

# **Chartered Institute of Environmental Health – Written evidence (FFF0053)**

**A public services workforce fit for the future  
CIEH submission to the House of Lords Public Services Committee**

**March 2022**

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## **About the Chartered Institute of Environmental Health (CIEH)**

CIEH is the professional voice for environmental health representing over 7,000 members working in the public, private and third sectors, in 52 countries around the world. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

For more information visit [www.cieh.org](http://www.cieh.org) and follow CIEH on Twitter @The\_CIEH.

## Key points:

There are significant recruitment challenges in local authority environmental health teams. However, not enough local authorities are investing in the training of the next generation of Environmental Health Practitioners – either via post-graduate training opportunities or via the creation of environmental health apprenticeship posts.

The varied skillset of EHPs and the flexibility of the roles they are able to perform, makes these roles a particularly valuable resource within local government, especially where workforces need to remain agile and flexible in the context of increasingly constrained budgets.

CIEH would like to see central Government set up a fund to assist local authorities in taking on environmental health apprentices. This fund should provide local authorities with funding to pay for all or some of the salaries of apprentices in order to put the future of the profession onto a sustainable footing.

At the end of 2020, the then Ministry for Housing, Communities and Local Government (MHCLG) convened a Regulatory Services Task and Finish Group. However, many of the key recommendations from this group have not been implemented, including the provision of funding for local authority regulatory apprenticeships.

Throughout the pandemic, the Office of Product Safety and Standards (OPSS) had designated a specialist team to improve coordination between central government and local authority environmental health departments. However, this team is now about to be disbanded. As a result, there will be no national point of contact within central government or any national agency to coordinate the work and workforce issues for the environmental health profession working in local government.

We therefore see the need for a Chief Environmental Health Officer who would work alongside the Chief Medical Officer in England, in order to feed in expertise directly to policy making from experience of EHPs on the ground and to support the future pipeline of professionals. This role already exists in the other UK nations.

The profession contributes to a range of public health outcomes and can contribute to a number of key ambitions set out in the recent Levelling Up White Paper, including better regulation of the private rented sector, supporting the roll out of the National Food Strategy and helping to improve health inequalities across the country.

Whilst the public sector can be an attractive place to work, there are also some missed opportunities for better staff retention and staff development. Over half of local authority EH teams told us that there were barriers to training and

development for existing EHPs in their authority. Local authorities could do better at retaining their existing experienced staff, by providing better staff recognition, employer benefits and training support.

## Recruitment, retention and training

**1) It is difficult to predict accurately how the public services workforce will need to change in the long term, and yet it is necessary to prepare now for the future. What is an appropriate approach to long-term planning for workforce needs and demand in public services, and how should current training adapt, not just at the point of employees' entry into the workforce but throughout their careers?**

Local government environmental health services are the front line of public protection: ensuring that people have safe houses to live in, that food is safe to consume, and that in times of national crises, such as during global pandemics, they are there to respond. Environmental Health Practitioners (EHPs) have played a vital role throughout the Covid-19 pandemic, from supporting contact tracing efforts to supporting businesses in operating safely during the various lockdowns. EHPs working in local government were also classified by the UK Government as 'Key Workers'. This was possible due to the varied skill-range of EHPs, including knowledge and application of infection control principles.

Our workforce survey of environmental health services within local authorities revealed that agency staff were increasingly being used to plug gaps in meeting demands on the service. The vast majority – 4 out of 5 local authorities - reported that they use agency staff to deliver environmental health services. Teams at 87% of local authorities told us that agency staff were used because of shortages in resources or delays in recruitment rather than due to unprecedented demand for services (30%) or due to specialist knowledge not being available in-house (23%). 56% of local authorities also reported that they had vacancies in their environmental health teams that were left unfilled for 6 months or more. The top reasons for the vacancies point to a lack of available EHPs who are fully qualified and experienced and difficulties in recruiting to permanent posts. The findings of workforce surveys carried out by the LGA are consistent with our surveys. They reported that in district councils, 53% said that recruitment difficulties were most acute for environmental health roles and 56% said they had problems retaining them.<sup>1</sup> Other sources also show that there have been ongoing reductions in the numbers of Environmental Health Practitioners over time.<sup>2</sup>

