



Local authority COVID-19 compliance and enforcement good practice framework

Councils across the country have been adapting existing compliance and enforcement practices and systems for these new circumstances. This document produced by the Ministry for Housing, Communities and Local Government (MHCLG) aims to capture some of the Covid-19-specific compliance and enforcement learning and make it more easily available to all authorities.

Introduction

The purpose of this document was to provide good practice case studies to local authorities in relation to compliance and enforcement activities against Covid regulations. Following the ending of those regulations with effect from Monday 19 July 2021, this Good Practice Framework is withdrawn but is retained here for reference.

Responding to the Covid-19 pandemic has thrown up new challenges for all public sector organisations.

As trusted local leaders, local authorities are playing a vital role in explaining rules to their communities, encouraging them to comply, and enforcing where necessary. This role continues as we move through the final stages of the Prime Minister's Roadmap. While the police have responsibility for enforcing and overseeing regulations as they apply to individuals, local authorities have responsibility for enforcing regulations applying to businesses. Local authorities are also a key player in enabling COVID-19 secure behaviour in the public realm, making public spaces safer during the coronavirus (COVID-19) pandemic. At a local level, the local authority and the police are working closely to drive up compliance.

Councils across the country have been adapting existing compliance and enforcement practices and systems for how to deal with the challenge of the pandemic. They have been sharing learning informally and at events and forums organised by the Local Government Association, by Government and within their Local Resilience Forum partnerships. This document captures some of the Covid-19-specific compliance and enforcement learning from throughout the period of the pandemic and make it more easily available to all authorities. It includes case studies of good practice drawn from across the local government sector, organised into a framework of areas councils need to consider:

- Capacity and resourcing.
- Decision making and using intelligence.
- Communicating and engaging.
- Enforcement.
- Multi agency working.
- Planning for change and managing flexibly
- Beaches and tourism

The approach in this document is underpinned by the engage, explain, encourage, enforce principles, in line with the work of the councils whose case studies illustrate it. This approach supports the belief that encouraging compliance is more effective than enforcement alone and is the most effective way of supporting businesses to make their customers feel safe or to re-open.

This document is updated regularly with new case study examples to make it a live resource from which the sector can draw. This will ensure it covers the range of local authority contexts and breadth of compliance and enforcement work associated with COVID-related regulations and COVID-19 Secure guidelines.

The case studies are drawn from across England, from rural and urban areas, and from various levels of local government. They highlight the excellent work councils are doing to protect local communities.

Latest update – June 2021

During December, the rapid rise in infections required two changes to the tiering levels in quick succession. On 4 January 2021, the Prime Minister announced a national lockdown in response to the rapid rise in infections attributed to the variant of Covid-19. Given these circumstances, we have added three new case studies which are relevant to the national lockdown. One relates to the

closure of businesses which should be closed, and the second and third relating to compliance and enforcement in essential retail businesses, including a supermarket. We have also added a fourth case study which demonstrates the value in publicising enforcement.

We have included these new case studies in a new section on planning for and managing transition between different lockdown levels.

This version of the document is being published in mid-June 2021 in Step 3 of the **Prime Minister's Roadmap** [<https://www.gov.uk/government/publications/covid-19-response-spring-2021/covid-19-response-spring-2021-summary>] and as councils are preparing for Step 4. The case studies collected in this document took place at various times since the beginning of the pandemic when rules in place were not the same as at time of writing (and were in many cases more restrictive). We are not therefore recommending councils copy these case studies. Rather, they may still be of interest and use to authorities in considering how to tackle current challenges. Local arrangements described in the case studies may now also have changed in response to the changing rules.

Since the last update MHCLG has worked with the Behavioural Insight Team based in Cabinet Office. They have devised two slides' packs, one on Applying Behavioural Science to the Hospitality Sector and Applying Behavioural Science to Signage and Crowd Management. These slides are not guidance but some suggestions that local authorities may wish to consider. Any council which wishes to receive the slide pack should email:

Covid19-PlacesandCompliance@communities.gov.uk [<mailto:Covid19-PlacesandCompliance@communities.gov.uk>] and put "BIT SLIDES REQUEST" in the subject box.

New case study added in this addition of the framework is:

Sefton – Variant of Concern (VoC)

Thanks

We are very grateful for the support of the Office for Product Safety and Standards, Local Government Association, all the members of the Ministry of Housing, Communities and Local Government's compliance working group, Burnley Borough Council, Bournemouth, Christchurch and Poole Council, Cannock Chase District Council, Charnwood District Council, Cornwall Council, East Sussex Council, Lancaster City Council, Leeds City Council, , London Borough of Brent, , London Borough of Hounslow, Manchester City Council, Oxfordshire Council, Sefton Council, Southend-on-Sea Borough Council, Royal Borough of Kensington and Chelsea, Southend-on-Sea Borough Council.

