

Cheltenham Borough Council Cabinet

Meeting date: Tuesday, 13 June 2023

Meeting time: 6.00 pm

Meeting venue: Council Chamber - Municipal Offices

Membership:

Councillors Rowena Hay, Peter Jeffries, Victoria Atherstone, Flo Clucas, Mike Collins, Iain Dobie, Martin Horwood, Alisha Lewis and Max Wilkinson

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SECTION 1 : PROCEDURAL MATTERS

1 Apologies

2 Declarations of interest

3 Minutes of the last meeting (Pages 5 - 12)

4 Public and Member Questions and Petitions

Questions must be received no later than 12 noon on the seventh working day before the date of the meeting

SECTION 2 :THE COUNCIL

There are no matters referred to the Cabinet by the Council on this occasion

SECTION 3 : OVERVIEW AND SCRUTINY COMMITTEE

There are no matters referred to the Cabinet by the Overview and Scrutiny Committee on this occasion

SECTION 4 : OTHER COMMITTEES

There are no matters referred to the Cabinet by other Committees on this occasion

SECTION 5 : REPORTS FROM CABINET MEMBERS AND/OR OFFICERS

5 Food Safety Service Plan (Pages 13 - 36)

Report of the Cabinet Member for Customer and Regulatory Services

6 Household Support Fund (Pages 37 - 48)

Report of Cabinet Member for Safety and Communities

SECTION 6 : BRIEFING SESSION

- Leader and Cabinet Members

7 Briefing from Cabinet Members

SECTION 7 : DECISIONS OF CABINET MEMBERS

Member decisions taken since the last Cabinet meeting

SECTION 8 : ANY OTHER ITEM(S) THAT THE LEADER DETERMINES TO BE URGENT AND REQUIRES A DECISION

Section 10: BRIEFING NOTES

Briefing notes are circulated for information with the Cabinet papers but are not on the agenda

8 Briefing Note: Health and Safety Service Update, 2023-24 (Pages 49 - 64)

9 Local Government Act 1972 - Exempt Minutes

The Cabinet is recommended to approve the following resolution:-

“That in accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in paragraph 5, Part (1) Schedule (12A) Local Government Act 1972, namely:

Paragraph 5: Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings

10 Exempt Minutes (Pages 65 - 66)

Exempt Minutes of meeting held on 23 May 2023.

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Cheltenham Borough Council

Cabinet

Minutes

Meeting date: 23 May 2023

Meeting time: 6.00 pm - 7.15 pm

In attendance:

Councillors:

Rowena Hay, Mike Collins, Iain Dobie, Martin Horwood, Alisha Lewis and Max Wilkinson

Also in attendance:

Claire Hughes (Corporate Director and Monitoring Officer), Sarah Farooqi, Darren Knight (Executive Director of Place and Communities) and Sophie Barton (Townscape Project Manager)

1 Apologies

Apologies were received from Councillors Atherstone, Clucas and Jeffries.

2 Declarations of interest

There were none.

3 Minutes of the last meeting

The minutes of the meeting held on 04 April 2023 were approved unanimously and signed as a true record.

4 Public and Member Questions and Petitions

There were no public or Member questions or petitions on this occasion.

5 Matters referred from Council: Briefing Note

The Leader said that, as requested, the Cabinet Member for Safety and Communities has provided an outline for developing options to further improve engagement with young people and add value to work currently undertaken by the council. She confirmed that further detail will be provided in July.

The Cabinet Member for Economic Development, Culture, Tourism and Well-being said a lot of good work to engage with young people is already taking place, but it is good that the options appraisal includes a map to bring together future work and engage further. The Cabinet Member for Cyber, Regeneration and Commercial Income agreed, saying this was a positive step to explore further work already being done.

No vote was required. The Briefing Note was noted.

6 Air Quality Action Plan

The Cabinet Member for Customer and Regulatory Services introduced the report, saying an enormous amount of excellent work had gone into it, for which he thanked officers. Although air quality in Cheltenham is generally good, it is an important issue and the report presents an Air Quality Action Plan for the whole town, together with a plan for a specific area around Poole Way, identified in 2019 as falling below the expected national standard and now designated an Air Quality Management Area. The former Cabinet Member for Climate Emergency made a clear commitment for the council to take concrete actions, including smoke control zones, schools quality projects to protect small children, steps to take the most polluting taxis off the road with a clean fleet by 2030. A lot of the work will be undertaken with partners such as the NHS and GCC as the highways authority – road traffic is overwhelmingly the biggest contributor to air pollution – and there is a clear commitment to keep monitoring air quality across the town, working continually towards improving it and people's health. He commended the report to Cabinet, and asked them to approve the Air Quality report, and Bureau Veritas management plan and modelling study.

The Cabinet Member for Economic Development, Culture, Tourism and Well-being said this was a good report, with 16 action points, some for Cheltenham alone and some to be undertaken with partners. He noted the legislative quirk that CBC is reliant on the county council – run by a different political party - as the authority with the power to implement some of the action points; it has made some progress but is not moving far enough to make big changes. He paid tribute to Clean Air Cheltenham, who pushed for a plan for the whole of Cheltenham, not just the small area in breach of NO2 levels, and commended the report.

The Cabinet Member for Cyber, Regeneration and Commercial Income was delighted to note that Golden Valley was mentioned in the report, saying how important it was to do things properly from the start. The transport hub currently

under construction in west Cheltenham would make a big difference, and these green developments can be showcased to other authorities embarking on similar plans.

RESOLVED THAT:

- 1. the draft Air Quality Action Plan attached be approved;**
- 2. the Bureau Veritas Air Quality Action Plan be approved;**
- 3. the Bureau Veritas Modelling Study be approved.**

7 Information Governance

The Leader introduced the report of the Monitoring Officer, saying that as part of the council's legislative and governance framework, it is required to demonstrate its compliance with data protection legislation and must put in place appropriate technical and organisational measures to demonstrate this. The report brings forward a suite of documents which seek to set out the council's policy position in this area – the information governance framework setting out the council's overall approach and the associated policies. Once approved, the council will implement the action plan and ensure that the policies are fully embedded and observed, with assurance provided by the Corporate Governance Group and via the audit process.

,

There were no Member comments on this item.

RESOLVED THAT:

The following policies are adopted, with effect from 01 June 2023:

- 1. Information Governance Framework**
- 2. Data Protection Policy**
- 3. Data Protection Impact Assessment Policy**
- 4. Anonymisation and Pseudonymisation Policy**
- 5. Data Quality Policy**
- 6. Data Retention Policy**

8 Application for designation of a Neighbourhood Forum

The Leader said this application was for a renewal of the original application, granted in 2017. The Cabinet Member for Customer and Regulatory Services explained

further that the council was obliged to check the forum complied with regulations before recommending approval for a second time. He stressed the importance of handing real power back to local communities, introduced by the coalition government in 2011, which was taken up widely in parished, rural and affluent areas, but notably less so in urban, less well-off areas. It was a matter of great pride that this unparished area, and one of Cheltenham's least well-off areas, had really grasped the nettle of neighbourhood planning and put an enormous amount of work into it.

He added that the neighbourhood forum area was based on Hesters Way ward, which made engagement with borough councillors easy. The slight changes being made to ward boundaries will result in small numbers of residents moving between Hesters Way, Springbank and Benhall/Reddings wards; a formal letter will be sent to the Neighbourhood Forum, requesting that they look at the boundaries and engage with the borough councillors in adjacent wards.

This is a very positive step, recognising the work done in the Hesters Way community to engage in the decision-making process which will affect the lives of local people for many years to come. He is proud to recommend the report to Cabinet.

The Cabinet Member for Cyber, Regeneration and Commercial Income said the report makes very good reading, and agreed that it will be excellent for the community as a whole. As ward member for Benhall and The Reddings, he looked forward to engaging with the Neighbourhood Forum.

The Cabinet Member for Economic Development, Culture, Tourism and Well-being welcomed decisions being made at the most local level, not just in parished areas but in less affluent parts of town. He welcomed this important proposal, and would like to see more unparished areas doing the same to strengthen their communities.

The Leader said she was a strong believer in 'bottom-up' communities, asking communities how they want to engage. Not all wards have the capacity to do this, and Hesters Way is lucky to have a community resource centre to take the lead.

RESOLVED THAT:

- 1. the designation of the Hesters Way Neighbourhood Development Forum as neighbourhood forum for the Hesters Way Neighbourhood Development Forum Area be approved;**
- 2. The Director of Community & Economic Development will formally write to Hesters Way Neighbourhood Development Forum to recommend that they consider reviewing the designated Neighbourhood Area to fully assess the impacts of the future boundary changes, including engagement with Benhall & The Reddings and Springbank ward councillors.**

9 Approval of countywide Memorandum of Understanding - Co-operation on Biodiversity Net Gain through the Gloucestershire Nature and Climate Fund

The Cabinet Member for Climate Emergency introduced the report which, she said, spoke for itself, going into great detail on the importance of working with partners across Gloucestershire to make sure biodiversity projects are delivered and funding is spent within the county. She added that it was great to see the climate impact assessment wheel included in the report – it is a great tool – and said in this case the council would continue work to ensure sustainable transport options improve. She commended her report as a strong investment in Cheltenham's biodiverse future.

The Cabinet Member for Customer and Regulatory Services welcomed the report, saying scientists acknowledge that the biodiversity crisis is as serious as the climate crisis. He said that the commitment to off-set biodiversity loss was sometimes a cover, and was a challenge in urban areas, but Gloucestershire counties have agreed to prioritise off-setting in the statement of common ground. Cheltenham has a strong commitment to achieving biodiversity net gain – an SPD is included in the corporate plan – and taking this report as a starting point to push the agenda, CBC could be recognised as one of the greenest local authorities in the country.

The Cabinet Member for Waste and Recycling and Street Services said CBC is taking steps all the time to increase biodiversity, with many of the town's parks keeping areas unmown to encourage biodiversity. He is also looking to amend the schedule for grass cutting, following No-Mow May, reducing mowing in a careful way, deliberately designed to increase biodiversity.

The Leader was pleased to see the climate assessment wheel in the report; it applies to every report, and CBC can be proud that it is recognised nationally as good practice and will be rolled out around the country. She said the Memorandum of Understanding covered several districts and partnerships working closely and across political divides to the benefit of all. It is good that these significant issues are being faced, and she hoped other parts of the country would follow Gloucestershire's example.

RESOLVED THAT:

- 1. the principle of continued co-operation on Biodiversity Net Gain through the Gloucestershire Nature and Climate Fund be approved. Whilst it will not be the only option available to developers unable to provide the required minimum 10% biodiversity uplift on-site, GNCF is designed to provide a robust off-site option for retaining developer investment in BNG within the county;**
- 2. authority is delegated to the Cabinet member for Climate Emergency to sign the Memorandum of Understanding on behalf of the authority.**

10 Briefing from Cabinet Members

The Cabinet Member for Climate Emergency congratulated the continued work of the Cheltenham Zero partnership, which was coming on in leaps and bounds, supporting local businesses, with workshops hosted at the Municipal Offices.

The Cabinet Member for Economic Development, Culture, Tourism and Well-being reported on the following issues:

- #FeedCheltenham leisure cards have been launched, entitling the holder to 12 gym, swim or fitness sessions at Leisure@, as well as further discounts;
- the proposed Honeybourne Line extension, funded by the DfT, has hit the buffers, as there is not enough money to deliver at present. This partnership work will hopefully get back on track in the future;
- he has recently attended:
 - a question and answer session with Cheltenham Education Partnership at the University of Gloucestershire, covering migration, climate emergency and the cost of living, among other things;
 - an interesting afternoon at Cheltenham Bowls Club;
 - a fundraiser event for Lansdown Art Studios, a community interest company looking for new premises to guarantee its future, held at the Royal Oak in Prestbury, who are looking for new premises.

The Leader said that following the recent local elections, she had reached out to Cotswold and Tewkesbury councils, and will do the same with Gloucester and Stroud. She said leaders from all Gloucestershire councils meet every eight weeks to discuss issues affecting the county. She also reported an enjoyable visit to Whaddon Bowls Club over the bank holiday weekend.

The Cabinet Members for Customer and Regulatory Services, Waste and Recycling and Street Services, and Cyber, Regeneration and Economic Development did not have any updates.

11 Cabinet Member decisions since the last meeting

The Cabinet Member for Waste, Recycling and Street Services reported on three decisions, taken in line with previously approved plan for a phased renewal of the fleet:

[Award of contract to Dennis Eagle Ltd for the supply of refuse collection vehicle](#)

[To award a contract to Motus Commercials Ltd to supply 1 x Isuzu CWS Recycling Stillage Vehicle](#)

[To award a contract to Motus Commercials Ltd for to supply of two 3.5 Fiat Ducato Chassis Cabs](#)

The Cabinet Member for Cyber, Regeneration and Commercial Income reported the following decision, which was taken to mitigate challenges going forward, in view of the complex nature of the development site, with Grade II listed buildings attached, services just below the surface, and highways constraints.

