
Report of Corporate Management Team

Report of Kevin Lough, Occupational Health and Safety Manager.

Electoral division(s) affected:

Countywide.

Purpose of the Report

1. To provide an update to Audit Committee on the council's Health, Safety and Wellbeing (HSW) performance for Quarter three 2020/21.

Executive summary

2. The government announced the COVID Autumn and winter plan and this resulted in further planning regarding return to workplaces and implementation of 'safer behaviours and actions' guidance. However, an increase in infection rates due to the emerging omicron variant during the quarter prevented this from being progressed. The government introduced Plan B was introduced which meant a work from home wherever possible restriction was reimplemented along with other national COVID controls.
3. The Council continued to provide a vaccination hub at county hall for vaccinations, including boosters, to be provided to health and social care staff from within the NHS and also Council services.
4. Risk assessments and safe working procedures were reviewed to reflect the various changes in government guidance and also to reinforce the Council own safe working procedures. Further assurance assessments of ventilation and Co2 levels in schools and non-schools settings were undertaken.
5. A number of schools in the county continued to experience COVID outbreaks during this quarter and these continued to be supported, managed and monitored by the Education oversight multi agency group.
6. There were two fire related incidents at Spennymoor Leisure Centre and Spennymoor Branch Library. There were no injuries and limited property damage and actions have been taken following investigations into these incidents.

7. There were three Fire and Rescue Service inspections of Council premises during quarter three. These were at the Empire Theatre, Prince Bishop's Community School and Windlestone School and outcomes were positive premises being broadly compliant with fire safety legislative standards.
8. There was a completion of the employee health and wellbeing engagement survey which was undertaken as part of the Better Health at Work award. Work was undertaken to analyse the results and report findings and recommendations to CMT and EMT at the beginning of 2022.
9. There was a positive outcome in relation to student induction week and planning which had taken place was successful in the delivery of a safe week for new and existing students within the city.
10. Arrangements were made with RoSPA to schedule the independent assessments of the new Milburngate development, wider city centre and the river corridor following previous assessments.

Recommendation(s)

11. That Audit Committee note and agree the contents of this report.

379

Accidents, incidents and near misses reported
(271 in Q2 2021/22, 329 in Q1 2021/22, 229 in Q4 2020/21)

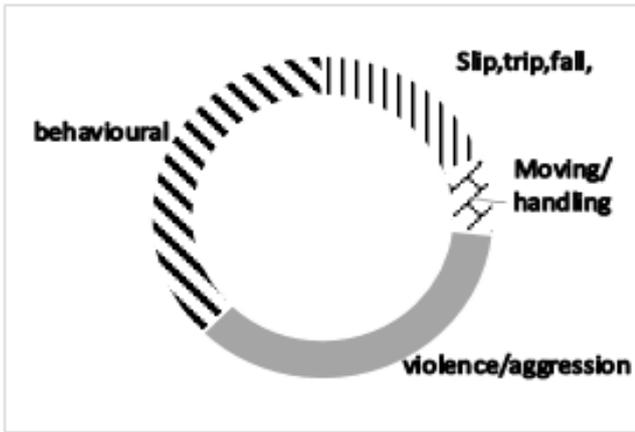


96%

Of all reported accidents are either no injury or near miss



Main Accident/Incident Causes



0 RIDDOR 'specified' injury, and 10 over 7 days absence RIDDOR injuries

162 statutory Health Surveillance appointments attended



39 psychological work-related incidents in Q3 2021/22 (compared to 36 in Q2 2021/22, 48 in Q1 2021/22, 16 in Q4 2020/21)

• Better Health at Work *Maintaining Excellence* Award status application submitted

2 fire related incidents



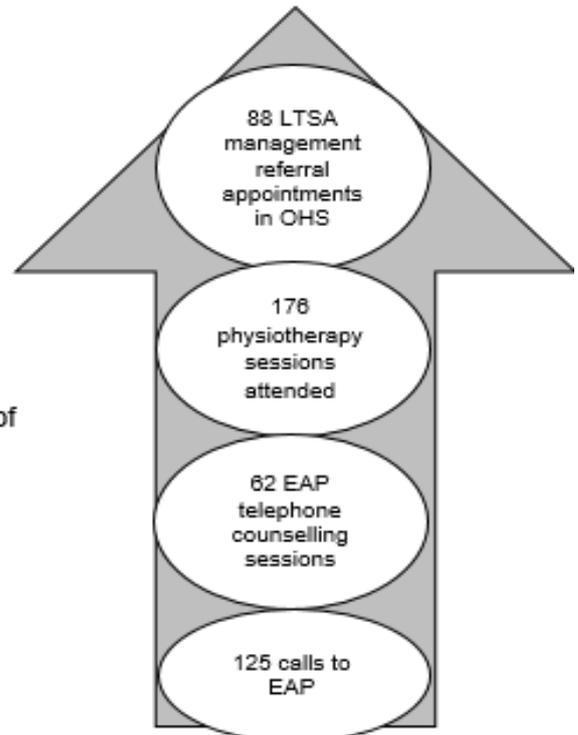
3 CDDFRS inspections of council premises



127 H&S Safety Audits and inspections of DCC premises and activities

0

Enforcement related actions or advice from HSE/CDDFRS following inspections and audit activity at various DCC sites



Background

12. The HSWSG has been established to ensure that suitable priority is given to the management of HS&W within the council. The group monitors the development, implementation and review of the Corporate H&S Policy to ensure that it is consistently applied throughout the council and that performance standards are achieved. Key reporting topics, including COVID, are detailed below.