Increasing compliance capacity

The coronavirus pandemic has placed significant demands for councils to redeploy resource. This includes having to re-prioritise resource which is already in limited supply onto pandemic related compliance and enforcement whilst at the same time continuing to do existing work as far as possible. Some enforcement work also needs to be carried out by specialist enforcement officers, who take a minimum of two years to train. Local authorities are familiar with effectively targeting the resources at their disposal and will have many ways of doing so. Government has also introduced some central measures to help bolster resources.

Councils can:

Increase Environmental Health Officer (EHO) staff:

- Make effective use of existing and / or developing new mutual aid agreements between local authorities and across tiers to support enforcement and compliance capacity.
- Utilise the **National Register of Environmental Health Officers** [<https://www.local.gov.uk/EHTogether-candidate-information-pack>] developed by the Chartered Institute of Environmental Health to identify further qualified staff. This is available to all councils.
- Recruit environmental health or regulatory compliance apprentices.
- In line with the process for military aid to civilian authorities' councils can seek military assistance for specific tasks as a required

Re-deploy other resource to support specialist officers:

- Pool resources from across teams that interact with local businesses or the public.
- Use teams already directly in contact with local businesses flexibly so compliance becomes a part of their remit.
- Pivot people from other work towards compliance issues after training – for example parking staff have been deployed into Covid-19 related roles.
- Making effective use of highly skilled / qualified individuals by reassessing the role and passing on routine or less skilled work to associates or other colleagues.
- Creating marshal schemes that undertake non-specialist compliance business and engagement work that can take some of the load off specialist officers. see the **Guidance** [<https://www.gov.uk/government/publications/covid-19-local-authority->

[compliance-and-enforcement-grant/guidance-to-support-local-authority-compliance-and-enforcement-activity-including-covid-19-secure-marshals-or-equivalents\]](#).

- Looking to get the best possible value from any expenditure e.g., adding to existing contracts, for example with security firms to provide additional marshal services.

Seeking outside support:

- Drawing upon Health and Safety Executive's offer of spot checks on local businesses, which many councils have already taken up. This decreases pressure on local authority qualified staff by enabling them to target their efforts appropriately. HSE (Health & Safety Executive) (Health and Safety Executive) has announced an offer of **physical spot checks** [https://www.hse.gov.uk/coronavirus/regulating-health-and-safety/spot-inspections.htm?utm_source=govdelivery&utm_medium=email&utm_campaign=coronavirus&utm_term=spot-checks-inspections&utm_content=inspections-16-nov-20] available to councils, link.
- Collaboration with others to share compliance approaches and expertise, for example through Better Business for All networks

Case studies

Oxfordshire – pooling resource between authorities

Oxfordshire has a two-tier local authority structure, consisting of the county council (Oxfordshire) and five district councils. The Oxfordshire councils implemented a comprehensive, system wide approach to COVID Compliance and Enforcement work across the county, including:

- Created a new COVID Secure Team, consisting of Environmental Health Officer and COVID Compliance Support Officers, working across the county improving compliance and providing additional capacity to supplement each local authority's core teams.
- Established a mutual aid arrangement providing a pan-Oxfordshire pool of officers with experience in infectious disease outbreak controls to support incident control teams.
- A pool of night-time officers to monitor, support and report on city centre activity in the evenings.
- Centralised information gathering to allow the core council teams to access records in each area and support data collection on a county wide basis enabling effective tasking of the COVID Secure team.
- A weekly operational managers forum to share information and discuss interpretation of the legal requirements to promote consistency.

The COVID Compliance work across the councils is overseen by the COVID Compliance sub-group of the Oxfordshire Health Protection Board. This sub-group meets weekly and is tasked by the Health Protection Board and Director of Public Health. Using data from contact tracing and 'soft' intelligence from partner organisations means the overall compliance activity was targeted at the most significant areas of risk (e.g., types of premises, geographical priorities, etc). The arrangements were underpinned by the delegation of enforcement powers from the county council to each district council and an agreement setting out which organisation leads on the various aspects of the compliance work.

Decision making and intelligence gathering

Scrutinising every step of the system to ensure that decisions are made at the right level and the decision-making process is, streamlined, clear and efficient can materially help with overall effectiveness. Making the best decisions will also depend on using data and local intelligence. Strong intelligence can help target interventions making them more effective and efficient.

Local authorities may also want to consider using data or behavioural science principles for designing compliance initiatives to encourage consistency in businesses and public realm.

