

**THE ROYAL BOROUGH OF KENSINGTON AND CHELSEA
REGULATION AND ENFORCEMENT REVIEW COMMITTEE**

25 FEBRUARY 2015

REPORT BY THE DIRECTOR FOR ENVIRONMENTAL HEALTH AND TRADING STANDARDS

**ENVIRONMENTAL HEALTH
PERFORMANCE MONITORING DIGEST
1 OCTOBER – 31 DECEMBER 2014**

1 BACKGROUND

- 1.1** This report covers performance monitoring of enforcement carried out in Environmental Health from 1 October 2014 to 31st December 2014.
- 1.2** Guidance is attached at Appendix A that explains Environmental Health's statutory duties.

2. PERFORMANCE FOR HEALTH AND SAFETY

2.1. Enforcement Actions for Health and Safety:

	Q2 1/7/13- 30/9/13		Q3 1/10/13- 31/12/13		Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14	All Out- standing
High Risk Inspections	Due 2	Done 2	Done 12	Done 1	Done 1	Done 0	Due 2	Due 0	0
Other Health and Safety interventions	69		71		130	47	335	17	
Health and Safety Complaints	30		25		32	39	34	37	
Complaints responded to in 24 hours	27/30 = 90%		21/25 = 84%		31/32 = 96%	35/39 = 90%	31/34 = 91%	34/34 = 100%	
Health and Safety Enquiries	21		11		18	20	18	29	
Reported Accidents Received	56		57		49	40	40	56	
Reported Accidents Investigated	25		22		15	17	15	27	
Asbestos Notifications	11		3		1	4	6	7	
Lift Reports	11		1		3	3	4	6	

Cooling Tower Inspections	0	2	0	11	2	0	
Number of Premises Licences reviewed as responsible authority	22	20	10	12	13	5	
Number of Licences reviewed and visited as responsible authority	0	0	1	0	0	0	
Number of Marriage Licenses reviewed for public safety	4	0	1	4	1	2	
Number of Massage and Special Treatment Premises visited for public health and Licence Renewal		33	27	17	21	4	

2.2 Management Comments: No management comments required this quarter.

2.3 Legal Actions for Health and Safety:

Type of Action	Q2 1/7/13- 30/9/13	Q3 1/10/13- 31/12/13	Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14
Cases referred to Legal Services	0	0	0	0	0	1
Prohibition Notices	2	1	1	0	0	1
Improvement Notices	0	3	3	0	0	0
Voluntary Closure or Stop Action	3	1	4	1	4	0
Health and Safety Serious Investigations	5	4	4	2	5	4

2.4 Management Comments: No management comments required this quarter.

3 PERFORMANCE FOR FOOD SAFETY

3.1 Enforcement Actions for Food Safety:

	Q2 1/7/13- 30/9/13		Q3 1/10/13- 31/12/13		Q4 1/1/14- 31/3/14		Q1 1/4/14- 30/6/14		Q2 1/7/14- 30/9/14		Q3 1/10/14- 31/12/2014		All Out- Standing
Food Hygiene Inspections	Due	Done	Due	Done	Due	Done	Due	Done	Due	Done	Due	Done	At end of current quarter
Category A	3	3	3	4	1	2	1	1	1	2	0	1	0
Category B	28	33	12	13	13	16	18	26	22	27	12	14	0
Category C	126	153	105	130	156	203	81	93	77	77	67	88	6
Category D	22	36	12	17	17	27	13	20	35	31	35	47	4
New Premises	58	50	54	30	47	67	69	31	57	31	134	81	111
Food Standards Inspections	Due	Done	Due	Done	Due	Done	Due	Done	Due	Done	Due	Done	At end of current quarter
Category A	1	1	0	0	0	1	0	0	1	1	0	0	0
Category B	13	35	9	21	14	33	14	23	13	19	10	29	4
Category C	21	60	25	37	48	191	47	50	18	27	13	58	36
New Premises	55	50	54	30	48	68	68	29	56	30	160	76	141
Food Safety Revisits	FH 49 FS 2		FH64 FS 2		FH 48 FS 1		FH 38 FS 1		FH 38 FS 1		FH 63 FS 1		
Food Safety Other Interventions	FH 66 FS 9		FH 84 FS 23		FH 84 FS 40		FH 69 FS 3		FH 86 FS 4		FH 65 FS 32		

