



**CITY OF LONDON CORPORATION  
DEPARTMENT OF MARKETS & CONSUMER PROTECTION  
PORT HEALTH & PUBLIC PROTECTION SERVICE**

## **HEALTH & SAFETY INTERVENTION PLAN 2014-2015**

### **1. Introduction**

The range of enforcement and advisory activities of the Health & Safety Team directly contributes to and supports the Strategic Aims of City of London Corporate Plan 2013-17:-

- ***To provide modern, efficient and high quality local services and policing within the Square Mile for workers, residents and visitors with a view to delivering sustainable outcomes,***
- ***To provide valued services to London and the nation.***

in particular the cross-cutting Key Policy Priorities of:-

- **KPP2** - Maintaining the quality of our public services whilst reducing our expenditure and improving our efficiency,
- **KPP3** - Engaging with London and national government on key issues of concern to our communities including policing, welfare reform and changes to the NHS,
- **KPP4** - Maximising the opportunities and benefits afforded by our role in supporting London's communities

and **The City Joint Health and Wellbeing Strategy** identifies alcohol, smoking and mental health associated with stress are the key health and wellbeing challenges for the City.

### **2. Our Key Challenges for 2014-17**

A key challenge for the Health & Safety Team for the forthcoming years is to respond to the changes to health & safety enforcement following the Government's commissioning of Professor Löfstedt's independent review of health & safety legislation<sup>1</sup>, the Government's response<sup>2</sup> and the resulting National Local Authority Enforcement Code<sup>3</sup> (the Code).

It will require changes to the way we plan, target and intervene with duty holders' activities and together with the new Regulators Code, the National Code will

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<sup>1</sup> ["Reclaiming Health & Safety for All"](#)

<sup>2</sup> [The Government's Response to the Löfstedt Review](#)

<sup>3</sup> [National Enforcement Code for Local Authorities - Health & Safety](#)

necessitate development of a different relationship and engagement with businesses whom we want to influence.

We will further develop and better use the available sources of intelligence on risks and compliance in order to target our interventions in the City where there is the greatest perceived and actual risk.

We will need to ensure enforcement officers have the skills to effectively apply the range of interventions necessary to identify and communicate health and safety messages to the City business and worker community.

### **3. KPIs for 2014-2015**

The following are the team's Key Performance Indicators for this year:-

- To complete a risk-based intervention programme for all cooling towers systems within the year.
- To complete all Health & Safety Intervention Plan projects within the year.
- To respond to all Primary Authority requests for advice within 1 working day.

### **3. Competent and trained officers**

In order to ensure that the service we offer to businesses and residents is competent and high quality we will ensure that:

- all officers carrying out enforcement work are appropriately authorised, according to their ability, qualifications, expertise and experience;
- officer's competence is continually assessed and that we support officers to develop their skills and widen their experience;
- we will ask for feedback from businesses and other service users on the quality of the service we provide and strive to continually improve; and
- we will continue to participate in peer reviews with other local authorities to ensure consistency and promote best practice.

PH&PP will seek to ensure all its enforcement decisions are consistent with:-

- *the current PH&PP Policy Statement on Enforcement; and*
- *the HSE and Local Authorities' Enforcement Management Model*

and will continue to train and develop competency of its enforcement officers to using the current [Regulators' Development Needs Assessment \(RDNA\)](#) tool.

There will be joint working on projects and interventions and in training between the Food Safety, Trading Standards, Pest Control and Health & Safety teams of the Port Health & Public Protection (PH&PP) Service so as to develop and encourage consistency and the exchange of advice and guidance.

#### **4. The National Local Authority Enforcement Code (The Code)**

All Health & Safety Enforcing Authorities in the UK must make adequate arrangements for enforcement of the Health and Safety at Work Etc 1974 (HSWA). 'The Code' sets out what is meant by 'adequate arrangements for enforcement' and for reporting on compliance. It is given legal effect as HSE guidance to LAs under Section 18 of HSWA and is designed to ensure that LA health and safety regulators take a more consistent and proportionate approach to enforcement.