Councils can:

Decision making

- Coordinate compliance and enforcement with neighbouring authorities and putting protocols in place that set out how this joins up of activity works.

Intelligence and data

- Draw on national data including from **YouGov** [<https://yougov.co.uk/>] to understand trends in various levels of compliance against different regulations.
- Use **data from Public Health England and from individual Directors of Public Health** [https://coronavirus.data.gov.uk/?_ga=2.36368032.1641224461.1606233244-751225023.1581619632] to understand coronavirus rates locally.
- Utilise available resources such as **COVID-19 Contain Framework** [<https://www.gov.uk/government/publications/containing-and-managing-local-coronavirus-covid-19-outbreaks/covid-19-contain-framework-a-guide-for-local-decision-makers>] on how to contain and manage coronavirus outbreaks at a local level.

- Use existing knowledge of local businesses to target support effectively e.g., targeting support to business sectors where there has been known compliance issues.
- Make effective use of local knowledge to focus compliance work where it will have the greatest impact, for example identifying hotspots, working via local forums for example Business Improvement Districts or other local leaders.
- Utilise intelligence from Covid-19 Secure Marshals to escalate non-compliance to the Police and Environmental health officers.
- Share anonymised data with other authorities.

Case studies

East Sussex County Council – integrating decision making.

From March 2020, East Sussex County Council became quickly aware that enforcement and compliance needed to be co-ordinated across Sussex to avoid disjointed and fragmented enforcement if departments kept to their traditional boundaries. As a result, a weekly liaison group was formed between both County's (East & West) Trading Standards Services, District/Borough Environmental Health leads, Brighton & Hove City Council (Unitary Authority) and Sussex Police.

A model protocol was designed, based on the restrictions current at that time, with police leading on movement restrictions, environmental health on food businesses and trading standards on non-food retail businesses. In addition, weekly intelligence sharing meant that each agency was, and still is, aware of each other's activities. There was also a single point of contact to exchange enquiries/complaints received from the public and businesses to ensure the most appropriate agency dealt with each issue.

The group gained representation on the Public Health Operational Cell weekly meeting ensuring updates on enforcement and compliance were shared and discussed in a timely manner – this led to a clear protocol for considering the issuing of Directions.

London Borough Hounslow - Response to community testing.

At points throughout the pandemic the London Borough of Hounslow had some of the highest instances of Covid infection across London.

One approach employed has been the use of mobile testing units. The authority has several static testing sites but also identified that the location of these meant that it was difficult for some members of the community to attend these. Using data which mapped the wards with the highest instances of Covid infections, mobile units were set up to address the need of these communities, targeting the areas of greatest concern.

The locations selected were ones that were easily accessible and would attract a good degree of natural through flow, i.e., supermarket car parks. These were promoted using a wide variety of sources including local newspapers and social media.

By having a mobile unit available the authority has been able to respond quickly to isolated outbreaks in an efficient manner, targeting areas of concern. This has helped to drive down the "R" rate in the borough and provided an effective solution to help safeguard the community.

Communicating and engagement

Communication and engagement is one of the most powerful tools for facilitating compliance by everyone. Councils help businesses to understand requirements and support them in complying. Publicising enforcement actions can also encourage compliance from businesses by demonstrating that councils will act where they see the need. It also reinforces messages that everyone needs to play their part and can highlight how the compliance and enforcement work done by councils contributes to keeping everyone safe. By doing so they help them to make their customers feel safe and to reopen. The council also acts a trusted source of information for the community. Council communications can help explain changing regulations, manage public expectation, and reduce the risk of compliance fatigue. This opens opportunities to capitalise on direct engagement to promote behaviours that lean towards compliance by businesses and through to the public, supported by implementing clear and broader communication.

Councils can:

Deliver Communication that supports and encourages good behaviour.

- Use social media and communications operations to remind people of good practice confidently and gently as well as proactively rebut negative stories as required. Examples set by local leaders and trusted individuals have been shown to be particularly effective in influencing public behaviour.
- Publicise their compliance and enforcement action via social media and local press to demonstrate to businesses that action will be taken where councils see the need, encouraging compliance in others.

- Continue to build on the 'Hands Face Space Fresh Air' campaign by encouraging people to adopt tangible behaviours that are easy and simple to undertake and can be normalised quickly.
- Launch a website which uses footfall data to tell users how busy the town centre is. The use of a traffic light system makes the detail simple to understand.
- Utilise promotional material from Government such as '[Local COVID Alert Level Posters.](https://www.gov.uk/government/publications/local-covid-alert-level-posters)'
- Publicise the "[We Offer Testing to our Staff \(WOTTOS\): endorsement scheme](https://www.gov.uk/government/publications/we-offer-testing-to-our-staff-wottos-endorsement-scheme/we-offer-testing-to-our-staff-wottos-endorsement-scheme)", with business.