Given the high rates of unfilled posts and use of agency workers to fill gaps in the service, training future practitioners is the only way to ensure a re-balancing of future skills and resources. However, a majority of local authorities are not supporting the training of a new generation of EHPs. In 2019/20, 52% of LAs did not have a single apprentice or trainee and 70% of LAs did not take on any apprentices in environmental health in either 2019/20 or 2020/21. Not having any budget (66%) and not having capacity to mentor (52%) were the primary

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<sup>1</sup> LGA COVID-19 Workforce Survey Research Report Relating to the week ending 8 October 2021  
<https://www.local.gov.uk/sites/default/files/documents/LGA%20Research%20Report%20-%20COVID-19%20Workforce%20Survey%20-%208%20October%202021.pdf>

<sup>2</sup> <https://www.cieh.org/media/5249/cieh-workforce-survey-report-for-england.pdf>

reasons given for not taking on any trainees. Only 20% said that no trainees were taken because there was no demand from students.<sup>3</sup>

We believe that a central Government apprenticeships fund to assist and incentivise local authorities in taking on more apprentices in environmental health. This would help alleviate the current workforce crisis and help to train up the next generation of environmental health practitioners. The cost of the salaries for apprentices is significant and is seen as a key barrier by local authorities – the environmental health apprenticeship takes four years to complete. However, employers also get the benefit of an extra member of the team for the majority of those four years. Furthermore, at the end of that time, LAs would have an individual who is already experienced in the world of work and competent to perform a range of regulatory and public health roles.

More and more new duties and responsibilities are being placed on local authorities, whilst funding has not increased at the same pace. Local authorities often need to make difficult decisions and to provide services with less resource. Competent and experienced environmental health practitioners offer a range of skills to a local authority. This means that staff can be used flexibly and redeployed across different tasks to meet changing priorities. We have heard from Heads of Environmental Health that this wide-ranging skillset is immensely valuable to local authorities. For example, the infection control training of environmental health practitioners meant that 8 out of 10 of them were redeployed at some point during the first year of the Covid-19 pandemic.<sup>4</sup>

Last year, the Government acknowledged concerns about current and future capacity for regulatory services. At the end of 2020, the then Ministry for Housing, Communities and Local Government (MHCLG) convened a Regulatory Services Task and Finish Group (RSTFG) to look specifically at the demands being placed on environmental health, trading standards and licensing services.

Comprising officials from across Whitehall, councils, the LGA and professional bodies, the group considered:

- the impact of the pandemic on workloads, and the backlogs of normal work arising from this
- the need for a comprehensive forward look of the many new demands being placed on services, and for a consistent process for departments to highlight these so they can be considered collectively
- current and future resourcing, capacity and qualification routes
- cost recovery across the services
- how to ensure coordination across the many different departments with an interest in the services, alongside appropriate input from councils and professionals.

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<sup>3</sup> <https://www.cieh.org/media/5249/cieh-workforce-survey-report-for-england.pdf>

<sup>4</sup> <https://www.cieh.org/media/5249/cieh-workforce-survey-report-for-england.pdf>

We are pleased the Government recognised the need to explore the issues in these services and the risks they pose for the future, and we commend the work of the RSTFG. However, not all recommendations of this group have been taken forward by Government, which is hugely disappointing and short-sighted. In particular, the recommendation, which was prioritised by all members of the group: funding for local authority apprenticeship programme for regulatory services. There is a need for urgent action on a number of fronts if we are to ensure sustainable long-term capacity in these crucial services. The lead times for training up a new generation of practitioners to the right level will take several years and capacity is needed to support trainees as well as meeting the demands placed on the services.

Recent research on public attitudes to regulation indicate support for the maintenance and enforcement of regulatory frameworks. Research by the National Centre for Social Research concluded that the public are not seeking a less strongly regulated economy<sup>5</sup> following our exit from the European Union, while qualitative research by Unchecked UK found significant support for strong and effective regulation among so called 'red wall' voters.<sup>6</sup> This suggests that expectations and demand for services are not likely to reduce over time and makes it critical for local authorities to have access to trained and competent staff with the right skills to deliver good quality services and meet their statutory duties.

## **2) Conventional approaches to training have not enabled enough professionals to enter the public services workforce to meet demand. How might training change to maximise the number of public services professionals and improve their skills?**

It can be difficult for employers to make longer term plans when funding tends to be on a year-on-year basis. This particularly challenges teams where training requires longer term training programmes. It is therefore crucial that local services have a long-term, sustainable future which gives councils certainty over their funding.

