

The Royal Environmental Health Institute of Scotland

An Environmental Health Manifesto for Scotland



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The Royal Environmental Health Institute of Scotland is a registered Scottish Charity, No SC009406

Our Challenge to you

The Royal Environmental Health Institute of Scotland (REHIS) firmly believes that there are four key challenges to protect and improve Scotland's environmental health and to support our communities through, and beyond, the Coronavirus pandemic.

We address these challenges to politicians of all parties. The Institute is ready to work with all stakeholders to face the challenges and to improve, and protect, public health in Scotland.

Challenge 1- Adequate capacity and training of the Environmental Health workforce

The Coronavirus pandemic, and EU exit challenges, highlight the dangers of the long-term contraction of the Environmental Health workforce and reducing numbers of new professionals starting accredited courses

How will you work with us to support the training of new environmental health professionals and to ensure that the public have the protection of a properly resourced Environmental Health Service staffed by officers trained to a high standard and able to demonstrate their competence?

Challenge 2 - Sustaining public health and ensuring a level playing field for business recovery and growth

Environmental health professionals protect the public by using Engagement, Education, Encouragement and, ultimately, Enforcement to achieve compliance with environmental health legislation.

How will you work with us to ensure we continue to protect public health, to tackle unlawful activity and ensure a fair and level playing field for legitimate business activity during and after the Coronavirus pandemic.

Challenge 3 - Healthier and safer communities through education, training and qualifications

Education, training and qualifications contribute to public health when learners gain knowledge which enables them to make appropriate choices at work or at home.

How will you work us to ensure employers, employees and members of the public are supported through cost effective training that will help them to be safer and healthier in their environment and to adapt to the post-pandemic economy?

Challenge 4 - Sustainable locally based Environmental Health for now and the future

The Environmental Health Service in Scotland should continue to be delivered locally and be sustainably invested in to ensure that resources are aligned with Scottish priorities of health and wellbeing. Priorities for Environmental Health should be set in Scotland.

How will you work with us ensure the sustainability of locally based Environmental Health in Scotland?

Environmental Health is that area of Public Health activity which strives to improve, protect and maintain health and well-being through action on the physical environment and on life circumstances.'

Dr David Old, 2006

Environmental Health in Scotland

Today, as it has for over a century, Environmental Health serves the Scottish population and can be relied upon to protect their health wherever they live, work or travel.

In Scotland, the six key areas of Environmental Health are:

**Food Safety and Standards
Public Health**

**Occupational Health and Safety
Waste Management**

**Pollution Control
Built Environment**

The delivery of the Environmental Health Service in Scotland lies primarily with Environmental Health Officers (EHOs) working in Scotland's local authorities. EHOs are public health professionals whose primary objective is to improve and protect the health of Scotland's people. The Environmental Health workforce in Scotland's local authorities also includes Food Safety Officers, Contaminated Land Officers and a range of other technical and scientific support staff.

In recent years the number of opportunities for environmental health professionals to practice in government agencies and in the private sector at home and abroad have increased.

Registered Presenters working from REHIS Approved Training Centres improve and protect health in Scotland through the delivery of community training courses leading to nationally recognised REHIS qualifications. Presenters of REHIS courses (food hygiene, food and health, HACCP, infection control, and occupational health and safety) are part of the wider environmental health workforce and the preventative education they deliver contributes to reducing the disease burden in society.

REHIS, EHOs and the wider environmental health workforce work in partnership with a wide range of organisations including Scottish Government, Society of Chief Officers of Environmental Health in Scotland, Food Standards Scotland, Public Health Scotland, NHS Boards, Health and Safety Executive, Scottish Environment Protection Agency, and University of the West of Scotland

The Coronavirus pandemic shows the impact of communicable disease, but it follows a series of new and returning threats to our communities. As the current pandemic shows prevention of these communicable diseases is as important as responding swiftly and efficiently to deal with outbreaks as they arise. Maintaining the high levels of skills and expertise within the profession is critical if we are to be prepared and ready to respond when these challenges arise.

A long-term reduction in Environmental Health resources has been exacerbated by the pandemic and, in some areas, EU exit.

For EHOs working within local authorities regulation is the bedrock for protecting public health in its widest form through achieving compliance. However, we are committed to public health and look beyond protection through regulation and want to see health improvement via aspirational means. Today's aspirations should become tomorrow's standards, enshrined in legislation, if appropriate.

Regulation by itself can be self-limiting. Yet some local authorities define Environmental Health as a purely regulatory service. The better and more effective partnerships involving Environmental Health are those where agencies pool their resources and tackle inequalities and poor health through community-based projects.

Challenge 1- Adequate capacity and training in the Environmental Health workforce

The Environmental Health Profession prides itself on the high standards of education and training required of aspiring Environmental Health Officers (EHOs). Ensuring that the highest level of entrants into the profession are assured, coupled with the retention of the most experienced and skilled personnel is essential for the profession charged with protecting the environmental health of our communities.