Engaging with different sectors using different channels

- Engage directly with businesses through different media including face-to-face, explaining, engaging, and encouraging compliance; ensuring messages are simple, tangible, and easy to follow.
- Establish a Covid-19 safe award to recognise businesses with high standards of compliance, helping them make their customers feel safe. Several trade associations also have award schemes that councils may want to consider in their risk profiling of businesses or to highlight to the public. For example, Visit Britain has developed a '[We're Good to Go Scheme \(WGTG\)](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.visitbritain.org%2Fbusiness-advice%2Fwere-good-go-industry-standard&data=04%7C01%7CAnna.Wojtowicz%40communities.gov.uk%7C3067814884a3417a80a808d8953635be%7Cbf34)'
- Hold sector-specific zoom sessions for local businesses.
- Create YouTube videos providing advice for businesses.
- Design a range of posters, leaflets and social media posts for businesses, organisations, and individuals to download and share with their communities.

Having a visible presence and using trusted messengers

- Establish a Covid-19 safe award to recognise businesses with high standards of compliance.
- Conduct inspections, spot checks and audits of business premises, operate a yellow-red card system to 'promote, prevent and protect.
- Make good use of Health Champions who are trusted members of their community to share health messages for people they serve via their organisations.

Case studies

Cornwall Council – Publicising Enforcement

Cornwall Council issued a fixed penalty notice resulting in a £1,000 fine to a Sports Club in breach of Covid regulations. The fixed penalty notice was issued on 20 January 2021 after members of the club were found to be drinking alcohol inside the licensed premises on 15 January 2021. Cornwall Council reinforced their enforcement action by publishing details on their website and tweeting about it. See links below.

The publicity made it clear that the council will work with businesses to explain the rules and provide support on how to meet their responsibilities before moving to enforcement. It also sent a message about how the action of this club put both members and the public at risk and that the council will act where there are clear breaches.

<https://www.cornwall.gov.uk/council-and-democracy/council-news-room/media-releases/news-from-2021/news-from-january-2021/sports-club-fined-1-000-for-serving-alcohol-during-lockdown/> [<https://www.cornwall.gov.uk/council-and-democracy/council-news-room/media-releases/news-from-2021/news-from-january-2021/sports-club-fined-1-000-for-serving-alcohol-during-lockdown/>]

<https://www.cornish-times.co.uk/article.cfm?id=129303&headline=sports> [<https://www.cornish-times.co.uk/article.cfm?id=129303&headline=sports>].

Lancaster – Covid-Safe award / Positive about compliance

Lancaster City Council Covid-safe award is a free-to-join award-based scheme. For businesses to achieve the award they apply via the council website completing 15 carefully selected questions designed to make the business consider key areas of government guidelines which apply to their business. The questions are changed to reflect government changes in regulations or guidelines. Questions are designed around: infection control, social distancing, contact recording, staff training and information and customer management. Applicants are also asked to upload a comprehensive Covid-19 risk assessment (if applicable), to show that they have thought about which procedures they need to implement, as well as upload photographs as evidence that key measures are in place. Lancaster City Council then check records to see if they have already benefitted from a Covid Advice visit and if they have any concerns. Where there are concerns, follow up visits take place.

Successful businesses receive:

- a certificate to put on the window / door preferably at the entrance,
- posters for various areas at the premises
- postcards to be left at pay areas or table for customers to take away.

The marketing left at the business has a “QR” code allowing customers to give feedback on their visit which is its unique selling point. Poor feedback will trigger a visit by the Covid-Safe team. The scheme keeps the council and businesses in touch, helping businesses with any changes to guidelines, ensuring they remain compliant and that they understand customer concerns.

Unannounced visits by a member of the team also ensure that they keep compliant, and where they still fall short after feedback, their certificate will be removed. Businesses are extremely positive about being part of something that will help customers feel safe in their premises and encourage them to return. The aim of the scheme is to reassure customers that when restrictions are lifted, they can return to the high streets' city centre shops, bars, pubs, cafes, restaurants, and other venues, helping boost the local economy as well as send messages that businesses have a responsibility to carry out the necessary risk assessment, safety measures and staff training to operate safely.



Liverpool City Council | #LetsGetTested @lpoolcouncil · 13h

We've been working with our communities to share the message about the #MassTesting pilot in a variety of languages.

Videos can be found here: vimeo.com/showcase/ourli...