Since the publication of our workforce survey last year, which shed light on the needs of environmental health teams within local authorities, we have been calling on central Government to set up an apprenticeships fund to help local authorities pay the salaries of apprentices over the duration of the four year programme. This type of fund would remove some of the key financial barriers and enable local authorities to take on and train for roles such as environmental health practitioners, thus building up a competent workforce of the future.

We believe that more local authorities should be using the apprenticeships programme to plan for their future staffing needs. This type of training is accessible and attractive to young people. The employer also benefits from the

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<sup>5</sup> [https://www.bsa.natcen.ac.uk/media/39375/bsa37\\_post-brexite-public-policy.pdf](https://www.bsa.natcen.ac.uk/media/39375/bsa37_post-brexite-public-policy.pdf)

<sup>6</sup> <https://redwall.unchecked.uk/our-research/>

work of apprentices whilst they train over four years. At the end of the course, the apprentices will have gained a qualification and also four years of work experience. Last year, CIEH has produced a toolkit aimed specifically at employers, which provides useful information, resources and reasons to hire an apprentice in environmental health.<sup>7</sup>

### **3) What are the hurdles to joint training between services? Do siloed approaches to attaining professional qualifications prevent joint training? How might better data-sharing improve joint training?**

For professionals joint training between services does present some challenges but there are generic areas where more joint training would be valuable. For example, during our engagement with local authority Environmental Health Managers, the need for more leadership training was identified as well as financial training and working with the media. These are all important skills for leaders of the future.

Last year, CIEH has started working closely with the Association of Chief Environmental Health Officers, who lead environmental health teams across England. It is hoped that this strengthened network of senior professionals will enable more information sharing between different areas and partnerships to form on issues such as joint training.

### **4) How might the public sector become more attractive as an employer, particularly in comparison with the private sector? How might it become attractive enough to retain workers throughout their careers while maintaining a level of turnover that brings fresh ideas to organisations?**

Public sector is an attractive option to many professionals due to variety of experiences that can be gained across different disciplines, as well as experience of working in large teams and with different agencies. However, due to funding pressures within local authorities and subsequent reductions funding allocated to different teams, training budgets have been reduced in many areas, thus potentially limiting opportunities for staff to develop.

From our workforce survey, environmental health teams representing 52% of local authorities told us that there were barriers to training and development for existing EHPs in their authority. Barriers cited included lack of capacity to undertake training (58%) and inadequate training budget (57%). This is concerning and may help to explain difficulties in staff retention in the longer term.

We also asked a question about the types of incentives the local authority offers to their EHPs to retain their experienced workforce. 97% and 92% of workplaces offered flexi time and homeworking, respectively. A much smaller proportion

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<sup>7</sup> <https://www.cieh.org/professional-development/apprenticeships/employing/toolkit/>

offered a staff recognition scheme (27%), market supplement (scarcity) payment (13%) and car allowance or lease (12%).

Competent and experienced EHPs do leave the public sector for better working conditions and a better salary in the private sector. Local authorities could do better at retaining their existing experienced staff, by providing better staff recognition, employer benefits and training support. Only one quarter of LAs offer a staff recognition scheme and only one eighth provide an allowance for a car, which is often needed to do site visits and inspections.

## **Transforming workforce effectiveness**

### **8) How can digital technologies be used most effectively for training and up-skilling the public services workforce?**

We have heard anecdotally from our members that remote training opportunities, which developed over the course of the pandemic, have meant that more staff at LAs have been able to take part in continuous professional development training as well as upskilling. This is due to the reduction of travel time, travel costs and accommodation costs, especially for staff based at more remote LAs. Whilst there is still a need for some face to face and practical training as well as networking with peers, this could become the exception rather than the rule, in order to maximise training and development opportunities for staff.