Whilst the primary responsibility for managing health and safety risks lies with the business who creates the risk, LA health & safety regulators have an important role in ensuring the effective and proportionate management of risks, supporting business, protecting their communities and contributing to a wider public health agenda.

The Code sets out the risk based approach to targeting health and safety interventions to be followed by LA regulators and it provides a principle based framework that recognises the respective roles of business and the regulator in the management of risk, concentrating on four objectives:-

- Clarifying the roles and responsibilities of business, regulator and professional bodies
- Outlining the risk-based approach to regulation that LAs should adopt with reference to the new Regulators Compliance Code and HSE's Enforcement Policy Statement and the need to target relevant and effective interventions that focus on influencing behaviours and improving the management of risk
- Setting out the need for training and competence of LA H&S regulators and
- Explaining the arrangements for collection/publication of LA data and peer review to give assurance on meeting the requirements of the Code.

We will use a range of regulatory interventions available to influence behaviours and the management of risk. Pro-active inspections will **only be** utilised for premises with higher risks and activities or where intelligence suggests that risks are not being effectively managed.

#### **5. National Priorities for the UK**

Alongside The Code HSE has published a list of higher risk activities as National Priorities to inform local authority planning, based on sector specific HSE strategies. National Priorities which the City will be addressing in 2014-15 are:

- **Legionella infection at premises with cooling towers** – through conducting risk-based audits of the large number of cooling towers within the City that require robust risk control. Local intelligence on risk management performance has led to the development of reduced intervals between inspections.
- **Fatalities / injuries resulting from being struck by a vehicle and falls from height** in wholesale, warehouses and distribution – through conducting inspections of stallholder areas at Smithfield Market,

- **Event Safety / Crowd control at large public sports / leisure events** – through prior working with dutyholders and other Corporation Departments in the prior planning and permissioning of events as well as inspections.

## **6. Local Priorities for the City of London**

The Code provides flexibility to address local priorities alongside national ones, but based on local intelligence and evidence. The City Corporation's Port Health & Environmental Services Committee have endorsed such an approach in the City and such City-related issues which the team will also be seeking to address through an intelligence-lead and targeted approach are:-

- **Falls from height** related to external building maintenance, cleaning and servicing, based on local intelligence, using inspection where appropriate, awareness raising by working with stakeholders and using social and web based media.
- **Legionella risks** associated with hot and cold water systems in large older office stock; most cases of legionellosis are associated with such systems.
- **Workplace health and wellbeing** – identified as a priority by local City-based research and Joint Health and Wellbeing Strategy, including mental health; working with other stakeholders to promote good practice and supporting businesses through advice, audits, London Healthy Workplace Charter, web and social media.
- **Slips, Trips and Falls, Gas Safety and injuries related to manual handling in Food premises** – City RIDDOR accident data indicate these are the most common causes of injury in the sector; interventions will be advisory where there is evidence of uncontrolled risks; serious risks (Matters of evident concern – MOEC) will be resolved using appropriate enforcement action.

The Health and Safety team's service targets for the year are provided in further tabulated detail in **ANNEX B**.

## **7. Working in Partnership**

In order to achieve its aims and objectives, the City of London will continue to work with a variety of other agencies, stakeholders and intermediaries and these include:-

- **HSE** – national policy, strategy and guidance; operational support; London Local Authority Liaison strategic support. .
- **London Partnership and Strategy Group**, the **[Association of London Environmental Health Managers](#)** (Alehm) and the **All-London Boroughs Health & Safety Liaison Group** – to encourage consistency across London through being actively involved in a variety of London-wide health & safety initiatives; and
- **Neighbouring London Boroughs** – both in the **South East London Quadrant** (the City of London plus the London Boroughs of Bexley, Bromley, Croydon, Greenwich, Lewisham, Southwark and Westminster)
- The **[City of London Police](#)** – on violence and crime in the Retail and Hospitality sector and other areas detailed in the Memorandum of Understanding between the City Corporation and the City of London Police;