Find your nearest testing centre: bit.ly/2UgoQ1c

#LetsGetTested

Liverpool City Council – trusted voices through social media

The Communications and Marketing team at Liverpool City Council have actively used their social media channels to keep residents, businesses, and elected members up to date on the latest Covid-19 developments. They reinforced messages around good behaviour using infographics, video, blogs, podcasts, and a city-wide advertising campaign. Their active messaging and communications activity around the mass testing pilot helped lead to a major reduction in Covid-19 cases across the city and the wider region, resulting in LCR (Liverpool City Region) being the first region to move from what was then Tier 3 to Tier 2.

Brent – engagement based on local intelligence.

Diwali is the five-day festival of lights, celebrated by Hindus, Sikhs, and Jains around the world. Part of this celebration would normally include visits to temples by individuals and their families for prayers. In the run up to Diwali in 2020 Brent Council received intelligence that certain temples might breach coronavirus restrictions. This led to engagement with all the temples through writing, virtual meetings, and visits to ensure the coronavirus restrictions were followed. The London Borough of Brent mutually agreed with

all 11 temples based within the Borough that they would close during Diwali weekend and that, if any were to open, it would be for individual prayers only with a limited capacity and pre-arranged attendance times. Officers who patrolled the streets over the weekend reported that the agreement was adhered to.

Leeds – Targeted engagement in low compliance area

Leeds City Council's Communities Team created a one-off pack for 100 small businesses on three local high streets within the Harehills area of Leeds. This area is densely populated and has a thriving high street but intelligence from statutory services operating in the patch reported that mask compliance amongst consumers was low.

Funded by the local Ward Members' emergency Covid-19 funding pot, the packs comprised face masks, hand sanitiser, posters, and information to support the businesses at the time including how to order PPE (Personal Protective Equipment) through Leeds City Council at cost price.

These bags were distributed to businesses on the popular high streets by Leeds City Council's Covid Marshals as part of their regular visits to shopping areas in the city. Other areas of the city have looked at replicating these packs demonstrating support to small businesses.

Multi-agency working

Local authorities work with a range of bodies to address compliance and enforcement issues and achieve the common goal of reducing the R number. Sharing their own, and drawing on, the expertise and resources of other agencies allows councils to contribute to more widespread and sustained compliance. Further, effective multi-agency working can contribute to a coherent approach in a place, so that the public and local businesses understand and feel reassured that public safety is being addressed by the appropriate authority. Teams working together on multi-agency response include:

Within the council:

- Regulatory services
- Public health
- Communications

Other local partners:

- The police
- Citizen Advice Bureaus
- Local Resilience Forums
- Local business organisations

Councils can:

- Establish multi-agency units between the police and councils to oversee enforcement and / or conducting regular liaison or engagement meetings and tasking discussions.
- Implement clear mechanisms in place for sharing intelligence and escalating concerns.
- Work collaboratively with the private sector and the voluntary and community sector.
- Link into Local Resilience Forum Compliance Cells (or equivalent).
- Launch night-time economy hotspots working point jointly with the police.
- Utilise the existing safety advisor group process to look at events.
- Create multi-faith forums to share learning between the faith sector and local authorities.

Case studies

Greater Manchester – working with police.

The Environmental Health Department had received multiple complaints about a large supermarket with particularly heavy foot fall at breakfast, lunch and in the evening and located in a high student population area. The supermarket also contained a fast-food restaurant, well used by younger people.

Complaints focused on the number of customers not wearing face masks in the supermarket and a lack of enforcement action being taken, a lack of social distancing controls and that reduced store capacity was not being observed.

To foster sustained compliance and mitigate risk of tying up police resources in one problem area, environmental health instigated a multi-agency approach working with the local metropolitan district council, Greater Manchester Police, and the supermarket in question. Greater Manchester Police and neighbourhood compliance officers spent a full day on the premises assisting store employees to monitor and challenge the use of face masks by customers entering the store. The supermarket was grateful for the assistance and since then ensured trained employees worked at the entrance every day, to challenge customers in the right way to protect public health, hand out free face masks for those who did not have one.

Since that work complaints reduced and the Council has a better, more direct, and responsive working relationship with the store.

Lancashire Resilience Forum – partnership at the strategic level.

When rates were rising rapidly in Lancashire, effective partnership working, and leadership of the Lancashire Resilience Forum (LRF) were pivotal in providing a platform for bringing together several workstreams including Public Protection services and other regulators including the police, trading standards and the fire service, to focus on compliance. Under the LRF, the various partners came together to look at creative ways to support and promote business compliance, share experiences on enforcement such as direction orders, outbreak management and interpretation of the guidance as well as mobilising resources to protect the public. Intelligence and good practice were shared as they worked closely with Directors of Public Health and PHE (Public Health England) – all focusing on health protection and reducing the infection rates of Covid. Collectively the group looked at risks and made recommendations for a blanket approach across the county. Some of these bold decisions included restrictions on events over 30 people across the county to minimise the risk of infection. The LRF worked with the Local Enterprise Partnership, local Business Improvement Districts, and the business community to promote compliance.

