

**Item 3**

25th April 2023



**Glasgow City Council**

**Environment and Liveable Neighbourhoods City Policy Committee**

**Report by George Gillespie, Executive Director of Neighbourhoods, Regeneration and Sustainability**

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**Environmental Health Annual Update Report 2022/23**

**Purpose of Report:**

To report on the activity of Environmental Health.

**Recommendations:**

To note the report and the positive work that the Service is undertaking.

Ward No(s):

Citywide: ✓

Local member(s) advised: Yes  No ✓

consulted: Yes  No ✓

## **1. INTRODUCTION**

### **1.1 Structure and Arrangements**

1.1.1 Neighbourhoods, Regeneration and Sustainability (NRS), Environmental Health team comprises of the following service areas:

- Public Health
- Business Regulation

1.1.2 Officers are based at Eastgate, however the nature of the job requires a significant amount of on-site work. An element of remote working from home has been in place for a number of years and officers continued this throughout the pandemic until the present day. Officer time is divided between on-site and hybrid working.

### **1.2 Resources and Challenges**

1.2.1 At a national level recruitment is a challenge facing Environmental Health as a profession. This is reflected in Glasgow, where recent recruitment of Environmental Health Officers has proved unsuccessful.

1.2.2 Consequently, the service has had to adapt to provide the most relevant protection to the citizens and businesses of Glasgow.

### **1.3 Performance**

1.3.1 Performance statistics are provided within this report, however, it should be noted that usual measures of performance, such as % of programmed inspections achieved has not been included to show comparison to our previous year's report. Due to the suspension of food enforcement during COVID-19 there is limited data so the figures provided primarily relate to the number and nature of different activities carried out. We have revised our key performance indicators for the year 23/24 and these will be included in next year's Annual Report to this Committee.

### **1.4 Enforcement Activity**

1.4.1 A key role of Environmental Health is the enforcement of relevant legislation including:

- Health and Safety at Work Etc Act 1974
- Public Health (Scotland) Act 2008
- Food Safety Act 1990
- Licensing (Scotland) Act 2005
- Control of Pollution Act 1974
- Environmental Protection Act 1990

1.4.2 The statistics provided within this report show the extent of enforcement activity. However, enforcement action alone is not considered to constitute a meaningful

performance measure. Much of the work carried out by the service is done with the aim of preventing non-compliance in the first place or, where non-compliance is found, remedying this without the need for formal enforcement action.

## **1.5 Future Service Delivery**

- 1.5.1 Environmental Health played a critical role in the COVID-19 response, contributing to the delivery of the successful EURO2020 and COP26 events and the protection of public health.
- 1.5.2 As we return to business as usual after the pandemic, we are assessing how best to use our resources to tackle the emerging issues the service faces. We are considering how to prioritise the demands, looking at innovative ways to fill vacancies and reviewing processes to maximise the new technologies available.

## **2. BUSINESS REGULATION**

2.1 The Business Regulation function within Environmental Health comprises the following key activities:

- Food Law Inspection/Intervention
- Health and Safety at Work Inspection/Intervention
- Food Surveillance
- Accident and Incident Investigation
- Civic Government Licensing Consultation
- Food Crime Investigation
- Export Health Certification
- Liquor Licensing Standards Food Poisoning Outbreak Investigation
- Port Health Event Safety
- Business and Customer Advice
- Complaint Investigation
- Skin Piercing and Tattoo Licensing

2.1.2 Within Environmental Health, the impact of COVID-19 on operations was most evident in the Business Regulation team. The businesses with which the team routinely engaged with were in many cases closed. Programmed inspections were suspended and instead engagement was with those businesses which continued to trade and was heavily focused on COVID-19 compliance.

2.1.3 We started our Food Law Recovery programme in August 2021 ahead of the national start deadline and provided the specific detail of our plan in our [Food Law Recovery Report](#) to Committee on 15<sup>th</sup> March 2022 . We are currently behind on our planned visits due to our proactive interventions are taking longer to close-off due to the increase in non-compliance. This is reflected in the number of the enforcement notices we are issuing.

2.1.4 We have seen an increase in the use of all of our enforcement powers but in particular there is a significantly greater number of Remedial Action Notices

(RAN) being issued. RANs often require a premise to cease trading until the non-compliance has been addressed. Since the 1<sup>st</sup> April 2022 to date (as of 22/03/23) we have issued 108 RANs, many of which were for vermin activity. We consider this is mainly linked to the economic pressures faced by businesses and the suspension of commercial pest control contracts.