Food Samples taken	9	24	36	12	33	18	
Food Safety Complaints	73	61	82	78	93	79	
Food Safety Complaints responded to within 24 hours	65/73=89%	57/61=93%	80/82=97%	70/78=90%	90/93=96%	75/79=95%	
Food Safety Enquiries	43	31	61	56	55	72	
Food Safety Alerts	**RW 14 **FA 0	**RW11 **FA 6	**RW 3 **FA 1	**RW 8 **FA 0	**RW 8 **FA 0	**RW 7 **FA 1	
Infectious Disease Notifications	25	35	23	22	23	22	

* FH is Food Hygiene and FS is Food Standards

** RW is product recalls and withdrawals and FA is food alerts for action

3.2 Management Comments:

In respect of the six outstanding Food Hygiene Category C inspections, one premises is closed at present, two were inspected at the beginning of January and another one closed in January. Of the four Food Hygiene Category D inspections that were outstanding, two were inspected in January. A number of the new premises are still not trading so we are unable to inspect these premises. However, 21 of those outstanding were inspected in January and February and we continue to work to make progress in this area of work.

Of the four Food Standards Category B inspections that were outstanding, one business closed in January and another one in February. One food business requested a later inspection date due to the busy Christmas period. The other B inspection will be undertaken at the same time that we do the food hygiene inspection in March 2015.

3.3 Legal Actions for Food Safety:

Type of Action	Q2 1/7/13- 30/9/13	Q3 1/10/13- 31/12/13	Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14
Cases referred to Legal Services	0	0	1	0	0	0
Emergency Closures	0	0	0	0	0	0
Food Safety. Seizures e.g. Of Unfit / Imported Food.	0	7	2	1	0	0
Improvement Notices Food Safety	12	14	3	7	10	14

3.4 Management Comments: No management comment required this quarter.

4 PERFORMANCE FOR TRADING STANDARDS

4.1 Enforcement Actions for Trading Standards

Risk category	Q2 1/7/13- 30/9/13		Q3 1/10/13- 31/12/13		Q4 1/1/14- 31/3/14		Q1 1/4/14- 30/6/14		Q2 1/7/14- 30/9/14		Q3 1/10/14- 31/12/14	
	Due	Done	Due	Done	Due	Done	Due	Done	Due	Done	Due	Done
High Risk Inspections	1	0	2	4	0	0	7	7	0	0	6	7
Trading Standards Complaints	112		124		107		122		135		133	
Trading Standards Complaints responded to within 24 hours	112/96 = 86%		124/101 =82%		92/107 =86%		115/122 =94%		130/135 =96%		133/123 =92%	
Underage Test Purchases	12		64		6		14		0		45	
Number of Criminal Referrals Received From Citizen Advice	115		86		78		99		124		133	
Requests for Business Advice	12		6		12		16		16		16	
Requests for Residents' Advice	3		13		8		29		16		6	
Number of Premises Licences reviewed as responsible authority	0		0		2		0		0		1	

4.2 Management Comments: No management comments required this quarter.

4.3 Legal Actions for Trading Standards

	Q2 1/7/13- 30/9/13	Q3 1/10/13- 31/12/13	Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14
Cases referred to Legal Services	0	0	1	0	0	1
Trading Standards Seizures	4	7	3	3	3	2

4.4 Management Comments: No management comments required this quarter.

5 PERFORMANCE FOR NOISE AND NUISANCE

5.1 Enforcement Actions for Noise and Nuisance

	Q2 1/7/13- 30/9/13	Q3 1/10/13- 31/12/13	Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14
Noise and Nuisance Complaints responded to within 24 hours	3041	2356	2098	2684/2684 = 100%	3122/3122 = 100%	2652/2652 = 100%
Building Site Noise	604	530	419	536	525	466
Music Noise	1045	875	857	1113	964	819
Footsteps, arguing, TV and Radio	373	370	338	419	543	487
Alarms	259	212	176	206	290	183
Dogs Barking	46	44	25	41	33	57
Buskers in the Street	85	55	34	85	104	85
Other Noise/Nuisance	486	273	249	284	663	555