- **Better Regulation Delivery Office** – on Primary Authority and other projects regarding local authority regulatory services ;
- **London Banks Health & Safety Forum** - to encourage consistency, share best practice across the Financial Services sector,
- **The Legionella Control Association** - to raise standards in service providers involved in the supply of goods and services relating to the control of Legionella bacteria in water systems.
- **Health and Safety Executive / Public Health England national working group** review of guidance on control of legionella in spa pools,
- **Cleaning Industry Liaison Forum** – to work with industry trade associations, training bodies and trade unions to improve health, safety and welfare standards in the cleaning industry.
- **Public Health England** – supporting training for other health professionals on legionella control by facilitating site visits
- **Managing Agents Forum** – providing advice and sharing good practice
- **City of London Health and Wellbeing Board** – providing advice and linking health & safety into the public health agenda
- **London Healthy Workplace Charter Steering Group** – supporting the Charter scheme development, sharing good practice.
- our **Primary Authority Partnerships**

The team will actively support all London local authority health & safety events, and continue to host training courses for the HSE and the All-London Boroughs' H&S Liaison Group whenever possible to ensure that the City of London maintains its position at the forefront of health & safety regulation in the capital and the UK as a whole.

In support of this it will continue to attend and support national industry groups such as the Legionella Control Association and the Cleaning Industry Liaison Forum where these are most closely linked to the City's local health & safety priorities.

## **9. Service Development**

PH&PP will also seek to develop and improve its overall health & safety enforcement through a number of improvement projects as set out below in support of the above theme of "**Works together.....**".

- **Customer surveys** – we will carry out further surveys of our customers across key elements of the service and use the results to inform service improvements;
- **Communications strategy** – we will develop a more strategic approach to communicating with our City stakeholders and customers, and seek effective means to improve access to, influence and work with City businesses communities and workers.
- **Skills for the new enforcement intervention landscape** – we will improve officers' awareness and understanding of business' needs, how to effectively communicate health and safety messages using a broader range of intervention strategies.

- **Test resilience of Legionella outbreak plan** – we will assess and test key steps in our outbreak response plan to ensure it is fit for purpose;

The Food Safety Team will also be included in all health & safety project working and competency development initiatives and whenever possible, representatives from both teams will attend the All-London Boroughs' Health & Safety Liaison Group.

Finally, the Health & Safety Team will undertake wherever action is most appropriate to promote and publicise the City Corporation's work as both a Health & Safety Enforcing Authority and the providers of quality and authoritative advice and information to City businesses and workers.

**Jon Averbs**  
**Port Health & Public Protection Service Director**

**April 2014**

## **HEALTH & SAFETY TEAM HIGHLIGHTS 2013-2014**

Last year, the Health & Safety Team undertook the following wide range of activities.

### **Legionella Control**

- Delivered 'Cooling Tower Inspection' training to 80 Environmental Health professionals across London and the UK, an important contribution to improving knowledge and competence on Legionella issues for regulators.
- Hosted site visits to cooling towers for regulatory fact finding mission by Kuwaiti government;
- Assisted the Public Health England by providing site visits for two national *Legionella* outbreak investigation and control courses to demonstrate risk assessment in practice for cooling towers and spa pools
- Showcased our work on *Legionella* control to leading businesses from the water treatment industry at a number of conferences and events, promoting the City of London and key public health messages concerning managing this risk.

### **Health and Safety Information Campaign**

The team continued a campaign around current key issues in health & safety as they affect the wide variety of City businesses from SMEs to multinational organisations and across different industry sectors. This included:-

- Regularly tweeted health & safety information from our Twitter account [@SafeSquareMile](#) - "*The City of London Corporation's Health & Safety Team, signposting the way to safety, health and well-being for all who work in the historic "Square Mile" – and which now has 450 followers*
- Promoted the London Healthy Workplace Charter at the high profile '**Business Healthy**' conference at Mansion House in March 2014.
- Produced two well received, short training 'YouTube' videos (over 3000 viewings) related to preventing injuries associated with fall arrest and rescue associated with City building maintenance and cleaning.

