



**ENVIRONMENTAL HEALTH
FOOD SAFETY and HEALTH AND SAFETY
SERVICE DELIVERY PLANS**

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INTRODUCTION

Food Safety and Health and Safety at Work remain important statutory regulatory functions for councils, at the centre of their Environmental Health services and both play a vital role in maintaining public safety. This document sets out what those functions do and importantly, how those duties are carried out. It therefore gives context around what both businesses and the public can expect when interacting with the services.

In common with other Food Safety Authorities, we are facing challenges caused by the increasing cost of living causing business to try and cut costs. Major changes in the way consumers access food, often via direct delivery rather than restaurant visits, present additional problems through a breakdown of the direct customer-restaurant relationship. There is also an increase in the number of home businesses that are registering, providing everything from cakes to ethnic cuisine, and food supplements.

Our role remains to help ensure food businesses produce and deliver products which are safe and produced from premises which are hygienic and properly controlled, thereby also helping the business to grow and thrive. It is also to provide information to the public to help them make informed choices about what and where to eat.

In addition, the team enforces Health and Safety in allocated premises. In 2027 we see the full implementation of the Terrorism (Protection of Premises) Act 2025, designed to improve public safety by requiring venues and events to prepare for and reduce the risk of terrorist attacks. This will affect venues with buildings holding more than 200 attendees, or outside spaces holding gatherings of more than 900. Through our work with event organisers, we will start to disseminate information produced by central government.

Our enforcement model seeks to protect public health, by supporting those businesses which seek to comply, and regulating and enforcing against those who do not, and who pose unacceptable risks to customers and workers alike.

This service plan forms the foundation of the service until the end of the council year in March 2027, and most likely the year after. Whilst Local Government Reorganisation may well change the structure of the service, it is likely that the key components of this Plan will change little, thus giving us a good foundation from which to move forward.

Nick Baker

Waste and Environmental Services Manager

1. **FOOD SAFETY AIMS AND KEY PRIORITIES**

1.1. **Service Aims**

Governmental Policy on food controls is dealt with by the Food Standards Agency (FSA). They set out through the Food Law Code of Practice, and the accompanying Practice Guidance, how food safety authorities should inspect, rate, and enforce food hygiene legislation. East Cambridgeshire District Council are expected to undertake all official food safety controls and related activities prescribed in specific legislation and those recommended within specific guidance as well as meeting the requirements of the FSA.

Food Safety inspection and enforcement is undertaken by the Environmental Health Commercial Team (the Team). The aim is to provide a food safety service in East Cambridgeshire that is proportional to the risk presented and consistent in the standards businesses are expected to maintain.

The annual inspection program is devised to align with the inspection frequencies published in the Food Law Code of Practice and the accompanying Practice Guidance¹. Inspecting officers are qualified, competent, and duly authorised to carry out the full range of interventions.

The Team spends time with new high-risk businesses to give them the best chance of earning and maintaining a high standard of hygiene compliance and works with existing businesses with the same aim.

The workplan consists of the delivery of:

- official controls where nature and frequency are prescribed in specific legislation,
- reactive work including enforcement in the case of non-compliance, managing food incidents and food hazards,
- investigation into and managing food complaints, and
- sampling in response to emerging issues and in support of national studies.

1.2. **Key Priorities**

The Covid pandemic of 2020-23 impacted on the food inspection programme through businesses not trading as normal, and the diverting of resources to enable the Council's specific functions under the pandemic. At the start of 2025 the inspection program was back to normal, but there were peaks and troughs in the inspection numbers throughout the year. A key priority has been to set the inspection numbers so that the team has an achievable target, whilst also ensuring all inspections are completed in accordance with the FSA's requirements.

¹ Food Law Code of Practice (England) (October 2025) and Practice Guidance (England) (October 2025)

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The table below summarises the frequency of interventions for different risk categories of food businesses, where A is the highest risk

Risk Category	Minimum Inspection Frequency
A	At least every 6 months
B	At least every 12 months
C	At least every 18 months
D	At least every 24 months
E	A programme of alternative enforcement strategies or interventions every three years.

