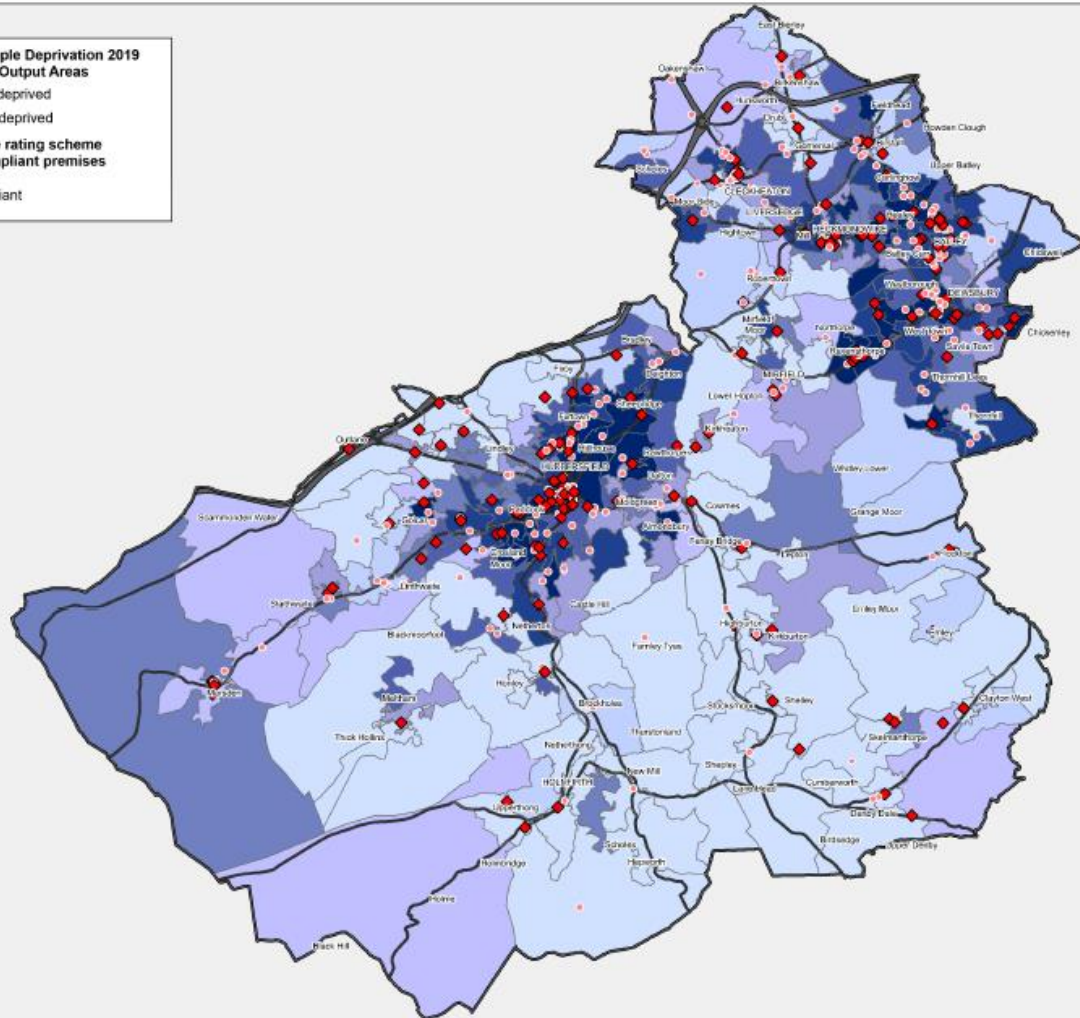
Food Hygiene Rating Scheme (FHRS), Number of Compliant or Failed Premises, IMD 2019

**Index of Multiple Deprivation 2019
Lower Super Output Areas**

Least deprived
Worst deprived

**Food hygiene rating scheme
Failed or compliant premises**

Failed
Compliant



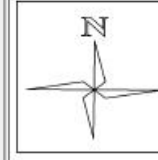
**Data
and
Insight
Service**

Date: 16/05/2024.

Scale: 1:110,000

Filename:
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2024.
Ordnance Survey
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APPENDIX 3 - INFECTIOUS DISEASES DATA

Disease		2020/21	2021/22	2022/23	2023/24
Viral Hepatitis A		2	0	2	1
Cholera		0	1	0	0
Dysentery	Entamoeba Histolytica	0	0	0	1
	Shigella Boydii	0	1	0	0
	Shigella Dysenteriae	0	1	0	0
	Shigella flexneri	0	1	3	0
	Shigella sonnei	2	2	6	8
	Not typed	0	0	0	0
Food Poisoning	Bloody diarrhoea	0	0	0	0
	B.cereus	0	0	0	0
	C.botulinum	0	0	0	0
	C.perfringens	4	0	0	0
	Campylobacter	184	182	184	197
	E.coli 0157	8	6	8	1
	Listeria	0	1	1	0
	Salmonella	19	9	34	42
	Suspected poisoning food	1	3	0	2
	Yersinia	0	0	0	0
	Not typed	0	2	0	0
Gastro Enteritis	Cryptosporidium	7	5	13	16
	Giardia	5	4	4	5
Respiratory Disease	Legionella	1	4	1	1
Paratyphoid Fever	Salmonella	0	0	0	0
Typhoid Fever	Salmonella	0	0	0	0
Total		233	225	256	274

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REPORT TITLE: Statutory Health & Safety Service Plan 24-25

Meeting:	Scrutiny
Date:	25 September 2024
Cabinet Member (if applicable)	Cllr Munir Ahmed
Key Decision Eligible for Call In	No No – adopted by Cabinet in July 2024
<p>Purpose of Report: To provide a report to Members on the function and activity of the Health and Safety Team within Environmental Health and present the Service Plan, adopted by Cabinet in July 2024, detailing activity between April 2023 to March 2024 and priorities and activity for the following 12 months until March 2025.</p>	
<p>Recommendations</p> <ul style="list-style-type: none"> • For Scrutiny to review and note the report • To present to Scrutiny the activities of this important statutory, regulatory team. <p>Reasons for Recommendations</p> <ul style="list-style-type: none"> • Service priorities have been set in consultation with Health and Safety Executive (HSE) guidance. • Service priorities deliver on Council shared outcomes. • Service priorities have been set in consultation with neighbouring local authorities. 	
<p>Resource Implications: None – within existing budget.</p>	
<p>Date signed off</p> <p>David Shepherd, Executive Director for Place, Growth and Regeneration.</p> <p>Is it also signed off by the Service Director for Finance?</p> <p>Is it also signed off by the Service Director for Legal Governance and Commissioning?</p>	<p>Give name and date for Cabinet reports Health & Safety Service Plan 2024/25 Cabinet: 9th July 2024 – signed off and agreed Scrutiny: 25th September 2024</p> <p>16th September 2024</p> <p>John Bartlett on behalf of Kevin Mulvaney 26.06.24</p> <p>YES – David Stickley, Principal Lawyer, for Samantha Lawton, Service Director 25.06.24</p>

Electoral wards affected: All

Ward councillors consulted: None

Public or private: Public

Has GDPR been considered? Yes, no personal data included, and any sensitive data anonymised.