### **Inspections and Interventions**

- 86 control of legionella in cooling tower' inspections and enforcement action.
- 32 project based interventions carried out, including:-
  - 4 'Seasonal Retail Overstocking' project interventions
  - 12 water fountain sites targeted for *Legionella* sampling
  - 16 Massage, Special Treatment and acupuncture licensing inspections
- 8 Full inspections of Smithfield Market businesses

## Complaints and service requests

152 complaints and service requests received were responded to, investigations and enforcement actions taken where necessary, including:-

- 4 Asbestos notifications
- 45 LOLER lift inspection reports
- 37 Pressure vessels inspection reports
- 66 Health & safety complaints
- 43 special events applications reviewed and advised upon

## Accidents, Ill-health and Dangerous Occurrences

- Received and assessed 245 accidents and dangerous occurrences,
- Investigated 28 reportable accidents comprising:-
  - 5 dangerous occurrences
  - 23 Specified injuries (serious accidents)
- Two cases of legionnaires disease investigated

## Primary Authority Partnership Work

Up until the end of March 2014, 190 chargeable hours were spent on advising the team's Primary Authority partners, **CBRE** (40 hours) and **Virgin Active** (150 hours) on health & safety management systems, auditing of performance, speaking at conferences and training events and dealing with regulatory queries and challenges from other local authorities and which also brought in income. Both partners have expressed a strong preference to continue with these partnerships, which they have both found valuable and good value.

## Formal Legal Action

- City of London Corporation have assumed lead role in the investigation of a fatality which took place in 2012, after formal hand over from City Police; CPS decided there was insufficient evidence to proceed with corporate manslaughter charges.
- Investigated potential exposure of building maintenance workers to asbestos as a result of poor management; legal proceedings have been authorised and have been referred to the City Solicitor;
- Three Improvement Notices were served under Section 21 of the Health & Safety At Work Etc. Act 1974 requiring improvements to the management and control of legionellae risks associated with cooling towers.

## Other Activities

- **London Healthy Workplace Charter** to improve workplace health in City businesses; A City Business Trainee was employed to identify and target potential interest and raise awareness of the Charter due to low uptake of the award; the Charter was promoted at the COLC sponsored **Business Healthy** conference in March 2014.



- **Customer survey:** a small pilot survey to assess the quality, effectiveness and value of cooling tower inspections to duty holders was carried out; all respondents (50%) valued the inspections and found them to be conducted professionally; 75% agreed that the inspections resulted in sustainable improvements.