COVID 19 H&S Update

13. During Quarter three, the government announced the COVID Autumn and winter plan which was aimed at progression from previous COVID roadmap stages 1 to 4. This plan was aimed at sustaining the progress made and to prepare the country for future challenges, while ensuring the NHS did not come under unsustainable pressure.
14. The Government announced that this was to be achieved during autumn and winter by:
 - Building our defences through pharmaceutical interventions: vaccines, antivirals and disease modifying therapeutics.
 - Identifying and isolating positive cases to limit transmission: Test, Trace and Isolate.
 - Supporting the NHS and social care: managing pressures and recovering services.
 - Advising people on how to protect themselves and others: clear guidance and communications.
 - Pursuing an international approach: helping to vaccinate the world and managing risks at the border.
15. The autumn and winter plans were caveated with a number of variables including levels of vaccination; the extent to which immunity wanes over time; how quickly, and how widely social contact returns to pre-pandemic levels as schools return and offices reopen; and whether a new variant emerges which fundamentally changes the Government's assessment of the risks.
16. The Council commenced with further planning regarding return to workplaces following the completion of stage 4 of the COVID roadmap. These plans were based on the general government 'safer behaviours and actions' guidance which changed restrictions from mandated to personal choice in terms of restrictions such as social distancing and wearing of face coverings.
17. Despite progress with the return to workplaces planning, an increase in infection rates during the quarter prevented this from being implemented. A focus therefore remained on mandated restrictions in accordance with public health advice in relation to social distancing and use of face coverings within workplaces and vehicles.

18. During this quarter the government guidance changed in several key areas in relation to rules for self-isolation and those who were close contacts of positive COVID cases. There was also a campaign to increase vaccination uptake for those who had not had first or second doses and offering a first dose to 12–15-year-olds. Further guidance was issued in terms of offering booster doses to individuals who received vaccination in Phase 1 of the COVID-19 vaccination programme (priority groups 1-9).
19. The Council continued to provide a vaccination hub at county hall for vaccinations to be provided to health and social care staff from within the NHS and also Council services. This was supported by general public related comms at a local level regarding the importance of vaccination uptake ahead of the winter period when rates were expected to rise as in previous years.
20. The risk assessments and safe working procedures were reviewed to reflect the changes in government guidance and also to reinforce the Council own safe working procedures. Further assurance assessments of Co2 levels in Council workplaces were undertaken to ensure that the ventilation standards within buildings were suitable and sufficient in terms of guidance and preventing virus spread. Also within schools, via the department for education, access to Co2 monitors for educational settings was established and all schools within the County commenced with obtaining monitors, supported by user guidance and information.
21. A number of schools in the county continued to experience COVID outbreaks during this quarter and these continued to be supported, managed and monitored by the Education oversight multi agency group. It was positive to report that during this reporting period there were no other non-schools workplace related outbreaks to report.
22. During the reporting quarter there was a continuation of council and elected member related meetings and committees. Reviews were undertaken to ensure that meeting venues had adequate COVID safety arrangements to ensure that social distancing in particular could be maintained. Spennymoor leisure centre was again utilised for full council meetings in accordance with public health advice.

Management of Health and Safety Procedures

23. Between October and December 2021, reviews of various current H&S procedures have commenced and are in various stages of development. During the quarter reviews have commenced in relation to working at height, unknown and suspicious packages, infection control and immunisation, consultation with employees regarding health and safety matters, lone working procedures and confined spaces.