### **9) Preventative and early intervention services can improve the ability of the public services workforce to respond to users' needs. How might such services be embedded within any public services workforce strategy?**

Environmental health practitioners work across a very wide range of areas which have the potential to prevent ill health. The cumulative contribution of the profession as a whole is often not recognised by central Government. For example:

- Housing and community – EHPs work to keep tenants safe in their rented homes, investigating complaints by tenants and doing proactive inspections of Houses in Multiple Occupation and within licensed areas.
- Environmental protection – EHPs work to reduce air pollution and manage noise-related complaints from the public. EHPs are often involved in Air Quality Management Areas across England. In 2020/21, 144 local authorities received over 356,000 complaints about noise. These authorities took 11,211 formal actions and 88 prosecutions. Each full-time equivalent officer investigated on average of 600 noise complaints that year.<sup>8</sup>

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<sup>8</sup> CIEH Noise Survey 2020/21 Report on findings – England, CIEH, 2022.

<https://www.cieh.org/policy/campaigns/noise-survey/>

[https://www.cieh.org/media/4898/cieh-noise-survey-findings-2019\\_20.pdf](https://www.cieh.org/media/4898/cieh-noise-survey-findings-2019_20.pdf)

- Food safety and integrity – in 2019/20, local authorities in England, Wales and Northern Ireland were responsible for inspecting over 562,000 food premises and took a total of 156,000 formal actions to improve food hygiene and 26,000 formal actions to improve food standards.<sup>9</sup>
- Health and safety at work – in 2019/20, local authorities in Great Britain made over 60,000 visits to businesses to investigate health and safety issues and offer advice to businesses, serving nearly 2,000 notices on businesses presenting risks to their employees and members of the public and taking 55 prosecutions.<sup>10</sup>
- Public protection and wellbeing – EHPs have played a major role in protecting the public, supporting Government, businesses and communities during the pandemic. Practitioners were widely redeployed due to their knowledge and skills in infection control and public health. Overall, around 8 out of 10 EHPs working for local authorities were redeployed last year in response to the pandemic. The most common activities included: enforcing business restrictions, advising businesses on trading safely, developing COVID related policies and procedures, managing local outbreaks, emergency planning and contact tracing.<sup>11</sup>

Whilst environmental health teams already work with a range of agencies in their day-to-day work, greater links could be established between housing and the NHS, in particular. Furthermore, the valuable contribution to public health should be better recognised and environmental health should be better joined up with public health strategies locally, regionally and nationally.

## **Transforming existing workforce structures**

### **15) To what extent is public services workforce planning managed better at regional, sub-regional and local levels, rather than at the national level, and what mechanisms might enable more effective devolution of workforce planning? How can the Government train workforces to deliver more effectively those public services that are coordinated at the national level?**

EHPs have proved themselves to be adaptable and invaluable during the course of the pandemic. This is highlighted by the fact that 8 out of 10 EHPs have been redeployed during 2020/21 to support a variety of urgent and essential work. However, this variety of roles that EHPs perform means that there is a split in government departments responsible for different areas of EH policy making. This can also make it difficult to coordinate this vital profession at a higher level. We therefore see the need for a Chief Environmental Health Officer who would work alongside the Chief Medical Officer in England, in order to feed in expertise directly to policy making from experience of EHPs on the ground and to support the future pipeline of professionals. The role should feed into the UK Health

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<sup>9</sup> Food Standards Agency - 2019/20 Enforcement Data - Food Hygiene and Food Safety available at: <https://data.food.gov.uk/catalog/datasets/069c7353-4fdd-4b4f-9c13-ec525753fb2c>

<sup>10</sup> Data collection – analysis of LAE1 2019/20 data from Local Authorities, HELA paper H29/01, Health and Safety Executive, 2021.

<sup>11</sup> CIEH workforce survey, 2021

Security Agency and also provide a direct connection between central Government departments and EHPs working for local authorities. This important co-ordinating role already exists in the other three UK Nations.

Throughout the pandemic, the Office of Product Safety and Standards (OPSS) have provided a team to improve coordination between central government and local authority environmental health teams. However, this team is now due to be disbanded. As a result, there will be no national point of contact within central government or any national agency to coordinate the work and workforce issues for environmental health. This is a step back and a failure to see the potential of the cross-cutting work of this important profession, which can contribute to a number of key ambitions set out in the recent Levelling Up White Paper, including better regulation of the private rented sector, supporting the roll out of the National Food Strategy and helping to improve health inequalities across the country. We urgently need another central Government or national body to take up the lead role in helping to coordinate the work of this profession and ensure that it is sustainable and properly linked up with other key areas.

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