[To engage Willmott Dixon to deliver the redevelopment scheme and 232-242 and 254 High street, and Gleeds to provide project and cost management services](#)

The Cabinet Member for Customer and Regulatory Services said community alarms are literally lifelines for many people, giving them confidence in independent living. The majority are analogue, but with a digital switchover due to complete in 2025, this timely move, in conjunction with the Gloucestershire Strategic Housing Partnership Fund, will ensure all equipment is replaced in a timely manner.

[To accept the funding of £245,986 from the Gloucestershire Strategic Housing Partnership to CBC to facilitate the funding and installation of new digital Lifeline equipment](#)

The Leader:

[To appoint an interim Accountable Manager for Gloucestershire Airport, in the absence of the Managing Director](#)

Cabinet Member for Economic Development Culture, Tourism and Well-being

[To award a contract for the delivery and management of Cheltenham Ice Rink to S3K Ltd](#)

The Leader also reported the following:

Cabinet Member for Housing's decision

[To approve the Local Lettings Plan](#)

Cabinet Member for Finance and Assets' decision

[To close Town Centre East Car Park on 29th and 30th July for some redecoration as part of the Cheltenham Paint Festival](#)

12 Local Government Act 1972 - Exempt Business

RESOLVED THAT:

- In accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in Paragraph 5, Part (1) Schedule (12A) Local Government Act 1972, namely:

Paragraph 5: Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

13 A Legal Matter

RESOLVED THAT:

- **the recommendations are approved.**

Cheltenham Borough Council

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Cabinet 13th June 2023

Food Safety Service Plan

Accountable member:

Cabinet Member for Customer and Regulatory Services, Councillor Martin Horwood

Accountable officer:

Louis Krog, Head of Public Protection

Ward(s) affected:

All

Key Decision: No**Executive summary:**

This Authority is required to produce a food safety service plan outlining the activities and resources needed to enable the delivery of a service in accordance with the requirements laid down in the Official Control Regulations (OCR) and the Food Law Code of Practice (FLCOP). The Frame Work Agreement on Official Feed and Food Control by Local Authorities sets out a standard approach to service planning which the Food Standards Agency (FSA) uses for audit and monitoring purposes. The FSA plays a key role in overseeing official food control activities under taken by this authority. This service plan is key to ensuring that national priorities are addressed and delivered locally and provides an essential link between corporate and financial planning. The authority is bound by the Regulator's Code which provides a principles based framework for engaging with those we regulate.

Recommendation:

- that Cabinet approve the appended Food Safety Service Plan 2023-24
-

1. Implications

1.1 Financial implications

Food Safety service plan to be delivered by the food safety team costed within cost code REG001 (Environmental Health) with the exception of the food safety contractor who is costed within COV021 (Covid Management) and funded by passported GCC funding (note this approach has been approved by GCC)

Signed off by: Andy Taylor, Principal Commercial Accountant, Andrew.taylor@cheltenham.gov.uk

1.2 Legal implications

The Food Safety Service Plan has been updated and is required in order to comply with the statutory duties set out in the Official Control Regulations 2019 and the Food Law Code of Practice to enforce the requirements of food law, have due regard to the relevant provisions of the code and effectively discharge the statutory duties.

Signed off by: Rachael Baldwin, Lawyer, Rachael.baldwin@onelegal.org.uk

1.3 Environmental and climate change implications

This report is not considered to have any significant environmental or climate change implications.

Signed off by: Laura Tapping Climate Emergency Programme Officer laura.tapping@cheltenham.gov.uk

1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan Priorities:

- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity
- Being a more modern, efficient and financially sustainable council

1.5 Equality, Diversity and Inclusion Implications

It is considered that this plan will not change how services are delivered. An Equality Impact Assessment is therefore not required.

Signed off by: Richard Gibson Head of Communities, wellbeing and partnerships
Richard.gibson@cheltenham.gov.uk

1.6 Performance management – monitoring and review

The FSA have statutory powers to monitor and audit this authority. Based on these powers, established audit schemes are in place to assess performance against specified standards within the FLCOP and the Framework Agreement. If we failed to discharge our statutory functions adequately then the FSA may consider using their powers of direction contained within the Food Standards Act 1999. Six periodic data returns and one full annual return will be submitted to the FSA during 2023/24. Previously the Local Authority Enforcement Monitoring System (LAEMS) was used to collect performance data. This system has now been switched off and a new method is being implemented in 2023. Internally our key performance indicators (KPIs) have been reviewed to include key FSA requirements. We will periodically review this plan to take account of any updated requirements from the FSA.

2 Background

The function of this Authority's food safety service is to ensure that the food and food sources handled in the course of a food business are safe and fit for human consumption. The term 'food business' is defined

in law and has a wider meaning of any stage of food production, processing and distribution of food whether for profit or not and whether by public or private bodies. By way of regulation, codes of practice and framework agreements, we have a statutory duty to monitor, verify and enforce the requirements of food law and ensure that we have sufficient resources to do so. We have a duty to discharge our functions as effectively as possible with suitably trained authorised officers. To support our work we set up maintain, and carry out official food controls and other activities in accordance with documented policies, procedures, plans and strategies. We must develop and approve a service plan detailing how we intend to deliver and resource official controls and other official activities and address any variance. The FSA's Covid 19 recovery plan aimed to ensure that during the period of recovery from the impact of COVID-19, our resources were targeted where they added greatest value in providing safeguards for public health and consumer protection in relation to food. This recovery plan has now been formally withdrawn but the requirements will continue until the new modernised food hygiene delivery model is in place in 2024.

3 Reasons for recommendations

This will fulfil our statutory responsibilities.

4 Alternative options considered

None. This is a statutory requirement

5 Consultation and feedback

A copy of this plan will be made available on the Authority's website.

6 Key risks

- 6.1 If official food controls are not carried out in accordance with statutory requirements then the FSA may make a direction under powers conferred in the Food Standards Act 1999 requiring improvements. This poses a reputational risk on the Council. This can be avoided by ensuring a suitable number of appropriately trained and authorised officers are available.
- 6.2 If official controls are not carried out in accordance with statutory requirements then this poses a risk to the health of consumers. This can be avoided by ensuring a suitable number of appropriately trained and authorised officers are available.
- 6.3 The Authority has entered into an agreement with the FSA to operate the food hygiene rating scheme in line with the 'Brand Standard' If we do not carry out official controls then the public confidence in the scheme is at risk and thus the reputation of the council. This can be avoid by ensuring a suitable number of appropriately trained and authorised officers are available.
- 6.4 A cyber security incident would lock down access to our entire food safety database. This would hinder delivery of the official control programme and statutory returns. This can be avoided through staff training and awareness on current information technology security and associated procedures.

Report author:

Bernadette Reed Public and Environmental Health Team Leader Bernadette.reed@cheltenham.gov.uk

Appendices:

- i. Risk Assessment
- ii. Food Safety Service Plan 2023-2024

Background information:

- 1. [The Framework Agreement on Official Feed and Food Controls by Local Authorities](#)
- 2. [The Food Law Code of Practice and Practice Guidance \(England\)](#)
- 3. [The Regulators Code](#)

Appendix i: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	<p>If the Authority is unable to carry out Official Food controls in line with the minimum requirements of the Covid 19 recovery plan, it is not fulfilling its statutory duties. FSA may make a direction under powers contained in the Food Standards Act 1999.</p> <p>It also poses a public health risk to consumers as official controls are not being carried out to monitoring compliance with legal requirements.</p>	Head of Public Protection	3	2	6	Avoid the risk	Ensure a suitable number of qualified staff are employed to carry out official food control activities	Cabinet	Ongoing milestone checks by data submission to FSA with early warning notification of variance. Use of contract staff while recruitment or permanent staff. Build competency of other team members for resilience in times of emergency, redeployment, and/or long-term staff absence.
2	The Council have signed an agreement with the FSA for the operation of the Food	Head of Public	3	2	6	Avoid the risk	As above	Cabinet	As above

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	Hygiene Rating Scheme in line with the 'Brand Standard. Any deviation from the code reduces the public confidence in the scheme and thus poses a reputational risk to the Council	Protection							
3	Cyber security incident which locks down access to all food database	Head of IT Publica	5	2	10	Avoid risk	All staff have completed the data security module on the LMS. All concerns to be reported to IT. Adherence to the IT user policy	Head of Public Protection	On going Page 18



FOOD SAFETY SERVICE PLAN 2023-2024

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1. Food Safety Service

1.1 Legal Background

The Official Control Regulations EU 2017/625* came into force in December 2019 repealing and replacing Regulation (EC) no 882/2002. They provide for the execution and enforcement of the food elements on official controls and other official activities, which must be carried out to ensure the proper application of food law. They set out a framework of requirements for competent food authorities, which have responsibilities for organising and performing official controls and activities to verify compliance with agi-food chain legislation. Assessment of the effectiveness of performance of the UK control system is reported annually in the UK Multi-annual National Control Plan (UKMANCP). It also lays down the organisation, structure and tasks of competent authorities, including Local Authorities. The Food Law Code of Practice (England) (FLCOP) March 2021, 'the code,' outlines how the requirements of regulation EU 2017/625 apply to this authority.

We have a statutory duty to monitor and verify compliance with food law and to have due regard to 'the code'.

The Food Standards Agency (FSA) Framework Agreement on Official Feed and Food Law Controls by Local Authorities, Amendment number 5 sets out the planning and service delivery requirements based on requirements within 'the code'. It requires the Authority to have an approved food service plan. The framework agreement sets out a standard approach to service planning which the FSA uses for audit and monitoring purposes. This plan outlines the activities and the resources needed to enable delivery. It takes into account the requirements of the FLCOP, the Food Law Practice Guidance (FLPG) (England) March 2021, the Framework agreement and the Covid19 Local Authority recovery plan. This authority must have sufficient resources to fulfil the requirements detailed within the FLCOP. In meeting our objectives, we must follow the principles of good regulation as outlined in the Regulators Code.

*The FSA is updating all EU references to accurately reflect the law in force since the transition period ended. Any references to EU regulations should be read as meaning retained EU law

1.2 The Covid Recovery Plan

The recovery plan had 2 phases. Phase 1 covered the period from 1 July 2021 to 30 September 2021 and phase 2 covered 1 October 2021 to March 2023.

The plan ensured that during the period of recovery from the impact of COVID-19, local authority resources were targeted where they added greatest value in providing safeguards for public health and consumer protection in relation to food. It also aimed to safeguard the credibility of the Food Hygiene Rating Scheme (FHRS).

The recovery plan provided a framework for re-starting the official control delivery system in line with the Food Law Code of Practice for new food establishments and for high-risk and/or non-compliant establishments while providing flexibility for lower risk establishments.

The recovery plan has now been withdrawn but the requirements detailed within phase 2 of the recovery plan will continue until the new modernized food hygiene

delivery model is in place in 2024. This proposed delivery model is currently under consultation until 30 June 2023. Following consultation a new food hygiene delivery model will be introduced which will:

- modernise the food hygiene intervention rating scheme.
- provide an updated risk-based approach to the timescales for initial official controls of new food establishments, and for undertaking due official controls.
- increase flexibility as to the methods and techniques of official controls that can be used to risk rate an establishment, including the appropriate use of remote assessment.
- extend the activities that officers, such as Regulatory Support Officers, who do not hold a 'suitable qualification' for food hygiene can, if competent, undertake.

2. Service Aims and Objectives

2.1 Aim of Service

The key food safety function of Cheltenham Borough Council is to ensure that the food sold, offered or stored for sale is safe and fit for human consumption. Everyone has a right to expect that the food they eat will not cause adverse health effects. As detailed in the corporate plan, Cheltenham has a collective commitment to ensure that residents, communities and businesses benefit from Cheltenham's future growth and prosperity and our objectives within this plan align with this commitment.

2.2 Statutory Service Objectives:

- To continue the delivery system of food premises control within the Borough in accordance with phase 2 of the recovery plan. We will move at a faster pace on our inspection programme in line with the FLCOP the for lower risk and complainant businesses where resources allow.
- To investigate and manage complaints of noncompliance with appropriate enforcement actions.
- To manage food incidents and hazards including outbreaks of food borne illness.
- To conduct reactive and proactive samplings or where sampling is necessary to determine business compliance with legal requirements.
- To conduct pro-active surveillance to obtain an accurate picture of the local business landscape to include new or recently closed businesses plus businesses where the overall risk has increased.
- To prioritise new businesses for an onsite intervention based on risks to public health. All new businesses will be inspected with 28 days of receiving a valid food business registration form.
- To maintain the credibility of the food hygiene rating scheme, in particular responding to requests for revisits in line with our documented procedure.