In addition, our service priorities are set:

- To ensure that interventions are carried out commensurate with the principles of risk ensuring compliance with the relevant food laws.
- To ensure, as far as reasonably practicable, that imported food used or sold in premises within the district complies with all relevant Food Law.
- To ensure food complaints are investigated.
- To undertake a food sampling regime based on local and national priorities.
- To provide informed and helpful advice to businesses and the public alike on matters relating to food safety.
- To act on food safety alerts promptly and in a manner that is proportionate to the risks involved.
- To play an active role with neighbouring local authorities to ensure a consistent approach to food law enforcement.

2. **BACKGROUND**

2.1. **District Profile**

East Cambridgeshire District has approximately 850 food premises which are regulated by the council. We liaise closely with our partners across the county to ensure a consistent and effective regulatory service.

2.2. **Organisational Structure**

The official food controls are undertaken by the Commercial Team who sit within the wider Waste and Environmental Services Department. The departmental lead is the Waste and Environmental Services Manager who in turn reports to the Director of Operations. The department reports to the Operational Services Committee.

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The Senior Environmental Health Officer in the Commercial team (SEHO) is designated as the Lead Food Officer. They undertake the day-to-day management of the Team as well as contributing to inspection and complaint investigations.

As well as undertaking the official controls laid out by the FSA, the Team are also responsible for the Council's enforcement role in relation to Health and Safety at work, as well as the infection control aspects of public health legislation.

Officers are authorised to undertake a range of food, health and safety, and public health enforcement commensurate with their competence and experience. The staff establishment of the Team comprises 1 SEHO, 2 Environmental Health Officers and a Food Safety Officer representing 3.6 full-time equivalent (FTE) posts. They are supported by 0.4 FTE for administrative support.

Working closely within a small authority, the Team liaises with Licensing, Building Control, the Markets Team, Waste Management, and Ely Tourism.

2.3. External Partners

External to the Council, the Team have an authorised Public Analyst (PA) with the role currently being undertaken by Public Analysts Scientific Services Ltd and a Food Examiner service undertaken by the UK Health Security Agency (UKHSA)².

Food Standards work, including new Food Allergen Controls, is administered by Cambridgeshire and Peterborough Trading Standards, but operationally, also dealt with by our own team, as the legislation recognises both services have a key role to play.

The Team liaises with neighbouring districts, both directly and through regular regional Cambridgeshire Food and Safety Group meetings. Representatives from UKHSA, Trading Standards (TS), the Health and Safety Executive (HSE) and FSA also attend the Group meetings.

Heads of Service attend strategic meetings at a county level.

Liaison and working alongside other authorities are undertaken as required.

Officers attend the Safety Advisory Group meetings allowing work with emergency services and other County representatives on larger events. No special resources are needed to undertake this liaison.

2.4. Scope of the Food Service

The Environmental Health Commercial Team is responsible for delivering the Authority's Food Safety Service. This includes:

- programmed and intelligence led food hygiene interventions and revisits
- the investigation of complaints regarding food sold or prepared in the district

² The UK Health Security Agency was formally known as Public Health England (PHE)

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- the investigation of complaints regarding hygiene standards or practices
- infectious disease control including food poisoning and food borne disease
- responding to food alerts issued by the Food Standards Agency
- the provision of advice and information on food safety issues
- the monitoring of existing approved premises as well as granting new approval applications.
- consideration of planning and licensing applications in relation to food premises
- routine/planned sampling programmes organised in liaison with the Cambridgeshire Food and Safety Group, and national studies organised by the FSA/UKHSA and local needs.
- imported food control

All the officers who deliver services within the Team also

- prioritise health and safety inspections when linked with the Health and Safety Executive's national priorities.
- hazard spot in relation to health and safety issues and work with businesses to improve standards of health and safety
- investigate accidents and other incidents at work premises for which the council is the designated Enforcement Authority

2.5. Demands on the Food Service

The Team are responsible for 850 premises, ranging from large manufacturers to one-person operations. A breakdown of the premises, and a brief historical trend is as follows:

Business Type	2020	2021	2022	2023	2024	2025	2026
Caring premises	117	109	96	94	96	94	94
Distributors/Transporters	26	22	20	23	25	26	24
Hotel/Guest House	28	27	24	21	16	15	14
Manufactures and Packers	37	38	37	36	33	36	35
Mobile food unit	33	48	51	57	64	69	71
Primary Producers	11	11	10	13	10	8	10
Pub/Club	67	65	65	64	65	64	64
Restaurant/Cafe/Canteen	117	118	125	127	121	125	122
Restaurants and caterers - other	161	188	169	149	150	151	173
Retailer - other	14	16	16	13	14	16	17
School/College	42	42	42	42	40	42	47
Small Retailer	133	131	129	124	124	109	110
Supermarket/Hypermarket	12	12	12	12	14	14	15
Take-away	43	44	42	46	48	48	51
Importers/Exporters (EU)	3	3	2	3	3	3	2
Importers/Exporters (3rd Countries)	2	1	1	2	2	2	1

Of these premises, approximately 350 are due for inspection in 2026/27. In addition, we also get around 100 new businesses per annum to inspect, some of these are totally new enterprises, but there are also businesses that are sold. New businesses dealing in high-risk foods require inspecting within 28 days of their start date. This adds significantly to the planned inspection program.

Figures show that nearly 50% of businesses either close or change hands within three years of registering, and after 5 years that figure increases to 65%. This churn creates unplanned work that must be accommodated throughout the year.

Under the Food Hygiene Rating Scheme (FHRS), premises are graded between 5 (very good) and 0 (urgent improvement necessary) with a rating of 3 being considered generally satisfactory. Food businesses that are unhappy with their scores can request a re-rating after they have made improvements. As the FHRS is customer facing, and the achievement of a certain rating can be written in some performance criteria, local businesses are keen to achieve and maintain a 5 Rating. There is a charge of £174 (reviewed annually) for this service, as it requires an additional inspection to be carried out. This adds about 20 inspections to the annual workload, with even premises earning a 4 Rating on inspection applying and paying for a re-rating.

The Environmental Health Commercial Team is responsible for 5 premises under Approved Premises Regulations. These are typically food businesses that make, prepare or handle meat, dairy, egg, fish, shellfish or animal produce for supply to other businesses. These premises are not inspected in accordance with our usual risk rating programme and instead an intervention is planned to be on an annual basis

The external operational factors that have an impact on Food Safety Service Delivery in the short to medium term are

- demands around health and safety enforcement in line with the Health and Safety Executive national priorities.
- demands from UK Health Security Agency, in particular responding to issues around communicable disease.

2.6. Access to the Service

Inspections typically take place during weekdays and office hours; but evening and weekend inspections and advisory visits are made where the business is not open at other times. In accordance with the FSA Food Law Code of Practice, inspections are without warning. However, inspections may be made by appointment where a business does not open at set times or where officers need to meet with a particular person or see a particular operation in progress.

Where a food business is based in residential premises, officers must give 24 hours' notice of entry. The Team does not have a safety enforcement responsibility in dwellings.

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Access for service users	Details
Office address: The Grange Nutholt Lane Ely Cambridgeshire CB7 4EE	Opening Hours 08:45 - 17.00 Monday to Thursday 08.45 - 16.30 on Fridays
Day time telephone number	01353 665555
Out of hours contact	07710 978 900
Email	foodandsafety@eastcambs.gov.uk
Council website	www.eastcambs.gov.uk

The Council does not operate a manned Duty Officer service but there is a senior manager who is contactable.

2.7. Challenges

The biggest challenges faced by the Team at present are both internal and external.

Recruitment and retention of staff together form the biggest internal challenges. With Local Government Reorganisation on the horizon, fewer officers are willing to move, so recruiting and then retaining high quality officers is very difficult. This is exacerbated by a recognised national shortage of qualified Environmental Health Officers. The team lost a fully qualified officer early in 2025 and it took almost a year to secure a replacement, and even then with additional flexibility of working.

The Environmental Health service is active in succession planning, with Student EHOs being developed, but any such strategy takes time (typically 4 years) and the staff effort in guiding and mentoring a student will also have short term impact on staff resources, especially within a small team..

Externally, there appears to be a drop in the standards being maintained by food businesses and this is reflected nationally. Some have blamed this on a reduction in customers; others have reported difficulty in retaining staff. The impact on the team is two-fold, because more time needs to be spent on the original inspection and letter writing, and a revisit may then be required to ensure that the legal requirements are met. There could also then be a request from the business to re-rate the premises, which although paid for, still adds to the officers' workload.

The number of 'new' food business notifications that are received remain consistently high with an average of 105 per year. A 'new' business may be a change in the ownership of an existing business, or a completely new enterprise. The change in ownership can be for any number of reasons, but it resets the inspection liability and, for high-risk businesses, requires a fresh inspection with 28 days of opening.