<b>HEALTH &amp; SAFETY INTERVENTION PLAN TARGETS 2014-2015</b>				
<b>PRO-ACTIVE INTERVENTIONS – National Priorities</b>				
<b>Sector, premises type or specific cross sector activity</b>	<b>Evidence that identified the concern and set its priority<sup>4</sup></b>	<b>Planned intervention type<sup>5</sup></b>	<b>Rationale for intervention</b>	<b>Planned activity or resource</b>
<b>Control of legionella interventions: cooling towers and other at risk water systems.</b>	<p>National and local priority.</p> <p>151 cooling towers sites within the City.</p> <p>Risk of Legionnaires' disease outbreak affecting the Square Mile is considered an unacceptable reputational risk.</p> <p>Poor performers identified via established risk ratings and local intelligence.</p>	<p>Inspection and enforcement</p> <p>Education and awareness</p> <p>Working with intermediaries, LCA, London Banks H&amp;S Forum, Managing Agents Forum</p> <p>Working to influence design at planning stage through CDM.</p>	<p>Due to the complex nature of the water systems involved it is essential to carry out a detailed audit in order to make a competent assessment of risk.</p> <p>Established intervention protocol utilised.</p> <p>Outputs measured via lower risk ratings following intervention.</p>	<p>Risk-based audit of highest risk of a population of 151 City sites</p> <p>Revisits and enforcement action taken as necessary</p> <p>Approximately 90 premises, 520 hrs.</p> <p>Response to Planning applications and advice to designers and CDM Coordinators</p>
<b>Health and Safety interventions at Smithfield Meat Market: Fatalities / injuries resulting from being struck by a vehicle and falls from height.</b>	<p>National Priority</p> <p>Risk rating, past performance, FSA / CoL Authorised Officer intelligence from food safety inspection, and confidence in management.</p>	<p>Inspection (Cat A), and enforcement</p> <p>Matters of evident concern</p> <p>Education and awareness</p> <p>Working with Smithfield Market management office and SM Tenants Association and HSE Filed Operations Team.</p>	<p>Targeting uncontrolled risks in the stallholder areas.</p> <p>Inspections and enforcement in highest risk premises and where risks not adequately controlled.</p> <p>Education / awareness</p> <p>Influencing business owners</p>	<p>Interventions focusing on the highest risk hazard and matters of evident concern with enforcement action taken as necessary</p>

<sup>4</sup> Evidence types detailed in Supplementary Materials 6 of LAC 67-2 rev4  
[www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf](http://www.hse.gov.uk/lau/lacs/67-2/supplementary-material-6-potential-sources-of-information-to-aid.pdf)

<sup>5</sup> Planned Intervention Types detailed in Annex A of LAC 67-2 rev4  
[www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types.pdf](http://www.hse.gov.uk/lau/lacs/67-2/annexe-a-Intervention-types.pdf)

<p><b>Event Safety / Crowd control at large public sports / leisure events</b></p>	<p>Large scale events are a National Priority.</p> <p>City Corporation is host to many high profile events such as the Lord Mayor's Show.</p> <p>Approximately 6 events are large events for which City are the enforcement authority for significant high risk activities.</p> <p>As a local priority it aims to mitigate reputational risk issues and avoid negative publicity on health &amp; safety grounds.</p>	<p>Education and awareness Liaison with event organisers</p> <p>CoLC Event 'permissioning'</p> <p>Inspection and Enforcement for highest risk activities</p>	<p>Officers are involved at planning stages of events through the City's Safety Advisory Group (SAG) and discussion with event organisers.</p> <p>Intelligence is shared at the SAG from Met and City of Police, London Ambulance, Highways, etc.</p> <p>Requests for competent advice by City Corporation's Highways service.</p>	<p>Review all event plans and risk assessments Visits to site as necessary. Follow-up action taken as necessary</p> <p>50 events, 175 hrs</p>
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<b>PRO-ACTIVE INTERVENTIONS – Local Priorities</b>				
<p><b>Falls from Height related to external building maintenance, cleaning and servicing</b></p>	<p>Window cleaner fatality 2012 and investigation, Local intelligence and observations made by COLC officers and others in the COL facilities management community,</p>	<p>Education and awareness.</p> <p>Working with intermediaries</p> <p>Advisory visits</p> <p>Inspection and enforcement where appropriate.</p> <p>Working with intermediaries, LCA, London Banks H&amp;S Forum, Managing Agents Forum</p> <p>Working to influence design at planning and fit-out stages through CDM.</p>	<p>Large number of sites where external working at height (WAH) carried out.</p> <p>Building managers usually keen to understand the risks and receptive to awareness raising - e.g. popularity of recent videos by H&amp;S Team</p> <p>Some sites may need direct enforcement intervention on MOEC or where non-compliance on follow up to advisory visits</p>	<p>Observations during street walks, dealing with matters of evident concern and using observations and LOLER Thorough Examination reports to target inspections of poorly controlled activities.</p> <p>Estimate 10 inspections, 90 hrs</p> <p>Awareness raising by working with stakeholders and using social and web-based media - e.g. videos</p> <p>2x video productions = 90 hrs</p> <p>Response to Planning applications and use of applications to trigger advice to designers and CDM Coordinators</p>