Environmental Protection Act 1990 Notices	38	33	39	27	24	33
Control Of Pollution Act 1974 Notices	139	73	93	138	18	113
Control of Pollution Act 1974 S61						13

5.2 Management Comments: The demand for the Service continues to be high. Officers are dealing proactively with building sites by serving notices to control the hours of work as soon as they become aware of building sites setting up. Complaints about buskers remain quite high and officers have begun to work with the Community Policing Team as a way of discouraging buskers that cause residents to complain.

5.3 Legal Actions for Noise and Nuisance

	Q2 1/7/13- 30/9/13	Q3 1/10/13- 31/12/13	Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14
Cases referred to Legal Services	0	3	0	2	5	2
Fixed Penalty Notices	N/A	N/A	N/A	1	1	0

5.4 Management Comments: No management comments required this quarter.

6 PERFORMANCE FOR PRIVATE SECTOR HOUSING

6.1 Enforcement Actions for Private Sector Housing:

	Q2 1/7/13- 30/9/13	Q3 1/10/13- 31/12/13	Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14
Private Sector Housing ALL Complaints	154	183	191	147	234	241
Private Sector Housing High Risk Complaints	30	56	66	42	69	79
Private Sector Housing Complaints responded to within 36 hours	134/154 87%	183/158 =86%	162/191 =85%	136/147 =93%	205/234 = 88%	222/241 = 92%
HMO Licensing Inspections, Category 1 Duty	19	8	13	16	15	4
HMO Licences issued	3	0	15	16	9	26

6.2 Management Comments: This quarter has seen the increased level of housing complaints continue. Given the time of year an increase is expected, however it is noted that this time last year the complaints were significantly lower. There

doesn't appear to be an obvious or simple answer to this so a separate report is being prepared to analyse and discuss this in more detail and will be presented to members when the end of year data is available.

6.3 Legal Actions for Private Sector Housing:

	Q2 1/7/13- 30/9/13	Q3 1/10/13- 31/12/13	Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14
Housing Act Improvement Notices	2	4	3	4	8	3
Housing Act Suspended, Improvement or Prohibition Notices	2	3	0	0	2	1
Environmental Protection Act 1990 Notices	1	1	3	2	2	4
Building Act 1984 Notices	0	0	0	0	0	0
Works put into Default (WID)	0	0	0	0	2	1
Cases referred to Legal Services	1	0	1	2	2	0
Residential Property Tribunal Appeals	1	0	0	0	4	0

6.4 Management comments: No management comments required this quarter.

7 PERFORMANCE FOR ENVIRONMENTAL QUALITY

7.1 Legal Actions for Environmental Quality

Actions	Q2 1/7/13- 30/9/13	Q3 1/10/13- 31/12/13	Q4 1/1/14- 31/3/14	Q1 1/4/14- 30/6/14	Q2 1/7/14- 30/9/14	Q3 1/10/14- 31/12/14
Service Requests	139	274	272	241	226	210
Service Requests responded to within 24 hours.	139/ 139 = 100%	274/ 274= 100%	264/272 = 97%	241/24 1= 100%	226/226 = 100%	210/210 = 100%
Section 61 Control Of Pollution Act 1974 Notices	6	5	4	0	0	See section 5.1

7.2 Management Comments: All Section 61 notices will now be reported with Noise and Nuisance figures and will be removed from this area of the report going forward.

8 COMMENTS AND CONCLUSION

8.1 The Committee is asked to note the contents of this report.

NB: Simple cautions are covered in Part B of the RERC report, no information regarding them are to be detailed Part A.

FOR INFORMATION

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ENVIRONMENTAL HEALTH AND
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Officer contact: Any person wishing to inspect the above documents should contact Ms E Bartram, Directorate of Environmental Health, Council Offices, 37 Pembroke Road, London W8 6PW. Telephone 020 7341 5714.

