

Appendix 1: IEE table when considering zoonotic risk and control measures at animal visitor attractions

Initial Enforcement Expectation/Action – Key
CP – Improvement Notice AND Consider Prosecution
PN – Prohibition Notice
IN – Improvement Notice
NOC Letter – Notification of Contravention Letter
VW – Verbal Warning

The following scenarios reflect the key issues and are designed to aid application of the Enforcement Management Model (EMM) when considering the health hazards associated with <i>E. coli</i> O157 and <i>Cryptosporidium parvum</i> and other micro-organisms. In every case the 'Established' standard is the current standard. The Initial Enforcement Expectation (IEE) is given below for a range of situations. Duty holder and strategic factors must then be considered when applying the EMM to determine the final enforcement decision.			
Scenario	Application of EMM	Standard	Initial Enforcement Expectation
THE MAIN BUSINESS ACTIVITY			
Establish the enforcing authority for the business.	n/a	Defined	Advise duty holder and where necessary transfer premises to relevant enforcing authority.
RISK ASSESSMENT			
Failure to carry out a risk assessment which identifies and sufficiently addresses the significant risks on site.	If there is control of risk on site but either absence of written assessment (if 5 or more employees) or a poor assessment is in place, any failure in the risk assessment should be assessed as a Compliance and Administrative arrangement under EMM in which case the level of non-compliance will range from Minor to Absent. If inadequately controlled significant risks are seen on site, it is appropriate to assess any failures of risk assessment relating to that lack of control by way of risk gap, in which case the Risk Gap will range from Substantial to Extreme.	Established	Compliance and Administrative arrangements IEE: VW – NOC Letter – IN Risk Gap IEE: IN – CP
POLICY			
Failure to have a policy which sets out the animal visitor attraction's approach to maintaining visitor safety.	This should be assessed as a Compliance and Administrative arrangement under EMM. The policy (and associated procedures) should address things such as: roles and responsibilities of staff, how safety critical information will be communicated to visitors, the scope and frequency of in-house inspections, cleaning regimes (for	Established	Compliance and Administrative arrangements IEE: VW – NOC Letter - IN

	pens, play equipment, pathways etc), supervision arrangements e.g. for petting areas, site plans etc. If there is either no policy or deficiencies in the policy the level of non-compliance will range from Minor to Absent.		
VISITOR INTRODUCTORY INFORMATION			
Failure to provide visitors with adequate information on the health and safety risks to them while they are on site and the control measures in place, before being exposed to that risk. For example - the need to explain the potential risks to health from micro-organisms and the reasons why handwashing is so important before any potential contact with animals takes place.	It is important that visitors to animal visitor attractions understand the risks to them while they are on site, especially from contact with the micro-organisms that animals carry. It is equally important that visitors understand the control measures provided to control the risk e.g. handwashing before and after specific activities. Animal visitor attractions should provide information on site risks and controls before visitors are exposed to that particular risk. Failure to do this may undermine the effectiveness of other control measures in place. If: - visitors are not given adequate information on the site risks to their health and safety e.g. risk from zoonotic disease. - or - the control measures in place to mitigate those risks are not properly explained e.g. handwashing, eating areas etc. the Risk Gap will range from Substantial to Extreme depending on the level of deficiency.	Established	Risk Gap IEE: IN – CP Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
PREMISES LAYOUT			
Failure to prevent visitors to the animal visitor attraction accessing high risk areas e.g. areas where transport is operating / compost stores / slurry pits / near to badly stacked bales etc.	Visitors should be prevented from accessing high risk areas e.g. hazardous areas on a working farm. If visitors are allowed inadequately controlled access to high risk areas such as an operational working farm which is operating plant and machinery etc this will give rise to a Risk Gap of Extreme.	Established	Risk Gap IEE: PN and CP
Failure to clearly define visitor routes around the animal visitor attraction.	Clearly defined routes assist in keeping visitors to designated areas, allow for better control of visitor movements and allow better segregation of areas e.g. animal contact, look and see areas, and non-contact areas. Usually routes can be defined by a mixture of pathways, signage and fencing, but where this is not reasonably	Established	Risk Gap IEE: IN – CP