<p><b>Legionella control in hot and cold water systems in large buildings</b></p>	<p>HSL Report HEX/12/07 identifies hot and cold water systems attributable to a significant number of legionellae sp. associated outbreaks in the UK over in the 10 years prior to the report; the City of London has a large number of large buildings with complex H&amp;C water systems; during inspections of cooling towers officers have acted on MOEC on a number of systems in recent years.</p>	<p>Education and awareness of new HSE guidance</p> <p>Use of intermediaries.</p> <p>Inspection of a sample of large, older buildings, not previously visited, to assess risks and to inform need for and mode of future intervention programmes.</p> <p>Working with intermediaries, LCA, London Banks H&amp;S Forum, Managing Agents Forum</p> <p>Working to influence design of new build and refurbishment at planning or fit-out stage through CDM.</p>	<p>See column 2.</p>	<p>Inspection of 10 premises = 70 hrs</p> <p>Use information found to determine need for further intervention. Use of Twitter, interactions with City forums and networks to advise on new HSE guidance informed by results of inspections.</p> <p>Response to Planning applications and use of applications to trigger advice to designers and CDM Coordinators</p>
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<p><b>Workplace health and wellbeing: Including Workplace Wellbeing Charter</b></p>	<p>Local Priority: <i>identified as a priority by local City based research and Joint Health and Wellbeing Strategy, including mental health.</i></p>	<p>Recognising good performance through the <b>London Healthy Workplace Charter</b></p> <p>Partnerships – working through City Health and Wellbeing Board and Business Healthy initiative</p> <p>Intermediaries – such as managing agents and London Banks Health and Safety Forum.</p>	<p>There is strong evidence to show how having a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity - this is good for employers, workers and the wider economy.</p> <p>As part of the steering group working with the Department of Health / GLA to promote engagement and business uptake with the Charter post pilot.</p>	<p>Further development of engagement strategy using existing networks and resources such as City Business Library contacts database.</p> <p>Working with other stakeholders to promote good practice and supporting businesses through advice, audits, London Healthy Workplace Charter, web and social media.</p> <p>Working with any interested businesses towards an award.</p> <p>Estimate 3 assessments = 50 hrs</p> <p>Attendance at Steering Group and City development meetings and activities = 120 hrs</p> <p>CoLC assessment activities = 50 hrs</p>
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<p><b>Health and safety interventions in food premises: Slips, trips and Falls; falls from height; gas safety; manual handling; burns.</b></p>	<p>RIDDOR and enforcement data on M3 for 2013-14; EHO intelligence from food safety inspections, confidence in management.</p>	<p>Enforcement on Matters of Evident Concern (MOEC)</p> <p>Advice, education and awareness</p>	<p>Food premises are some of the highest risk premises in City of London and also contain highest proportion of SME's where risk management weakest.</p>	<p>Advice and information during inspections, 1000 x 10mins = 165hrs</p> <p>Interventions when matters of evident concern encountered with enforcement action taken as necessary</p> <p>MOEC Estimate = 60 hrs</p>
<p><b>Joint London Fire Brigade Seasonal Overstocking Project</b></p>	<p>Local Priority Based on intelligence from London Fire Brigade</p>	<p>Partnerships</p> <p>Education and awareness</p> <p>Inspection and enforcement</p>	<p>Issues such as blocked fire exits, impeded access / egress are immediate and serious issues best identified by site visits.</p>	<p>Joint inspections with City &amp; Islington LFB In December 2014</p> <p>Inspect for hazards relating to overstocking around Christmas</p> <p>Provision of advice to business</p> <p>Enforcement as necessary to achieve compliance Estimate = 15 hrs</p>