## **2.2 Scottish Authority Food Enforcement Re-Build (SAFER)**

2.2.1 Food Standards Scotland (FSS) conducts an annual audit of council resources involved in food law enforcement. In 2021, the annual audit included an exercise to quantify the resource gap across Scotland to enable the Food Law Code of Practice (Scotland) to be fully implemented. The audit identified an estimated shortfall of 178 FTE officers across Scotland to enable food law interventions to be fully delivered. The estimated deficit and the consequences for the Scottish food industry, particularly for export trade, prompted FSS to initiate the SAFER project.

2.2.2 The data presented by FSS only relates to food law enforcement and the Society of Chief Officers of Environmental Health of Scotland (SOCOEHS) estimates food law accounts for 30-40% of council environmental health activity. The deficit for food law enforcement will be replicated across the other delivery areas.

2.2.3 The aim of SAFER is to implement a new approach to Food Law implementation in Scotland which will deliver:

- Public health protection and assurance.
- A sufficient, sustainable and dynamic resource.
- Alternative qualification pathways.
- A Food Law delivery model focused on risk and non-compliance.
- Vital training and practical guidance.
- Technological and digital solutions.

2.2.4 SAFER is a collaborative approach with key partners to address the sustainability of the food safety delivery programme for Scotland. Glasgow is supporting the aims of the project by:

- Releasing Environmental Health staffing resource to help design and deliver the SAFER programme.
- Continue to deliver core functions whilst the programme is developed. FSS will provide relaxations during this process.

2.2.5 The SAFER programme will aim to achieve the following outcomes:

- Re-invest the resources saved through SAFER back into food law enforcement.
- Protect existing resources for food law enforcement to ensure public health protection and assurance in the food industry.

2.2.6 As Scotland's largest local authority, it is critical we are part of the SAFER project. The discussions over the relaxations from the statutory Food Law Code of Practice will be key to determining our ability to do so.

## **2.3 Licensing Standards**

2.3.1 To date in 2022/23, the Licensing Standards Team has provided comment on:

- 59 New and Provisional Licensed Premises Applications.
- 149 Major Variation Applications.
- 278 Applications for Extended Hours.
- 1,754 Occasional Licence Applications.
- 251 Complaints about licensed premises
- 570 Enquiries relative to the provision of advice and guidance

2.3.2 The above figures represent a significant increase on the previous year, which is indicative of some of the challenges faced by the licensed trade at present. These include a shortage of experienced staff, and increased financial pressures and changes in consumption trends. As a consequence, a significant number of businesses are now restricting their hours of operation during the week whilst conversely looking at new ways to generate revenue through additional temporary extensions on themed dates. This coupled with more unlicensed premises becoming temporary licensed hospitality-style pop ups and small to large scale events within the city on the rise, has resulted in demands on the Licensing Standards resource increasing as the sector looks to recover.

### **2.3.3 Business Regulation Statistics**

2.3.1 Appendix 1, Table 1 outlines enforcement activity since April 2020. The higher numbers, relative to previous years, are to be expected given the suspension of programmed inspections for a significant period of time. It should be emphasised, however, that formal action is reflective of the seriousness of the non-compliance, with a graduated approach to enforcement taken where appropriate. The emerging scale of non-compliance and the need to use enforcement powers to protect public health is hampering our ability to meet our statutory responsibilities in relation to inspections. Currently there is no framework or mechanism to compensate the service for repeat visits to address non-compliance. Further discussions with Food Standards Scotland around this issue will be raised again. It is possible that the SAFER program may address this.

2.3.2 Appendix 1, Table 2 outlines some key activity of the Business Regulation Team since the beginning of the pandemic.

## **3. PUBLIC HEALTH**

3.1 Public Health work addresses a range of issues which impact upon the health of Glasgow's citizens as well as the amenity, safety and quality of the city's environment.