GUIDANCE ON ENVIRONMENTAL HEALTH'S STATUTORY DUTIES

1.0 HEALTH AND SAFETY

1.1 Health and Safety Inspections

- a) Where a re-inspection shows a workplace, or work activity, to be unsatisfactory, a warning or advice letter is sent, or a statutory notice is served to remedy the situation.
- b) Where a statutory notice is not complied with a prosecution usually follows, and the file must be passed to the Director of Law and Administration.
- c) Done – This indicates what high risk inspections have been 'Done' in the quarter that have been identified as poor performers from intelligence gathered. The intelligence gathered to identify these inspections is generated from the analysis of accident and complaint data and advice given and serious matters noted from site visits for other purposes such as food inspections or licensing visits.
- d) All Outstanding - These are inspections which are outstanding at the end of the quarter. The figure includes any inspections outstanding from the quarter and any outstanding inspections from previous quarters.

1.2 Other Health and Safety Interventions

These are revisits to check on compliance with a notice or to check that highlighted contraventions have been remedied. They also include advice visits at targeted high risk activities and health and safety advice given at the time of other proactive visits such as food hygiene inspections.

1.3 Accident Investigations

Fatalities and injuries at workplaces in the Royal Borough will be reported to the Department. Accidents, which result in employees or self-employed persons being away from work for more than seven days, **must** be reported. Dangerous occurrences such as an electrical short circuit or overload resulting in a fire, or explosion will be reported.

- a) First response to fatal accidents, major injuries and dangerous occurrences must be within **24 hours**.
- b) First response to any accident notifications which result in a seven day absence from work must be within **seven days**.

1.4 Asbestos Notifications

Before contractors remove certain types of asbestos containing material, they must notify the enforcing authority (normally the Council) who will agree to a method of removal.

- a) Officers should respond to the formal notification within **seven days**.
- b) Officers should reach agreement with the contractor on a satisfactory method of removal within **fourteen days**.

1.5 Cooling Tower Inspections

All cooling towers will be inspected at least once during the course of the year. However, the work is seasonal and so data may be zero in some quarters.

1.5 Lift reports

The Department is notified of any defects with a company's lifting equipment which is affecting their safe operation. Officers will respond under the Health and Safety at Work Etc. Act 1974 if the managers of the premises do nothing to remedy the defects.

- a) First response to a lift report must be within 24 hours.
- b) Investigations following the lift report must be complete within **ten days**.
- c) Lift reports should be practically resolved within **twenty-eight days**.

1.6 'Responsible Authority' Reviews

All new/amendments to premises licences for the retail sale of alcohol, club premises certificates for the supply of alcohol to club members, regulated entertainment and late night refreshment in the Borough are passed to the Health and Safety Team to review as a 'Responsible Authority' under the Licensing Act 2003 for public safety.

1.7 Marriage Licence Venues

Applications for premises to be used as a venue for civil marriages are reviewed and visited to ensure they are safe for public access.

1.8 Improvement Notices

An Improvement Notice may be served when; there is a record of non compliance, and or where an informal approach is unlikely to be successful, and or where a formal approach is proportionate to the risk to public health.

1.9 Prohibition Notices

A Prohibition Notice will be served where a risk of serious personal injury has been identified and where an informal approach with the duty holder is unlikely to be successful.

1.10 Health and Safety Serious Investigations

These are investigations into serious accidents/incidents and dangerous occurrences such as the lack of suitable management leading to asbestos contamination. These are in-depth and time consuming investigations that may, but do not necessarily result in a prosecution.

1.11 Prosecutions

Prosecutions will only be taken if there is enough evidence to provide a realistic prospect of a conviction and it is in the public interest to do so and in accordance with the Department's Enforcement Policy. A prosecution may be considered where there has been a significant legal contravention and there has been a blatant or reckless disregard of the law.

2.0 FOOD SAFETY

2.1 Food Safety Inspections - General

Food hygiene and food standards inspections are carried out on a planned inspection basis in accordance with the Food Standards Agency's Code of Practice. The frequency of inspections depends on the type of food premises and level of compliance. Higher risk processes and poor performing businesses will be inspected more frequently than better managed and lower risk premises.