- To conduct sector specific controls to support trade and enable export.
- To ensure all Officers delivering official controls meet and maintain the competency requirements within the FLCOP.
- To engage with the FSA and stakeholders during the development phase of the new food hygiene delivery model.

2.3 Principles of service delivery

We aim to maintain a level playing field for honest and diligent businesses, whilst reducing the burden on businesses with an intelligence led approach. Our resources will be targeted where they have most value for public health in relation to food. Service capacity is prioritised at the high-risk food activities and/or the poorest performing food businesses, with the aim of improving standards across Cheltenham whilst supporting business growth.

3. Organisational Structure and Resources

Currently the food safety function sits within the Environmental Health Team under the direction of the Head of Public Protection and the Communities and Place Director. The structure is shown in Appendix 1. There are 3 full time posts allocated to authorised food officers to deliver official controls and other interventions within food businesses. The allocated posts are 1 Senior Environmental Health Officer (SEHO) and 2 Environmental Health Officers (EHOs). They are supported by 0.2 full time equivalent (FTE) Business Support Officers. The Public and Environmental Health Team Leader acts as the Lead Officer for Food Safety, a specific role required by the FSA. The Public and Environmental Team structure is shown in Appendix 2.

The current Team Leader became substantive in July 2022. The current SEHO is working through a lead officer competency framework and the EHO completed their food competency framework in Dec 2022. A contractor EHO (0.8 full time equivalent) was employed until March 2023 to help meet our objectives and is backfilling the redeployment of food competent EHO's during the pandemic. Due to challenges with recruiting to the vacant EHO post, this contract has been extended until Jun 2023 until a permanent Officer is in post. It is recognised that recruitment of fully competent officers is challenging for all local authorities due to a number of factors.

4. Food Sampling

As detailed in our food sampling policy, sampling is required for a number of reasons including:

Investigation of food contamination, food poisoning and complaints.

Imported food responsibilities.

Primary Authority and Originating Authority responsibilities.

Participation in national, regional and locally coordinated sampling programmes.

Surveillance/Intelligence sampling to identify foods that could pose a hazard.

Sampling on request of a food business eg new product and/or process.

Informal sampling to assist with giving advice to businesses.

Resampling from previously unsatisfactory results.

4.1 Sampling Officers

Formal samples taken in accordance with the provisions of the Food Safety and Hygiene (England) Regulations 2013, section 29 of the Food Safety Act 1990 or the Food Safety (Sampling and Qualification) (England) Regulations 2013 can only be undertaken by authorised officers with the relevant qualifications and sampling competencies as defined in Chapter 4.8 of 'The Code'. Other officers will be used for sampling for information gathering purposes only.

4.2 Sampling Resources

Specialist analytical services such as the public analyst and the food examiner are provided externally by the Public Analyst Scientific Services (PASS), Wolverhampton and UK Health Security Agency (UKHSA formerly PHE) Food, Water & Environmental Laboratory, Porton Down, respectively.

We have a service level agreement with UKHSA for microbiological testing. Cheltenham Borough Council is allocated a baseline level of sampling credits. Once the credits are used then costs may be incurred however in some cases credits can be shared between County liaison groups. Samples directly associated with an outbreak will not be charged and the cost will be borne by UKHSA but certain sample types will incur a charge as detailed in the Service Level Agreement. The allocation for 2022-23 was £4,948. We await a revised agreement for 2023-24 but do not anticipate significant change and consider this allocation sufficient for our needs. We have a small budget for samples sent to the Public Analyst which are not part of the UKHSA allocation.

4.3 Private water supplies

In addition to food sampling, we have a duty to inspect, risk assess and where necessary take samples in relation to private water supplies (PWS). These are supplies which are not provided by a water company. PWS need to be properly assessed and treated as they can be a source of contamination and pose a risk to health. Owners of the supply may be required to take certain remedial action. The Authority is required to submit an annual return to the Drinking Water Inspectorate giving details of PWS. Currently there are 12 single dwellings with private water supplies and 3 premises with private water supplies with commercial activities.

5. Infectious disease

This authority must appoint a proper officer to receive and forward information of notifications of infectious disease within their area. Under the Local Government Act 1972 Sec 270 (as amended), and the Public Health (Control of Disease) Act 1984 sec 74 (as amended), this authority has appointed the Consultant in Health Protection UKHSA South West as the proper officer. The Authority must also appoint authorised officers to exercise powers contained within the Public Health (Control of Disease) Act 1984 and associated regulations, to carry out prompt investigations and response to infectious disease that may pose a risk to public health, including food poisonings, and food/water borne disease. Officers within the food team are

authorised for this purpose. Our health protection powers are used when voluntary measures to avert a health risk cannot be secured.

The policy in respect of this infectious disease service is to:

- To administer and implement our statutory responsibilities relating to the control of infectious disease.
- Investigate all notifications of food poisoning cases and likely sources of infection whether confirmed or not at the earliest opportunity in accordance with standard procedures developed by UKHSA.
- Where a source is identified, take appropriate action to ensure risk of spreading is controlled.
- Work in conjunction with the proper officer to protect the well-being of individuals at risk, including taking action to contain the spread of infection and provide advice and information regarding personal hygiene, food handling and control of infection.

A Countywide “Outbreak Control Plan” has been developed including standard operating procedures for the investigation of single cases of infectious disease.

6. Other duties

Officers within the food team provide some resilience when necessary to other environmental health functions in emergencies including authorised Health and Safety Inspectors assisting with the health and safety intervention plan in food businesses.

Officers within the food team provide a specialist role as part of the Authority’s emergency response.

Officers within the food team are also responsible for food safety advice at events and festivals in the district of Cheltenham, and for monitoring planning and licensing consultations as a means of identifying and engaging with new or developing food businesses.

We continue to offer chargeable service for advice, sampling, and attestation certificates for export on request.

The lead Officer for food is validated as the Authority’s Food Competent Certifying Officer (FCCO) on behalf of the Animal and Plant Health Agency APHA.

We continue to be an active partner of the Gloucestershire Food Safety Liaison Group.

7. Scope of the Food Service

The responsibility for UK Official controls is divided between various organisations. Overall responsibility for food law is held centrally but the day-to-day responsibility for monitoring and enforcement is divided between central government and this Authority as a Borough Council. This Authority is not a Unitary Authority and therefore shares its Local Authority duties with the Trading Standards Department of Gloucestershire County Council. Cheltenham Borough Council is responsible for food hygiene and Gloucestershire County Council Trading Standards are responsible for

food standards and on-farm food hygiene. Where there are areas of overlap, appropriate Memoranda of understanding are in place.

8. Demands on the Food Safety Service

8.1 Out of hours Service:

We are not an emergency service and therefore do not have an out of hours food service available which addresses the closure of premises, food product withdrawal and outbreaks of food associated disease. It is expected that any emergency would form part of the emergency planning arrangements through which the duty emergency planning officer would be contacted. This service has not been required during 2023-24.

9. Establishment Profile

At the time of writing, 1 April 2023, there were 1102 food businesses registered with this authority. There were 1113 registered the same time last year 2022. This number fluctuates throughout the year as new business open, businesses change ownership and others close. The business type distribution is shown in Table 1 below:

Table 1: Cheltenham Food Business Establishment Profile 1 April 2023

Business Type	Number 2022	Number 2023
Restaurant/Café/Canteen	280	294
Restaurant and caterers- other*	160	153
Small retailer	126	124
Take away	111	101
Pubs/Clubs	100	99
Caring premises	92	101
Schools/colleges	66	66
Mobile Food Units	43	35
Hotel/Guest House	34	34
Supermarket/Hypermarket	32	33
Retail other**	31	29
Manufacturers/Packers	21	19
Distributors/Transporters	12	9
Importers/Exporters	3	3
Primary Producers	2	2

*Home caterers and village halls

**retailers who sell a very limited range of food products

9.1 Approved Premises

The council has one premises approved under Regulation (EC) No. 853/2004: The approval regime covers premises which handle products of animal origin and require approval (as oppose to registration) before trading. The business is a manufacturer and packer supplying to its own-brand shops.

9.2 Specialist or complex processes

The council does not currently have any such processes in its area.

9.3 Business Compliance:

Business compliance within the Borough is high with 92% of registered businesses rated 3 (satisfactory) or above on the Food Hygiene rating Scheme with 74% rated 5 (very good). Only 0.5% of businesses are currently recorded as non-compliant. New business, which have not yet been inspected, are also classed as non-compliant until they receive a rating. When these businesses are included, the figure is approximately 3%. The full break down of compliance is in Appendix 3

In addition to the hygiene ratings above, each business is risk rated in accordance with the Food Law Code of Practice England (FLCOP). The risk rating is graded A-E. This is based on a number of set criteria, which determine potential risk, both inherent risks, which the business operator cannot control, and risks over which the food business operator has full control. It is this rating, which determines the frequency of inspection as shown in Fig 1. The food hygiene rating of 0-5 aligns with this risk rating. (This risk rating methodology is under review as part of the modernization of the food hygiene delivery model).



Figure 1: Risk rating Intervention policy schematic

The current risk ratings for businesses within Cheltenham is shown in Table 2 below:

Risk Rating	Number of businesses in Rating
A inspection every 6 months	0
B inspection every year	19
C Inspection every 18 months	204
D inspection every 2 years (can alternate with another intervention in some cases)	529
E Alternate enforcement strategy	350

Table 2: Risk ratings for food businesses in Cheltenham

The majority of businesses are currently D rated, requiring an intervention every 2 years, however it is common for some business not to have sustained compliance or allow compliance to fall and thus move between ratings so this is only ever a 'point in time' overview.

10. Predicted Service Demands

10.1 2022/23

As shown in Table 3, the demand on the service has been driven by the Covid recovery plan and will continue until the new food hygiene delivery model from the FSA is implemented in 2024. Periodic data returns known as 'temperature checks' were submitted throughout 2022 to the FSA. These gave details and assurances on work activity against the minimum FSA expectations for this authority.

10.2 2023/24

Table 3 predicts the **main** future demands on the Service based on previous demands and the requirements of the FLCOP. It is difficult to predict all future demands due to a number of variables including the implementation of a new hygiene delivery model and a rapidly changing food hygiene landscape. We will carry out the minimum demands required within the Covid recovery plan and move at a faster pace for lower risk businesses where resources allow.

Table 3: Summary of Service Demands 2022/23 and projected demands 2023/24

Activity	Demand on Service 2022-23	Minimum projected demand on service 2023-24
Inspection 100% A rated establishments	1	1
Inspection 100% B rated establishments	19	19
Inspect 100% non-compliant C rated premises	1	1
Inspect all 100% non-compliant D	0	0
Inspect 100% compliant C	153	86
Prioritise all new business registrations*	114	114
Investigate and manage complaints (including request for advice, complaints about premises, food and allegations of food poisoning)**	98	98
Investigations of confirmed infectious disease	136	136
FHRS requested revisits	14	25
Food Alert for action***	4	4
Reactive Food Sampling	0	10
Ongoing proactive surveillance	Monthly check of delivery platform, websites, social media and site surveying.	Monthly checks of delivery platforms, websites, social media and site surveying
Officer professional development in line with Institute regulations	Min 70 hrs	Min 90 hrs
Action required beyond the recovery period in line with FLCOP		
Inspect all compliant D rated	-	367

premises		
Alternative enforcement Intervention at E rated premises	-	248
Site visit at 10% of E rated businesses	-	25
Proactive sampling	-	50
Review and training of statutory plans and procedures x 24	-	240 hrs

*All new businesses and new food business operators must register with the Council 28 days before they intend to open. There is no charge for registration and it cannot be refused. A large proportion of businesses register but do not subsequently trade for a number of reasons. Under the FLCOP businesses would be inspected within 28 days of registration. The recovery plan requires Officers to focus on risk by considering the information provided at registration together with any intelligence. Site interventions are carried out soonest where there are concerns around public health. Where there are no immediate concerns around public health they will be inspected in accordance with the Code of Practice and practice guidance.

** The measures to be taken to control the spread of infectious diseases are contained in various acts of Parliament and their associated Regulations. This legislation places a duty on local authorities to control the spread of food poisoning and food and water borne diseases. Annual notifications vary from year to year.

*** The Food Standards Agency operates a system to alert the public and food authorities to serious problems concerning food that does not meet food safety requirements. Food alerts vary in significance and require an appropriate response. Some are of high priority and are food alerts for action. Others are for information only. Only food alerts for action are recorded on the Council's Uniform system. All alerts are received directly from the Food Standards Agency via a secure dedicated 'Smarter Comms' platform. The Lead Officer will instigate the necessary response for this service. Where the Council becomes aware of a serious localised incident or a wider food safety problem, it will notify the FSA in accordance with the FLCOP.