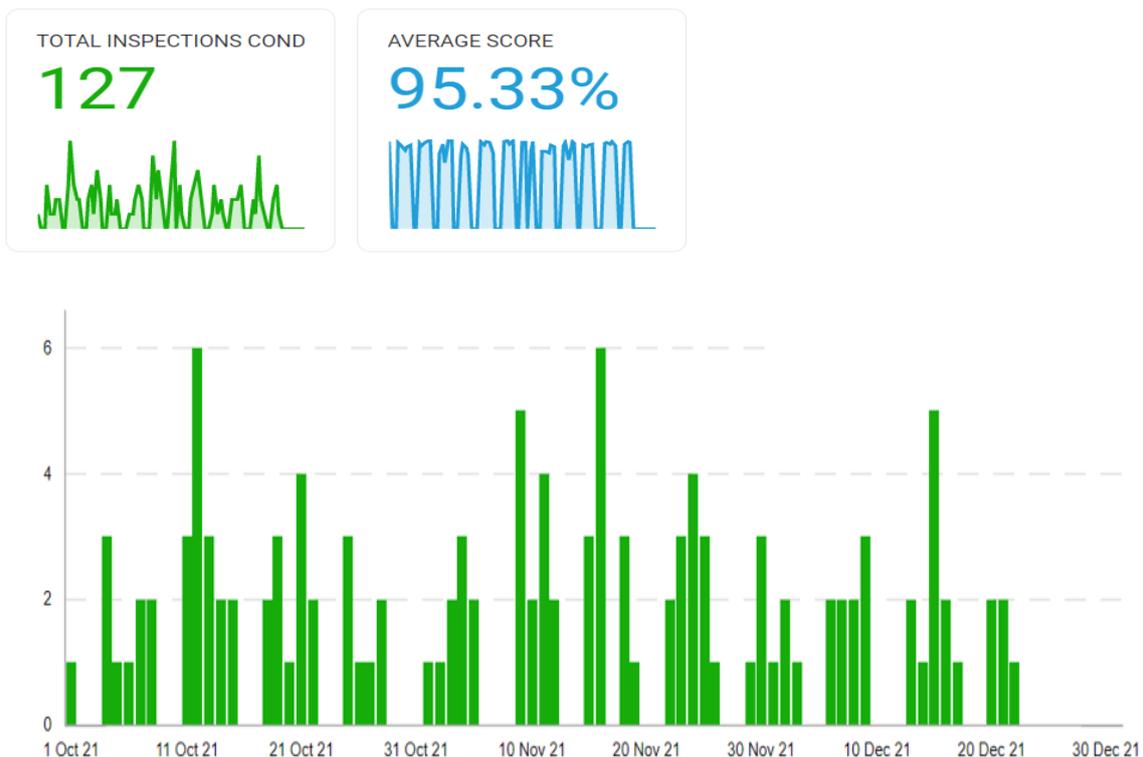
Consultation/Communication

24. Trade Union H&S representatives continue to actively participate in the corporate and service specific H&S meetings. Each service grouping has an established H&S forum that has met since the last HSWSG meeting in August 2021. The H&S team continue to undertake, on a priority basis, a range of joint audit and inspection programmes in conjunction with trade union H&S representatives, particularly within NACC and REG.
25. Following new guidance which was published by the Health and Safety Executive regarding welding operations, this has led to a project to revisit safe working procedures and risk assessments for areas of the Council undertaking welding activities. Following a series of employee risk awareness sessions provided by members of the H&S team, advisers and clinical staff from occupational health and safety have attended a number of work sites to undertake walkthrough surveys and information gathering. Biological monitoring is being arranged and engagement with an occupational hygienist has commenced to ascertain and evidence additional control measures that may be required in accordance with legislative requirements. A schedule of respiratory health surveillance for those employees identified by the risk assessment is also being arranged.

Audits and Inspections

26. There were a total of 127 audits and inspections undertaken by the H&S team during quarter 3.

Chart 1 – Audit and Inspection Activity for Quarter 3.



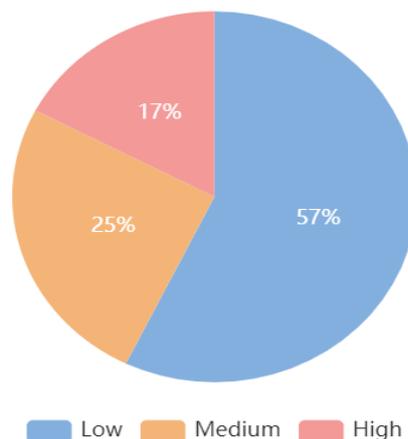
27. From the audits undertaken the following percentage compliance scores can be determined for each service area:

Table 1 Compliance scores

Audit and Inspection Area	Total Undertaken	Compliance Score %
DCC Fire Safety Audit	38	95.03
Civil Engineering and Construction Sites	23	85.56
CYPS - Schools Audit/COVID Audit	48	96.98
Culture and Sport	5	89.85
Refuse and Recycling	2	96.83
NACC Services/Depot	2	91.81

28. From the compliance scoring it must be noted that the majority of non-compliance related issues identified were low to medium low as per below chart 2.

Chart 2 Compliance Actions by Priority



Fire Incidents

29. There were two fire related incidents at Council premises or staffed premises or on-board Council vehicles during Quarter three, these were at
- Spennymoor Leisure Centre
 - Spennymoor Branch Library

Spennymoor Leisure Centre

30. It was reported that at approximately 15:30 on 19 December a member of poolside staff walked into the changing area and could smell smoke. They walked through the plant room and upon exiting the building observed a fire to her right at the end of the building. When they went to investigate an Asda, worker was in attendance and was extinguishing the fire with a fire

extinguisher. Shortly afterwards two Police Community Support Officers attended, and they were requested to make this area part of their patrols.

31. The subsequent investigation into the incident identified that youths had used kindling and hand gel for fuel which is believed to have been stolen from the nearby Aldi supermarket and then set fire to it which fortunately did not spread. The prompt action by the Asda employee who observed the fire, extinguished it using a fire dry powder fire extinguisher.
32. As a result of this incident and other incidents of anti-social behaviour within the vicinity contact was made with the Arson reduction team at the Fire service and the crews at Spennymoor fire station were also made aware of the incident. In addition, the Police and Neighbourhood wardens are patrolling the area and nearby known anti-social hotspots. Leisure centre staff have also been informed to ring the fire service if any more deliberate fires are set.

Spennymoor branch library

33. It was reported that at approximately 13:05 on Friday 21 December 2021 a member of the public informed the staff needed to call the fire service as the bin was on fire. He had seen some teenagers put what appeared to be a lit cigarette in the recycle bin. The fire service were immediately called but while waiting the delivery driver came and tipped out the contents of the bin and stamped out the fire. The fire service then arrived and confirmed that the fire was all out and poured some water in the bin to make sure it was extinguished. The police were also informed of the incident.
34. The bins have been kept in an alcove that contains the entrance to the boiler house and the rear fire escape from the back office for several years. When the library is closed the roller shutter is lowered to increase security and access to the bins is prevented. However, when the single storey premises are occupied the roller shutter is required to be in the open position as the rear means of escape exits through the alcove. It is not known if the youth who placed the cigarette in the recycle bin intended to start a fire however there has been an increase in anti-social behaviour in Spennymoor Town Centre with a deliberate fire occurring to the rear of the Leisure Centre as reported above.
35. Staff have been encouraged to contact the police if youths are seen congregating in the library vicinity and are looking at an alternative storage area for the bins when the library is open.

Fire Inspections – County Durham and Darlington Fire and Rescue Service

36. There were three Fire and Rescue Service inspections of Council premises during Quarter three. These were at the Empire Theatre, Prince Bishop's Community School and Windlestone School. The outcome of the inspections were that all the premises were deemed to be broadly compliant with fire safety legislation.