Cannock Chase DC – Multi agency working – enforcement.

The owner of a restaurant operating as a takeaway had been instructed to self-isolate by NHS Test & Trace. The authority received information that he was at work during the isolation period and visited the premises in conjunction with the police.

Upon entering the premises, the individual concerned was serving customers at the counter and working in proximity with 3 other members of staff. The authority had CCTV evidence that he had worked other evenings during the isolation period when the takeaway was open.

During the visit, a Coronavirus Emergency Restriction Notice was imposed, closing the premises for 48 hours. During this period, the individual's isolation period ended. It reopened approximately 72 hours later, following an Environmental Health Officer visit and confirmation there was no longer a risk to public health.

The council supported the owner to implement appropriate measures to keep staff and customers safe. The owner has since been issued with a £4000 fixed penalty.

Charwood DC - Multi agency working – Fire Service.

Over the course October 2020, Fire Officers visited 30 restaurants and cafes in the borough and carried out basic Covid secure checks, using Microsoft Forms to electronically record the checks carried out, Local authority enforcement officers, followed up with any issues noted.

A local business reopening seminar was held, and the Fire Service assisted by presenting fire safety information and more specifically relating to marquees.

The authority has been asked by the Fire Service to distribute fire safety information during our own Covid audits of hospitality businesses and we are feeding back any fire safety issues to the Fire Service for follow up. This information has also been sent to 5000 businesses through emails and business communications. Charnwood Borough Council website also provides links and information relating to fire safety.

Planning for and managing transitions between tier restrictions

The rapid rise in the infection rates because of the new variant of Covid resulted in additional tier restrictions being put in place in rapid succession, culminated in a national lockdown from 6 January 2021.

Over the course of 2020 and continuing through 2021 councils have become experienced at managing compliance and enforcement in different restriction levels, including national lockdown, and the resulting different levels of restriction on businesses and premises. As part of this, councils developed experience in managing the transition between different levels of restrictions, with each change requiring a shift in focus for councils to respond to the changes and to their specific local circumstances.

Building on previous lessons learned councils can:

- Develop tailored strategies to help plan for and manage transition between different steps of restriction, including easing from national lockdown.
- Think in advance where/how to prioritise compliance and enforcement measures as restriction levels change, building on learning from previous transitions from national lockdowns.
- Anticipate where the roadmap steps will pose greater risk of non-compliance in particular places or sectors, or where a risk of complacency or fatigue might also need to be challenged. For example, when hospitality and non-essential retail have been

closed by national lockdown, there is an opportunity for councils to focus more on making sure businesses are closed where they should be, and on compliance for those businesses which remain open, such as in the essential retail sector.

- Consider how changes are communicated with both businesses and the public, particularly recognising that in some businesses key staff will be furloughed until shortly before they are able to reopen.
- Ensure their working practices are sufficiently flexible to allow for a rapid change of focus.

The emergence of variants of Covid-19 have led to councils deploying their resources flexibly to contain the outbreak as quickly as possible.

Sefton Borough Council – Variant of concern

There was a concentrated outbreak centred around Sefton's Formby area, **forcing the closure of a pub and a leisure centre** [<https://www.liverpoolecho.co.uk/news/liverpool-news/four-merseyside-schools-pub-nearby-20567025>], with hundreds of school pupils being sent home to isolate.

Concerns were heightened when the Council was informed that a case of the **Delta variant of concern** [<https://www.liverpoolecho.co.uk/news/liverpool-news/most-coronavirus-cases-sefton-indian-20615598>] had been detected locally.

This led to public health teams **deploying surge testing in the area** [<https://www.liverpoolecho.co.uk/news/liverpool-news/everyone-sefton-advised-tested-coronavirus-20588930>] in a bid to contain the spread of the variant.

Drive-through and walk-through tests sites were set up and "Swab Squads", comprising members of the Council's asymptomatic testing team were deployed carrying out hundreds of throat and nasal swabs on asymptomatic local people, who had been encouraged to participate in the testing.

Having previously experienced surge testing for the Beta variant, Sefton Council focused, through its communications, on identifying the target group for the Formby testing and also making clear people needed to visit the specific test sites set up rather than other sites in the Borough.

During around three weeks of dedicated testing in Sefton for the Delta variant, over 3,100 PCR tests were carried out at the drive-through, walk-through, and pop-up test sites.