## **3.2 Public Health Functions**

- Investigation of 'Statutory Nuisances', including noise, light pollution, odours, accumulations of refuse, defective drainage and minor housing disrepair.
- Statutory Consultee for Planning Applications.
- Investigation of fly tipping.
- Infectious disease investigation and control, including liaison with Greater Glasgow & Clyde Health Board.
- Vehicle Emission Testing and Vehicle Idling Enforcement.
- Air Quality Monitoring.
- Commercial Waste Enforcement.
- Dog Control work in relation to dogs not under adequate control or that have strayed.
- Control of noise from outdoor events.
- Pest control service.

### **3.2.1 Key Activities Include:**

- Responding to service requests from members of the public, businesses and Elected Members
- Taking enforcement action where required by law or where evidence of culpability is established (see statistics below).
- Working in partnership with colleagues within NRS and other Council services, as well as external agencies, such as SEPA and the Scottish Government, on major issues and to implement joint solutions.
- Monitoring and patrolling 'hotspot' fly tipping areas, engaging with residents
- and taking enforcement action where appropriate.

3.2.2 Public Health service requests are detailed at appendices 2 and 3.  
Public Health enforcement notices issued are detailed at appendix 4.

## **3.3 New Approach to Fly Tipping**

3.3.1 NRS looks forward to the launch of the Scottish Government's National Litter and Flytipping Strategy, however in advance of this NRS considered the historical response by Environmental Health to fly tipping. These service requests are mainly received via the Customer Care Centre and through elected member enquiries. In response environmental health officers were deployed to each flytipping location to search for evidence of the perpetrator, thereafter the fly tipping was removed by cleansing services. This reactive response approach - which seldom presented evidence for enforcement - is inefficient, expensive, does not make best use of the resources available and does not address or resolve the underlying causes of fly tipping.

- 3.3.2 The preferred approach to tackling fly tipping is to utilise existing data and intelligence to provide a targeted, visible and disruptive approach to the problem. NRS' Performance and Information Management Unit (PIMU) analyse data on fly tipping across the city to help identify the areas that are the most problematic in terms of fly tipping and require the most attention to bring about positive change.
- 3.3.3 It was agreed to conduct a nine-month trial of a new approach, which started in November 2022 using a dynamic programme of engagement in the target areas.
- 3.3.4 Officers from Public Health visit these locations and take the already established 'weeks of action' approach to dealing with fly tipping, which essentially involves:
- 1) Proactively patrolling the area;
  - 2) Identifying fly tipping incidents;
  - 3) Searching through waste to look for evidence as to the source;
  - 4) Utilising 'environmental crime scene' graphics;
  - 5) Contacting Dispatchers at Blochairn to advise of the waste, record on Remedy and to arrange uplift after 48 hours;
  - 6) Following up on any evidence obtained, e.g. issuing a fixed penalty notice;
  - 7) Engaging with citizens by knocking on doors to seek information, advise on fly tipping, advise on correct methods of waste disposal, and make them aware that enforcement officers are operating in the area.
- 3.3.5 It is anticipated that over time we will bring about a positive behavioural change in citizens and encourage them to take responsibility for their own waste and use legitimate methods for disposing of their waste.

### 3.4 Weeks of Action

- 3.4.1 Since 1<sup>st</sup> April 2022, we have been involved in seven Weeks of Action. This combined with our new approach to fly tipping enforcement has led to 635 visits to commercial premises resulting in 135 enforcement notices for the lack of commercial waste contracts and 3 FPNs for fly tipping. We have also carried out 342 fly tipping investigations, engaged with 283 households and issued 26 FPNs as a result.



Figure 1: Environmental Crime Scene Example

### **3.5 Commercial Waste Enforcement**

- 3.5.1 The commercial waste team ensure that businesses are complying with their waste disposal responsibilities under the Environmental Protection Act 1990. Non-compliance can result in an enforcement notice and/or a £200 fixed penalty notice being served.
- 3.5.2 In 2022/23 officers carried out 3,885 visits. 393 (10.1%) were found to have inadequate arrangements in place for waste disposal at the time of the visit and required follow up action to ensure compliance.
- 3.5.3 Proactive, co-ordinated joint working with other council services and community groups has proved to be a successful model in helping tackle some of the waste issues found on the streets and lanes within Glasgow. This is continuing to be particularly evident when the team works with NRS colleagues as part of the new approach to fly tipping enforcement.