2.2 Food Hygiene Inspections

Category A food hygiene premises are inspected at least every 6 months, Category B every 12 months, Category C every 18 months, Category D every 2 years and Category E every 3 years. Resources are prioritised to Categories A, B, and C. Other types of planned intervention visits are permitted to Category D premises. Alternative inspection strategies are permitted for Category E premises. The category 'New' are newly opened or registered premises that are waiting to be inspected.

Due/Done – This indicates what inspections are 'Due' and what inspections are actually 'Done' in the quarter. The 'Done' figure may exceed the 'Due' where outstanding inspections from previous quarters or inspections due in the next period are also carried out in the quarter.

All Outstanding – These are inspections in each category which are outstanding at the end of the quarter. The figure includes any inspections outstanding from the quarter and any outstanding inspections from previous quarters.

Food hygiene inspections look at potential hazards of a business including the type of food produced, the method of handling, the types of processes undertaken and the number and type of consumers at risk. The level of food hygiene compliance is assessed and includes examining; food handling practices and procedures, temperature control, level of structural compliance of the premises, cleanliness, layout and facilities. The confidence in management and control is also assessed which includes examining; the food safety management system, traceability of food, record of compliance, attitude of the management, and the understanding and knowledge of the company.

2.3 Food Standards Inspections

Category A food standards premises are inspected at least every year, Category B every 2 years, and Category C every 18 months. Alternative inspection strategies are permitted for C rated premises. Food standards inspections are normally carried out concurrently with the food hygiene inspection if they are due to avoid the business facing multiple inspections from the Council.

Food standards inspections relate to the food products themselves. The inspection will consider; the type of food business and the potential risk to consumers, the level of compliance with legal requirements such as quality, composition, labelling, presentation and traceability, any claims, and materials that are in contact with food. The confidence in management is also considered examining the record and attitude of the company, internal or external technical knowledge and food standards management systems.

2.4 Other Interventions

Other interventions such as revisits, monitoring, surveillance, coaching and advice visits are carried out to ensure improvements where a lack of standards are identified.

2.5 Food Sampling

Food sampling is carried out in accordance with a Regional Sampling Plan drawn up by the North West Sector London Food Liaison Group, the Health Protection Agency's Public Health Laboratory and the Public Analyst. This is to meet the requirements of the Food Law Code of Practice. Sampling programmes are determined from outbreaks/incidents involving certain foods or highlighted problem areas where an extended survey is able to establish whether there is a more widespread problem.

In response to local issues, surveys and sampling at specific premises are carried out and samples are taken where appropriate to investigate complaints and food poisoning incidents.

2.6 Food Safety Complaints and Enquiries

These include complaints from residents, customers, and other local authorities. Business enquiries are also dealt with relating to notifications and food safety at local events.

2.7 Food Alerts

The Food Standards Agency issues a 'Product Withdrawal Information Notice' or a 'Product Recall Information Notice' to inform local authorities and consumers about problems associated with food. These notices are issued where a solution to a problem has been put in place, the product has been, or is being, withdrawn from sale or recalled from customers. Information is sent to food enforcement officers in Environmental Health to be vigilant whilst visiting premises.

In some cases a 'Food Alerts for Action' is issued where intervention by local authorities is required and it provides details of specific action to be taken, such as mail-shots or visits to premises that are likely to sell the product. These notices and alerts are often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor.

2.8 Notifications of Infectious Disease

These are the number of notifications of infectious disease that are referred by the North West London Health Protection Team to the Department for investigation or other action such as the exclusion of food handlers from work who are/have been infected.

2.9 Emergency Closures

If there is imminent risk of injury to health an Emergency Prohibition Notice to formally close premises, prohibit equipment or a process may be served. The Council has to make an application to the Magistrates Court within three days to confirm the emergency closure. If the Court is satisfied it will then grant a Hygiene Emergency Prohibition Order.

2.10 Seizures of unfit/illegally imported food etc.

Seizures of food are carried out where it is unfit or has not been produced in compliance with food hygiene requirements. Seizures of illegally imported food are also carried out when necessary.