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Where the business is new, and particularly home based, some may never start trading, whilst others may quickly cease trading. The Team is currently reducing the amount of assistance that can be given to new, low risk, home businesses such as cake makers.

2.8. Enforcement Policy

The Council has signed up to follow the principles laid out in the Government's Regulator's Code³ and the principles contained therein. A service specific Enforcement Policy has been developed and is available on the Council's website.

Officers always aim to support and guide businesses in compliance with food laws. When advice and guidance and an informal route fails, officers will use a graduated approach in enforcement following the ECDC Food Safety Enforcement Policy.

3. SERVICE DELIVERY

3.1. Food Premises Interventions

All businesses receive an intervention within the minimum frequency set in the current Food Law - Code of Practice. The category of the premises, i.e. A - E, is defined by scoring premises around potential hazard associated with the business and food safety compliance, this then relates to the interval between inspections. As the category is determined in part by risk to food safety it is possible for a business to move up or down the scale as they improve food hygiene practices, or present different risks in the food produced.

The following is a breakdown of categories of risk, frequency of intervention, and number of premises within the district.

Rating	Minimum frequency of Intervention	2020	2021	2022	2023	2024	2025	2026
A	Once every 6 months	1	1	3	1	1	5	1
B	Once every 12 months	17	17	20	20	35	24	24
C	Once every 18 months	122	116	117	112	104	123	119
D	Once every 24 months	305	296	310	299	294	294	314
E	Once every 36 months	401	445	391	394	308	348	393

In addition to visits undertaken as part of the risk assessment programme, interventions are also undertaken in respect of:

- complaints regarding food business operations.
- enquiries and requests for advice from a food business.
- investigation following a poor sampling result.
- transient stalls and mobiles including working with the Ely Markets team.

We aim to inspect new high-risk businesses registering with the authority within 28 days of

³ <https://www.gov.uk/government/publications/regulators-code>

the business opening for trading or sooner if requested. Low risk new businesses e.g. home bakers, will be given less priority and initially targeted through remote interventions.

3.2. **Primary Authority and Home Authority Principle**

The Primary Authority Scheme is managed by the Department for Business, Energy and Industrial Strategy. The Primary Authority scheme enables businesses to form a legal partnership with one local authority, which then provides assured advice on complying with regulations that other local regulators must respect. If a business has a Primary Authority partnership, officers must use any published inspection plans and have due regard to any assured guidance agreed under the scheme.

Primary Authority partnerships are suitable for businesses with multiple sites, ensuring consistency of enforcement across the country. Due to the nature of ECDC's largely small, independent businesses culture, it is not predicted that the Team will form a Primary Authority partnership with a business in the foreseeable future.

If no Primary Authority arrangement has been established, multi-site Businesses are able to build up a relationship with, and receive advice and information from, one local authority. This is usually a local authority where the business' head office is based and that authority is referred to as the 'Home Authority'. No inspection plan is published under this scheme and any guidance issued is not given the same weight as through the Primary Authority but should still be followed.

The Team acts as the Originating Authority for our Approved Establishments and any businesses supplying food outside the district. At the request of another regulatory authority, the Team will give appropriate information and assistance.

3.3. **Advice to Businesses**

The district has a high proportion of small, independent businesses that do not have the technical support usually associated with big companies. Therefore, and in keeping with the Council's "open for business" ethos and business growth policy, the emphasis of the Team is to work with businesses and develop positive working relationships. Officers are willing to invest significant amounts of time on advice and guidance to both support enterprise and maintain compliance; and in doing so hopefully avoid the need for future formal action.

Special emphasis continues to be placed on disseminating the FSA guidance on preventing E.coli 0157 in local food businesses, both before businesses open and at the time of inspection. Businesses can be signposted to the Council's webpages which contain links to the FSA's site.

3.4. **Food Sampling**

Microbiological and physical examination and analysis of food is undertaken based on: -

- businesses identified for sampling as part of nationwide, regional or local projects.
- businesses subject to consumer complaints or linked with outbreak investigations.

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- or during a programmed inspection where an inspector deems a sample is necessary.

The Council supports all relevant nationally coordinated food sampling programmes organised by the Food Standard Agency and the UKHSA as well as any relevant cross-regional surveys, where there are suitable premises on our district.