	practicable e.g. a working farm that opens once a year on Open Farm Sunday for example, close continued supervision of the visitor party around a planned route may suffice. Where there are no clearly defined visitor routes or close supervisory controls in place, the Risk Gap would range from Substantial to Extreme.		Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
Failure to clearly define and segregate: • animal contact areas (areas where animal contact is allowed or intended e.g. petting barns) • look and see areas (areas where animal contact is not intended but may still be possible e.g. paddocks containing animals on farm trails) • non-contact areas (areas where animal contact must not be possible e.g. animal areas next to eating or playing areas).	Failure to properly define and where necessary segregate areas can undermine the control of risk. Areas should be defined so that visitors understand the level of risk and required control measures in any particular area. This can be achieved by using an appropriate combination of signage, fencing and supervision. Where risk areas are not clearly defined and appropriately segregated the Risk Gap would range from Substantial to Extreme. Areas where animal contact is allowed or intended should be supervised by trained staff while in use and have good washing facilities close by. “Look and see” areas (where visitor contact with the animals / potentially contaminated fencing is not intended but may still be possible) should be controlled based on the risk they pose. Depending on the risk, it may be reasonably practicable to double fence “look and see” areas. Visitor contact with animals / potentially contaminated fencing should not be possible in non-contact areas such as eating and playing areas. This can be achieved by double fencing of any nearby areas containing animals. It may be possible for working farms that open infrequently to control the risk from animal contact by means of close supervision, by sufficient numbers of trained staff, during a pre-planned guided tour of the farm.	Established	Risk Gap IEE: IN – CP Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
Failure to locate washing facilities so that they can be used immediately after contact with animals, before using eating areas,	Visitors should be able to wash their hands immediately after contact with animals, before using eating areas, before and after using playing areas, and before leaving site. Washing facilities should be located near to these areas so that this can be achieved.	Established	Risk Gap IEE: IN – CP

before and after using playing areas, and before leaving site.	If they are not, the Risk Gap will range from Substantial to Extreme depending on the distances between these areas and washing facilities.		Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
Failure to prevent visitors in eating or playing areas from being able to make contact with animals / potentially contaminated fencing in adjacent areas.	It is particularly important to prevent contact with animals / potentially contaminated fencing contact by people in eating or play areas. Contact with animals / potentially contaminated fencing while visitors are eating gives rise to a risk of ingesting micro-organisms that can cause disease. Contact with animals / potentially contaminated fencing while visitors are using the play equipment can also spread micro-organisms that can cause disease. An accepted way of segregating eating / play areas from adjacent animal areas is by using double fencing. Eating or playing in areas where contact with animals is possible should not be permitted and gives rise to a Risk Gap of Extreme .	Established	Risk Gap IEE: PN and CP
ANIMAL CONTACT AREAS			
Failure to prevent public entering animal pens i.e. pens where the animals are usually kept.	Failure to prevent the public especially children entering animal pens where faeces or contaminated bedding is likely to be underfoot gives rise to a Risk Gap of Extreme due to the potential for contamination with micro-organisms that can cause disease. Visitor handling of animals should be supervised by farm staff and take place outside the animal pens in designated areas.	Established	Risk Gap IEE: PN and CP
Visitors permitted to eat and drink in the animal contact areas.	Eating or drinking in animal contact areas is unacceptable and gives rise to a Risk Gap of Extreme due to the risk of contamination of hands and food with micro-organisms that can cause disease.	Established	Risk Gap IEE: PN and CP
Failure to segregate sick animals from the public	Where animals are sick but visitors are still able to make contact with them, the Risk Gap will range from Substantial to Extreme . The attraction should be able to demonstrate what they do to quarantine sick animals that pose a risk to visitors	Established	Risk Gap IEE: IN – CP Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
HAND WASHING SIGNAGE			
Visitors not advised / instructed to wash their hands immediately after	Hand washing is a risk control measure which is especially important immediately after petting animals, before using eating or	Established	Risk Gap IEE: IN – CP