1. Executive Summary

Health and Safety (H&S) legislation in England, Scotland and Wales is enforced by either the Health and Safety Executive (HSE) or local authorities (LA). The Health and Safety (Enforcing Authority) Regulations 1998 determine whether an activity comes under the HSE or LA enforcement.

The law places a legal duty on local authorities to make adequate arrangements for enforcement of Health and Safety in workplaces. In Kirklees, the Council's Health & Safety Team enforce the provisions of the Act within businesses within Kirklees and the team are located within the wider Environmental Health (EH) team under the Head of Public Protection. The team work closely with the Health and Safety Executive (HSE), and the enforcement relates to the leisure, retail, office and warehouse working environments. The enforcement and the priorities for enforcement are determined with reference to the HSE National Local Authority Enforcement Code (the Code), which provides local authorities with a principle-based framework that focuses regulatory resources based on risk. It allows LAs to develop their own health and safety priorities and target intervention to consistently comply with the code. Guidance issued outlines the wide range of regulatory interventions open to LAs, requiring consideration to be given to which are the most effective to influence management of risk in a particular business.

The service delivery plan at appendix 1 has been created in reference to this National guidance and sets out the service priorities for the financial year 2024/25. The Service Plan also discusses how the team met the priorities set for 2023/24, with reference to the resources allocated and considers the financial resources required to continue to meet the Council's statutory obligations and how.

2. Information required to take a decision

This service delivery plan reviews the outcomes from the Team in 2023/24 and sets out the Health & Safety priorities for financial year 2024/25. It has been formulated in reference to national priorities set by the HSE and considers the local priorities through the review of accident statistics and intelligence information from other departments or partners, over the 2023/24 period.

The previous year's performance outcomes are submitted, annually to the HSE through a statutory return called the LAE1. This return is analysed by the HSE to determine if the LA is meeting the requirements of the Code and its legal duty under the Health and Safety at Work etc Act 1974 (HASWA).

The 1.8 FTEs within the team and the high percentage of workplaces that the team regulate, make delivery of a regulatory function, based on inspection of individual workplaces, inefficient and impracticable. The Code enables the use of a wide range of interventions to improve our impact and reach, with proactive interventions only being used on highest risk workplaces. Some priorities/interventions remain the same each year, as these must be undertaken by the Team to meet the Council's statutory duties. These are listed as 'Continued Priorities' with new initiatives identified as 'New Priorities for 2024/25'.

The 2024/25 service priorities are:

Continued Priorities:

- *Investigate all major injuries/ accidents/ serious complaints and notifications of disease.*

All fatal and major accidents will be investigated in line with service guidelines and national guidance produced by the HSE. The Service received 121 accidents last financial year and through their investigations, the team have identified some unsafe working practices. Through their advice and enforcement, these working practices have been made safe.

New Priorities for 2024/25:

- *To reduce work related ill health from stress and depression by raising awareness amongst employers within the retail sector.*

Poor mental health and ill health, associated with work related stress, is contributing to increasing numbers of lost days from work. The HSE in conjunction with LAs is targeting employers and their workforces to ensure they have the necessary tools to help prevent work related stress and to support good mental health at work. The service has identified the retail sector to target this intervention, with this sector having a high turnover of staff, it's a manual profession, which is relatively low paid. Furthermore, the increasing incidences of shop lifting within this retail sector (Office for National Statistics, Crime in England and Wales: year ending December 2023) has created the additional risk of violence at work. The team will look at reviewing what controls the business already has and will advise them on ways to improve their support to staff. The team will also review other risks associated with this type of industry including violence and aggression at work, manual handling and working at height.

- *Planned Preventive Maintenance within Tyre and Exhaust retailers.*

Planned preventative maintenance (PPM) of work equipment is essential to the reduction of serious injuries and fatalities in the workplace. Evidence suggests that maintenance has lapsed during COVID due to difficulties preventing contractors entering duty holder sites to undertake statutory examinations. Moreover, with the current cost of living crisis placing additional pressures on businesses, national intelligence suggests planned preventative maintenance on work equipment is not taking place to save money. The team has identified the tyre and exhaust sector for this intervention, with this sector having lifting platforms and other major work equipment, which if not maintained and serviced, could result in serious injury. Furthermore, through the examination of HSE project archive database, a similar project was found to be useful. Initial scoping suggest we have round 60 tyre and exhaust businesses within the Kirklees area.

- *Raising awareness of pressure vessels in coffee machines*

The increasing culture of barista coffee within our leisure industry has resulted in most cafes or restaurants having a pressure vessel in their control. These vessels require a written scheme of examination by a competent person and require periodic inspection by a trained individual. A lack of maintenance on this equipment can result in these pressurised vessels over pressurising and exploding. A local business who contacted the team earlier this year and provided free

training on the pressure systems, alerted the team to these types of equipment, within the food sector, and the potential risk they pose.

In conjunction with the national priority of planned preventive maintenance the team plan to raise awareness within this leisure sector by delivering key training to the food safety team, who in their remit will visit these types of businesses.

Advice will be provided to the business owner on the risks of their work equipment and how to comply with this legal requirement. Any matters of concern will be fed back to the Health and Safety team who will contact the business owner and provide additional advice.

- *Carbon Monoxide in commercial premises*

Raising awareness of the risk of exposure to carbon monoxide in commercial kitchens has been a national priority for a few years. Recent close working with the industry inspector (Gas Safe) has enabled the team to identify potential specific catering equipment (tandoor ovens) which could be a risk. These types of equipment are large and expensive to purchase new, with most businesses inheriting them when they take over the business. Often, they have not been serviced regularly and as a result key safety features have failed or been by passed to get the machine operating. This results in a significant risk of a gas explosion and the team will utilise the food safety team to identify this type of equipment during their food hygiene inspections. Any matters of evident concern will be reported back to the Health and Safety team who will contact the business owner and provide additional advice to reduce that risk.