3.5. Control and Investigation of Outbreaks and Food Related Infectious Diseases

Investigation into outbreaks will be in accordance with the UKHSA Communicable Disease Outbreak Management Plan. All infectious disease notifications are followed up by a questionnaire wherever practicable to identify possible sources of infection and recommend practices to prevent its spread.

There has been an increase in the number of notifications being received owing to the capacity of the UKHSA to process isolated cases.

3.6. Food Safety Incidents

The Council complies with Food Safety Act Code of Practice in relation to handling food alerts. All officers within the Team are alerted to food alerts via Food Standards Agency E-mail alerts. We respond to all food alerts that require action within 1 working day.

4. HEALTH AND SAFETY

4.1. Overview

Whilst the responsibility for managing health and safety risks lies with individual business, the council has a statutory responsibility for safeguarding through regulation, the health, safety and welfare of employees and the public, in many businesses located within the district.

Under the Health and Safety at Work etc. Act 1974, a duty is placed on ECDC to make “adequate arrangements” for the enforcement of health and safety. These “arrangements” are set out in The National Local Authority Enforcement Code 2013; a framework ensuring LA regulators adopt a consistent and proportionate approach to enforcement. It directs that business operating in comparatively lower risk premises should not be subject to proactive, unannounced inspections, unless there is real and proportionate reason to suspect poor performance (“no inspection without a reason”).

A business can make a complaint to the Council and to the Independent Regulatory Panel if it believes that the Code has not been followed and there is no doubt that the code has reduced the number of proactive inspections carried out by council officers.

Enforcement of health and safety in businesses is divided between the Health and Safety Executive (HSE) and local authorities under The Health and Safety (Enforcing Authority) Regulations 1998 and examples of these are shown below:

LA enforcement	HSE enforcement
Offices (not LA or government)	Factories
Shops and retail premises	Farms
Hotels, restaurants, pubs, clubs	Gas, electricity and water service providers
Leisure premises	Garages undertaking repairs/ MOTs
Care homes, sheltered accommodation	Nursing homes, hospitals
Nurseries and playgroups	Schools and places of education
Skin piercers and beauty sector	Construction sites
Storage warehouses	Warehouses (mainly distribution)
Zoos	Government / LA undertakings
Churches and places of worship	Offshore installations

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Local businesses may come to the Team's attention through complaints, reports, referrals, and national intelligence. In addition, the HSE issues Local Authority Circulars (LAC) on topic areas considered suitable for Local Authority proactive and project work.

Accidents may be reported to the Council through service requests or formally, under The Reporting of Incidents, Diseases and Dangerous Occurrences Regulations 2013 (as amended). Any accidents are investigated according to the HSE guidance.

The Team also reacts to referrals from engineers reporting unsafe lifting equipment.

Officers attend the regular Safety Advisory Group meetings (SAG), supporting event organisers and businesses with advice, before, during and after the meetings. Officers also attend the regional Food and Health and Safety Group meetings, sharing information with the group and use it to undertake peer reviews.

The Team disseminates information about health and safety because of alerts from the HSE Advice is given any business seeking support.

The Team will refer any matters of potential national significance to the HSE and reports its activities to the HSE annually.

4.2. Primary and Home Authority

As with Section 3.2 above, the principles of Primary and Home Authority relate to Health and Safety Enforcement as well as Food Safety. For the same reasons as above, ECDC does not have a primary authority agreement with a business but Officers will use primary authority plans where they exist.

4.3. Targeting inspections

The Team uses HSE Guidance as its framework for its daily activities and work plans. Notified incidents and complaints are investigated as stated above. Sources to help target the team come from working relationships with other regulators such as fire, ambulance, police; building control, licensing etc. allowing intelligence to be shared at SAG meetings and at other times. The Team receives alerts from the fire service and HSE. In this small local authority, officers liaise with colleagues directly in areas such as building control and licensing.

Other sources of work and intelligence include officers hazard spotting at food inspections, regional meetings with other LAs and the HSE local principal inspector, social media, local press, and on-line resources.

Across 2026/2027, the Team will:

- Investigate all fatalities and major accidents where ECDC is the enforcing authority.
- Investigate other accidents reported under RIDDOR* having regard to the HSE incident selection criteria.