A long-term reduction in environmental health resources has been exacerbated by increasing workloads of the pandemic and, in some areas, EU exit. For example, the number of EHOs employed by Scottish councils has fallen by 23% (from 556 in March 2009 to 428 in April 2019). Over the same period the number of Food Safety Officers, who are qualified to enforce food law only, fell by 39% (from 105.6 to 64).

Student EHOs require to achieve a BSc (Hons) or MSc accredited degree in Environmental Health and follow this by attaining the Institute's Diploma in Environmental Health. The Diploma requires a minimum of 48 weeks practical training followed by the submission of a portfolio, evidencing the candidate's learning, and oral examinations covering all areas of environmental health. After achieving the Diploma, EHOs participating in the Institute's CPD scheme can ultimately achieve the status of Chartered Environmental Health Officer.

No educational providers in Scotland offer a Higher National Diploma (HND) in Food Technology, the minimum academic qualification required to enter training to become a Food Safety Officer in Scotland, and only a decreasingly small number of other courses are available in Scotland which meet the educational requirements to allow training as an FSO.

Full details on how to train as an EHO or FSO are available on the REHIS website.

Many EHOs, and other staff, are leaving the Environmental Health service as local authorities strive to make financial savings. These officers take with them knowledge, expertise and experience. Local authorities, facing spending cuts, are recruiting fewer student EHOs to carry out their practical training and this had led to a critically low number of newly-qualified EHOs entering the profession and the service.

The sum effect of these pressures is that the number of qualified and experienced staff working in Environmental Health Departments is falling. This reduction in staffing and capacity will have an effect on the service, and protection, provided by the Environmental Health Profession.

REHIS is working with partners at the University of the West of Scotland and local authorities to promote a new model of education and training which would see environmental health students carry out placement during Year 3 of their course. The time spent on placement would count towards the practical training element of the Institute's Diploma,

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Challenge 2 - Sustaining public health and ensuring a level playing field for business recovery and growth

The Coronavirus pandemic has shown the importance of legislation and guidance in ensuring public health and safety. In more normal times adverse public comment is often made regarding the 'health and safety' culture in the UK. This can often be translated into antipathy towards those officials who are tasked with enforcing health and safety, food safety and other legislation. In Scotland many of these people will be REHIS members, particularly those working in local environmental health departments and for other regulators.

REHIS does not believe that there is anything fundamentally wrong with either the core environmental health legislation or regulatory systems in Scotland. Some people use 'health and safety' or "regulations" as a convenient excuse under which they can justify their own actions.

Most environmental health enforcement has always been achieved by advice, education, advocacy, support and persuasion. Environmental Health staff aim to work with businesses to achieve good standards of public protection and employee safety. Formal enforcement action is only used when other options fail. The success of this approach is seen in the way environmental health departments have ensured compliance with the evolving Coronavirus restrictions.

However, it is important for public safety, and to ensure a level playing field for those businesses who strive to achieve good standards, that effective steps are taken to deal with businesses who do not comply with the law. This is important during the pandemic and will be crucial as business activity increases during the economy's recovery. Nobody should be able to profit or gain commercial advantage from disregard for the safety and welfare of the community. The public expect nothing less.

More recent environmental health legislation has seen the introduction of more modern enforcement tools. These often are more immediate and act as an effective deterrent. A notable example is fixed penalty notices for the smoke-free legislation which were an important factor in ensuring the early and continuing success of the smoking ban.

Scottish local authorities combine the various aspects of environmental health legislation when they deal with businesses. This is an approach, underpinned by the holistic training and approach of Environmental Health Officers, which gives maximum protection to the wider population

Environmental Health professionals protect the public by using engagement, education, encouragement and, ultimately, enforcement to achieve compliance with environmental health legislation.

How will you work with us to ensure we continue to protect public health, to tackle unlawful activity and ensure a fair and level playing field for legitimate business activity during and after the Coronavirus pandemic?

Challenge 3 - Healthier and safer communities through education, training and qualifications

REHIS is primarily concerned with the health of Scotland's people. REHIS is committed to employers, employees, members of the public and students in schools being healthier and safer in the environment through supported learning and training. This is one of the most effective ways of improving public health and gaining maximum value from limited resources. Education, training and qualifications contribute to public health when learners gain knowledge which enables them to make appropriate choices at work or at home.

The Institute is Scotland's awarding body for a wide range of courses and qualifications including food hygiene, food and health, HACCP, occupational health and safety, and infection control all of which are aimed at the general public as well as industry. The courses leading to these qualifications are presented by a network of over 700 REHIS Approved Training Centres throughout Scotland as well as a number abroad.

The skills learned help students to work safely in their workplaces but also provide life skills and, for many, first positive learning experiences which will be essential as the economy adapts to the pandemic recovery.

A strict quality assurance system is in place in order to maintain a consistent standard of training across the network of Approved Training Centres. The Institute works with partners in the environmental health, and wider public health, communities to identify areas where formal training and qualifications will help employers, employees and members of the public protect and promote public health.