### **3.6 Homes for Displaced Ukrainian**

- 3.6.1 Following the Russian invasion of Ukraine on 24<sup>th</sup> February 2022, the UK Government announced the Homes for Ukraine Scheme on 14<sup>th</sup> March 2022 to support those fleeing Ukraine. The Homes for Ukraine Scheme is a sponsorship scheme whereby UK residents can sponsor Ukrainian guests fleeing the war in their country. Scotland also offered to provide refuge and sanctuary to displaced Ukrainians, as part of the UK Government's Homes for Ukraine scheme, which is known as the Scottish Super Sponsor Scheme. Officers from the service were involved at a national level to develop the processes for property checks in conjunction with Scottish Government, CoSLA and other LAs.
- 3.6.2 Local authorities have been administering these schemes on behalf of the government since March 2022. Since the launch of the Homes for Ukraine scheme, NRS Environmental Health has coordinated the property checks of host accommodation to ensure that these are safe and would not pose any issues with overcrowding. To date over 600 properties have been inspected over both schemes.
- 3.6.3 In addition to this, Environmental Health worked in partnership with other colleagues from NRS, Health and Social Care Partnership and the Scottish Government to successfully host the ship, MS Ambition in Glasgow. This ship was commissioned by the Scottish Government to temporarily house over 1,000 displaced Ukrainians who had travelled to Scotland under the Scottish Super Sponsor Scheme. Environmental Health Officers were involved from the early stages by reviewing documentation and procedures as well as carrying out numerous visits ahead of the ship receiving passengers.

## **4. CHALLENGES AND POTENTIAL EFFICIENCIES**

### **4.1 Recruitment**

- 4.1.1 It is acknowledged that a national staff shortage is a risk to the ongoing provision of Environmental Health services. In response we are developing a workforce plan to mitigate the risks to the service. Therefore, in addition to attempting to fill current vacancies, a key focus of the Environmental Health workplan this year is to improve resilience and efficiency to minimise the impact of any further reduction in resource.
- 4.1.2 Glasgow is working in partnership with the Society of Chief Officers of Environmental Health and the University of West of Scotland to facilitate the training of Environmental Health students. The professional training is now integrated, with students spending their third year gaining practical experience with a Local Authority. Two students are currently training with Environmental Health in Glasgow, and it is proposed that this commitment to training continues.
- 4.1.3 In addition to increasing the number of student training places, it is hoped that those training in Glasgow would be keen to remain and take up employment as Environmental Health Officers, should posts be available at the point of qualification.
- 4.1.4 We are also looking at the national changes to the pathways into Environmental Health to see if we can widen the number of candidates in scope of our recruitment requirements. This will also allow Environmental Health to consider existing staff for further training and qualifications to enable them to upskill.
- 4.1.5 We are currently working on a plan to promote both working for Glasgow City Council and Environmental Health as a great career choice through engagement with our schools.

## **4.2. Building Resilience**

- 4.2.1 Business Regulation and Public Health under one Environmental Health Group is a critical factor in building resilience. Environmental Health Officers work in both teams and while it would still be expected that they are based in one team at any point in time, there is scope to increase familiarity with processes in the other team to provide support as and when priorities require this.
- 4.2.2 We continue to review the work across both teams to build further resilience.

## **4.3. Improving Efficiency**

- 4.3.1 The team will continue to work with NRS' Service Development Team and Performance and Information Management Unit to maximise the use of data in relation to service demand and performance. This will assist with review of priorities and identification of areas where further improvements to processes can be made.
- 4.3.2 Work is ongoing to increase the use of mobile technology for the recording and reporting of interventions, including the use of mobile apps. The technology supports better data capture and retrieval and is more time efficient for officers.

We have recently piloted the use of tablets to record the work in relation to commercial waste enforcement in the field.

## 5. Policy and Resource Implications

### Resource Implications:

<i>Financial:</i>	A small element of the overall budget is provided by the Scottish Government for air quality work.
<i>Legal:</i>	See section 1.4.1
<i>Personnel:</i>	Delivered by existing council staff.
<i>Procurement:</i>	<i>Not Applicable</i>

**Council Strategic Plan:** Grand Challenge 4 - Deliver Essential Services in a Sustainable, Innovative and Efficient way for our Communities.