petting animals, before using eating or smoking areas or before and after using play areas.	smoking areas and before and after using play areas. Visitors should also be able to wash their hands before leaving site. There should be adequate arrangements in place so that instructions are communicated to visitors to wash their hands in these situations. One way of achieving this would be to display highly visible signage in prominent places next to animal contact areas, before eating, playing and smoking areas which instruct people to wash their hands. Verbal reminders by staff to visitors leaving animal contact areas to wash their hands may also be reasonable to achieve. Where adequate arrangements do not exist, the Risk Gap would range from Substantial to Extreme.		Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
CLEANING AND CLEANLINESS			
Failure to keep all visitor routes reasonably clean and free from build-up of animal faeces.	Visitor routes, including those in animal contact areas should be kept reasonably clean to minimise risks of contamination of hands and footwear and reduce transfer of faecal matter to non-animal areas. Measures should be in place to prevent run-off material from contaminating walkways and visitor areas e.g. by putting boarding at the base of pen fencing. Periodic cleaning of walkways will be required. If visitor routes are not kept reasonably clean this will give risk to a Risk Gap of Substantial.	Established	Risk Gap IEE: IN Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
Failure to regularly clean play area equipment.	Play area equipment is regularly touched by children and should be designed so it can be regularly cleaned to reduce the risk of spread of micro-organisms that may inadvertently be transferred to play equipment. Where play equipment is not regularly cleaned this will give risk to a Risk Gap of Substantial. Where there is no or inadequate signage to remind visitors to wash their hands before and after using play areas and no or inadequate washing facilities located nearby this will give risk to a Risk Gap of Extreme.	Established	Risk Gap IEE: IN – CP Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
Failure to regularly clean and disinfect pen divisions and gates in animal contact areas which are likely to be touched by visitors.	Pen divisions and gates in animal contact areas are regularly touched by children and should be regularly cleaned in order to reduce the risk of spread of micro-organisms that may be transferred from animals inside the pens. Where pen divisions and	Established	Risk Gap IEE: IN – CP

	gates in animal contact areas are not regularly cleaned this will give risk to a Risk Gap of Substantial . Where there is also no or inadequate signage to remind visitors to wash their hands and no or inadequate washing facilities located nearby this will give risk to a Risk Gap of Extreme .		Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
WASHING FACILITIES			
No hand washing facilities provided.	Thorough hand washing is an important risk control measure. A lack of hand washing facilities where there is potential for visitors to have contact with animals / potentially contaminated fencing gives risk to a Risk Gap of Extreme . Provision of hand gels etc does not alter the Risk Gap if no washing facilities are provided.	Established	Risk Gap IEE: PN and CP
Insufficient number of hand washing facilities provided.	If there are an insufficient number of hand washing facilities to deal with the numbers of visitors this gives rise to a Risk Gap of Extreme depending on the numbers of visitors and the deficit in washing facilities. The location of washing facilities is also very important, especially where children are involved. There is a risk of them putting fingers in mouths, touching their faces etc if hands are not washed soon after animal contact.	Established	Risk Gap IEE: PN and CP
No clean running hot and cold or warm water provided.	The default standard is that clean running hot and cold water should be provided for visitors to wash their hands. This is considered reasonably practicable in the majority of cases. Where this standard is not met the Risk Gap would range from Substantial to Extreme . <i>In exceptional circumstances, such as premises that open on an occasional basis in the summer providing cold running water only may be acceptable. The risk assessment should address this.</i> Where no clean running water at all is provided this gives rise to a Risk Gap of Extreme .	Established	Risk Gap IEE: IN – CP PN if no clean running water at all is provided.
Re-using water for multiple hand washes.	Re-using water for multiple hand washes e.g. providing a bowl so that many people wash their hands in the same water should not be allowed as this creates a risk of passing on possible contamination.	Established	Risk Gap IEE: PN and CP