Open Water Safety

37. The City Safety Group and county wide Open Water Safety Group both met during the reporting period. Both groups were supported by multi agency attendance and reviewed plans for risk assessment and controls for open water across the county, including the city centre.
38. The City Safety Group made progress against its action plan. There was a positive outcome in relation to student induction week and planning which had taken place was successful in the delivery of a safe week for new and existing students within the city.
39. Arrangements were made with RoSPA to schedule the independent assessments of the new Milburngate development, wider city centre and the river corridor following previous assessments in 2015 and 2018. These assessments were completed in December 2021 and subsequent reports will be provided to the City Safety Group in early 2022 for consideration.
40. The County wide open water safety group also met during Quarter 3 to review work undertaken across the County in 2021 and plan for future activities and interventions. It was positive to note that all higher risk and priority locations had been revisited and reassessed during 2021 and assurance provided that safety controls measures are in place in accordance with national guidance and best practice.
41. A meeting was convened at the request of local councillors and residents group leaders in relation to Chester-Le-Street riverside complex. This was aimed at reviewing safety control measures following an incident in August 2021. The outcomes of previous water safety related assessments were shared with the attendees and further opportunities for improvement were discussed with several actions taken forward in relation to lost and found children and educational and awareness activities within the Chester-Le-Street area, particularly within schools.

Employee Health and Wellbeing

42. The employee better health at work group met again during this quarter and identified ongoing interventions and communications which were again aimed at raising awareness of support and interventions available and ensuring employees were able to access this where required.

43. There was the completion of the employee health and wellbeing engagement survey which was undertaken as part of the Better Health at Work award. Work was undertaken to analyse the results and report findings and recommendations to CMT and EMT at the beginning of 2022.
44. There was further promotion of the employee wellbeing portal and employee assistance programme during this quarter to continue to ensure that all employees were aware of support available during the ongoing pandemic.
45. Occupational Health Service (OHS) also continued to deliver employee related management referral services during the quarter and supported employees and their managers during the process. A full breakdown of occupational health triage and testing is detailed in the supporting OHS Quarter three report.
46. OHS delivered the employee related winter flu vaccination programme and provided in house clinical support to deliver a series of onsite clinics throughout the Councils workplaces.

Occupational Health Service

47. During Quarter 3, 284 employees participated in clinical consultations with the OHS, following management referral in relation to Long Term Sickness Absence (LTSA), Short Term Sickness Absence (STSA), Management Concerns (Man Con) Reviews, and Re referral appointments, Long Term Sickness Absence/Short Term Sickness Absence (LTSA/STSA) and Covid. The number of referrals in Q3 this year has risen from the Q3, 2020/21, an increase of 56 referrals which represents a 25% increase.

Chart 1

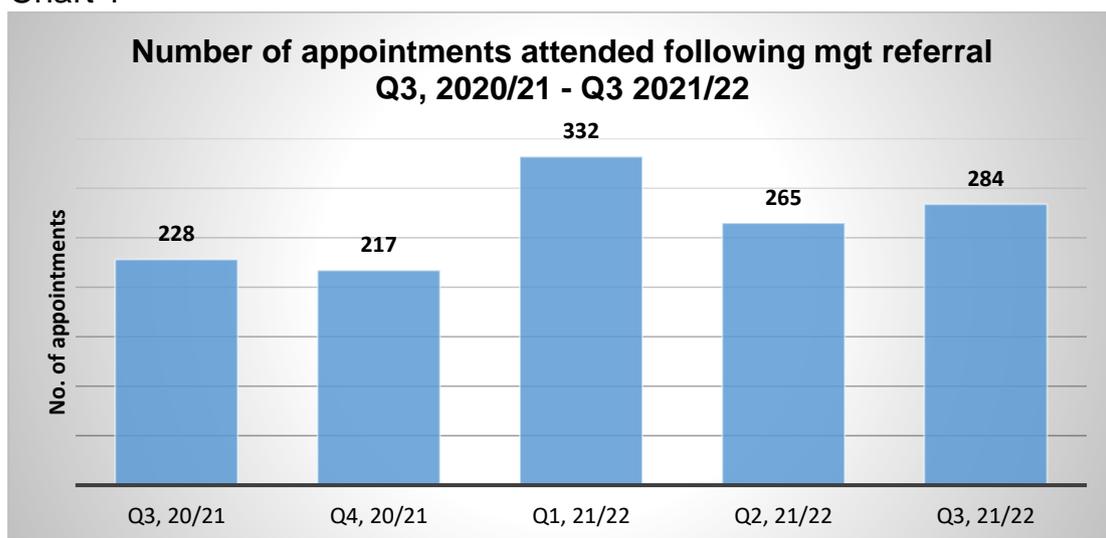
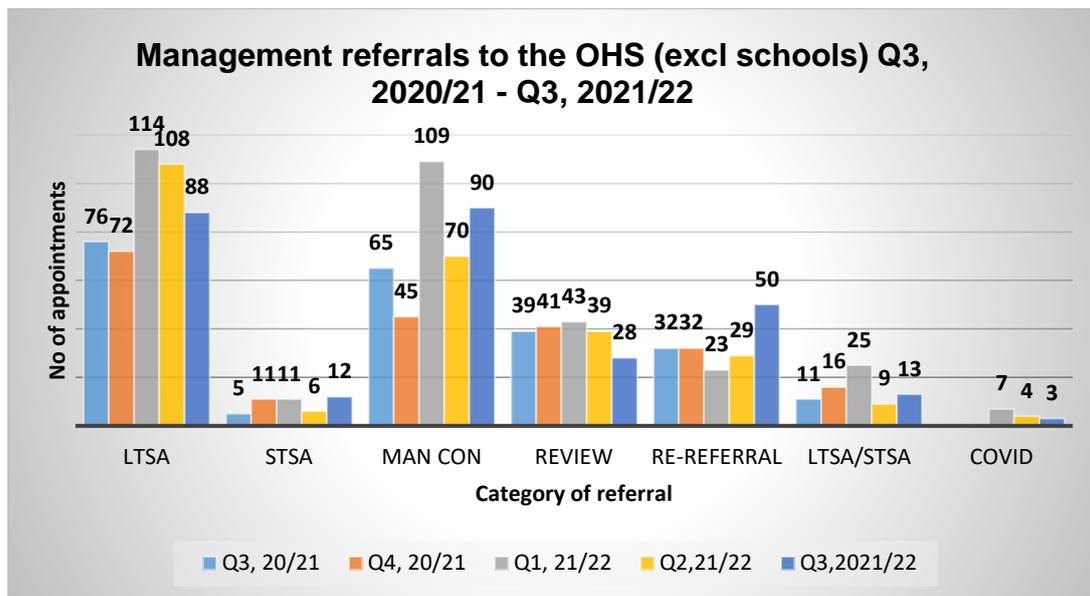