11. The Food Hygiene Rating Scheme (FHRS)

The FHRS aims to improve public health through behaviour change. This authority operates the scheme in partnership with the FSA. It enables consumers to make informed decisions about the places where they eat out or shop for food by providing them with information about the standards of hygiene found at the time of intervention. The scheme recognises those businesses that meet legal requirements on food hygiene matters and incentivise others to improve standards. The aim is to reduce the incidence of food-borne illness and the costs to the economy. FHRS ratings and inspection results are uploaded from this authorities management information system to the FSA ratings portal. They are then published on the FSA website. We encourage businesses to display their rating at the entrance to their premises but this is not mandatory in England. The Authority continues to operate the scheme in accordance with the brand standard guidance to ensure a consistent approach with adequate safeguards in place for the business. We take part in the FHRS national consistency exercises as required by the FSA.

12. Imported Food Control

As an inland Authority, enforcement of imported food is carried out during our day-to-day responsibilities including examination of imported food during premises

inspections, routine and programmed sampling and analysis, and through responding to service requests.

13. External factors that may impact on service delivery

13.1 Covid-19

The significant impact of Covid 19 on local authority food service delivery has been acknowledged by the Food Standards Agency by way of the Covid recovery plan as detailed earlier. As restrictions have been lifted there are no officers currently redeployed however should the need arise officers may be required to support the work of the County public health teams on request. Covid 19 created a backlog of medium/low risk inspections mainly due to Officers redeployment as Environmental Health Officers were given the powers to enforce the Coronavirus regulations.

This means that many businesses are overdue an intervention and standards may have dropped. The recovery plan has now been withdrawn and it is expected that this authority brings the service back in line with the normal expectations within the FLCOP. We will continue to work with the FSA to address some of the challenges which still lie ahead.

13.2 Competency:

Only fully competent officers can effectively deliver this plan. The FLCOP outlines the requirements for delegation of official food controls and other official activities. It outlines the qualifications and competency requirements for officers undertaking official food controls, other official activities, and any other activities related to these. The FLCOP implements the training provisions of Regulation (EU) 2017/625. The competency framework for officers carrying out official food controls was revised in July 2021 and is again under review as part of the modernisation of the food delivery model. The recently appointed EHO has completed the competency framework and the EHO has been promoted to SEHO and is working through competency as the Lead Officer. Each Officer must maintain ongoing competency training in line with the FLCOP and Chartered Institute of Environmental Health membership regulations. The Team Leader is a Chartered Environmental Health Practitioner and competent to carry out official controls but also leads other Environmental Health Teams thus capacity is limited. There is little resilience in the event of any long-term sick or other absences.

13.3 Recruitment:

We continue to recruit to fill the current vacant EHO post, currently filled by a contractor. This contractor can leave with 5 days' notice. As a team we work with our recruitment and human resources partners to ensure there is no hindrance to the flow of potential new officers in the official control system. We recruit to 'career graded' posts and support 'on the job' training where possible. This results in additional supervision and monitoring work for the team leader and existing qualified staff. We are also at risk of losing existing staff to other authorities and roles as the pool of qualified officers reduces. We work with our human resource partners to retain existing staff. Recruitment is recognised as a national issue and the FSA have commissioned a study to understand the barriers which hinder the flow of new officers into the official control system.

13.4 Time factors:

The time taken to carry out an inspection has increased due to a number of factors including the introduction of legislation regarding allergen labelling for food pre packed for direct sale and the potential for more food fraud. There is evidence from the national temperature checks that standards within some businesses have dropped. This will have an impact on the number of inspections done in a given time.

13.5 The modernisation of the food hygiene delivery model:

When implemented, the new model will redefine the expectations of local authorities enabling us to use resources more effectively and address risks in the food system. This intelligence led model is in the pilot stage with full implementation from 2024. It also includes the use of artificial intelligence to predict FHRS ratings for newly registered establishments to assist officers with triaging and prioritisation. Any such changes to processes will require training and information cascade during the transitional period. There will also be implications for our management information system which would need to be reconfigured. This will have a cost implication. The FSA have commenced high-level engagement with all local authority management information system (MIS) providers to understand the impacts of data management changes for local authorities and we continue to engage with the FSA on this matter.

13.6 Commercialisation:

We continue to explore opportunities to work more efficiently and charge for discretionary service, using the most of technology during site interventions, using the flexibilities within the Code, utilisation of technology for 'digital' low risk inspections in line with the new delivery model and primary authority partnership opportunities.

In conclusion, subject to the above it is considered that we will have sufficient resource to meet the minimum current expectations from the FSA. This is based on the establishment profile in the Cheltenham area, including new businesses, the number of staff within the food team and the work done in phase 1 and 2 of the recovery plan, analysis of historic service data and maintenance of a duty officer system. However, we may not be able to complete the backlog of low risk inspections nor the ongoing low risk inspections nor our full proactive sampling plan if recruitment of a fully competent officer to the vacant post is unsuccessful. The considerable uncertainty of the current operating environment must be recognised.

14. Performance measurement

The FSA have statutory powers to monitor and audit this authority. Based on these powers established audit schemes are in place to assess performance against specified standards within the FLCOP and the framework agreement. If we failed to discharge our statutory functions adequately then the FSA may consider using their powers of direction contained within the Food Standards Act 1999. 6 data returns or 'temperature checks' and 1 annual return was required by the FSA during 2022/3. The FSA is reviewing the way it monitors the performance of Local authorities. Previously the Local Authority Enforcement Monitoring System (LAEMS) collected performance data. This will be reconfigured to collect new data and support a transition to a more intelligence based risk assessment approach. Change is required to reflect the significant changes to the food business operating environment. It will result in a more qualitative assessment of the Authority's performance focusing on achievement of outcomes within the food system with less emphasis on inputs and outputs. The aim is to have this system ready for 2023 and replace the current interim monitoring arrangements which covered the period of the

recovery plan. It is expected that a quarterly data return requirement will apply during 23/24 with a full annual end of year return in April 2024.

14.1 Internal monitoring

All officers use standard inspection forms and have undergone consistency training.

The premises database (which also forms the public register of food premises) is audited on a fortnightly basis for data accuracy before upload to the FHRS portal.

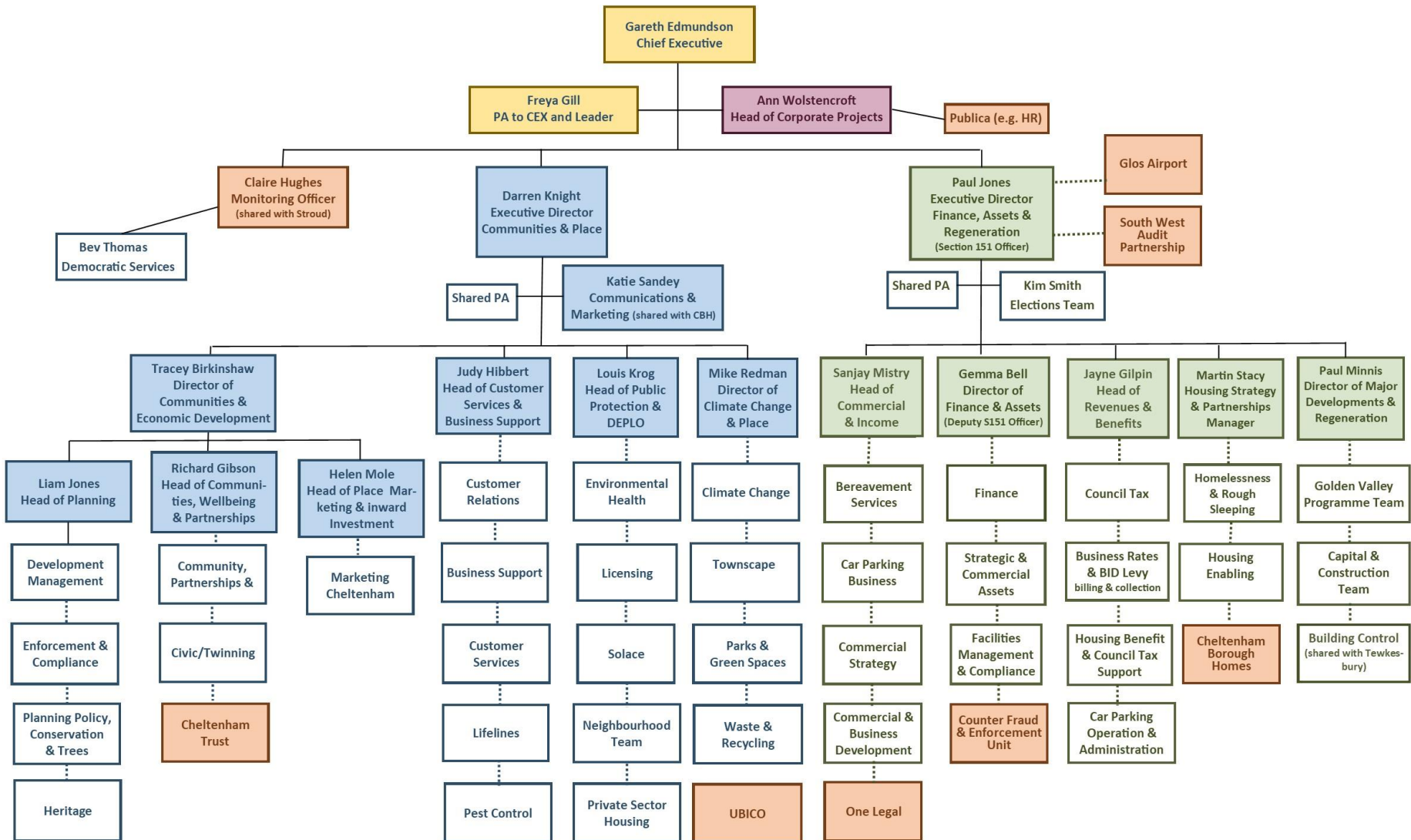
Data checks are undertaken when quarterly inspection lists are produced.

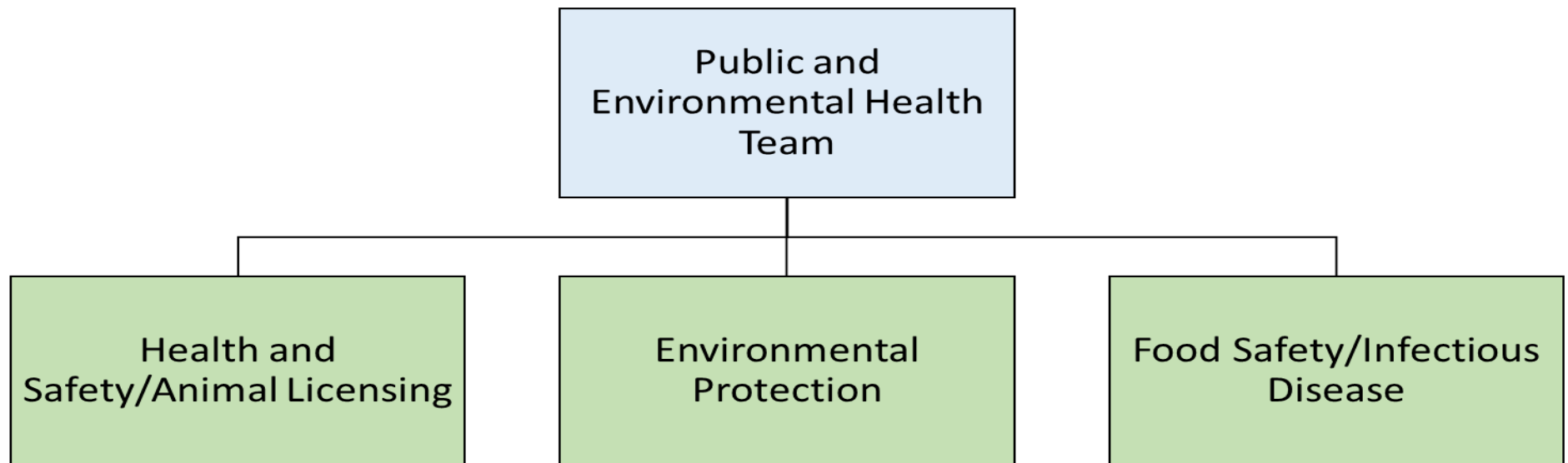
Officers conduct an internal monthly consistency check against the brand standard and FLCOP and internal monitoring checks are conducted during Officer 121s; Accompanied visits occur quarterly and feedback is given in team meetings. Cross county training is arranged through the liaison group and the authority participates in inter-authority audits as necessary. The authority's performance indicators for food service delivery have been reviewed in light of the above changes.