3. Implications for the Council

The service delivery plan sets out its priorities for the financial year 2024/25 and the anticipated impact from this work will contribute to the Council's shared vision for a better Kirklees and its shared outcomes. The service plan will contribute to the four key council priorities:

3.1 Council Plan

3.1.1 Address our financial position in a fair and balanced way.

The proposed service plan will be delivered within the existing Health and Safety Team budget and will not require any additional staffing resources. The priorities identified have been based on the staffing resources available, not just within the H&S Team, but by utilising the wider EH resources. As part of this, a wide range of different interventions will be utilised to deliver the priorities, maximising the impact and influence on the management of risks within businesses. For example, raising awareness of the dangers of pressure vessels within restaurants and cafes will be delivered by food safety officers, who are already visiting this type of business during statutory food inspections. Delivering this project through this method widens the impact of the intervention without increasing the dedicated H&S staffing resources required to deliver it.

All existing Health and Safety fees and charges are set in accordance with legislation and are calculated to recover the cost for delivering them. These fees will be reviewed annually to ensure all costs are being recovered and where possible efficiency saving can be made.

3.1.2 Strive to transform council services to become more modern, efficient and effective

The Health and Safety team will deliver its service priorities by utilising a wide range of interventions to ensure the greatest impact and influence on the management of risk within that business. For example, rather than visiting all cafes and restaurants to raise awareness of risk of pressure vessels, it is more productive and efficient to raise this awareness through the food safety team, who will be visiting this type of business through their existing statutory food hygiene inspections. Furthermore, not all reports of Health and Safety incidents and complaints will get investigated after initial enquires have been made, with only those meeting HSE incident selection criteria (LAC 22/13) being selected. This triaging of service requests will ensure those incidents which have a greater severity of potential or actual harm are investigated. This ensures a better and more efficient use of the limited staff resources available within the team and enables the Council to meet its statutory obligations, within the resources available.

3.1.3 Continue to deliver a greener, healthier Kirklees and address challenges of climate change.

The Council's vision of a healthier, safer Kirklees is mirrored by the objective of the team to work with others to protect people's health and safety, by ensuring risks in the workplace are managed properly. All service priorities have an outcome of improving the health or safety of employees in Kirklees, with the proposed project of raising awareness of work-related stress and depression key in achieving this shared vision. Work related stress is a leading cause of ill health from work and contributes to 17.1 million days lost per annum. Through raising awareness and sign posting the duty holders to the necessary tools available, this ill health could be reduced.

3.1.4 Continue to invest and regenerate our towns and villages to support our diverse places and communities to flourish.

Having a safe working environment is key to ensuring any business is sustainable and the proactive, and reactive interventions delivered by the Health and Safety team can contribute to this council priority. The team will continue to offer free health and safety advice to all businesses within our enforcement area, with those not being regulated by the Local Authority being directed to the HSE. The team will continue to participate within the Safety Advisory Group for large Kirklees events and will provide health and safety advice to event organisers. Through utilisation of their expert knowledge, event risk assessments can be reviewed and advice on practical management of risk can be shared.

3.2 Financial Implications

The plan outlines the priorities for the team and the staffing resources required to deliver on these priorities. The priorities have been identified using a risk-based approach to ensure that they will be delivered within budget, utilising the 1.8 FTE H&S officers and through other EH staff providing additional resource, through the provision of information and advice, as previously discussed. The H&S budget has remained consistent with previous years, with increases relating solely to staffing cost increases associated with inflation etc.

The H&S Team budget for 2024/25 is as follows:

2024/25	
Expenditure	Health and Safety Team
Staffing	£88,506
Training	£0
Travel and other subsistence	£0
Supplies and services	£702
ICT	£0
Sampling	£0
Total Expenditure	£89,208

Income generated will be offset against the necessary costs associated with service delivery and/or contribute to training and other costs.

The income target for the H&S Team is £11,263. This income is generated through fees charged for skin penetration registration activities (e.g. ear piercing, tattooing etc). Fees are reviewed on a yearly basis to ensure cost recovery.

The funding for the Team's budget is based on the following funding streams:

- Government Grant £40,000
- Council Tax/Business Rates £38,000
- Fees and Charges £11,000

3.3 Legal Implications

Section 18 of the Health and Safety at Work etc Act 1974 places a legal duty on every Local Authority to make adequate arrangements for the enforcement of this statutory provision. The Health and Safety plan 2024/25 has been developed in conjunction with the National Local Authority Enforcement Code and the Local Authority Circular 67/2 (Revision13) setting Local Authority Priorities and Targeting interventions for 2024/2025. The plan outlines the priorities for the team for the 2024/25 and ensures adequate arrangements are in place to meet this legal duty.

The priorities have been identified to ensure a proportionate and risk-based approach to H&S enforcement that ensures that all statutory obligations are met, with the staffing resources available. The process of determining these priorities indicates that satisfactory staffing resources are available for the 2024/25 period to meet statutory obligations.

3.4 Other (e.g. Risk, Integrated Impact Assessment or Human Resources)

The service plan sets out the team's priorities for the delivery of Health and Safety for the year 2024/25. The plan ensures that Kirklees Council meets its statutory duty under the Act and provides detail in what the team will focus its resources. Some of these priorities have been chosen using national and local intelligence to form these priorities. However, as these

priorities partly change the focus of the service, an integrated impact assessment has been completed.

4. Consultation

There is no requirement to consult members of the public or business on the Health and Safety plan. It is a document required, by law, to ensure that the Council has the resources in place to enforce H&S legislation and to set priorities and projects.

Internal consultation with officers has been carried out and priorities agreed with Senior Officers and Portfolio Holder.

5. Engagement

No public engagement with this Plan is required. It is for members to note.

6. Options

6.1 Options considered

Not applicable, the Health and Safety Service Plan is for noting.

6.2 Reasons for recommended option

Cabinet adopted the service plan in July 2024. Service priorities have been set in conjunction with national guidelines from the Health and Safety Executive. Both national and local intelligence has been used to form the service priorities, with neighbouring authorities critically reviewing these priorities to ensure consistency with national guidance.

7. Next steps and timelines

Following the adoption of the Health and Safety Plan it is published on the Council's website and the Health and Safety team will carry out its regulatory and discretionary functions in line with the adopted plan.

8. Contact officer.

James Kaye, Environmental Health Group Leader, Environmental Health, PO Box 1720, Huddersfield, HD1 9EL. Tel: 01484 221000, ext. 70738, Email: james.kaye@kirklees.gov.uk

9. Background Papers and History of Decisions

National Local Authority (LA) Enforcement Code <https://www.hse.gov.uk/lau/la-enforcement-code.htm>

10. Appendices

Health and Safety Service Plan 2024/25

11. Service Director responsible

Katherine Armitage – Service Director Environmental Strategy and Climate Change



Health & Safety Service Plan 2024-25 Corporate Strategy, Commissioning and Public Health

Background

Health and Safety (H&S) legislation in England, Scotland and Wales is enforced by either the Health and Safety Executive (HSE) or local authorities (LA). The Health and Safety (Enforcing Authority) Regulations 1998 determine whether an activity comes under the HSE or LA enforcement.

