

Preventing or controlling ill health from animal contact at animal visitor attractions – Guidance on inspection and enforcement

Open Government status - Open

Target audience - HSE inspectors and Environmental Health Officers (EHOs) in local authorities (LAs)

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Summary

This guidance provides information and advice on inspection and enforcement action to be taken by HSE inspectors and Environmental Health Officers (EHOs) in connection with the risk of infection from micro-organisms such as Escherichia coli O157 (E. coli O157) and Cryptosporidium parvum (C. parvum) from animals at visitor farms, open farms and similar attractions, hereafter “animal visitor attractions”.

Guidance for dutyholders on the measures they should take to protect the health of visitors and staff is set out in the Industry Code of Practice ‘Preventing or controlling ill health from animal contact at visitor attractions’ and the abridged ‘Summary of control measures’ both available at <http://visitmyfarm.org/farmers-resources/339-industry-code-of-practice>

The Industry Code of Practice sets out the types of premises covered by the guidance. This document also covers those types of premises and refers to them collectively as animal visitor attractions.

Introduction

The standards and benchmarks set out in this guidance are determined by the application of HSE’s Enforcement Policy Statement (EPS) and Enforcement Management Model (EMM) to the risks associated with E. coli O157, C. parvum and other infectious micro-organisms at animal visitor attractions. It is important that inspectors and EHOs ensure that animal visitor attractions meet the standards set out in this guidance and the Industry Code of Practice.

Action

HSE inspectors and EHOs should be familiar with the content of this guidance and refer to it when engaging with animal visitor attractions in the following circumstances:

- Carrying out inspections of such attractions.
- Carrying out investigations into cases of infection with E. coli O157, C. parvum or other micro-organisms. Note that for outbreaks, investigations will usually be led by the relevant public health authority for England, Wales or Scotland, namely Public Health England/National Institute for Health Protection, Public Health Wales and Health Protection Scotland. HSE is expected to co-operate with the public health authority investigation. However, the duty and authority to deal with on-site risk remains with either HSE or the LA depending on the nature of the site. Inspectors and EHOs may have limited experience of dealing with an outbreak of zoonotic disease and so may need support. HSE's Agriculture Sector are able to provide advice to inspectors or EHOs involved in the investigation of an outbreak. Seeking support early is advised.
- Carrying out investigations in response to concerns raised.
- Providing help and advice to such attractions.

Inspections / investigations should assess standards found at the animal visitor attraction against the standards required by health and safety law. The guidance set out in the Industry Code of Practice sets out ways in which dutyholders may achieve compliance with the law.

Inspectors and/or EHOs carrying out visits to animal visitor attractions, should use this guidance and the standards set out in the Industry Code of Practice as the basis for assessing compliance.

LAs may contact HSE's Enforcement Liaison Officers (ELO) for support on:

- Determining the correct enforcing authority for premises.
- To assess the degree to which specific animal visitor attractions comply with the guidance before taking enforcement decisions. HSE is prepared to assist Senior Environmental Health Officers, but any assistance will be on the understanding that HSE is not the enforcing authority and cannot make enforcement decisions.

ELOs are advised to contact HSE Agriculture Sector for additional support where appropriate.

Background

Animal visitor attractions are mainly commercial operations the primary purpose of which is leisure/entertainment, at which visitors are encouraged to have hands-on contact with animals. Responsibility for enforcing health and safety legislation at such premises falls to the LAs by virtue of the Health & Safety (Enforcing Authority) Regulations 1998. However, there are a number of equivalent attractions on premises, the main activity of which is as an 'agricultural undertaking' for which enforcement falls to HSE. LAs should consult with the ELO where there is any doubt over the correct enforcing authority.

Guidance on the risk of infection with *E. coli* O157, *C. parvum* and other micro-organisms is predicated on the assumption that microbiological hazards are always liable to be present at animal visitor attractions i.e. that it is not possible to completely prevent exposure. The guidance focuses on preventing or controlling the risk.

Different types of animal visitor attraction present different levels of risk of exposure to or infection with *E. coli* O157 and *C. parvum* etc. The degree of risk is difficult to quantify but influencing factors include the:

- number, type and sometimes age of animals.
- degree of contact between people and animals.
- presence or absence of eating facilities.
- adequacy of control measures, particularly hand washing facilities.
- adequacy of communication of risk and control measures to visitors.

Organisation

HSE-enforced farms

Farms subject to HSE enforcement are working farms (i.e. commercial agricultural undertakings) whose primary purpose is agriculture and for which visitor access by members of the public is educational and secondary or incidental to the main farm business. This type of animal visitor attraction will not normally be a separate business nor will it be dissociated from the management of the main farm, but do

check.

Such premises include:

- Working farms visited by school parties.
- Working farms that participate in various schemes for educational purposes, eg farms in England and Wales that have achieved accredited training status through the Countryside Educational Visits Accreditation Scheme (CEVAS) administered by Linking Environment And Farming (LEAF) Education.
- Working farms that open to the public for specific seasonal events eg during lambing or as part of the national LEAF Open Farm Sunday scheme.

Current guidance

As well as the full [Industry Code of Practice](#), a summary document, and an advice document for teachers in charge of school trips is also available from the Access to Farms website. All three documents have been produced by the Access to Farms partnership which includes representatives from a number of organisations whose members encourage visitors, especially children to visit animal visitor attractions to view, touch or pet animals.