14.2 Review:

This plan, its format and content will be reviewed periodically to include all requirements and recommendations within the new food hygiene delivery model.

Appendix 1: Cheltenham Borough Council Structure Chart





Distribution of FHRS for Cheltenham June 2023

FHRS rating	Restaurant Café/Canteen	Hotel Guest House	Small Retailer	Supermarket Hypermarket	Caring Premises	Restaurants and Caterers - Other	Distributors/ Transporters	Pub/ Club	Retailer - Other	Take-Away	School/College	Mobile Food Unit	Manufacturers and Packers	Importers/ Exporters	Primary Producers	Total
5 - Very good	222	29	71	29	79	134	3	69	12	60	66	25	16		1	816
4 - Good	45	4	31	4	8	9		23	2	29	1	7	1			164
3 - Generally satisfactory	14	1	5		1	1		3	1	5		1				32
2 - Improvement required	1		1					2		1						5
1 - Major improvement required										1						1
0 - Urgent improvement required																1
Total rated establishments	282	34	108	33	88	144	3	97	15	96	67	33	17		1	1018
Establishments with rating of 3 or better	281	34	107	33	88	144	3	95	15	94	67	33	17		1	1012
Awaiting inspection	8			1		6		3		4		5	1		1	29
Exempt	1		14			4	1		14							34
Sensitive	2		1		2								1			6
Excluded			2		1		6		1				1	3		14
Total establishments	293	34	125	34	91	154	10	100	30	100	67	38	20	3	2	1101

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Cheltenham Borough Council

Cabinet

13 June 2023

Household Support Fund Programme 2023/24

Accountable member:

Cllr Flo Clucas Cabinet Member Safety and Communities

Accountable officer:

Richard Gibson, Head of communities, wellbeing & partnerships

Accountable scrutiny committee:

Overview and Scrutiny Committee

Ward(s) affected:

All

Key/Significant Decision:

No

Executive summary:

The Household Support Fund (HSF), first introduced in 2021/22, is funding that is made available via Department of Work and Pensions (DWP) to County Councils and Unitary Authorities in England to support those most in need to help with global inflationary challenges and the significantly rising cost of living.

In total Gloucestershire County Council has been allocated a sum of £7,384,966 for the period 1st April 2023 to 31st March 2024.

The allocation of this funding has been agreed by the [County's cabinet](#) which includes a sum of £1.6m allocated to the six district councils to enable them to provide their own localised schemes to support vulnerable people.

A sum of £294,752.25 has been allocated to Cheltenham Borough Council to cover the period 1 April 2023 to 31 March 2024. This has been calculated on a per head population basis using 2021 mid-year population estimates. The council was notified of this allocation on 11 May 2023.

Previous allocations of household support fund were agreed by Cabinet in [December 2022](#)

This report summarises the allocation, distribution and monitoring of the grant.

Recommendations:

- **that Cabinet approve the framework for the award of grant funding for the Household Support Fund as set out as set out in para 4.13;**
 - **that Cabinet delegate authority to the Head of communities, wellbeing & partnerships in consultation with the Cabinet Member Safety and Communities to determine the agreed amounts to be awarded to individual organisations.**
-

1. Implications

1.1 Financial, Property and Asset implications

There will be no impact on the base budget for CBC as a result of decision. The grant will be invoiced for once the delivery plan has been signed off by GCC. Spend will be monitored and residual balances will be carried forward or returned in accordance with the grant agreement.

Signed off by:

Andy Taylor, Principal Commercial Accountant

E-mail: andy.taylor@cheltenham.gov.uk

Phone: 01242 264 186

1.2 Legal implications

The Council should enter into grant agreements with the providers which are based on the approved Small Grant Agreement for grants below £10,000 and the approved Standard Grant Agreement for grants of £10,000 and above.

All financial assistance given by the Council to non-individuals has to comply with the provisions of the Subsidy Control Act 2022 (the Act). This replaced state aid when the UK left the EU. In order for financial assistance to be a subsidy, it has to meet 4 criteria; one of which is that an economic advantage is conferred on one or more 'enterprises'.

This criteria will not be met where the benefit of the financial assistance is being passed on by the recipients to residents and the provider themselves are not gaining any benefit. Also, it is unlikely that the providers referred to in this report would be considered to be an 'enterprise' defined as "a person who is engaged in economic activity that entails offering goods or services on a market..."

Contact: One Legal, legalservices@onelegal.org.uk

1.3 Environmental and climate change implications

The completed dashboard and summary report are attached as **Appendix 2**. The delivery plan for household support fund is generally positive in its contribution to environmental and social outcomes .



1.4 Corporate Plan Priorities

This report contributes to the following Corporate Plan 2023 – 2027 Priorities

- Ensuring residents, communities and businesses benefit from Cheltenham's future growth and prosperity.

The corporate plan includes a specific action in relation to this work:

Work with partner organisations, such as #FeedCheltenham and Cheltenham Borough Homes, to support our residents and communities with the cost of living crisis

1.5 Equality, Diversity and Inclusion Implications

The project is delivered via an established network of community-based providers who all place a high priority on promoting equality and tackling discrimination. Each of the providers will manage the scheme in line with their own equality and diversity policies.

As a network of providers, they are very much focused on ensuring that those that are in the most need are able to access the additional support funded by the household support fund.

The proposed delivery framework as set out in para 4.13 ensures that there is both a good geographical spread of support across the borough via our network of five community food pantries, plus ensuring that the organisations that are working most closely those that are vulnerable (Citizens Advice, Childrens Centres, CCP and the household essentials project) have the support to make a difference.

1.6 Performance management – monitoring and review

The council submits a delivery plan to GCC to secure the funds. This includes an estimate of the numbers of people that will access support. Working with its providers, the Council monitors the numbers of people accessing support via this fund and reports this back to GCC at the end of the scheme.

2. Background

- 2.1** The objective of the household support fund is to provide crisis support to vulnerable households in most need of support to help with significantly rising living costs.
- 2.2** Each of the six districts has the flexibility to develop their own schemes that best meets the needs of their local communities whilst complying with the conditions set by the DWP for delivery of the grant to provide support with food, energy and water bills, household items and other essential items.
- 2.3** In the [guidance](#) for county councils and unitary authorities in England, DWP sets out their definitions of eligible spend:
- 2.4** **Energy and water:** The Fund should primarily be used to support energy bills for any form of fuel that is used for the purpose of domestic heating, cooking, or lighting, including oil or portable gas cylinders. It can also be used to support water bills including for drinking, washing, cooking, as well as for sanitary purposes and sewerage.
- 2.5** **Food:** The Fund can be used to provide support with food, whether in-kind or through vouchers or cash.
- 2.6** **Essentials linked to energy and water:** The Fund can be used to provide support with essentials linked to energy and water (for example warm clothing, blankets, the purchase of equipment such as fridges, freezers, ovens, slow cookers), in recognition that a range of costs may arise which directly affect a household's ability to afford or access energy, food and water. In particular, Authorities are encouraged to consider supporting households on low incomes to repair or replace white goods and appliances with more energy efficient ones, or to invest in simple energy efficiency measures which will pay back quickly, such as insulating a hot water tank, fitting draft excluders to a front door, or replacing inefficient lightbulbs or white goods. The intention of this is to provide sustainable support which could result in both immediate and long-lasting savings for the household.
- 2.7** **Wider essentials.** The Fund can be used to support wider essential needs not linked to energy and water should Authorities consider this appropriate in their area. These may include, but are not limited to, support with other bills including broadband or phone bills, clothing, period and hygiene products, essential transport-related costs such as repairing a car, buying a bicycle, or paying for fuel.
- 2.8** **Advice services.** The Fund may be used to provide supplementary advice services to award recipients, including debt and benefit advice, where Authorities consider this appropriate.
- 2.9** Authorities are reminded that the primary intention of The Fund is to provide crisis support for households, and we would expect any advice services to complement this. We would not expect a large portion of funding to be spent on advice services. We would expect to see a connection between the funding provided for advice services and the practical support provided under HSF. We anticipate that a significant proportion of this will be through signposting to existing advice services funded through other routes, such as the Help to Claim scheme which supports those making a claim to Universal Credit.

3. How previous funding has been allocated

- 3.1** Previous tranches of the funding were allocated as follows:

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Apr 22 – Sep 22 (6 months)

Provider	Household Support Fund Activity (Apr 22 – Sep 22)	allocation
#feedcheltenham	Supermarket food vouchers and food pantry tokens to be distributed through the network of community food pantries	47025
	Admin	3150
Cheltenham Children Centres	Household items (eg cleaning / toiletries) for vulnerable families with under 5s, plus clothes and shoes or bedding vouchers.	19350
	Admin	1912.5
Food Bank - energy vouchers	Fuel Bank Foundation vouchers provision via Cheltenham Food Bank, CCP and Springbank	50625
	Admin	1912.5
Chelt Household Essentials Project	Access to household essentials / one-off items to vulnerable families, plus clothes and shoes or bedding vouchers.	9787.5
	Admin	1912.5
CCP	Access to household essentials / one-off items to vulnerable families, plus clothes and shoes or bedding vouchers.	9787.5
	Admin	1912.5
Citizen's advice	clothes and shoes or bedding vouchers.	1350
	Admin	1125
		149850

Oct 22 – Mar 23 (6 months)

Provider	Household Support Fund Activity ()	allocation
#feedcheltenham	Supermarket food vouchers and food pantry tokens to be distributed through the network of community food pantries	37700
	Admin	3770
Cheltenham Children Centres	Household items (eg cleaning / toiletries) for vulnerable families with under 5s, plus clothes, shoes & bedding vouchers.	14170
	Admin	1417
Food Bank - energy vouchers	Fuel Bank Foundation vouchers provision	19500
	Admin	1950
Chelt Household Essentials Project	Access to household essentials / one-off items to vulnerable families, plus clothes, shoes & bedding vouchers.	7410
	Admin	741
CCP	Access to household essentials / one-off items to vulnerable families, plus clothes, shoes & bedding vouchers.	7410
	Admin	741
Citizen's advice	Energy grants	26000
	Admin	2600
		123409

3.2 For the period October 22 to March 23, the numbers of people supported by the delivery partners was as follows:

Provider	Household Support Fund Activity ()	monitoring
#feedcheltenham	Supermarket food vouchers and food pantry tokens to be distributed through the network of community food pantries	613 individuals supported via food vouchers
Cheltenham Children Centres	Household items (eg cleaning / toiletries) for vulnerable families with under 5s, plus clothes, shoes & bedding vouchers.	58 households, comprising 83 adults and 131 children
Food Bank - energy vouchers	Fuel Bank Foundation vouchers provision	1,170 individuals supported with fuel vouchers
Chelt Household Essentials Project	Access to household essentials / one-off items to vulnerable families, plus clothes, shoes & bedding vouchers.	46 households supported with household essentials
CCP	Access to household essentials / one-off items to vulnerable families, plus clothes, shoes & bedding vouchers.	67 households supported
Citizen's advice	Energy grants	56 households made up of 87 Adults and 68 Children. 13 people were 65+ and 39 people had a health issue.

4. Context for 2023/24 delivery

4.1 Working within the government guidance set out above and the decision made by the county council's cabinet, the council has started the work to assemble its delivery plan as set out in the table below in para 5.11.

4.2 As in previous years, the government's focus on food, energy and household essentials means the council can draw on the support of a number of community-based organisations that are working closely with those made vulnerable due to the cost of living crisis. Previous delivery plans have been developed in line with our partnership ethos:

- Provision should to be inclusive – and open to as many people as possible
- Provision should embody our NCLB community agreement – working hand in hand with families, understanding effects of poverty and trauma and being compassionate & strengths-based
- Provision should be partnership-based – building on the network of local community providers and the strength of our relationships eg our community food network
- Provision should be community-based enabling people to build longer-term relationships with local providers which is more sustainable in the long-run

5. Proposals for 2023/24 delivery

- 5.1** Taking the context into account, the partners listed below are those best placed to deliver the household support fund programme.
- 5.2** A meeting was held with delivery partners on 18 May and they all confirmed their willingness to be part of the programme.
- 5.3** In terms of support for people with **energy costs**, we have worked closely with Cheltenham Food Bank and Springbank Community Project who both deliver the [Fuel Bank Foundation's](#) vouchers for people on pre-payment meters.
- 5.4** Recognising that the Fuel Bank Foundation support is only for people on pre-payment meters, we have also worked with Citizens Advice who provide emergency grants for people struggling with bills. The grant payments are only given once all other advice options are exhausted.
- 5.5** In 2023/24, we plan to continue to work with Cheltenham Food Bank, Springbank Community Project and Citizens Advice to support people with their energy bills.
- 5.6** The council and its partners will also have access to support from Severn Wye Energy Agency, who are in receipt of £300k via the County Council allocation.
- 5.7** In terms of **food support**, we have worked with #feedcheltenham to provide supermarket food vouchers and food pantry tokens that have been distributed through the network of community food pantries.
- 5.8** In 2023/24, we plan to continue to work with #feedcheltenham, but also provide some direct financial support to the food banks and pantries to enable them to continue to provide food support.
- 5.9** In terms of **household essentials**, in previous years, we have worked with Cheltenham Household Essentials (based at Springbank), CCP and Cheltenham Children's Centres (Aspire Foundation) to provide a range of household items to vulnerable people.
- 5.10** In 2023/24 we plan to continue to work Cheltenham Household Essentials, CCP and Cheltenham Children's Centres. In recognition that the government have included a more specific reference to supporting households to repair or replace white goods and appliances with more energy efficient ones, we plan to work with Vision 21 via their Reclaim project.
- 5.11** We also plan to include some funding for [Unstoppable](#), our period poverty project to enable it to purchase period and hygiene products.