In Kirklees, the Health & Safety Team enforce provisions of the Health and Safety at Work etc Act 1974 within businesses within the Borough. Working closely with the Health and Safety Executive (HSE), the team enforce provisions of the Act within leisure, retail, office and warehouse working environments. Section 18 (4) of the Act places a legal duty on this Authority to make adequate arrangements for enforcement and the team are located within the wider Environmental Health team under the Head of Public Protection.

The team consists of one Environmental Health Group leader (who also oversees two other functional areas of Environmental Health), one part time Senior Environmental Health Officer and one Senior Technical Officer. The team utilise two other staff members from the wider Environmental Health team for one day per week to help in delivery of the service. This equates to a total of 1.8 FTE, with the service having 4 warranted officers (i.e. those fully authorised to undertake all duties associated with Health & Safety enforcement).

In 2013, the HSE published the National Local Authority Enforcement Code (the Code) which was created to ensure LA health and safety regulators take a more consistent and proportionate approach to their regulatory interventions. It sets out the Government's expectation of a risk-based approach to targeting interventions and highlights the important role LA health and safety regulators have in ensuring effective and proportionate management of risk.

The Code provides this Authority with a principle-based framework that focuses regulatory resources based on risk. It allows LAs to develop their own health and safety priorities and target interventions to consistently comply with the code. Guidance issued outlines the wide range of regulatory interventions open to LAs, requiring consideration to which are the most effective, to influence management of risk in a particular business. This guidance is sent out annually by Government under the title Local Authority (LA) Circular 67/2 (LAC). This Authority is currently working towards version 13 of the LAC.

Aim of Service

To work with others to protect people's health and safety by ensuring risks in the workplace are managed properly. This includes risks to the public and others who may be at a workplace.

With a staffing resource of 1.8 FTE, and the Government's requirements for LAs to take a risk based, proportionate approach to Health and Safety enforcement, it is necessary, and appropriate, to target interventions on those activities that give rise to the most serious risk or where the hazards are least well controlled. This also enables the Team to meet its statutory duties. This is done by:

- Having risk-based intervention plans focused on tackling specific risk.
- Consider risks that need to be addressed and using a whole range of interventions to target these specific risks.
- Using national and local intelligence to inform service priorities.

Based upon this, our key delivery priorities are:

- To reduce the risk in high risk, poorly performing and/or rogue trader businesses through advice and proportionate enforcement action where appropriate.
- To investigate major injuries, incidents and fatalities.
- To investigate serious complaints made by employees & other stakeholders.
- To comply with the National Local Authority Enforcement Code and associated guidance and the Regulators Compliance Code.

Local Priorities

The priorities of Kirklees Health and Safety Team are to:

- Work with businesses to ensure the Councils vision for Kirklees to be district that has a strong sustainable economy which provide a great quality of life.
- Using local intelligence to target resources at high-risk activities.
- Work with specific sectors as identified by the HSE in the National Local Authority Enforcement Code.



- Advise and inform businesses of their legal obligations.
- To ensure enforcement decisions are consistent with our Enforcement Policy, the Health and Safety Commission's Enforcement Policy Statement and the HSE's Enforcement Management Model.
- Train and develop our staff to ensure competence and retention through investment and guarantee workforce planning for the future.



Delivery of Health & Safety Executive's Strategy.

- Protecting people and places: HSE Strategy 2022-2032
- Adhering to LAC 67/2 for Priority Planning

Working in Partnership

- Promoting the adoption of Primary Authority Partnerships between Kirklees Council and local businesses and working closely with Primary Authorities where such an agreement exists.
- To work with HSE on campaigns as appropriate.
- To liaise with Council departments and partners re: offering advice to new businesses.
- To work with other West Yorkshire Authorities and participate in initiatives to promote consistency and training and development exercises.

Longer Term Priorities and Potential Future Impacts on Service Delivery

Workforce Planning

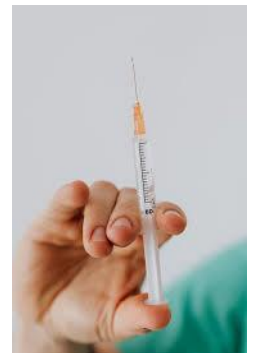
The longer-term delivery of the LA Health and Safety function could be at risk, should any of the existing warranted officers leave the Service. This is due to the competency requirements for H&S officers and the situation, nationally, where there is a lack of qualified Environmental Health Officers in the market. Indeed, recruitment processes, over the last 3 years have failed to obtain H&S-qualified staff, either from a lack of suitable candidates applying or candidates withdrawing / not accepting offers due to the monetary package.

In considering the difficulties in recruitment, the management in Environmental Health has been undertaking workforce and succession planning. As a part of this, the Senior Environmental Health Officer within the Health & Safety team has been identified as being a critical role within the Council and through this identification process, future succession planning will be implemented. The development of other officers within EH who are suitably qualified (e.g. hold an accredited Environmental Health degree), but not yet H&S competent, is also being kept under review.

Emerging Demands Upon Service Delivery

Health & Care Act 2022

The increasing prevalence and risk of businesses / practitioners administering Botox and other non-surgical cosmetic treatments has resulted in the Government amending the Health and Care Act to potentially enact legislation to require the licensing of these types of businesses. Currently the delivery of non-surgical cosmetic treatment such as Botox, facial fillers, lip implants etc. is unregulated and although the aesthetics industry has a strong professional body, incidents of poor practice are on the increase. The consequences of poor practice can be very significant. The proposed licensing regime will fall to LA H&S teams to enforce and will require additional staffing resources for Kirklees to administer this.



In anticipation of these changes, during 2023/24 the team carried out a joint intervention with our infection prevention and control colleagues, to provide advice to businesses, who were practising non-surgical cosmetic treatments. The aim being to highlight good infection control practice and to make them aware of the recent enactment of the Botulinum Toxin and Cosmetics Fillers (Children's) Act 2021, which prohibits the administration of any of these cosmetic procedures on people under the age of 18. Whilst the enforcement of this legislation sits with our Trading Standards partners at West Yorkshire Joint Services, it was deemed to be a worthwhile proactive, joint initiative to protect public health, until such time that appropriate regulation of this sector comes into force. It was also seen as a useful project to scope current practice within the authority, prior the proposed licencing requirements. A potential 20 businesses were identified.

Martyn's Law – Protected Duty

The threat of terror attacks within the UK is an evolving and complex issue, with the prediction of locations that could be targeted by terrorists being a difficult task. Historic attacks within the UK have led the Government to identify that security at public venues needs to improve to better protect against future attacks.