### Equality and Socio-Economic Impacts:

<i>Does the proposal support the Council's Equality Outcomes 2021-25? Please specify.</i>	Reducing health inequality
<i>What are the potential equality impacts as a result of this report?</i>	Positive Impact
<i>Please highlight if the policy/proposal will help address socio-economic disadvantage.</i>	This work will help address socio-economic disadvantage

### Climate Impacts:

<i>Does the proposal support any Climate</i>	Contributes towards improved air quality
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*Plan actions? Please specify:*

*What are the potential climate impacts as a result of this proposal?* N/A

*Will the proposal contribute to Glasgow's net zero carbon target?* N/A

**Privacy and Data Protection Impacts:**

Are there any potential data protection impacts as a result of this report  
Y/N No

If Yes, please confirm that a Data Protection Impact Assessment (DPIA) has been carried out

**6. Recommendations**

6.1 To note the report and the positive work that the Service is undertaking.

## Appendix 1

### Business Regulation Enforcement Activity

	2020/21	2021/22	22/23 (until 20 <sup>th</sup> March)
Hygiene Improvement Notices	7	42	101
Remedial Action Notices	1	37	108
Hygiene Emergency Prohibition Notices	0	1	3
Seizure of Food	0	1	0
H&S Improvement Notice	3	8	17
H&S Prohibition Notice	2	8	6
Reports to the Procurator Fiscal	0	2	1

Table 1: Enforcement Activity

## Business Regulation Inspection and Certification Activity

	2020/21	2021/22	22/23 (until 20 <sup>th</sup> March)
<b>Food Service Requests</b>	<b>2,256</b>	<b>2,400</b>	<b>2,183</b>
<b>Food Law Inspections</b>	<b>111</b>	<b>631</b>	<b>1,422</b>
<b>Alleged Food Poisoning Investigations</b>	<b>75</b>	<b>81</b>	<b>185</b>
<b>Health and Safety Service Requests</b>	<b>637</b>	<b>664</b>	<b>652</b>
<b>Health and Safety Interventions</b>	<b>24</b>	<b>176</b>	<b>647</b>
<b>Accident Investigation Follow Up</b>	<b>87 (of 255 reported)</b>	<b>71 (of 385 reported)</b>	<b>69 (of 493 reported)</b>
<b>Export Health Certificates</b>	<b>535</b>	<b>401</b>	<b>259</b>
<b>Ship Sanitation Certificates</b>	<b>Suspended</b>	<b>1</b>	<b>6</b>

Table 2: Inspection and Certification Activity

**Appendix 2**

**Public Health**

**Fixed Penalty Notices and Statutory Notices Issued**

<b>Fixed Penalty Notices and Statutory Notices Issued 2021/2022</b>		
	<b>FPNs Issued</b>	<b>Statutory Notices Issued</b>
<b>Total</b>	73	301

<b>Fixed Penalty Notices and Statutory Notices issued 2022/2023 (until 29/3/23)</b>		
	<b>FPNs Issued</b>	<b>Statutory Notices issued</b>
<b>Total</b>	123	878