5.12 Proposed Delivery Framework April 2023 – March 2024 (12 months)

HSF CATEGORY	Providers	Type of support	Amount 23-24
ENERGY AND WATER to support energy bills related to heating, cooking, or lighting and to support water bills for drinking, washing, cooking, as well as for sanitary purposes and sewerage	Citizen's advice / Food banks and pantries	Energy grants and Fuel Bank Foundation vouchers	56,000
FOOD provide support with food, whether in kind or through vouchers or cash.	#feedcheltenham Food pantries / food banks	Supermarket food vouchers and food pantry tokens, funding to support resilience, direct funding to support food costs	96,000

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ESSENTIALS LINKED TO ENERGY AND WATER to provide support with essentials linked to energy and water (for example warm clothing, blankets, the purchase of equipment such as fridges, freezers, ovens, slow cookers), or to repair or replace white goods and appliances with more energy efficient ones, or to invest in simple energy efficiency measures	Cheltenham Children Centres, Chelt Household Essentials Project CCP and Reclaim	Access to household essentials / one-off items to vulnerable families, plus clothes, shoes & bedding vouchers.	70,000
WIDER ESSENTIALS to support wider essential needs include, support with other bills including broadband or phone bills, clothing, period and hygiene products, essential transport-related costs such as repairing a car, buying a bicycle, or paying for fuel.	Unstoppable – period poverty	Supply of period and hygiene products	10,000
ADVICE PROVISION to provide supplementary advice services to award recipients, including debt and benefit advice	Citizens Advice	Funding to increase capacity	35000
Sub-total			267,000
Admin (to be shared by delivery partners:			26,700
TOTAL			293,700

6. Reasons for recommendations

- 6.1 Working within the government guidance and within the terms of funding set out by GCC, we have engaged with the partners set out above to assemble the delivery plan and they have agreed to be part of the delivery framework.

7. Alternative options considered

- 7.1 As set out above, the council has chosen to work with its community partners as they are the organisations that are working closest with those made vulnerable due to the cost of living crisis. This is in line with our partnership working ethos set out in para 4.2.
- 7.2 As an alternative, the council could have chosen to procure and run its own food and energy voucher scheme. However, this option was dismissed as it would duplicate existing voucher schemes in existence, particularly the county council voucher scheme and more locally the #FeedCheltenham voucher scheme. Plus it would have created a significant draw on staff time to manage the scheme.

8. Consultation and feedback

- 8.1 Through our community food network, the council has developed good working relationships with a wide range of community organisations through our collective work to support people during the pandemic and the current cost of living crisis.
- 8.2 Through this network, we have collectively identified the most appropriate organisations to work with on the household support fund scheme. Regular updates are provided to the other organisations via the food network. The delivery plan was then developed in consultation with the providers identified in the tables above.

9. Key risks

- 9.1** There are three risks identified in the risk assessment in appendix 1:
 - 9.2** The potential cost over-run e.g. by inadvertently paying out more to the providers that has been allocated in the delivery plan;
 - 9.3** The potential misuse of the grant;
 - 9.4** The potential for a grant recipient to become insolvent or wound up before the grant is used.
-

Report author:

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Appendices:

- i. Risk Assessment
- ii. Climate Impact assessment tool

Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	Potential cost over-run by inadvertently paying out more to the providers that has been allocated in the delivery plan	Richard Gibson	3	2	6	Reduce	Only pass money over to third parties up to the maximum that has been pre-allocated and monitoring spend Ensure due diligence has been undertaken with each provider.	Richard Gibson	31.3.24
	Potential misuse of the grant	Richard Gibson	3	2	6	Reduce	Ensure due diligence has been undertaken with each provider.	Richard Gibson	31.3.24
	If a grant recipient becomes insolvent or winds up before the grant is used	Richard Gibson	3	2	6	Reduce	Endeavour to pay out funds in arrears to minimise financial risk to the council. Ensure due diligence has been undertaken with each provider.	Richard Gibson	31.3.24

Appendix 2

Impact Assessment Tool - v.1

Household Support Fund



ENVIRONMENTAL	Scores	Action	Justification
GHGs	4	No action required	It is hoped that HSF funds may be used to support people with energy efficiency measures, and purchase of more efficient white goods
Air quality	0	No action required.	N/A
Sustainable Transport	0	No action required.	0
Biodiversity	0	No action required.	0
Land use change	0	No action required.	0
Soil and waterway health	0	No action required.	0
Climate Change Adaptation	0	No action required.	0
Energy Use	1	No action required	It is hoped that HSF funds may be used to support people with energy efficiency measures, and purchase of more efficient white goods
Waste	0	No action required.	0
Sustainable Materials	0	No action required.	0

SOCIAL	<u>Scores</u>	<u>Action</u>	<u>Justification</u>
Food	0	No action required.	HSF funds will be used by community partners to support vulnerable people's access to food, esp those living in food poverty as a result of the cost of living crisis
Health	0	No action required.	HSF funds will be used to support people made vulnerable by the cost of living crisis and enables them to lead healthier lives
Housing	1	No action required	0
Education	1	No action required	0
Community	1	No action required	0
Culture	1	No action required	0
Accessibility	0	No action required.	The proposed HSF delivery plan ensures that there is both a good geographical spread of support across the borough via our network of five community food pantries, plus ensuring that the organisations that are working most closely those that are vulnerable (Citizens Advice, Childrens Centres, CCP and the household essentials project) have the support to make a difference.
Local Economy and Jobs	1	No action required	0
Safety	1	No action required	0
Democratic Voice	1	No action required	0
Equity	0	No action required.	The project is delivered via an established network of community-based providers who all place a high priority on promoting equality and tackling discrimination. Each of the providers will manage the scheme in line with their own equality and diversity policies.

Briefing Note: Health & Safety Service Update 2023/2024

Committee name: Cabinet

Date: 13th June 2023

Responsible officer: Bernadette Reed

This note provides information to keep Members informed of matters relating to the work of the Cabinet or a committee but where no decisions from Members are needed.

If Members have questions relating to matters shown, they are asked to contact the officer indicated.

1. Service Aims and Objectives

- 1.1 We aim to protect the health, safety and wellbeing of those working within the Borough in premises for which we have enforcement responsibility. We also aim to protect members of the public and others who may be harmed by a work activity.
- 1.2 We aim to support, encourage and advise and where necessary hold to account businesses to ensure they effectively manage the occupational health and safety risks they create.
- 1.3 We aim to use the most appropriate method to influence those creating risks and target our interventions on those business and sectors which pose the higher level of risk.
- 1.4 We aim to contribute to the growth of local businesses by providing advice and guidance to create a level playing field.
- 1.5 We will work in partnership with the HSE and others to ensure effective service delivery.

2. Background

- 2.1 On 14th July 2015, Cabinet approved that health and safety service performance would be communicated to Members and the Leadership Team via a briefing note each year. This briefing note highlights matters of interest, our performance for the year in review and provides a plan of work for the year ahead. A service plan would be prepared for approval every 3 years. The next service plan will be 2024/25

2.2 The responsibility for health and safety enforcement is divided between local authorities and the Health and Safety Executive (HSE). The division of responsibilities depends on the work activity and can be found in the [Health and Safety \(Enforcing Authority\) Regulations 1998](#). For this authority it includes amongst others: offices, shops, hospitality sector, leisure activities, nurseries, museums, residential care homes, places of worship, tyre and exhaust fitting, steel stock holders, camping and caravan sites, animal boarding, beauty parlours and skin piercing.

2.3 Under Section 18 of the Health and Safety at Work etc Act 1974, this authority has a duty to ensure it has adequate arrangements for the enforcement of health and safety statutory provisions for which it is responsible and to ensure it has sufficient suitably qualified and suitably appointed officers to carry out enforcement. We must allocate sufficient time and resources to investigate accidents, dangerous occurrences and cases of occupational ill health in line with the HSE incident selection criteria.

3. Service delivery

3.1 The [Local Authority National Code](#) is statutory guidance issued under Sec 18 (4)(b) of the Health and Safety at Work etc Act 1974. Adherence to the code will ensure that this authority is compliant and consistent in its approach. It sets out a risk-based approach to targeting health and safety interventions by this authority. It provides a framework that recognises the role of businesses and the regulators in the management of risk, concentrating on 4 objectives:

- Clarifying the roles of business, regulators and professional bodies
- Outlining a risk based approach to regulation which this Authority must adopt
- Setting out the need for training and competencies of offices of this authority.
- Outlining arrangements for collection and publication of data.

4. Organisational Structure and resources

4.1 The health and safety function sits within the environmental health team under the Head of Public Protection and the Communities and Place Director. The structure is shown in Appendix 1. On a day to day basis, The Public and Environmental Health Team Leader manages health and safety, and other environmental health teams (animal licensing, food safety, infectious disease, environmental protection). This is shown in Appendix 2.

4.2 The health and safety team is also responsible for animal licensing including (dangerous wild animals, home boarders, kennels, catteries, dog breeding, pet shops and zoos) and the Local Government (Miscellaneous Provisions) registrations (tattooing, acupuncture, semi-permanent make up, body piercing).

4.3 The health and safety team officer allocation is:

0.2 Full time equivalent (FTE) Public and Environmental Health Team Leader
1 x 0.6 Senior Environmental Health Officer (SEHO)

- 4.4** Three additional EHO's within the environmental health team have been appointed as Inspectors under the Health and Safety at Work etc. Act 1974 and provide resilience in the event of an emergency.
- 4.5** This authority is supporting the TO to achieve full baseline qualification as an EHO with 'Registered' status with the Chartered Institute of Environmental Health (CIEH). Training has taken the officer out of the business for a considerable period and put additional pressure on existing officers but provides resilience in the longer term for the environmental health team.
- 4.6** The CIEH is the main professional body for health and safety regulators and sets the standards of professional practice and continued professional development.
- 4.7** This authority supported the SEHO and the TO to obtain their Level 3 OFQUAL qualification for animal licence inspection as required by the Department of Environment Food and Rural Affairs (Defra).
- 4.8** The TO will be increasing to full time with 0.4 spent on carrying out official food controls. This will reduce the health and safety capacity by 0.1 FTE. This is a temporary arrangement until recruitment to the vacant food EHO post is successful.
- 4.9** Section 26 of the Health and Safety at Work etc. Act 1974 allows local authorities to indemnify inspectors appointed under that Act under specified circumstances. This authority indemnifies inspectors, against the whole of any damages and costs, or expenses, which may be involved, if the authority is satisfied that the inspector honestly believed that the act complained of was within their powers and that their duty as an inspector entitled them to do it, providing the inspector was not wilfully acting against instructions.