	Where water is used for multiple hand washes this gives rise to a Risk Gap of Extreme.		
No soap provided as part of welfare facilities.	Where soap is not provided this gives rise to a Risk Gap of Extreme. Dispensable liquid soap is better than bars of soap. Bars of soap can be dropped on the floor and become contaminated over time. It is reasonably practicable to provide a liquid soap dispenser.	Established	Risk Gap IEE: PN and CP If only bars of soap are provided the animal visitor attraction should be required to provide a liquid soap dispenser via VW or NOC Letter.
No safe means of drying hands provided.	A safe means of drying hands should be provided. Disposable paper towels or a pull down material towel via a dispenser are the best options. A hot air hand dryer may also be acceptable. Re-usable towels should not be used as they can become contaminated and pose a risk to follow on users. Failure to provide any suitable means of drying hands may mean that hands are dried on potentially contaminated clothing. Drying of hands safely forms part of the hand washing process and failure to provide a safe means to dry hands gives rise to a Risk Gap of Extreme.	Established	Risk Gap IEE: PN and CP
Using cleansing wipes or anti-bacterial gels as a substitute for proper hand washing.	Use of cleansing wipes or anti-bacterial gels are not an acceptable substitute for proper hand washing. Where only wipes or gels are used this is not acceptable and gives rise to a Risk Gap of Extreme.	Established	Risk Gap IEE: PN and CP
Washing stations should be clearly signposted.	Wash stations should normally be clearly visible because they should be sited next to higher risk areas such as petting areas etc. Wash stations located in buildings may need signposting because it may not be obvious where they are. It is important that visitors know where to wash their hands or there is a risk that they will not do so. One way of ensuring that visitors know where to wash their hands is to clearly signpost washing stations. Unless washing facilities are clearly identifiable, the failure to clearly signpost wash stations gives rise to a Risk Gap of Substantial.	Established	Risk Gap IEE: IN
Failure to clean welfare facilities at suitable intervals, at least on a daily basis.	Welfare facilities should be cleaned at least daily when the animal visitor attraction is open. It is reasonably practicable to do this. Failure to properly clean the welfare facilities can increase the risk of spreading micro-organisms that cause disease. If welfare facilities	Established	Risk Gap IEE: IN – CP

	are not cleaned on a daily basis, the Risk Gap would range from Substantial to Extreme depending on any cleaning that does take place, its frequency and the condition of the welfare facilities.		Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
Open top or pedal operated bins should be provided in or next to welfare areas so that visitors do not have to touch the bins in order to dispose of towels etc.	Avoiding the need to touch bins and bin lids after washing hands (in order to dispose of waste) reduces the risk of hand contamination. It is reasonably practicable to provide open top or pedal operated bins. Where open top or pedal bins are not provided as part of welfare facilities this gives rise to a Risk Gap of Substantial .	Established	Risk Gap IEE: IN
No facilities to clean wheelchairs, pushchairs or footwear as necessary.	The animal visitor attraction should have adequate facilities to clean visitor wheelchairs, pushchairs and footwear as required. Where this is not provided this gives rise to a Risk Gap of Substantial . Visitors should be instructed to wash their hands after changing footwear as it may be contaminated. Facilities should be close by to allow this to happen.	Established	Risk Gap IEE: IN Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.
Are there signs to instruct on hand washing techniques?	Poor hand washing techniques may leave contamination on hands. Signs to instruct visitors on hand washing techniques at wash stations may reduce the risk of contaminated hands. If good welfare facilities are in place, but there is no information to instruct on good hand washing techniques, the Risk Gap would range from Nominal to Moderate .	Established	Risk Gap IEE VW – NOC Letter
TRAINING OF STAFF			
Employees/staff/volunteers are not able to identify basic safety precautions such as: 1. animal contact areas (e.g. petting areas), look and see areas (e.g. paddocks containing animals on trails) and non-contact areas (e.g. eating / playing areas) on site. 2. visitor wash station locations. 3. visitor go and no-go areas. 4. areas where hand washing must occur e.g. after petting	If staff cannot explain this basic information they may be ill equipped to properly advise visitors and keep them safe. Staff should have received adequate training in at least the 7 areas mentioned. If none of the staff who have contact with visitors are able to provide satisfactory answers to the 7 areas outlined the Risk Gap would range from Substantial to Extreme depending on what other control measures were in place. If only some of the staff who have contact with visitors are able to provide satisfactory answers to the 7 areas outlined, they should be trained to an appropriate level and paired with staff who have a good understanding of the 7 areas until training is complete.	Established	Risk Gap IEE: IN – CP