Chart 2 shows the categorisation of management referral appointments attended.

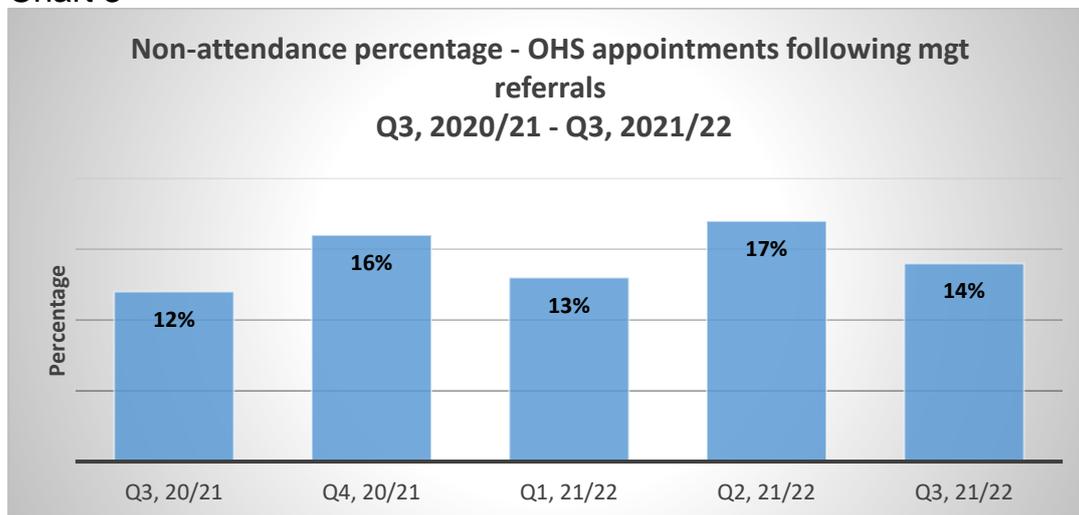
Chart 2



Management Referrals - Non Attendance

48. During Q3, 46 employees did not attend their allocated appointment following management referral. This represents a 14% non-attendance rate. See Chart 3

Chart 3



Management Referrals – Employee Attribution

49. During Quarter 3, 88 employees were seen for LTSA of which 23% (n=20) stated to the OHS that they consider the underlying cause to be due to work related factors. Of the employees, 85% (n=17) identified this was due to ‘psychological’ reasons, 10% (n=2) identified as ‘musculoskeletal’ and 5% (n=1) identified as other.

See Charts 4 & 7

Chart 6 shows the cause of absence categories for non-work related LTSA seen in the OHS, 24% (n=16) were due to psychological reasons; 32% (n=22) were due to musculoskeletal problems; 1% (n=1) was due to respiratory problems and 43% (n=29) was due to other.