5. Demands on the Service

Fig 1: Accident reports 2018- 2023

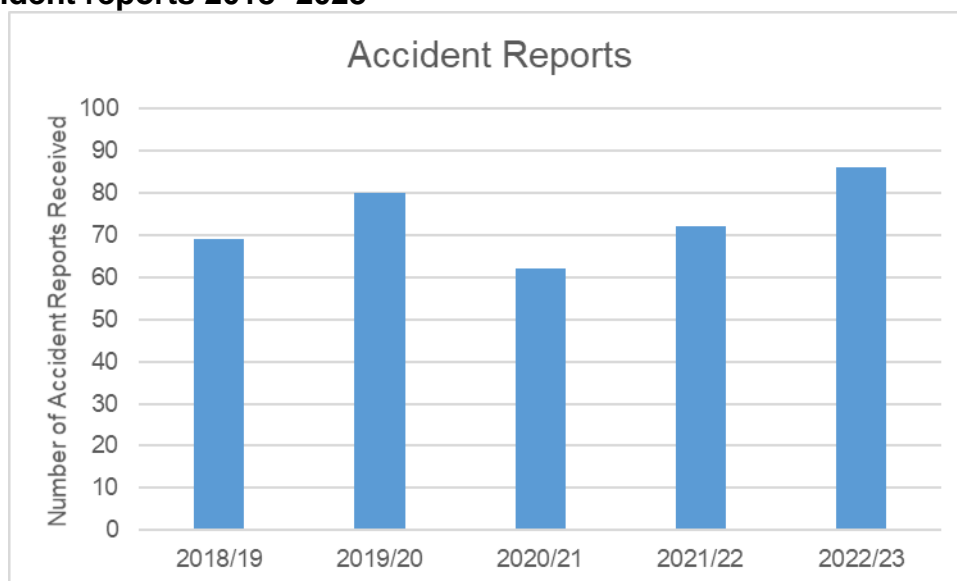
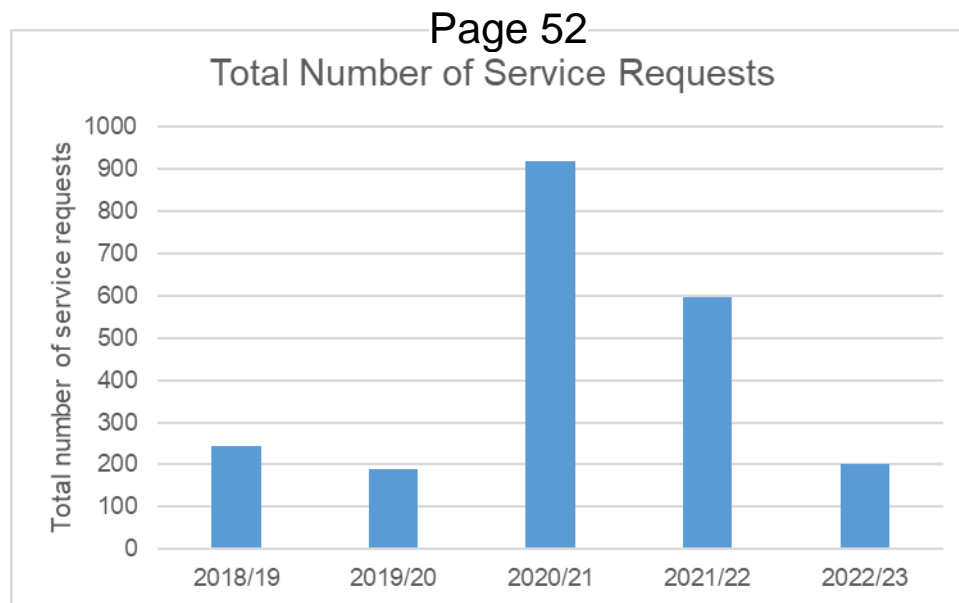


Fig 2:Service requests 2018-2023



- 5.1** The above figures show accident notifications have remained reasonably consistent at an average of 74 per year over the last 5 years.
- 5.2** Service requests fluctuate and peaked due in 2020/21 and 2021/22 due to Covid-19 service requests. If Covid requests are discounted, health and safety service requests average around 192 per year.

Table 1: Overview of work undertaken 2022-2023

Intervention	2022-23	
H&S Service requests*	Received	102
	Investigated	64
	Visited	16
RIDDOR incident reports **	Received:	85
	Actioned	20
	Visited	5
Registrations / Beauty Sector	Issued:	66
	Inspected	13
Animal Licensing	Issued/ Inspected:	17
	Related enquiries including infection	30
	Visited:	2

H&S proactive inspections	Page 53 Revision	
		39
Enforcement Notices	0	
Safety Advisory Groups	9	

***Service Requests (SRs)**

39.2% of H&S SRs were concerns about commercial premises including events, 28.4% animal infection and licenced premises enquiries, 23.5% concerns about registrations/byelaws, 6.8% adverse lift reports, 1% gas safety, 1.9% animal infection.

****Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013**

All notified incidences are subject to the HSE Incident Selection Criteria test.

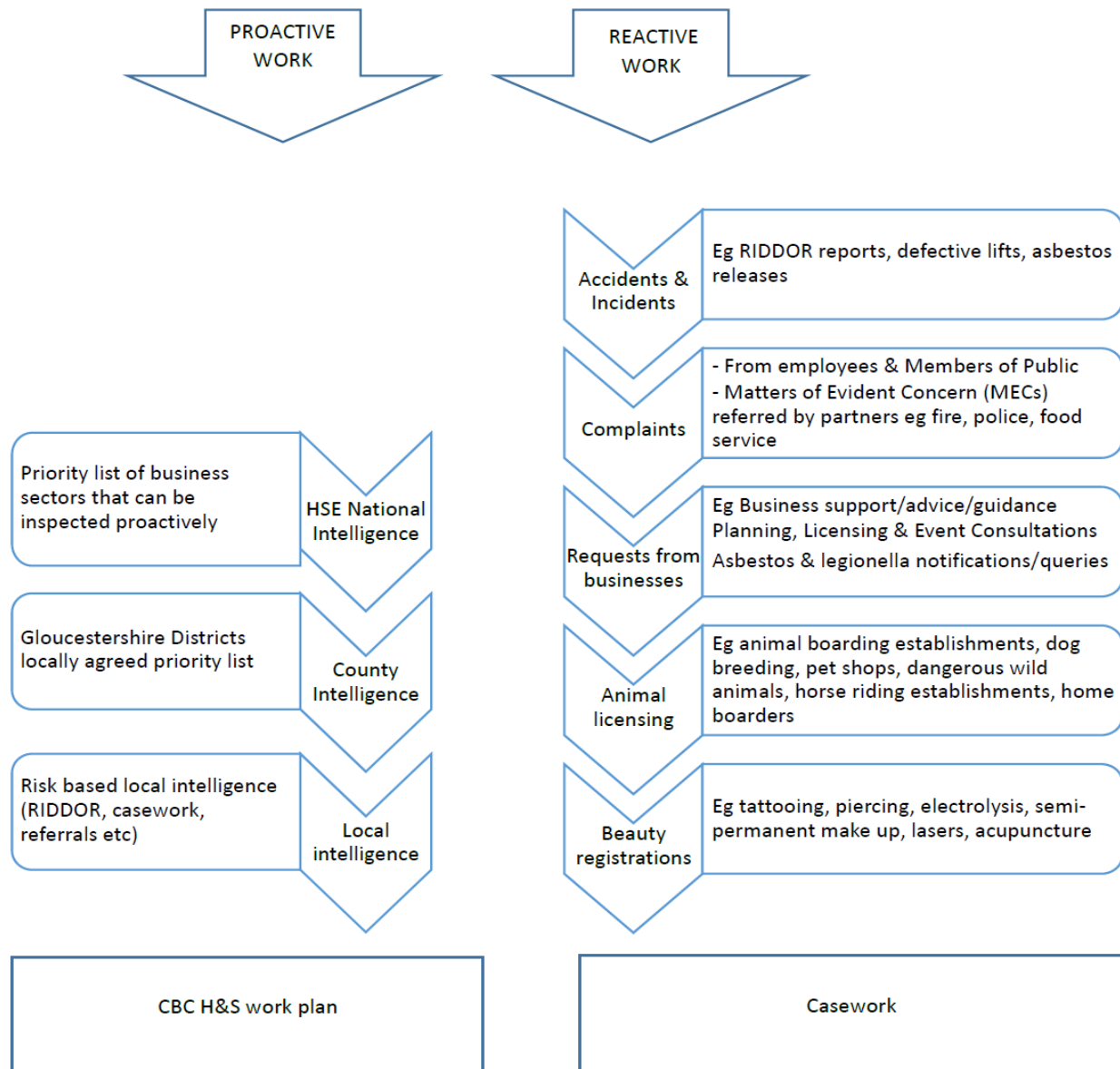
2022-23 RIDDOR incidents were: 28% slips/trips on the same level, 14% falls from height, 9% injured while carrying and lifting. The next most reported categories were: 'other', stuck against something fixed struck by moving object, exposure or contact with substance, injured by animal, violence and one report of struck by moving machinery.

6. Partnership working

- 6.1** The HSE Enforcement Liaison Officer (ELO) and representatives from all Gloucestershire's Districts aim to attend a quarterly County Health and Safety Technical Group. There were 3 Meetings in 2022-23 due to resource issues across the county. The group aims to facilitate joint service objectives such as, priority lists, training, officer competency, joint working and mutual aid where/if necessary. We work with others and the HSE to establish best practice and consistency in enforcement as required by law.
- 6.2** We will be updating the County Council on our health and safety work streams via the health protection board in September 2023.
- 6.3** Officers attend the Councils and the Race Course's Safety Advisory Groups (SAGs) and the events consultative groups (ECGs). All event organisers give due regard to their health and safety responsibilities.

7. Risk based Intervention Plan

- 7.1** The following schematic depicts how proactive and reactive work streams are formed:



8. Intervention plan

- 8.1** The authority's health and safety intervention plan is delivered each year in accordance with the HSE Local Authority Circular on 'Setting Priorities and Targeting Interventions' revision 12 [LAC 67/2](#)
- 8.2** The Circular provides guidance and tools for priority planning and targeting of interventions, enabling the authority to meet the requirements of the National Local Authority Enforcement Code.
- 8.3** Our approach to interventions are targeted, proportionate, consistent and transparent in line with the Enforcement Code.
- 8.4** Appendix 3 shows Cheltenham Council's risk based intervention plan for 2023-24. This plan is based on specific business sectors and nationally recognised specific hazards, identified by the HSE. Proactive inspection must only be used in the high-risk activities and sectors specified by the HSE or where local intelligence suggests risks are not being effectively managed.

8.5 The HSE guidance allows for consideration of local intelligence when formulating the intervention plan.

8.6 The focus of the plan will be reviewed in the following circumstances:

- If an initial feasibility exercise does not justify the proposed intervention
- If the first proactive inspections do not evidence the need for further interventions
- If initial proactive inspections require more intensive regulatory support (and/or enforcement) due to risks identified
- If capacity in the team is affected by complex or major investigations or legal work, or by officer sickness or corporate priorities

9. Monitoring

9.1 This authority has a duty to monitor and share intervention data with the HSE and the public. The authority submits an annual statutory return to the HSE (LAE1), which reports against proactive and reactive intervention categories such as the numbers of planned interventions, revisits, accident investigation site visits, requested visits and enforcement action. This allows us to benchmark and peer review our data against other authorities. This data is publically available.

9.2 Key performance indicators (KPI's) have been developed which include response times to health and safety service requests and responses to accident notifications. This will ensure compliance with the HSE incident selection criteria. All data is recorded on the authority's management information system (MIS) Uniform Idox.

10. Future Demands on the service

10.1 It is considered that we will have sufficient resource to meet the health and safety expectations subject to the identified risks below. This is based on the establishment profile in the Cheltenham area, the number of staff within the team, the number of officers authorised as Inspectors, analysis of historic service data and maintenance of a duty officer system. However, the considerable uncertainty of the current regulatory operating environment must be recognised.

11. Risks

11.1 There are no key risks specific to the delivery of the health and safety work plan that need to be highlighted to Members. It is expected that this intervention plan can be met based on analysis of previous service demand data and anticipated service demand.

11.2 Recruitment of appropriately trained staff is challenging. We continue to work with our human resources business partner (HRBP) to recruit to career graded posts and provide quality 'on the job' training where necessary. We also work with our HRBP to retain existing qualified officers.

11.3 Not all businesses are required to register with us which poses challenges for data led intelligence and targeted interventions and keeping our MIS up to date.