<p><b>Primary Authority CBRE and Virgin Active</b></p> <p><b>Seek further primary authority partnerships with businesses or organisations.</b></p>	<p>Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation.</p>	<p>Partnerships</p> <p>Motivating Senior Managers</p> <p>Supply Chain</p> <p>Design and supply</p> <p>Best practice</p>	<p>Partnerships established as part of the Better Regulation Delivery Office's initiative.</p>	<p>Appraisal of each company's health &amp; safety policies, procedures and practices as they are reviewed.</p> <p>Appraisal of each company's contractors and management arrangements</p> <p>Audit and review the health &amp; safety arrangements, to including strategy and organisational implementation.</p> <p>Advising on related documentation as required.</p> <p>Advising the Company upon new developments in health &amp; safety legislation and best practice</p> <p>Respond to challenges to each company from other health &amp; safety regulators</p> <p>Total 700 hrs</p>
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<b>REACTIVE INTERVENTIONS</b>				
<b>Sector, premises type or specific cross sector activity</b>	<b>Evidence that identified the concern and set its priority</b>	<b>Planned intervention type</b>	<b>Rationale for intervention</b>	<b>Planned activity or resource</b>
<p><b>Notifications under RIDDOR:</b></p> <ul style="list-style-type: none"> <li>• <b>Accidents and Dangerous Occurrence</b></li> <li>• <b>Occupational ill-health</b></li> </ul>	<p>Accidents, Dangerous Occurrences and Work-related ill-health are indicators and intelligence of both common safety risks and areas of non-compliance across both industry sectors and City businesses as a whole</p>	<p>Incident and ill health investigation</p>	<p>In accordance with the <a href="#">Incident Selection Criteria Guidance LAC 22/13<sup>6</sup></a></p>	<p>Establish key facts and available evidence</p> <p>Determine whether further investigation is required in accordance with LAC 22/13</p> <p>Follow-up enforcement action taken in accordance with Enforcement Management Model (EMM)</p> <p>Estimate 200 hrs</p> <p>Additionally PH&amp;PP has assumed lead on an investigation into a fatality in 2012; anticipated resource: 240 hrs</p>

<sup>6</sup> Health and Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria [www.hse.gov.uk/lau/lacs/22-13.htm](http://www.hse.gov.uk/lau/lacs/22-13.htm)

<p><b>Complaints &amp; Service Requests</b></p> <ul style="list-style-type: none"> <li>• <b>Complaints</b></li> <li>• <b>Asbestos notifications</b></li> <li>• <b>LOLER reports</b></li> <li>• <b>Pressure vessels</b></li> <li>• <b>Massage and Special Treatment (MST) Licensing Inspections</b></li> </ul>	<p>Statutory Adverse Insurance Reports (AIR's) may indicate poor management and /or maintenance practices.</p>	<p>Investigations, inspections where appropriate</p> <p>Advice</p>	<p>Local response policy</p> <p>Input to local licensing arrangements of MST activities</p>	<p>Research and provision of H&amp;S advice.</p> <p>Establish key facts of complaints and adverse reports; investigation and inspection for selected complaints and reports in accordance with risks and dutyholder performance.</p> <p>Follow-up enforcement action taken in accordance with Enforcement Management Model (EMM)</p> <p>All complaints and service requests (excluding MST inspections) estimate = 250 hrs</p> <p>90 MST inspections = 200 hrs</p>
<p><b>To review planning applications and make representations where appropriate</b></p>	<p>Working with architects, designers, planners and engineers at planning stage is essential to design out issues that can become a health and safety risk to on completion.</p> <p>Discussions held on work at height - i.e. window cleaning, legionella control, prevention of slips and trips.</p>	<p>Education and awareness</p>	<p>Requested by COL Planning Department as part of the planning process.</p>	<p>Scrutinise and comment on applications where appropriate.</p> <p>Advise on CDM regulations &amp; workplace regulations.</p> <p>Visits to premises as necessary.</p> <p>50 hrs</p>