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- Investigate allegations of poor health and safety standards/complaints, having regard to the HSE incident selection guidance.
- Continuing to raise health and safety standards in businesses as part of other inspections and visits such as food hygiene inspections.
- Investigate adverse lift reports sent in by engineers.
- Offer advisory visits to skin piercing premises in relation to the maintenance of autoclaves and management of infection control. This is in addition to the routine offer of support and guidance to skin piercing establishments at the time of registration applications.
- Update the Council's Health and Safety web pages.
- Host a relevant training course for ECDC and external LA officers using an external trainer.
- Continue to attend SAG, the Council's internal health and safety committee meetings and the Cambridgeshire Food Health and Safety Group.
- Refer emerging safety issues to the HSE.

4.4. Terrorism (Protection of Premises) Act

The purpose of this legislation is to ensure the public is better protected from terrorism by requiring certain public premises and events to be prepared and ready to keep people safe in the event of an attack. A tiered approach is established according to the number of individuals it is reasonable to expect may be present.

Standard Tier Premises where 200 – 800 people may be present

Enhanced Tier Premises and Events where 800 or more people may be present

Whilst the regulator of the legislation will be the Security Industry Authority (SIA), the council, through the Safety Advisory Group, will be involved in disseminating the statutory guidelines and any other information

4.5. Competencies and procedures

Officers are responsible for maintaining their competency by way of personal study, taking part in online training and webinars. Where external training is undertaken, officers share this with other Team members, normally at monthly team meetings.

Officers often work in pairs during accident and complaint investigations, both to improve investigatory work and to help maintain knowledge and practical skills. Officers have targets for maintaining competencies that are reviewed regularly through one to one meetings and at annual appraisals.

Health and Safety Notices are issued having regard to the Enforcement Policy and for health and safety, the HSE Enforcement Management Model (EMM). Health and Safety, and food Safety Notices are reviewed by the SEHO before service.

5. **RESOURCES**

5.1. **Staffing Allocation**

As explained above, the work of the Team is carried out by the officers and a part-time administrator, supported as needed by the Council's wider internal services. In the event of an extreme or complex event or outbreak, the Team can seek additional resources from elsewhere in the council, and other councils.

All officers carrying out official controls for both food and health and safety, as well as any enforcement duties are registered with the Chartered Institute of Environmental Health itself or its Registration Board (EHRB). Each enforcement officer is authorised in accordance with the standards and requirements of the respective legislation, FSA Food Law Code of Practice, and the Constitution of the Council.

5.2. **Staff Development Plan**

All officers are appropriately qualified according to the Food Law Code of Practice. To maintain their competencies Officers, undertake personal study and there is a culture of sharing knowledge and "buddying" colleagues at more important interventions within the Team. Maintaining competencies in Approved establishments is not only by "buddying" in the district but maybe sought via neighbouring authorities.

Each officer is responsible for the maintenance of their personal Continual Professional Development (CPD) records, subject to the requirements of the Chartered Institute of Environmental Health and FSA.

Staff development for the service includes:

- Undertaking in-house or external competency-based training. This includes webinars and other on-line training. Officers undertaking external training are required to feed this back to the team members after the event.
- The undertaking of "buddying" or mentoring with qualified or officer with different experience in food or health and safety.

6. **QUALITY ASSESSMENT**

6.1. **Consistency**

The Team's work is monitored for consistency by the Lead Food Officer and is subject to Peer Review by the Regional Food Group. The following monitoring arrangements are currently in place to assist in the quality assessment of the work carried out by the food team: -

- sample accompanied interventions
- sample audits of food files and associated paperwork
- sample review of post intervention enforcement action being taken
- performance and development reviews
- performance monitoring of target response times
- team meetings

7. **REVIEW**

7.1. **Review of Service Plans**

The process of review typically commences in March each year with a focus on the yearly figures in comparison with the output from previous years. Using an average of the workload demands from the previous year, a judgement is made on the expected demand for the next 12 months.

Regular reviews of the overall objectives of this Service Plan will be undertaken based on:-

- performance and resources available over the previous 12 months,
- responses to feedback from local businesses and the community,
- observations from Members and the Environmental Health Commercial Team itself,
- relevant changes in legislation, advice and guidance issued by government
- Changes in accepted best practice, and local working, via discussions with service and senior managers, including the impacts of major changes coming from LGR.