The proposed legislation will place a legal duty on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures. A wide range of premises will fall within scope of

the new legislation depending on the activities carried out and the capacity of the venue. Qualifying premises would include, retail, hospitality, entertainment, sports grounds, recreation and leisure, public libraries, visitors' attractions, hotels, places of worship, healthcare, public transport and other public services. Many of these are premises for which the Council's H&S team are the enforcing authority.

At present it remains unclear which agency will enforce and inspect premises against this duty. If this statutory duty was delegated to LA Health & Safety teams, the current staffing resources are likely to be insufficient to meet these statutory duties. This would require the wider Environmental Health management to consider how the necessary staff resources could be identified to ensure its delivery. However, this could pose significant difficulties without additional resources and could require the redeployment of existing staff from other statutory duties to provide support. This would have to be done on a risk-based approach.

Review of the Outcomes of the Service Priorities 2023/24

The priorities below were identified by the team for the 2023/24 period with reference to the Local Authority Circular 67/2 (rev 12).

1. Investigate all fatality and major accidents in line with HSE guidance
2. Investigate all complaints in line with HSE selection criteria
3. The risk of zoonoses and E. coli transmission to members of the public from visitor attractions
4. Audit all builders' merchants to address the risk of workplace transport, working at height and manual handling.
5. Raise awareness of work-related stress within the residential care sector.
6. Investigate all confirmed cases of Legionnaires disease.
7. Gas safety in commercial catering establishments

During 2023/24, the service delivered on most of its priorities, with all major accidents and complaints being investigated, in line with the HSE guidance (priorities 1 & 2). These two priorities are a standard requirement of LA H&S teams.

Priority 3 related to the proactive work of providing information and advice (and on-site visits as necessary) to all visitor attractions in Kirklees that involve the exhibition of animals (e.g., petting zoos/farm animals etc.). This is to ensure adequate hand washing facilities and other controls are in place to prevent the transmission of zoonotic diseases to members of the public, such as E.coli. The timing of this was planned to coincide with lambing season where the risks of E.coli transmission are highest.

In addition, in accordance with priority 4, the team completed 22 proactive inspections at builders' merchants with the focus being the national risks from falls from height, workplace transport, manual handling and lack of welfare facilities for drivers being assessed. All merchants were visited and, in general, most were compliant with national guidance, and the risks were well managed by the company.

With reference to priority to 5, the team carried out 18 face-to-face stress awareness interventions at residential care homes. Most businesses are aware of their duty to control stress within the workplace, with most undertaking a stress risk assessment, once the stress had been identified as a factor. There were two establishments who had a specific policy on work related stress and had a stand-alone risk assessment. In addition, a few other health and safety issues were identified while carrying out these interventions. A common one being a lack of understanding by management of the requirements under the Reporting of Injuries, Diseases, and Dangerous Occurrences Regulations (RIDDOR) to report accidents to residents. To address this, the team are linking up with Kirklees Adults & Health with a hope to cascade our message amongst care homes and improve an understanding of these legal requirements.

All confirmed cases of Legionnaire's Disease are investigated, and the team continued to work closely with the UK Health Security Agency (UKHSA) in relation to individual cases of Legionnaire's Disease and/or into any potential clusters of cases.

In addition to the above priorities the team carried out a joint initiative with Kirklees Infection Prevention and Control team to provide best practice advice on the administration of non-surgical cosmetic treatments and to promote the recent enactment of The Botulinum Toxin and Cosmetic Fillers (Children) Act 2021 (as detailed above). Of the potential 20 businesses identified, 17 were written to, with 16 visits being completed. However, of those visited only 11 were offering non-surgical cosmetic treatments.

Priority 7 was commenced during 2023/24, with the food safety officers receiving training from the Team on what issues of concern to look for, associated with gas appliances, whilst inspecting food businesses. As a result of this, a number of safety concerns were reported by food safety officers to the H&S Team, who followed up to ensure the safety of gas appliances. Due to the ongoing nature of this initiative, this priority will continue into the 2024/25 period as discussed later on.

A summary of the Kirklees Health and Safety Team's national return to the Health and Safety Executive (LAE1) for year 2023/24 is shown below.

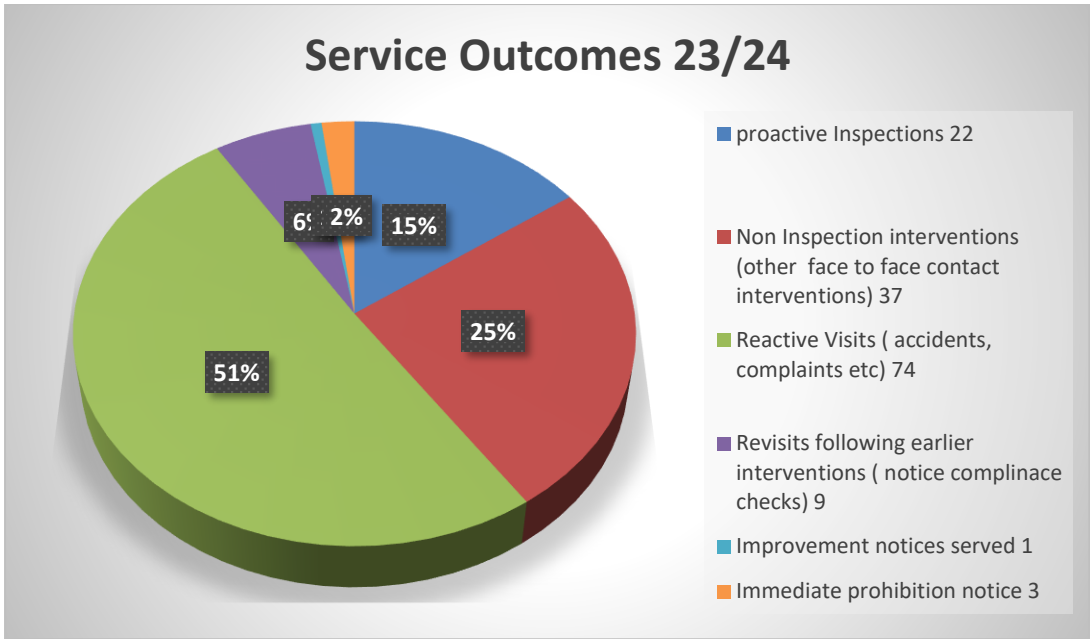


Chart 1. Part of the LAE1 return to the HSE for work carried out in 2023/24. This chart shows the number and percentage of different types of interventions undertaken.