animals, before using eating areas. 5. why hand washing is important 6. being able to explain the nature of the health risks from animals e.g. zoonoses. 7. explain how the above safety critical messages are given to visitors.			
Employees/staff are not able to explain how to manage difficult and uncooperative visitors.	Most visitors to animal visitor attractions will be well behaved and cooperate with instructions. However, difficult and uncooperative visitors may endanger themselves and others through their actions. They may spread contamination throughout the rest of the site e.g. by entering pens, eating in contact areas, refusing to wash hands etc. The animal visitor attraction should instruct its staff on what to do in the event that they have a difficult or uncooperative visitor. Where staff have not been instructed on what to do in the event of having to manage difficult or uncooperative visitors the Risk Gap would range from Nominal to Moderate.	Established	Risk Gap IEE: VW – NOC Letter
SUPERVISION OF VISITORS			
Sufficient levels of supervision exist in key areas of the animal visitor attraction e.g. animal contact areas, in order to ensure that visitors adhere to the site rules.	Adequate supervision of visitors is crucial to ensuring that they adhere to site rules. If the animal visitor attraction does not have in place sufficient numbers of trained staff in key areas, the risk of visitors not following site rules increases. If there is inadequate supervision of visitors, the Risk Gap would range from Nominal to Substantial depending on the level of inadequate supervision and the associated risks to visitors.	Established	Risk Gap IEE: VW – NOC Letter - IN
LIVESTOCK MANAGEMENT			
Are there livestock management procedures in place?	This should be assessed as a Compliance and Administrative arrangement under EMM. Poor livestock management can increase the risk to visitors of coming into contact with micro-organisms. There should be livestock management procedures in place which cover things such as: management of bedding and animal cleanliness, how bedding should be changed to avoid spreading contamination, management of sick/pregnant/stressed animals especially in relation to contact areas, regular checks of animals for	Established	Compliance and Administrative arrangements IEE: VW – NOC Letter – IN The Animal and Plant Health Agency (APHA) can provide more information and guidance on standards of animal health and welfare -

	signs of illness, veterinary input. Depending on what procedures are in place for livestock management the level of non-compliance will range from Minor to Absent.		https://www.gov.uk/government/organisations/animal-and-plant-health-agency
Where there is potential for contact with animals by visitors, are animals excessively dirty and do pens have a build-up of faecal material?	There is a risk to visitors of coming into contact with micro-organisms from excessively dirty animals or excessively dirty pens. The risk is increased if visitors are allowed or encouraged to have contact with the dirty animals or pens. Where there are excessively dirty animals or pens that visitors may have contact with this gives rise to a Risk Gap of Extreme.	Established	Risk Gap IEE: IN – CP Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public. The Animal and Plant Health Agency (APHA) can provide more information and guidance on standards of animal health and welfare - https://www.gov.uk/government/organisations/animal-and-plant-health-agency
MANURE & COMPOST HEAPS			
Manure and compost heaps and their liquid run-off are not managed and segregated to prevent avoidable spread of faecal matter.	Manure and compost heaps should ideally be located well away from pedestrian routes. Wherever the heap is located, visitors should be prevented from getting access to it, and run-off of faecal matter onto walkways or areas used by visitors should be prevented. Depending on the extent of the failings related to these factors the Risk Gap would range from Nominal to Extreme.	Established	Risk Gap IEE: VW – NOC Letter – IN - CP Consider issuing a PN if there is a risk of serious personal injury/health effect to members of the public.