Chart 4

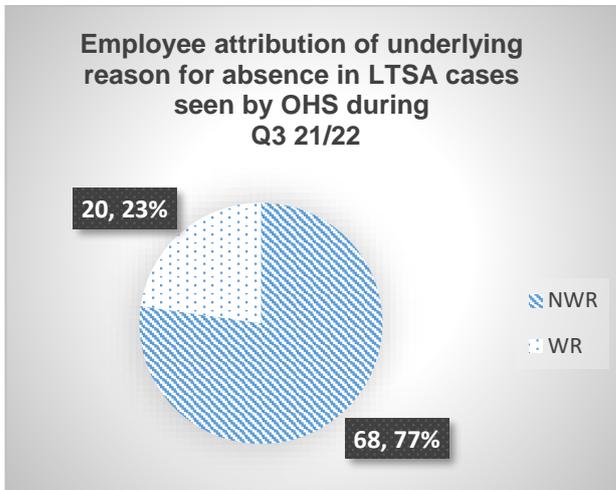


Chart 5

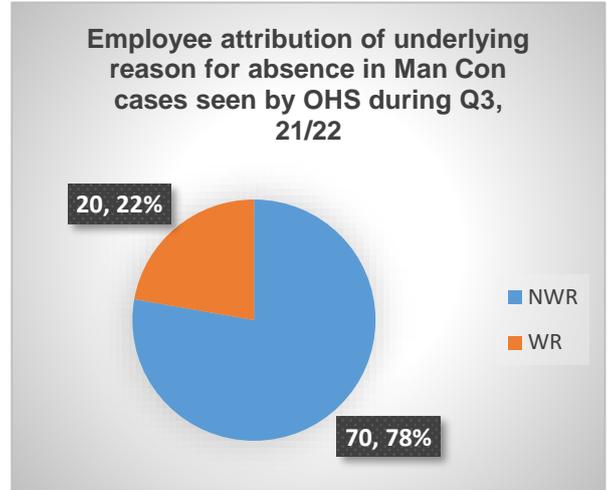


Chart 6

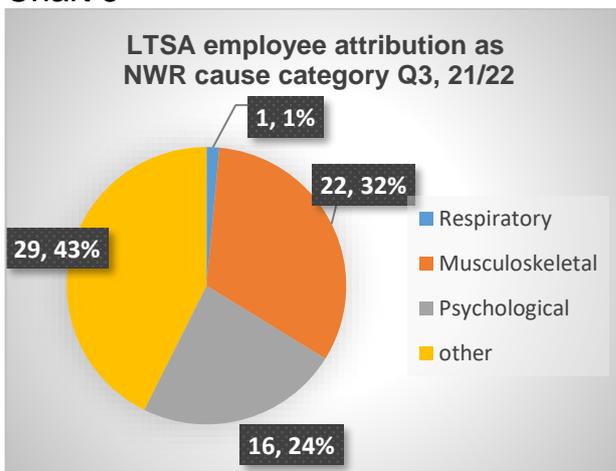
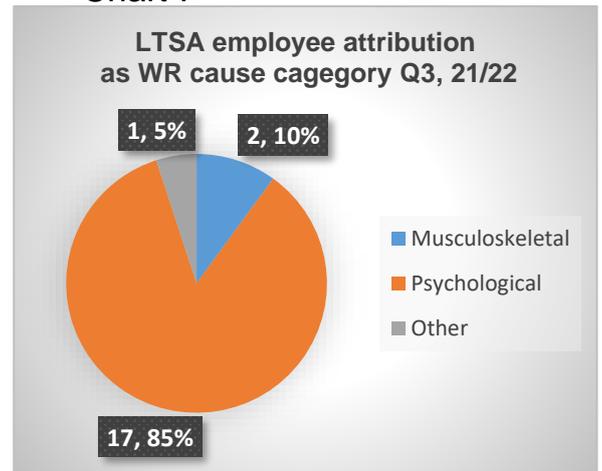


Chart 7



Support Services

50. During Quarter 3, the OHS provided the following additional support services. See Table 1.

Table 1

Additional Support services accessed via the OHS	A&H S	CYP S	NCC	REG	Res	CM	Service not detailed	Q3	Q2	Q1	Q4	Q3
								21/22	21/22	21/22	20/21	20/21
								Total	Total	Total	Total	Total
Number of routine physiotherapy referrals	13	14	12	14	6	0	-	59	46	37	40	21
Number of routine physiotherapy sessions	32	22	55	43	24	0	-	176	126	121	111	109
Number of 'face to face' counselling referrals	0	0	0	0	0	0	-	0	1	1	0	0
Number of 'face to face' counselling sessions	0	0	0	0	0	0	-	0	5	0	0	0
Total number of calls to the EAP	19	57	6	2	13	0	28	125	114	144	128	135
Telephone EAP structured counselling cases	8	32	6	1	19	0	11	77	15	22	18	11
Telephone EAP structured counselling sessions	12	30	5	1	5	0	9	62	29	90	50	52

Physiotherapy

51. Routine physiotherapy clinics now operate two days per week in the OHS at Annand House under contract with the OHS, the clinics are a combination of telephone assessments and face to face physiotherapy appointments, should following the physiotherapy initial assessment by telephone the physiotherapist deem this to be clinically required. The physiotherapist has also carried out a workplace assessment to assist with the individual risk assessment for an employee.

52. Q3 data provided by the contracted service has identified that 40% of the referrals for physiotherapy were related to work, it was also reported that 7 of the referrals were reported by the employee to be following a work accident. Going forward further information on any referrals relating to work accidents is to be collated and if any 'hotspot' areas are identified, targeted advice sessions for employees by the physiotherapist can be facilitated.

Health Surveillance

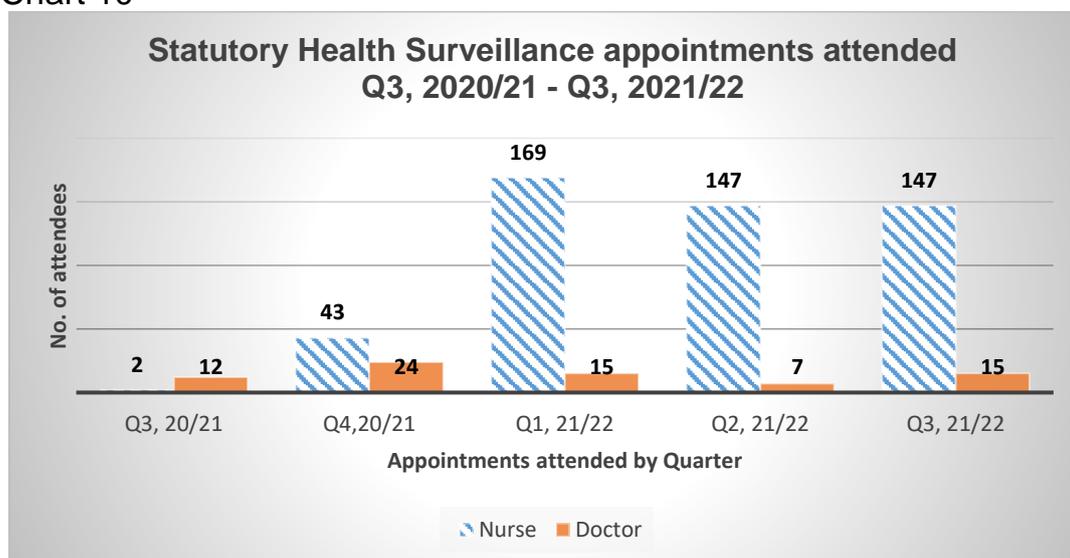
53. During the pandemic the Occupational Health Service (OHS) has continued to provide Statutory Health Surveillance programmes to employees in line with the guidelines issued by the HSE in relation to health surveillance. The HSE advice was reviewed on 31st December 2021 and remains as follows:

Health surveillance, safety critical medicals and coronavirus (COVID-19) Guidance for occupational health providers and appointed doctors

54. *Previous guidance allowed deferral of some medicals subject to a satisfactory remote assessment. However, for any medicals due after 1 September 2021, occupational health providers should have returned to following detailed HSE guidance on health surveillance for the relevant regulations. Face to face assessments for health surveillance and safety critical medicals should be subject to a suitable and sufficient risk assessment and continue to follow the relevant UK government guidance on working safely.*

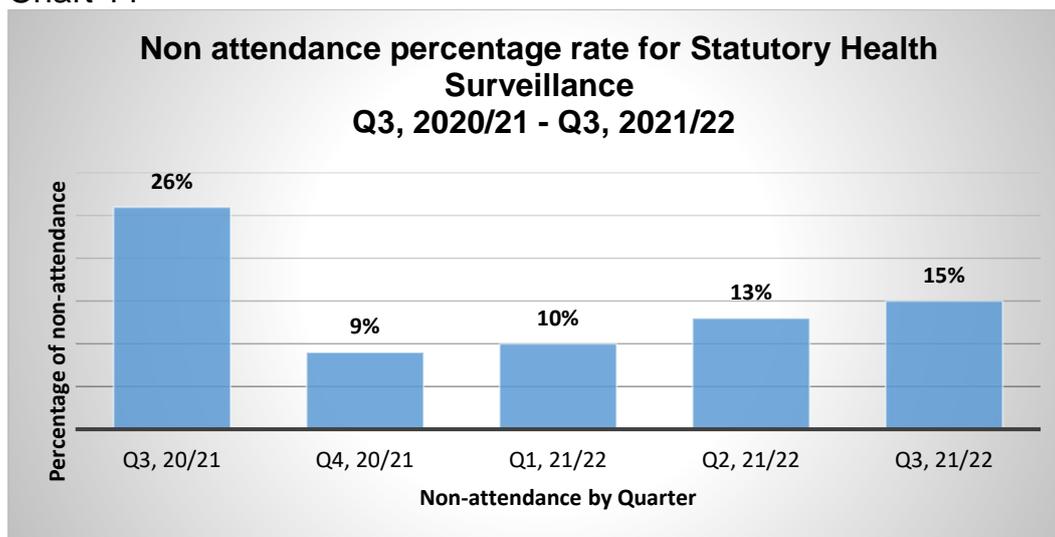
55. The OHS is carrying out face to face routine audiometry, in line with the HSE advice above with an appropriate risk assessment in place. During Quarter 3, a total of 162 employees attended OHS appointments for routine statutory health surveillance, 147 with an Occupational Health Nurse and 15 with the Senior Occupational Health Physician.

Chart 10



56. During Quarter 3, 15% (n=29) employees failed to attend their appointment with the OHS in relation to statutory health surveillance. See Chart 11.

Chart 11



Welding

57. New guidance was published by the Health and Safety Executive in February 2020 regarding welding operations, this has led to a DCC Health and Safety Service driven project to revisit risk assessments for areas of the Council undertaking welding activities. The OHS have attended visits to a number of work sites to undertake walkthrough surveys, with a Health and Safety Officer. Biological monitoring is being arranged and a schedule of respiratory health surveillance for those employees identified by the risk assessment is to be arranged.

Immunisation

58. During Q3 the OHS have continued to provide Hepatitis B immunisation to employees whose job role has been identified via risk assessment as requiring an offer of Hepatitis B immunisation, administering a total of 8 vaccines.
59. During Q3 there were 2 inoculation incidents, one human bite and one needlestick injury. Appropriate action was taken to support the employees involved including immunisation, follow up blood tests, advice and signposting to the EAP.
60. The Occupational Health Service delivered onsite flu vaccinations to employees who routinely provide up close and personal care to clients who are at risk of the complications of flu and provided additional clinics in the OHS, administering 415 flu vaccines during Q3.

Covid response

61. During the restrictions in place due to the coronavirus outbreak the OHS have continued to provide Occupational Health provision to DCC and external contracts. This has been done remotely when possible and in line with guidance from the HSE, DVLA, Faculty of Occupational Medicine and the NHS.
62. The OHS have continued to provide advice to managers via management referral specifically relating to employees with health conditions and working during the covid pandemic, returning to the workplace and those who continue to suffer the effects of having covid. The OHS have continued to provide advice to managers and employees via email and telephone on a variety of covid related matters.