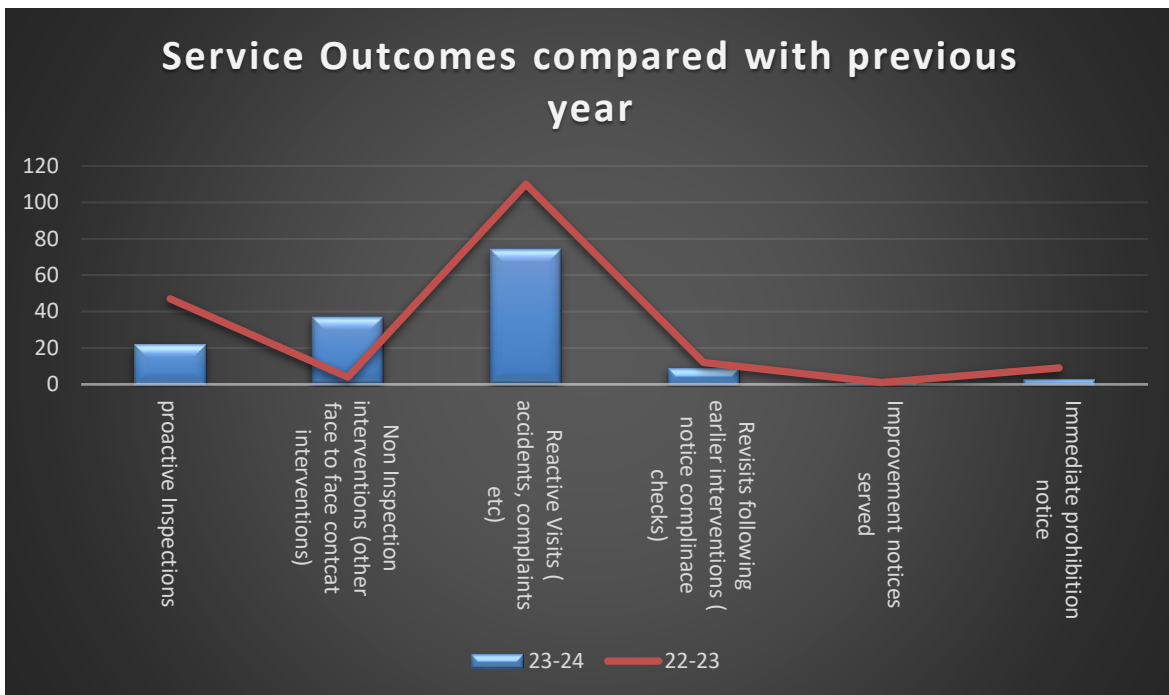


Chart 2. Service outcomes compared to previous years. This chart shows the number of interventions undertaken in each category.

Discussion on outcomes.

The data show that the team carried out fewer proactive 'inspections' in 2023/24 compared to the previous year. The number of overall interventions is, however, consistent with the previous reporting period as more 'non-inspection' interventions were undertaken during the period. The terminology of inspection or non-inspection is determined by the HSE. Only interventions carried out within specific industry sectors can be defined as a proactive 'inspection' and of the interventions carried out by the team in 2023/24, only the builders' merchants' visits can be classed as proactive inspections. The team completed more 'non-inspections' interventions in 2023/24, compared to the previous year, due to the stress awareness project being classed as non-inspection intervention. The overall number of proactive onsite visits by the team increased in 2023/24 from the previous year.

Reactive visits to businesses have reduced in 2023/24 and although accident and complaint investigation visits are similar to the previous financial years, requests for Health and Safety advice have reduced.

The review of the outcomes of the priorities in 2023/24 should be seen as a success, as staffing resources were reduced in the latter part of the year due to one staff member undertaking shared parental leave. This had not been anticipated at the time that the 2023/24 priorities were identified, therefore the completion of the majority of the priorities has been an excellent achievement by the team.

Expectations on service

The number of interventions that can be achieved is clearly limited by the number of FTE officers available to undertake this important area of work. However, the figures indicate are currently meeting our statutory duties in terms of reactive work (accident and complaint investigations etc) but have limited capacity to undertake a more significant number of proactive interventions. Should there be additional resources in the form of additional officers, we would be able to complete more proactive interventions. The potential outcome of such work would be to prevent accidents / incidents from occurring by providing advice and guidance to businesses. Many such businesses would otherwise generally only have a visit in a response to an accident or complaint.

Service Priorities 2024/25

The following table below shows the service priorities for the year 2024/25 with figures on expected outcomes from previous years. The areas highlighted in red are our top priorities with reactive work accounting for most of these areas. The following proactive themed projects have been identified as a priority for this year.

These priorities have been identified through reference to the Local Authority Circular 67/2 (rev. 13) which considers national accident statistics collected by the HSE. Furthermore, review of the latest Office for National Statistics crime survey, which provides data on reported crimes within England and Wales, and through

discussions local and national authorities, the below service priorities have been identified.

1, Retail premises and stress

The HSE in conjunction with LAs are targeting employers and their workforces to ensure they have the necessary tools to help prevent work related stress and to support good mental health at work. The service has identified the retail sector to target this intervention, as its workforce is deemed to be at high risk due to: having a high turnover of staff, it being a manual profession; and it being relatively low paid work. Furthermore, there is the additional risk of violence at work as a result of increases in shop lifting in the retail sector (Office for National Statistics, Crime in England and Wales: year ending December 2023). The team will look at reviewing what controls the business already has and will advise them on ways to improve their support to staff. The team will also review other risks associated with this type of industry, including violence and aggression at work, manual handling and working at height.

2, Planned Preventative Maintenance

Planned Preventative Maintenance (PPM) of work equipment is essential to the reduction of serious injuries and fatalities in the workplace. Evidence suggests that maintenance has lapsed during COVID, due to difficulties preventing contractors entering duty holder sites to undertake statutory examinations. Moreover, with the current cost of living crisis placing additional pressures on businesses, national intelligence suggests planned preventative maintenance on work equipment is not taking place, to save money. The team has identified the tyre and exhaust sector for this intervention with this sector due to the prevalence of lifting platforms and other major work equipment, which if not maintained and serviced could result in serious injury. Furthermore, through the examination of HSE project archive database, a similar project was found to be useful. Initial scoping suggests we have round 60 tyre and exhaust businesses within the Kirklees area.

3, Raising awareness of pressure vessels in coffee machines.

The increasing culture of barista coffee within our leisure industry has resulted in most cafes or restaurants having a pressure vessel in their control. These pressure vessels require a written scheme of examination by a competent person and require periodic inspection by a trained individual. A lack of maintenance on this equipment can result in these pressured vessels over-pressurising and exploding. A local business who contacted the team earlier this year and provided free training on the pressure systems, alerted the team to these types of equipment within the food sector and the potential risk they impose. In conjunction with the national priority of planned preventive maintenance, the team plan to raise awareness within this leisure sector by delivering key training to the food safety team, who in their remit will visit these types of businesses. Advice will be provided to the business owner on the risks of their work equipment and how to comply with this legal requirement. Any matters of concern will be fed back to the Health and Safety team who will contact the business owner and provide additional advice.