Both HSE and the Chartered Institute of Environmental Health were consulted in the production of the Industry Code of Practice. Both endorse and support the code.

The Industry Code of Practice incorporates the recommendations from the Independent Investigation Committee report into the major outbreak of E. coli O157 in Surrey in 2009. It is aimed at dutyholders and through the supplement at teachers or others in charge of visits as a work activity.

The Industry Code of Practice is not aimed at members of the public. However, it is important to remember that members of the public have a personal responsibility for following the good hygiene advice provided to them when visiting animal visitor attractions.

Evidence base for the assessment of risk

It is important to understand that there are a number of different zoonotic diseases which can be passed from different animals to people. Micro-organisms which cause

disease can be carried by the animal even when it appears to be clean and healthy. Some zoonotic diseases can be life threatening.

Two micro-organisms carried by animals commonly found at animal visitor attractions and which pose a risk of disease to humans are *E. coli* O157 and *C. parvum*. Historically *E. coli* O157 and *C. parvum* have been linked to most gastrointestinal disease outbreaks at animal visitor attractions.

E. coli O157 is the most frequently diagnosed Shiga toxin-producing *Escherichia coli* (STEC) strain to cause illness in Great Britain. Terms such as VTEC (Vero cytotoxin-producing *Escherichia coli*) or STEC may be used interchangeably when talking about *E. coli* O157. Essentially, STEC are a group of bacteria that cause infectious gastroenteritis. Symptoms can range from mild gastroenteritis through to severe bloody diarrhoea and in some can develop into a potentially fatal illness. There are around 800 confirmed cases of STEC in Great Britain each year¹.

Cryptosporidiosis is caused by the bacteria *C. parvum*. There are around 4000 reported cases of cryptosporidiosis in Great Britain each year.

C. parvum and *E. coli* O157 can be found in many types of animal but particularly cattle and sheep and goats. The disease can survive in the excrement of animals for some considerable time. Hygiene is extremely important at animal visitor attractions and poor hygiene standards should not be tolerated by regulators.

Micro-organisms such as these can be transmitted from animals to humans and cause disease. Children are more at risk of developing serious life changing complications from these diseases. Very low numbers of micro-organisms can cause human infection.

Pregnant women, the elderly, or people with weaker immune systems may also be at increased risk from some types of zoonotic disease.

Of all of the cases of zoonoses reported annually, it is not known exactly how many

¹ <https://www.gov.uk/government/collections/vero-cytotoxin-producing-escherichia-coli-vtec-guidance-data-and-analysis>

result from infection at animal visitor attractions. However, with good controls in place the risk of people contracting zoonotic diseases should be low.

Zoonotic diseases contracted by members of the public are not notifiable diseases under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013. However, where people are carrying out work activities, such as tending farm animals, zoonotic diseases are reportable under RIDDOR 2013.

Health and Safety arrangements

Staff may have health issues which make them more vulnerable to micro-organisms found at animal visitor attractions. Occupational health advice should be taken for these staff members.

Subject to the above statement, the following points should be noted in carrying out visits to animal visitor attractions:

- No additional or special precautions need be taken over and above those required for normal visits to farms.
- No additional personal protective equipment is required.
- Staff should thoroughly wash and dry their hands (using liquid soap) as appropriate and necessary during and at the completion of site visits. Further advice on good handwashing practice is set out in the Industry Code of Practice.
- HSE's biosecurity advice, which is available on its website, should be followed at all visits. For further information visit http://www.hse.gov.uk/foi/internalops/sims/ag_food/1_10_02/index.htm

Enforcement guidance

Guidance on enforcement action to be taken by HSE inspectors and EHOs is set out in [Appendix 1](#) and reflects the principles set out in the HSE's EPS and EMM.

The EMM provides a framework to assist inspectors to make enforcement decisions. Inspectors are expected to apply the EMM including application of dutyholder factors.

Guidance on applying the EMM principles to health risks is set out in HSE document “Enforcement Management Model (EMM): Application to Health Risks” (formerly OC130/5) and is intended to help inspectors reach a proportionate enforcement decision. It contains advice on use of the EMM, determining the Risk Gap, risk-based decisions and compliance issues and refers to the Initial Enforcement Expectation (IEE).

The numbers of people who may potentially be exposed to zoonotic diseases at animal visitor attractions are such that it is appropriate to use the EMM Risk Gap Table for multiple casualties.

[Appendix 1](#) sets out the IEE for some situations which you may find at animal visitor attractions. Dutyholder factors should be taken into account as part of the EMM process in the usual way to determine the final enforcement decision, but poor standards should not be tolerated. The guidance in [Appendix 1](#) is there to:

- provide a transparent framework for making decisions on enforcement
- provide a guide for inspectors in making enforcement decisions
- promote proportionality and targeting by confirming the risk based criteria against which decisions are made
- promote enforcement consistency

Further references

Further information can be found at the following websites

- [HSE agriculture website](#)
- [Gov.uk information and guidance on zoonoses](#)
- [Industry Code of Practice](#)
- [Gov.uk information and links to DEFRA approved disinfectants](#)

Contacts

Vulnerable Workers, Agriculture, Waste and Recycling Unit

Appendices

[Appendix 1: IEE table when considering zoonotic risk and control measures at animal visitor attractions](#)