2.11 Improvement Notices

An Improvement Notice may be served when; there is a record of non compliance, and or where an informal approach is unlikely to be successful, and or where a formal approach is proportionate to the risk to public health.

2.12 Prosecutions

Prosecutions will only be taken if there is enough evidence to provide a realistic prospect of a conviction and it is in the public interest to do so and in accordance with the Department's Enforcement Policy. A prosecution may be considered where there has been a significant legal contravention and there has been a blatant or reckless disregard of the law.

3.0 TRADING STANDARDS

3.1 Risk Rating of Businesses

Risk Ratings are determined by LACORS risk assessment scheme. The revisit period for high risk inspections is 12 months and medium risk inspections 36 months.

3.2 Complaints and Enquiries

All complaints relating to civil disputes are dealt with by the national agency Consumer Direct. Consumer Direct refer a small number of complaints to us where there are criminal law implications.

We receive complaints from residents, customers, visitors and other local authorities. Business enquiries from local business and trading issues associated with local events are also carried out.

3.3 Underage Test Purchases

These inspections cover a range of age restricted products which include alcohol, solvents, tobacco, and knives.

3.4 Licensing Reviews

All new/amendments to licences in the Borough will be passed to Trading Standards to review as they are a 'Responsible Authority' under the Licensing Act 2003.

3.5 Suspension notices

These are issued where suspected unsafe products are found at business premises and the suspension has the effect of restricting the movement of the goods.

3.6 Trading Standards Prosecutions

Prosecutions will only be taken if there is enough evidence to provide a realistic prospect of a conviction and it is in the public interest to do so and in accordance with the Department's Enforcement Policy. A prosecution may be considered where there has been a significant legal contravention and there has been a blatant or reckless disregard of the law.

4.0 PRIVATE SECTOR HOUSING

4.1 Environmental Protection Act 1990

There is a statutory duty to investigate any reported possible nuisance within the Borough. Once witnessed action must be taken to abate this nuisance and in Private Sector Housing this usually relates to dampness and leaks.

4.2 Housing Act 2004

There is a statutory duty to investigate and take formal action on any serious hazards known as 'Category 1' hazards. There is also a duty to licence and inspect for 'Category 1' hazards any houses in multiple occupation (HMO's).

4.3 Building Act 1984

This act gives regulatory powers for defective premises.

4.4 Works in default

This is a formal process that can enforce works that are not carried out by the responsible person/parties. The Council is able to carry out the works and recover the costs.

4.5 Complaints and Enquiries

High risk complaints relate to tenants complaining about standards or safety of housing that are deemed high risk and therefore warrant action. They usually include; inadequate heating complaints, serious dampness, and fire hazards.

Lower risk complaints are received which are dealt with informally. Enquiries relating to notifications of water pressure, power cut-offs and other matters.

4.6 Improvement Notices

An Improvement Notice may be served when; there is a record of non compliance, and or where an informal approach is unlikely to be successful, and or where a formal approach is proportionate to the risk to public health.

4.7 Prosecutions

Prosecutions will only be taken if there is enough evidence to provide a realistic prospect of a conviction and it is in the public interest to do so and in accordance with the Department's Enforcement Policy. A prosecution may be considered where there has been a significant legal contravention and there has been a blatant or reckless disregard of the law.

5.0 NOISE AND NUISANCE

5.1 Environmental Protection Act 1990

There is a statutory duty to investigate any reported possible nuisance within the Borough. Once witnessed action must be taken to abate this nuisance.

5.2 Improvement Notices

An Improvement Notice may be served when; there is a record of non compliance, and or where an informal approach is unlikely to be successful, and or where a formal approach is proportionate to the risk to public health.

5.3 Prosecutions

Prosecutions will only be taken if there is enough evidence to provide a realistic prospect of a conviction and it is in the public interest to do so and in accordance with the Department's Enforcement Policy. A prosecution may be considered where there has been a significant legal contravention and there has been a blatant or reckless disregard of the law.

6.0 ENVIRONMENTAL QUALITY

6.1 Section 61 Notices - Control of Pollution Act 1974

These are notices which give prior consent for work on construction sites so as to control noise and pollution.