On one Saturday, an additional, "Street Team" also handed out hand sanitiser to members of the public and information and a rapid home test (lateral flow). People who weren't confident about taking a rapid test at home could choose to go for an assisted test at venues in the area.

Swift action taken by the council and local health chiefs combined with the area's already very high vaccination rates helped contain the outbreak.

In the seven days to May 16th, 2021, the infection rate for Sefton fell from 52 per 100,000 to 28 per 100,000 people.

Case Studies

Southend Council – Anticipating increase of potential non-compliance.

A series of complaints about a specific supermarket not observing correct Covid-safe practices, allied with observation from Councillors, and Officers including their own Ambassadors was the catalyst for Southend Council to take a more strategic approach.

Southend were considering the risks around the festive period and the likelihood of changing to a higher tier. In addition to specific complaints, Officers had noticed that supermarkets were not as rigorous in complying with Covid-19 regulations as they had been in March 2020: including allowing more people in the store and a lack of challenge to those not wearing face masks. Southend checked through the risk assessments of supermarkets, to ensure they were robust and being properly implemented.

Anticipating high footfall in large retailers, Southend Council decided to write to all large retailers across their borough reminding them of the importance of asking customers to wear face coverings and keep social distancing. The letter, from the council's Chief Executive and Director of Public Health, was shared with local trade associations and other business contacts to help get the message out to smaller shops and stores. The letter was sent to all major retailers including Asda, Waitrose, Marks and Spencer, Tesco, Sainsburys, Nisa, Co Op, Lidl, Morrisons and Aldi, as well as Leigh Traders Association, Southend BID (Business Improvement Districts) and representatives from Hamlet Court Road, Shoebury, Southchurch and Thorpe Bay shopping areas.

It was further supported by a webinar designed to support local businesses to adapt to the new restrictions that were coming into force. This challenge resulted in lower numbers of people being allowed in some of the stores.

As a follow up, Southend Ambassadors increased the number of visits made to businesses that remained open, sharing advice and guidance, and responding to concerns. As a result, no formal interventions were required. The letter also reminded local businesses that they can report breaches of Covid-19 regulation to the Police.

The council also shared the letter via a stakeholder group of local businesses, set up earlier in 2020, and used their networks to communicate concerns and expand their reach.”

Burnley Council – Deploying resources effectively.

Burnley Council continued to develop their compliance and enforcement work throughout the pandemic. They have used intelligence to identify sectors of concern at distinct stages of lockdown and developed targeted responses. In the run up to the release from the first national lockdown Burnley produced Covid-secure information that was distributed to various business sectors. Towards the end of June 2020 when the close contact sector reopened a campaign was developed that focussed on engaging and explaining to the 82 businesses within the sector what they needed to do. That included a series of visits being carried out to provide compliance information & advice specifically relevant to them. The campaign led to greater compliance across the sector.

They identified additional capacity through redeploying Civil Enforcement staff from the Car Parking Team these staff were utilised as Covid Marshals, engaging, and explaining Coronavirus restrictions to retail and businesses on the high street. They escalated egregious breaches to Enforcement Officers and fed back information on places or sectors of concern.

An area of concern for the Council was the disproportionate high rate of Covid infection amongst the BAME population, Covid Marshalls regularly carried out several walk-by and drop-in visits to business in these areas.

By bringing together intelligence from Public Health, Enforcement Officers and Marshalls it was found that several beauty salons, hairdressers, and barbers, including some within the BAME (Black and Minority Ethnic) community, were non-compliant with instances of large numbers of people inside premises, problems with queuing arrangements and a lack of PPE and other control measures in use.

This led to further targeted interventions through August, September and again in December 2020, including continued engagement, visits to the premises, the issuing of factsheets, posters and mailshots, and a robust proactive presence in the area. Follow up visits were conducted to ensure compliance, and, in most cases, this was achieved. Where businesses failed to comply then escalation action was undertaken by Environmental Health Officers which resulted in enforcement action being taken where necessary.

At each stage when regulations changed, or as local and national restrictions have been imposed information has been provided to the sector for example on contact tracing/QR code requirements.

In the minority of premises where non-compliance has persisted informal and formal action has been. The Council has made use of various Covid and non-Covid enforcement powers. Community Protection powers have in the main been utilised to deal with non-compliance with Covid secure guidance relating to PPE and face-coverings. Four Community Protection Warning Notices have been issued. In two of those businesses further issues arose and Community Protection Notices were issued. Prohibition Notices were also used where one business continued to operate through the second lockdown.

This approach allowed resource to be redeployed efficiently and effectively, targeting instances of non-compliance quickly. It also ensured a prominent level of engagement with those who have an increased risk of infection, developing relationships within that community.