## Appendix 3

### Public Health Service Requests Received in 2022/23

	Abandoned Trailers	Air Quality	Cooking Odours	Defective Drainage	Dirty House	Disrepair (Miscellaneous)	Dog Fouling	Environmental Pollution	Water Overflow	Domestic Refuse	Fly Tipping	General Dampness	Immigration Letter	Light Pollution	Rainwater Penetration	Smoke	Vehicle Idling	Water Penetration	Total
<b>Ward 1</b>	4	4	9	10	8	22	4	46	6	111	2	13	0	9	9	8	8	68	341
<b>Ward 2</b>	4	7	0	0	10	10	3	4	3	45	0	4	4	4	0	0	2	7	107
<b>Ward 3</b>	22	7	2	6	5	5	7	28	2	55	5	15	7	0	3	4	0	39	212
<b>Ward 4</b>	12	1	1	5	5	15	4	9	2	28	11	6	6	1	1	5	0	11	123
<b>Ward 5</b>	3	0	1	15	17	32	3	15	3	45	7	15	2	3	6	5	2	21	129
<b>Ward 6</b>	21	0	0	14	5	15	4	14	7	57	3	3	4	1	10	1	2	42	104
<b>Ward 7</b>	14	0	1	12	8	18	10	7	3	24	11	9	1	1	2	3	1	20	101
<b>Ward 8</b>	12	0	0	5	17	11	7	7	4	42	1	7	0	0	4	4	3	14	82
<b>Ward 9</b>	3	2	0	17	5	19	5	10	5	45	6	12	7	3	5	6	1	26	106
<b>Ward 10</b>	16	3	2	33	18	38	10	33	8	79	21	13	6	3	10	4	1	83	219
<b>Ward 11</b>	16	1	0	4	10	10	5	10	1	23	3	12	10	0	0	5	1	12	88
<b>Ward 12</b>	12	3	9	22	10	25	2	13	5	59	4	13	4	2	7	3	1	58	135
<b>Ward 13</b>	14	4	6	16	11	30	4	38	8	27	4	11	4	2	5	3	3	56	163
<b>Ward 14</b>	9	1	5	13	3	14	3	12	5	24	3	9	1	2	8	7	1	12	96
<b>Ward 15</b>	18	1	3	3	2	13	2	3	4	17	6	4	2	0	4	4	1	16	70
<b>Ward 16</b>	6	2	2	11	8	8	6	11	3	26	6	6	10	1	5	3	4	11	92
<b>Ward 17</b>	7	1	0	3	4	17	3	8	1	43	1	5	0	3	0	6	0	21	59
<b>Ward 18</b>	4	4	6	13	6	22	1	17	3	42	2	11	6	10	7	11	4	45	8
<b>Ward 19</b>	17	5	8	17	15	28	5	11	8	47	9	6	12	5	5	16	5	72	172
<b>Ward 21</b>	5	4	4	7	9	13	3	16	6	77	3	6	0	6	4	6	1	28	93
<b>Ward 22</b>	17	5	8	24	27	43	7	47	14	177	13	8	12	2	6	5	6	167	244
<b>Ward 23</b>	3	1	0	4	3	15	0	5	6	41	0	9	5	1	5	5	0	20	62
<b>No Ward</b>	27	3	7	5	4	18	5	7	6	29	8	2	2	2	4	5	5	33	30
<b>Total</b>	<b>266</b>	<b>59</b>	<b>74</b>	<b>259</b>	<b>210</b>	<b>441</b>	<b>103</b>	<b>371</b>	<b>113</b>	<b>1163</b>	<b>129</b>	<b>199</b>	<b>105</b>	<b>61</b>	<b>110</b>	<b>111</b>	<b>52</b>	<b>882</b>	<b>4708</b>

## Appendix 4

### Noise Service Requests Received in 2022/2023

Table 5

	Advisory	Car Alarms	Commercial Premises	Construction Noise	Entertainment Noise	Ice Cream Chimes	Industrial Noise	Intruder Alarm	Equipment Noise	Vibration	Other	Total
Ward 1	76	11	98	106	493	3	6	69	54	4	106	1026
Ward 2	5	1	4	2	21	8	0	7	9	0	6	63
Ward 3	22	2	25	21	84	0	1	32	12	4	12	215
Ward 4	11	0	7	7	0	1	0	8	5	0	8	47
Ward 5	5	0	8	1	4	0	0	11	1	0	1	31
Ward 6	12	1	22	7	28	0	1	6	8	8	14	107
Ward 7	3	1	6	2	4	0	1	4	4	0	6	31
Ward 8	14	3	6	6	17	17	0	5	3	1	11	83
Ward 9	8	0	12	9	17	0	1	7	7	0	10	71
Ward 10	13	1	25	14	28	0	6	13	117	1	15	233
Ward 11	4	0	4	5	6	0	1	15	7	0	5	47
Ward 12	11	2	22	21	75	0	1	14	9	0	11	166
Ward 13	14	3	11	21	37	0	2	11	10	1	6	116
Ward 14	2	2	2	3	22	0	2	9	10	0	5	57
Ward 15	3	0	6	4	4	1	7	8	8	1	13	55
Ward 16	3	6	6	14	5	0	3	4	6	0	6	53
Ward 17	3	1	1	6	0	2	0	0	5	1	0	19
Ward 18	24	3	24	7	73	0	0	12	12	0	12	167
Ward 19	6	3	33	19	20	0	1	19	12	2	5	120
Ward 20	10	1	7	5	21	1	1	5	5	3	10	69
Ward 21	27	2	45	19	310	0	0	25	13	1	12	454
Ward 22	4	2	6	15	1	0	0	1	11	0	9	49
Ward 23	11	10	14	12	11	0	1	8	16	1	10	94
<b>Total</b>	291	55	394	326	1281	33	35	293	344	28	293	3373