The Institute recognised the need for Food Hygiene training for school students some years ago and the Food Hygiene in Schools Initiative was launched to meet that need. Schools can be approved to deliver the Introduction to Food Hygiene and Elementary Food Hygiene Courses to students aged 13-18. The Institute and Food Standards Scotland provide co-funding for this initiative and for 2019 a total of 202 secondary schools were registered to deliver the Food Hygiene Courses, with over 12,000 pupils participating.

It is widely known that a poor diet leads to poor health and that many of the Scottish population are not meeting dietary recommendations. There are many reasons cited for this; one being a lack of cooking skills. The Institute is part of Scotland's Malnutrition task force and through this developed the REHIS Eating Well for Older People short course. This aim of this course is to provide participants with the knowledge and appreciation of the importance of good nutrition for older people and how to support them to eat well. The course is non-clinical and is suitable for anyone working with older people in the community.

The Institute now has 28 standard qualifications available for delivery by Approved Training Centres. During 2019 over 40,000 certificates were issued for these qualifications.

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How will you work us to ensure employers, employees and members of the public are supported through cost effective training that will help them to be safer and healthier in their environment and to adapt to the post-pandemic economy?

Challenge 4 – Sustainable locally based Environmental Health for now and the future

The Environmental Health Service has historically been delivered by local government. This locally provided, and locally accountable, service is valued by the public and their representatives. Increasingly the focus of environmental and public health is through the Scottish Parliament.

Local Environmental Health Departments are cognisant of, and reactive to, local issues and concerns. Environmental Health Officers have a respected role as public servants with an unbiased role in ensuring that public health is protected.

Some environmental health work is carried out by local councils under the guidance of national organisations such as the Food Standards Scotland or Health and Safety Executive. Other areas draw on the expertise and advice of colleagues in Public Health Scotland or local NHS boards. The response to the pandemic shows how Environmental Health Officers always work with these partners to ensure the safety and welfare of the communities they serve.

While locally based, the Environmental Health community has structures in place to share best practice across the country ensuring even the most complex problems are dealt with consistently and fairly. Local and national liaison structures are in place for all areas of Environmental Health to support locally based staff.

Initiatives such as Community Planning are powerful tools which should bring together all partners able to contribute and deliver positive health benefits. Those authorities which do not have Environmental Health at the core of these plans are, we believe, short-changing the public.

2021 sees Glasgow host the UN Climate Summit (COP26) – a powerful reminder that local environmental controls and sustainability improvements can make an international difference. Environmental health professionals in a number of agencies work and co-operate to help communities make important changes to the way we live and to work towards national and international sustainability targets

Environmental Health Services and EHOs provide a locally based resource of broadly experienced professionals with a practical and holistic approach to public health.

Any change to current arrangements where the norm is for the Environmental Health work to be discharged by locally based, directly employed, Council staff could lead to a diminution of public, and business, confidence in the service provided. It would also lead to an important component of the local government skillset being lost.

Occupational health and safety is the last significant area of environmental health which remains reserved to Westminster. We believe that this function should transfer to Holyrood to allow protection of the work environment to be considered as an integral part of public health protection in Scotland. If health and safety remains reserved we would support work with other stakeholders to ensure that the focus of health and safety priorities and interventions best protects workers in Scotland.

The Environmental Health Service in Scotland should continue to be delivered locally and be sustainably invested in to ensure that resources are aligned with Scottish priorities of health and wellbeing. Priorities for Environmental Health should be set in Scotland.

How will you work with us ensure the sustainability of locally based environmental health in Scotland?

Further information

REHIS is keen to work with everyone with an interest in improving and protecting public health in Scotland.

If you would like to work with us, or if you want more information on the challenges facing Environmental Health in Scotland, please visit our website at www.rehis.com.

Further information can also be obtained from:

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THE ROYAL ENVIRONMENTAL HEALTH INSTITUTE OF SCOTLAND

The Institute was incorporated as a Company Limited by Guarantee on 16th February 1983, to give effect to the amalgamation of The Royal Sanitary Association of Scotland and The Scottish Institute of Environmental Health. The Institute was incorporated by Royal Charter on 8th March 2001, following which the Company was wound up.

The Royal Environmental Health Institute of Scotland is a registered Scottish charity, Number SC009406.

The objects for which the Institute is established, contained in Article 3 of the Charter, are for the benefit of the community to promote the advancement of Environmental Health by:

- a. stimulating general interest in and disseminating knowledge concerning Environmental Health;
- b. promoting education and training in matters relating to Environmental Health; and
- c. maintaining, by examination or otherwise, high standards of professional practice and conduct on the part of Environmental Health Officers in Scotland.

The Royal Environmental Health Institute of Scotland is an independent and self-financing organisation. It neither seeks nor receives grant aid. The Institute's charitable activities are funded significantly by the subscriptions received from its members.

The Institute's affairs are managed by a Council which is elected by members. The Royal Environmental Health Institute of Scotland is a founding member of the International Federation of Environmental Health.

The Institute frequently uses the acronym: REHIS®.

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