4, Carbon Monoxide in commercial premises

Raising awareness of the risk of exposure to carbon monoxide in commercial kitchens has been a national priority for a few years. Recent close working with the industry inspector (Gas Safe) has enabled the team to identify potential specific catering equipment (tandoor ovens) which could be a risk. These particular types of equipment are large and expensive to purchase new, with most businesses inheriting them when they take over the business. Often, they have not been serviced regularly and, as a result, key safety features have failed or been by passed to get the machine operating. This results in a significant risk of a gas explosion and the team will utilise the food safety team to identify this type of equipment during their food hygiene inspections. Any matters of evident concern will be reported back to the Health and Safety team who will make contact with the business owner and provided additional advice to reduce that risk.

Service Delivery plan **2024-25** (RAG rated)

What	How	Where / When	Expected Outcomes
Reactive Work			
Major Injuries/Accidents	All fatal & major accidents investigated (in line with Guideline Health & Safety [GHS] GHS-02 & HSE adopted investigation criteria).	All relevant premises Continuous	2020-2021 143 accidents reported. 2021-2022 142 accidents reported. 2022-2023 155 accidents reported. 2023-2024 121 accidents reported.
Complaints and accident investigations.	Investigated in accordance with Kirklees internal Guideline Health & Safety [GHS], GHS 02 and GHS 04 and HSE adopted investigation criteria in Local Authority Circular - LAC 22/13.	Ongoing	2020-2021 183 complaints received. 2021-2022 196 complaints received. 2022-2023 201 complaints received. 2023-2024 181 complaints received.
Local priorities based on intelligence	Targeted interventions of local intelligence from Food Team and other sources.	All identified premises Ongoing	
UKHSA notification of disease / organisms (legionella)	All legionella notifications are investigated in line with Yorkshire and Humber memorandum of understanding 2018	All identified premises (workplace, home or other premises which maybe potential source of infection)	2020-2021 2 Legionella notifications 2021-2022 6 Legionella notifications 2022- 2023 4 legionella notifications 2023-2024 3 Legionella notifications
UKHSA Sampling Surveys	Complete sampling initiatives facilitated by UKHSA in targeted premises	UKHSA programme plan where resources available	
Registration and inspection of activities (Acupuncture, Tattooing, semi-permanent skin colouring, cosmetic piercing and electrolysis)	Respond to applications for registration by carrying out an onsite inspection of premises and to assess the applicant's practices	Continuous	2020-2021 32 registration inspections completed. 2021-2022 39 registrations inspections completed. 2022 – 2023 53 registration inspections completed 2023-2024 29 registration inspections completed.

Asbestos removal	Notification of licensable asbestos removal by a contractor will result in an onsite inspection	Continuous	2023-2024 1 notification and visit
Adverse reports	Investigate and take action as appropriate upon receipt of adverse examination reports. E.g. Lifting Operations and Lifting Equipment Regulations (LOLER), electrical and pressure systems	Continuous	2020-2021 Adverse inspection reports 11 2021-2022 Adverse inspection reports 9 2022- 2023 Adverse inspection reports 3 2023-2024 Adverse inspection reports 7
National Local Authority Enforcement Code Proactive Work Programme			
Target high risk/poor performing/rogue traders	Proactive Inspections & Revisits where necessary (in line with Risk Rating & local knowledge/intelligence) Reacting to complaints	Category A premises (all year)	Currently one category A premises within the area.
Tyre and Exhaust -planned preventive maintenance	Inspection Audit of work equipment including: <ul style="list-style-type: none"> • Lifting equipment • Grinders • Pressurised Vessels 	2024-2025	Around 60 within the authority have been identified. All but national chains (Kwik fit, ATS, Halfords etc) will be visited to provide advice and check compliance against the key risks
Open Farm visits e.g. Ponderosa etc.	Risks from Zoonoses and e-coli to be discussed during allocated visits & joint visits with AL Officer	Selected premises March each year	Inspection of one Zoo (Ponderosa) and other petting farms in March / April due to the seasonal risk to visitors from e coli and other zoonotic infections

National Priorities			
Retail sector – stress and mental health of workforce	Define retail sector (supermarket, clothing or electrical) Contact all businesses and visit, audit of Stress management Aggression at work Manual handling	2024-2025	Once the type of retail sector has been identified the number of businesses will be known.
Gas Safety in commercial catering premises and raising awareness with the duty holder.	Identify potential high risk catering equipment (Tandoor Oven) and provide advice on flame suppression devices and annual safety checks. Promote Gas Safety week through social media	Ongoing 9-15 th September	Food safety to notify the team of premises with Tandoor ovens. Advice to be sent out and a revisit will follow after an initial period.
Local Intelligence based Interventions			
Pressurised Vessels in coffee machines	Raise awareness through training food safety team to raise during their statutory inspections	2024-2025	Around 605 restaurants and cafes have been identified.
Recurring accident themes	Analyse RIDDOR reports via M3 and identify common causes/activities at risk	Run report 2x p.a. (Oct & Mar) and then decide intervention type – i.e. visit or mailshot	
Miscellaneous			
Primary Authority Partnership	Quarterly meetings with an annual review. Issue assured advice as and when required.	Ongoing	
Information/training to Food Team	Attend 2x Consistency Meetings p.a.	Ongoing	

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ENVIRONMENT AND CLIMATE CHANGE SCRUTINY PANEL

Work programme 2024/2025

Members: Cllr Andrew Cooper (Chair), Cllr David Longstaff, Cllr Susan Lee-Richards, Cllr Will Simpson, Cllr John Taylor, Cllr Matthew McLoughlin, Jane Emery (Co-Optee), Garry Kitchen (Co-Optee)

FULL PANEL DISCUSSION		
THEME/ISSUE	APPROACH / AREAS OF FOCUS	OUTCOMES / ACTIONS
Cleansing Performance Update	<p><u>Meeting of the Panel to be held 14th August 2024</u></p> <p>A report setting out an update on progress to address issues raised by Panel Members around waste collection.</p>	
Statutory Food Hygiene Plan 2024 – 2025	<p><u>Meeting of the Panel to be held 25th September 2024</u></p> <p>The Panel will consider the Statutory Food Hygiene Plan 2024 – 2025.</p>	
Statutory Health & Safety Plan 2024 – 2025	<p><u>Meeting of the Panel to be held 25th September 2024</u></p> <p>The Panel will consider the Statutory Health & Safety Plan 2024 – 2025</p>	