Violence and Aggression – Potentially Violent Persons Register (PVPR)

63. At the close of Quarter three 2021/22, there were live entries on the PVPR register. The 12 month rolling figures for PVPR live entries are as follows:

Year	Quarter	PVPR live entries
2020/21	4	63
2021/22	1	55
2021/22	2	47
2021/22	3	66
Number of Live Records		66
Number of Additions		30
Number of Removals		11
Number of Warning Letters Sent		12
Number of PVPR Appeals		1

64. Breakdown by service of PVPR views in the last quarter is as follows:

- CYPs - 38 viewed 43 times
- AHS - 89 viewed 543 times
- N&CC 54 viewed 80 times
- REG 98 viewed 162 times
- RES 12 viewed 589 times
- Members 6 viewed 11 times

65. The below tables detail the corporate risk that may have an impact on Health and Safety at the end of January 2022.

Health and Safety Related Strategic Risks

Ref	Service	Risk	Treatment
1	AHS	Failure/inability to respond to and recover from the COVID-19 pandemic, leading to delayed economic recovery and adverse impacts on employee resilience and the health and wellbeing of the wider community.	Treat
2	CYPS	Failure to protect a child from death or serious harm (where service failure is a factor or issue).	Treat
3	REG	Serious injury or loss of life due to Safeguarding failure (Transport Service)	The current controls are considered adequate.
4	AHS	Failure to protect a vulnerable adult from death or serious harm (where service failure is a factor or issue).	Treat
5	NCC	Breach of duty under Civil Contingencies Act by failing to prepare for, respond to and recover from a major incident , leading to a civil emergency.	Treat
6	RES	Serious breach of Health and Safety Legislation	The current controls are considered adequate.
7	REG	Potential serious injury or loss of life due to the Council failing to meet its statutory, regulatory and best practice responsibilities for property and land .	Treat
8	RES	Potential violence and aggression towards members and employees from members of the public	The current controls are considered adequate.
9	NCC	Demand pressures on the Community Protection inspections and interventions arising from the COVID-19 pandemic and the UK exit from the EU may lead to an adverse impact on public health and safety in Co Durham.	Treat

Statistical Information

66. The H&S team in conjunction with service H&S providers continue to record, monitor and review work related accidents, incidents and ill health. This data is captured through internal reporting procedures and the Corporate H&S Accident Recording Database (HASARD). It is important to note that when setting future performance targets this data should be utilised.

Main implications

Legal

67. Compliance with statutory legislative requirements reduce risks of enforcement action and/or prosecution against the council or individuals. It will also assist in defending civil claims against the council from employees and members of the public, including service users.

Finance

68. Compliance with legislative requirements will reduce increased service delivery costs, financial penalties associated with H&S sentencing guidelines 2016 and successful civil claims against the council. Financial costs may be insured to some degree and uninsured in some cases, with poor outcomes possibly leading to increased insurance premiums. Financial implications also include staff absence associated with physical and mental ill health, staff training, retention, recruitment and productivity.

Staffing

69. In relation to impact on staffing due to employee absence from injury or ill health, attendance management, employee complaints and grievances, recruitment, selection and retention of employees.

Conclusions

70. The move towards the governments autumn and winter plan was a sign of a further progression out of COVID restrictions. This progress was however halted by the emerging omicron variant and the Council reacted swiftly once again to ensure that transmission risks remained controlled in accordance with new guidance. Workplace safety procedures and risk assessments were also reviewed and revised to enable the Council to be compliant with guidance.
71. Whilst concerning to see infection rates still being prevalent in schools, it was again positive to note that cases associated with Council workplaces remained extremely low and predominantly thought to be because of community transmission. The COVID educational oversight group remained effective in controlling outbreak situations within schools and proactively dealing with pre-outbreak support and guidance.

72. The H&S team undertook an increased number of risk-based audits and inspections compared to previous quarters and reflective of activities continuing to return to business as usual.
73. Resumption of services and activities inevitably meant that accidents and incidents have steadily started to increase in 2021/22 with 397 being recorded in quarter three, compared to an average of 300 for the first two quarters. It was positive to report that no RIDDOR specified injuries for this quarter.
74. The council has continued to be proactive in its approach to mental health and wellbeing. Completion of the employee health and wellbeing survey during this quarters enables further insight and intelligence which will be acted upon in 2022.

Other useful documents

75. Occupational Health Quarter three 2020/21 Report
76. Health, Safety and Wellbeing statistical Quarter three 2020/21 report

Appendix 1: Implications

Legal Implications - Failure to comply with statutory legislative requirements may result in enforcement action and/or prosecution against the council or individuals. There are risks from civil claims against the council from employees and members of the public, including service users.

Finance – Failure to comply with statutory legislative requirements may result in enforcement action, including prosecution against the council or individuals. These enforcement actions may result in increased service delivery costs, financial penalties associated with H&S sentencing guidelines 2016 and successful civil claims against the council. Financial costs may be insured to some degree and uninsured in some cases, with poor outcomes possibly leading to increased insurance premiums.

Consultation - Service Grouping strategic managers and operational management staff have been consulted in the preparation of this report.

Equality and Diversity / Public Sector Equality Duty - Equality Act compliance ensures consistency in what the council and its employees need to do to make their workplaces a fair environment and workplace reasonable adjustments are required.

Climate change- None

Human Rights - The right to a safe work environment, enshrined in Article 7 of the International Covenant on Economic, Social and Cultural Rights, links with numerous human rights, including the right to physical and mental health and well-being and the right to life.

Crime and Disorder – None.

Staffing – Potential impact on staffing levels due to injury and ill health related absence, staff retention and replacement staff.

Accommodation – The report references H&S related risks associated with workplaces some of which may have impact on accommodation design and provision of safety systems and features.

Risk – This report considers physical and psychological risks to employees, service users and members of the public. Risks also relate to the failure to comply with statutory legislative requirements, which may result in civil action being brought against the council and enforcement action, including prosecution against the council or individuals. These enforcement actions may result in financial penalties, loss of reputation and reduction in business continuity.

Procurement – None