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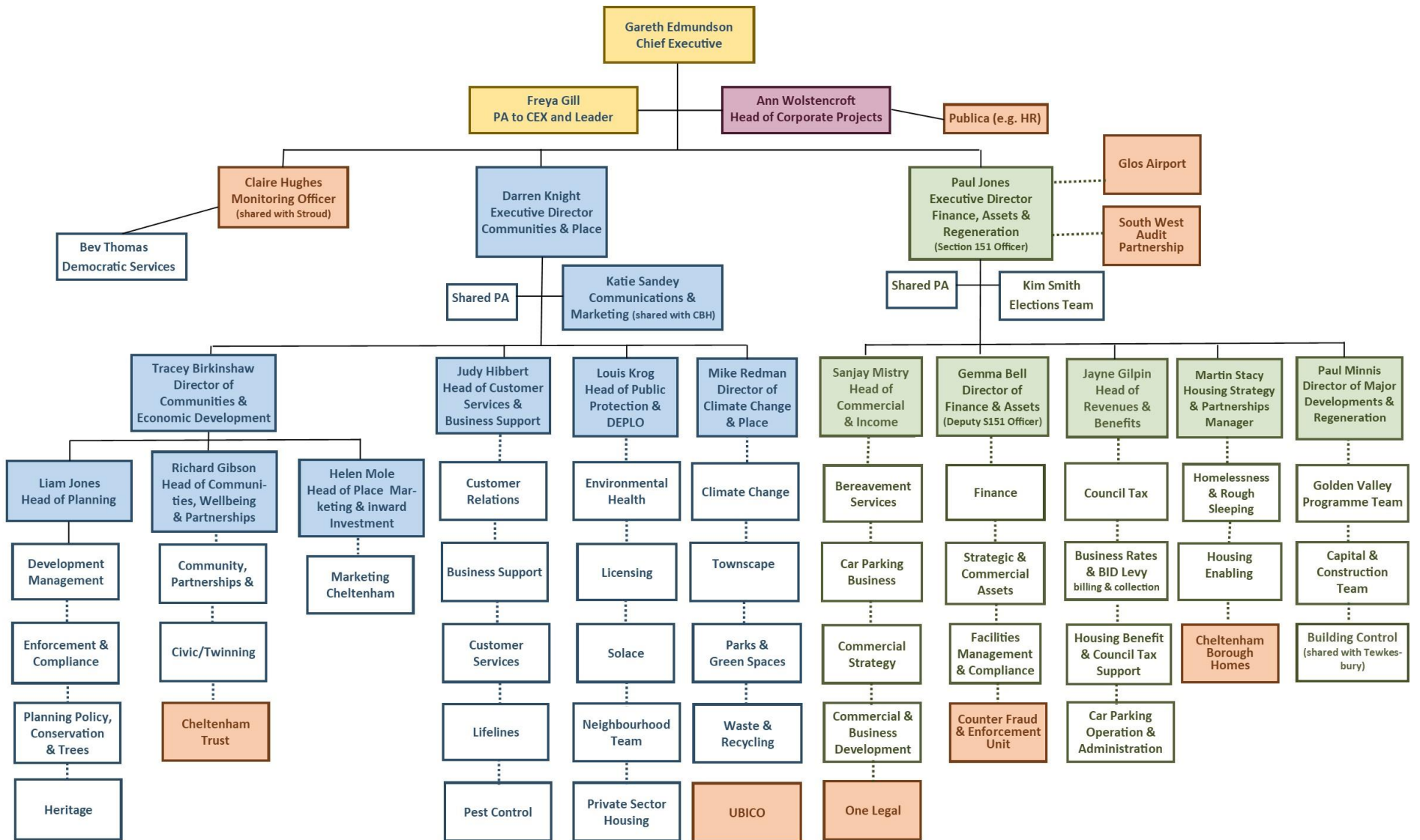
Reference documents:

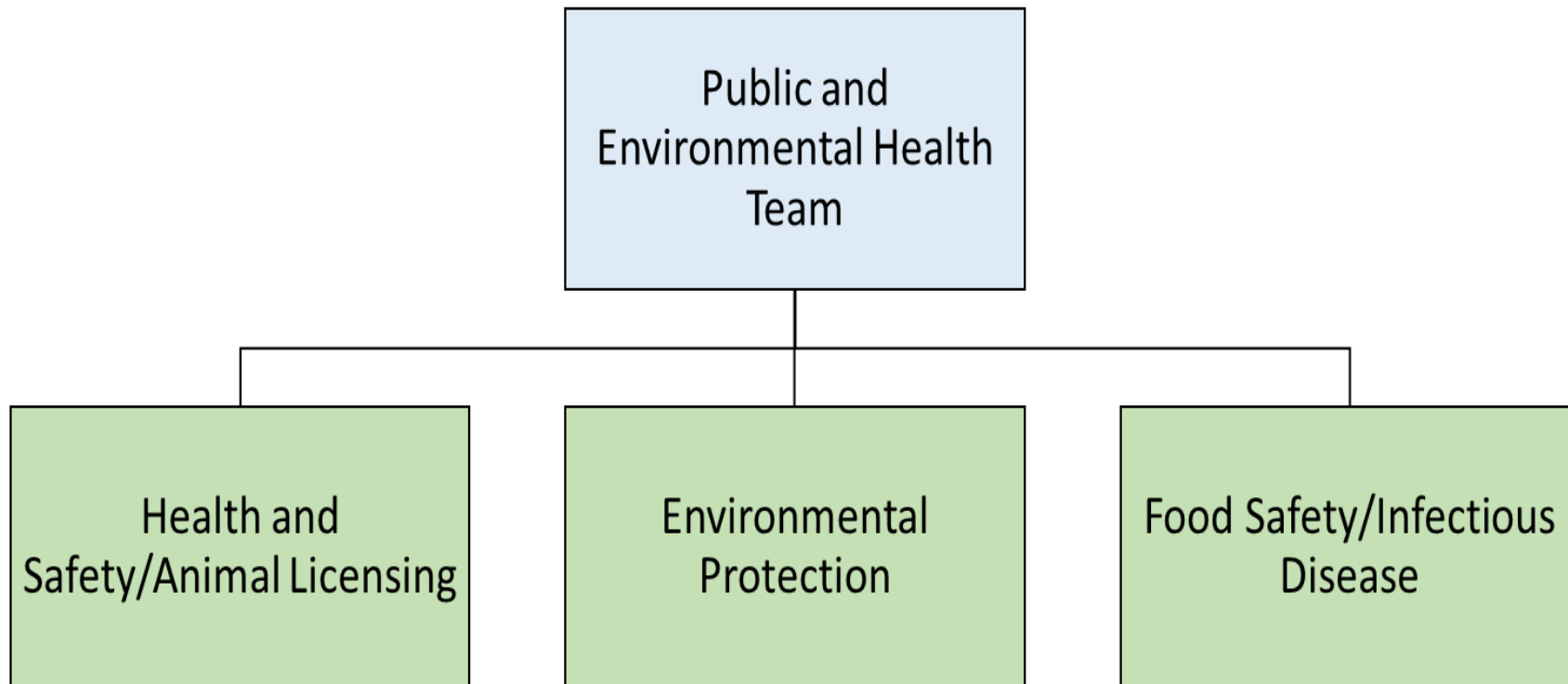
[LAC 67-2 \(Revision 12\) - Setting Local Authority Priorities and Targeting Interventions](#)

[National Local Authority Enforcement Code](#)

[LAE 1 Returns](#)

[Incident Selection Criteria Guidance HSE- LAC 22/13 rev 1](#)





Health and Safety Service Intervention Plan 2023-24

Proactive - Inspection

National HSE Priority Area	Risk areas activities / rationale	Dates	Actions / Considerations
Industrial or large retail/ wholesale / warehouse and distribution	Struck by vehicles, falls, major injury, occupational deafness, falls from height, manual handling	Visits begin: Aug / Sep 23	Inspections focusing on areas of concern.
Occupational lung disease asthma in bakeries	Health – frequent exposure to inhalation of flour dust and/or associated enzymes (e.g. tipping ingredients into mixers, bag disposal, weighting and dispensing, mixing, dusting with flour via hand or sieve, use of flour on dough brakes and roll machines, maintenance or workplace cleaning)	Visit by: Jan 24	Bakery follow up inspections following information intervention in 2022/23.
Occupational lung disease silica in retail/wholesale	Health - Stone Cutting exposure to respirable crystalline silica. In retail outlets that cut own stone or high silica content ' manufactured stone' e.g. gravestones or kitchen resin/stone tops	Visited by: Jan 24	Stone cutting follow up inspections following information provision intervention in 2022/23

Proactive- Intervention

National HSE Priority Area	Risk areas activities / rationale	Key Dates	Actions / considerations
Crowd management in large scale public gatherings e.g. cultural events, sports, festivals & live music	Safety – Events may lack suitable planning, management and monitoring of crowd movement and behaviour risks. During arrival, leaving and moving around at a venue	On going	Safety Advisory Group (SAG) and Event Consultation Group (ECG) Entertainment Licence applications
Priority areas supported by any national campaign e.g. work related stress	Various	On going linked to HSE promotion weeks	Promotion of HSE material through social media sites
Worker consultations for safety management	Business benefit of effective consultation with employees includes: better efficiency and quality; higher levels of workforce motivation, and a healthier and safer workplace.	Relevant H&S reactive and proactive visits	Contact safety representatives or employees on visits and send information
Trampoline Parks	Number of accidents increasing nationally. Suggests lack of user understanding of risks & unchallenged reckless behaviour results in injuries.	On going If new business	Raise awareness of need for improved information provision and supervision of users. - Establish procedures to check user understanding of risk - effective supervision - improved court monitor training in line with BSI PAS 5000:2017
Local - Intervention	Risk areas activities / rationale	Key Dates	Actions / considerations
Access / egress maintenance, specifically at heritage sites.	Trips and falls associated with non-highlighted and/or poorly maintained thresholds.	Action by	Promote need and methods to ensure safe access and egress from risk premises.

Reactive

Priority* given to the following accidents and complaints received:

*(priority actions are outside normal risk selection procedure of the 'incident selection criteria' and the 'complaints filter' which may indicate no action)

National HSE Priority Areas Suitable for proactive inspection	Risk areas activities / rationale	Actions / considerations
Solid fuel use in catering.	Health – Lack of suitable ventilation and/or unsafe appliances carbon monoxide poisoning from wood fired pizza ovens and BBQs in commercial catering using solid fuel.	Visit new business with solid fuel in catering.
Violence at Work - vulnerable workers e.g. Lone/night working/betting shops/off licences/hospitality.	Safety – Lack of suitable security measures / procedures. Police/licensing intelligence advises local factors increasing the risk of violence at work e.g. located in high crime area, or targeted due to criminal campaign Or situation not managed effectively	Visit advise, where intelligence given.
Professional firework operators	Safety – Poorly managed fusing of fireworks Fires and explosions caused by initiation of explosions by	Events advise and visit where necessary
National HSE Priority Area	Risk areas activities / rationale	Actions / considerations
Referral via Events: <i>(in addition to general events consultations which includes crowd management above)</i>		
Animal Visitor Attractions	E coil/Crypto infection in children related to open farms / visitor attractions Commercial operations whose primary purpose is leisure/entertainment where visitors are encouraged to have hands-on contact with animals. Risk of E.coli, <i>parvum</i> and other micro-organisms are expected and exposure prevention is not possible.	Events advise and visit where necessary
Inflatable Amusement Devices	Serious incidents where inflatable amusement devices have collapsed or blown away in windy conditions. - Information relating to Anchorage to ground - Arrangements for measuring wind conditions on site - Annual Inspection and build compliance to BS EN 14960	Events advise and visit where necessary
Spa Pools and hot tubs on display	Nationally there is a number of cases and outbreaks of Legionnaires' disease associated with display or demonstration spa pools and hot tubs. When filled and in operation. Systems present	Events advise; ensure safe system of work

		an appreciated risk of infection.	Visit / sample where necessary
Officer Referral (matters of evident concern): <i>(all other areas of the intervention plan may also be referred)</i> Food, Licensing, Neighbourhood Team, Trading Standards etc.			
Electrical Safety in Hospitality Settings		Faulty electrical equipment has caused fatalities. Pubs, restaurants and cafés to ensure outdoor electrical equipment e.g. lights, heaters are designed for outdoor use, installed by a competent person and checked regularly for damage or water ingress.	Raise awareness of need and take action where necessary
Gas Safety in Catering		Gas safe report commercial caterers are not fully aware of their legal duties under the Gas Safety (Installation and Use) Regulations 1998. Leading to appliances being unsafe. Risks of CO exposure due to faulty appliance, bad installation and poor ventilation / inadequate extraction systems.	Request evidence of gas safety maintenance and checks. Action where failure occurs
Delivery – Driver welfare provision - Road safety		LA enforced in premises which receive or send regular deliveries (including those picked up by aggregator drivers/ riders). H&S law requires onsite toilet, handwashing and rest facilities to be made available to visiting workers. Vehicle and driver safety on food deliveries. Highest risk of death or injury when riding two wheelers (e.g. motorcycles, mopeds, or bicycles). Robust risk management approach needed take account of road safety risks: vehicle condition, time pressures, weather, distraction, skill, loads, navigation, clothing and fatigue.	Raise awareness of needs. Action if necessary.
Waste bins - Preventing public access of >660 litre		Fatalities and injury have occurred following people sheltering in large waste bins (660 litres or above)	Raise awareness of needs. Action if necessary.
Construction	CDM	CDM 2015 draw attention to if intending works.	Raise awareness of needs refer to HSE for action where necessary
HSE request to react to & highlight relevant	Managing Asbestos	Asbestos in premises built before 2000 and refurbishment or works identified to refer to guidance	

areas if LA enforcement area work is planned or taking place in:			
	Falls from Heights	Repair and maintenance work involving work on/adjacent to fragile roofs/materials. Relevant to building owner or user.	
	Respirable Silica	Health risk from block cutting, chasing brickwork and cutting concrete floors.	
	Moving and Handling Construction Materials	Health risk from poor handling of paving stones, plasterboard and glazing units etc.	

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