Royal Borough of Kensington & Chelsea (RBKC) - Testing of new policies.

RBKC have noticed that the Covid pandemic acted as a catalyst allowing them to work in a new way including testing new policies and , where they can help with various aspects of the pandemic, bringing them forward. Examples include:

Bringing forward pedestrianisation schemes: the requirements for social distancing meant the council brought forward a scheme to pedestrianise the Portobello Road market area. They are considering other high footfall areas where pedestrianisation will help non-essential retail and hospitality venues.

They have built on their street warden scheme established in early in 2020 so that it is now a well-developed joined up with other teams who work on wider anti-social behaviour including the noise and nuisance teams.

The demands of Covid-19 led to increased joint working between different departments to help progress issues and identify mutual interests. Not only has this resulted in a more comprehensive approach across different services it has also helped resolve issues in a much shorter timescale, supporting both the local community and businesses within the area. An example of the latter is the way the licensing team has worked with economic development teams. Aware of the potential for the increased amount of licensing work anticipated for different lockdown easements RBKC set up several forums to engage and communicate with both residents

and businesses; have a pre application service, where a business can have a 1-2-1 meeting about their application and be supported in the need to engage with residents in advance of their application. The Covid Enforcement Group meets once a week as well as a weekly Community Safety Partnership Tasking Group meeting, and includes compliance and enforcement officers, and links to the local Police. This allows areas of concern to be identified early and addressed promptly. On a monthly basis there is a multi-agency meeting about businesses that are causing concern in the area around enforcement matters.

RBKC has analysed data obtained during the 2020 - 21 to inform their plans of where best to deploy wardens in the borough. Sources used have included areas of high footfall, complaints of ASB (Anti-Social Behaviour) and noise and nuisance issues.

Beaches and tourism

The relaxation of restrictions as detailed in the roadmap document, combined with current restrictions imposed on travel to overseas countries are expected to place an increase in the numbers of people taking holidays within the UK (United Kingdom). Beaches, tourist attractions and Areas of Outstanding Natural Beauty (AONB) could experience a significant increase in visitor numbers.

In the Summer months of 2020, following the lifting of restriction following the first lockdown a number of these areas experienced an increased influx of visitor numbers. In particular, the major incident that was declared after large numbers of people visited Bournemouth and the Dorset coastline in June 2020. Issues included lack of social distancing, overcrowding, traffic gridlock and anti-social behaviour.

These authorities are looking at measure that could be taken to prevent a repeat of these issues.

Case Study – Cornwall District Council

Following the return of a limited number of students to the Penryn campus of Falmouth University, Falmouth Safe Group comprising of multi-agency representatives, recommenced patrols in the town, residential and beach areas. The patrols operated from 8pm – 3am, 7 days per week.

This is a unique issue for Falmouth, which has a disproportionately high student population for a town of its comparative size.

Following experiences from the lifting of lockdown restriction in 2020, these patrols help monitor the behaviour of students returning to campus and provide support for how students interact with the wider public in the area around current Covid restrictions.

The authority also used funds from enforcement grants to target compliance activities. They are anticipating a busier than usual summer holiday period due to current overseas travel regulations and have used intelligence gained from the previous lifting of restriction in 2020.

In potentially busy night-time coastal areas, which may attract anti-social behavioural issues, they plan to deploy extra compliance officer resources from less busy areas during evenings and night times to meet the anticipated increase in volume of visitors.

Bournemouth, Christchurch, and Poole Council – using technology to communicate.

Developed in Bournemouth, Christchurch, and Poole by BCP Council, Europe's first Beach Check app was launched last year in response to an increase in visitor numbers in the region. The innovative app provided real-time updates on the crowding status of local beaches. This helped people to make safe choices and plan their visit, as well as providing valuable resort management data.

Over the course of the winter BCP Council, with support from MHCLG (Ministry of Housing Communities and Local Government) (Ministry for Housing Communities and Local Government) has been working hard to automate the app even further. Relaunching for the new 2021 season, the app now incorporates automatic updates and algorithms from footfall sensors and additional cameras to help staff accurately manage app updates. Live updates can be streamed within the app showing parking space availability at key locations. Further information on available facilities such as toilets on the seafront is also provided.

Due to the success of the app, BCP Council has been awarded an additional £40,000, through the MHCLG Local Digital Fund to further develop the app and support its roll out in other towns and cities across the UK. Beach Check UK will launch in time for peak summer 2021.

Further Case Studies

If you have a successful or innovative example of compliance and enforcement in your area which could be included in this document, we would like to hear from you. Please email: SaferPlaces@communities.gov.uk [<mailto:SaferPlaces@communities.gov.uk>] and put "Case Studies" in the subject line with details.