Events Update	<p><u>Meeting of the Panel to be held 20th November 2024</u></p> <p>The Panel will consider a report on Kirklees Events, to include a focus on climate impact and value vs resources.</p>	
Lane Rental Scheme	<p><u>Meeting of the Panel to be held 20th November 2024</u></p> <p>The Panel will consider a report on the Lane Rental Scheme for pre-decision scrutiny.</p>	
Kirklees statement of Licensing Policy	<p><u>Meeting of the Panel to be held 20th November 2024</u></p> <p>The Panel will consider a report on the Kirklees statement of licensing policy for pre-decision scrutiny.</p>	
Parks and Greenspace Vision	<p><u>Meeting of the Panel to be held 29th January 2025</u></p> <p>The Panel will consider an update on the Parks and Greenspace Vision</p>	
	<p><u>Meeting of the Panel to be held 29th January 2025</u></p>	

<p>Huddersfield Heat Network (around the development of the full business case</p>	<p>The Panel will consider an update on the Huddersfield Heat Network</p>	
<p>Waste Procurement Update</p>	<p><i>Background:</i></p> <p><i>At its meeting held 27th March 2024 the Panel considered an update on Waste Disposal Contract Procurement in relation to the recommended option to extend the interim arrangements. The Panel noted the report ‘Waste Disposal Contract Procurement’ and recommended that:</i></p> <ul style="list-style-type: none"> <i>• The Panel’s feedback with regards to tetra pack recycling and occurrences of the receptacles being too full regularly be communicated to the HWRC’s.</i> <i>• More workshops in relation to the action taken to address missed waste collection services be offered to all elected members as a priority.</i> <i>• An update on waste collection services be provided to the Panel.</i> <i>• An update on following the development of the full business case for the HDEN be considered for the scrutiny 2024/24 work programme.</i> <p><u>Meeting of the Panel to be held 29th January 2025</u></p> <p>The Panel will consider a progress report on Waste procurement.</p>	

<p>2-year Highway Capital Plan 2024-25 25-26</p>	<p><i>Background:</i></p> <p><i>At its meeting of the Panel held 10 January 2024 the Panel considered an update in relation to the 2 year Highways Capital Plan and it was recommend that:</i></p> <ol style="list-style-type: none"> <i>1. That clarity around the location and future planned moves of Speed Indicator Devices (SIDS) be investigated provided to the Panel.</i> <i>2. The Panel be provided with information about the potential impact the recent changes to national policy and climate change targets may have on local schemes following discussion with Transportation Officers.</i> <i>3. The issue of blocked drains in the specific location raised by Co-optee (Garry Kitchen) be investigated.</i> <i>4. The road name A636 Denby Dale Road be amended in the report to Wakefield Road for clarity.</i> <i>5. Further opportunities for pre-decision scrutiny in respect of the Capital Plan be considered.</i> <p><u>Meeting of the Panel to be held 12th March 2025</u></p> <p>The Panel will consider the 2-year Highway Capital Plan 2024-25 25-26.</p>	
	<p><u>Meeting of the Panel to be held 12th March 2025</u></p>	

Fleet Replacement Programme and O Licence compliance	<p>The Panel will consider a report on Fleet Replacement Programme and O Licence compliance.</p>	
Air Quality Update (Action Plan, Strategy and Annual Status Report)	<p><i>Background:</i></p> <p><i>The former Economy and Neighbourhoods Scrutiny Panel received an update in October 2019 and a number of areas to monitor were identified following implementation of the Action Plan. At its meeting held on 25th October 2023 the Panel considered the 2023 Air Quality Annual Status Report (ASR)) and recommended that:</i></p> <ol style="list-style-type: none"> <i>1. The documents identified in the report as opportunities for pre-decision scrutiny be presented to the Panel going forwards.</i> <i>2. It be confirmed with the air quality lead, if the output from the incinerator had any impact on AQMA No.9</i> <i>3. Work be undertaken to investigate Gas to Liquid fuel to increase understanding of any potential benefits as part of the refresh of the Air Quality Action Plan and Air Quality Strategy</i> <i>4. To maintain a good relationship with Highways England as a key external stakeholder and to continue building on this partnership as part of the refresh of the Air Quality Action Plan and Air Quality Strategy.</i> <i>5. The scientific literature review in relation to the potential benefits of Roadvent be shared with the Panel.</i> 	

	<p>6. <i>Clear, effective, and positive communications be developed with regards to the Roadvent project to increase public understanding of the benefit</i></p> <p><u>Meeting of the Panel to be held 16th April 2025</u></p> <p>The Panel will consider the Air Quality Update (Action Plan, Strategy and Annual Status Report)</p>	
<p>Fly tipping Update</p>	<p><u>Meeting of the Panel to be held 16th April 2025</u></p> <p>The Panel will consider a report on Fly tipping Enforcement.</p>	
<p>Public Space Protection Orders</p>	<p><u>Meeting Date TBC</u></p>	
<p>Road Safety Update</p>	<p><i>Background:</i></p> <p><i>The former Economy and Neighbourhoods Scrutiny Panel received a presentation around Highways Safety which set out The Councils statutory responsibilities, (as per the Highways Safety Act), (i.e.- Safe vehicles, speeds, roads and behaviours as well as Post collision learning and care). The presentation also covered issues in relation to capital funding, and the Vision Zero ambition to eliminate road</i></p>	

	<p><i>deaths and serious injuries (KSI's) to zero by 2040 and improve road safety for everyone using a safe systems approach. The Panel recommended that more emphasis be placed on enforcement and that the council continue to promote, persuade and influence driver behaviour as well as maintaining strong partnership work with the Police.</i></p> <p><i>At its meeting held 10th January 2024 the Panel received a report on Highways Safety Update and recommended that work be undertaken around collision data, and that this be filtered to differentiate between avoidable and unavoidable casualties and to help identify trends and differences. It was also recommended that the recording and consideration of locations where there were multiple minor incidents be investigated and that examples of successful interventions made in high-risk areas are showcased to demonstrate which schemes were effective.</i></p> <p><u>Meeting Date TBC</u></p> <p>The Panel will consider a report on Road Safety to include a focus on achieving Vision 0.</p>	
<p><u>Informal Briefings</u></p>		
<p>Parks and Greenspace Vision (to include Biodiversity and net gain)</p>	<p>February</p>	

Future of Bereavement Services	November	
Kirklees Internal Carbon Reporting	Date TBC	
Kirklees Enforcement Policy	February	
Air Quality Update (Action Plan, Strategy and Annual Status Report)	November	
Fleet Replacement Programme and O Licence compliance (to include link to particulate matter impact on air quality)	November	

Golden Threads:

The Panel will consider and would like to receive information around the following themes throughout its programme of work

- Climate Impact
- Risks and Opportunities
- Partnership work, links to other opportunities and engagement
- Communications; i.e.- how is the council using communications to deliver messaging, raise awareness of issues and provide information

Items not yet scheduled:

- Flood Risk (Panel to monitor and consider recent reports/outcomes from scrutiny prior received at OSMC – may request an update later in the year)
- Public Space Protection Orders

Panel Visits: TBC

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