

## CHAPTER XXI

### REGISTERS, RECORDS AND REPORTS

THE performance of so many duties of such diverse kinds necessarily involves an enormous amount of clerical work. Not only have notices to be served and correspondence carried on, but records and registers must be kept up-to-date either in fulfilment of statutory duties or to enable the officials to make periodical reports to their authority and to the departments of the Central Government. Of course, every increase in official activity entails a corresponding increase in clerical work, and this is made more burdensome by the many reports now required by the Ministry of Health. An amusing illustration of this difficulty occurred some years ago at a meeting of the Bulkington Rural District Council, where in reply to a question in reference to complaints that he had not made any returns under the Housing Regulations of 1910, the inspector stated that "it would take him centuries" to fill up the book provided for the purpose.<sup>1</sup> The burden is specially felt in the many rural and small urban districts where the sanitary inspector is the only whole-time sanitary officer and has little or no aid in his office work; and many complain that they must either greatly extend their working hours or neglect inspectorial duties which they feel demand more attention than they can possibly give. Where, as is often the case, the inspector's home is also his office, and his salary is anything under £4 per week, particularly bad cases of official "sweating" arise without public knowledge or protest. Such a condition of things undoubtedly results in many insanitary conditions remaining undealt with,

<sup>1</sup> *Coventry Herald*, May 5, 1914.

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and they will remain so until a definite standard of inspectorial staffing, based upon area to be covered, population to be dealt with, and the amount of clerical assistance provided, is insisted upon.<sup>1</sup> Some knowledge of the effect of the demands for information made by the Central Government upon the work and hours of sanitary officials found its way into Parliament just before the War, but the President of the Local Government Board declined to consider the question of a grant to local authorities to meet the cost of providing the information;<sup>2</sup> since then circumstances have not been propitious for again raising the matter.

The clerical work of a public health department, like that of a business, should be simple and adequate without any duplication; but, as similar work is being carried on in every sanitary district in the country, there should be a great measure of uniformity in the methods adopted. Unfortunately these desirable points cannot be said to be achieved. In the effort to attain simplicity much duplication arises, and many books, not really necessary if an efficient system of cross-reference is adopted, find place on the office shelves, whilst uniformity is almost unthought of, still less attained.

Referring to lack of uniformity in records of local administration, Mr. G. M. Harris wrote:

"Each authority thinks its own fashion the best, and consequently anyone who has to study the documents of a number of authorities has to deal with papers of every size and shape, with minutes and reports of councils, committees and sub-committees, sometimes printed one after the other in chronological or other order, sometimes interspersed with the resolutions of the various bodies who consider them . . . it might well be worth while for those concerned to consider whether the public convenience and the interests of knowledge might not be served by some more scientific and more uniform system of documentation than exists at present."<sup>3</sup>

<sup>1</sup> See Memorandum of Evidence submitted on behalf of the Minister of Health to the Royal Commission on Local Government, pp. 63 *et seq.*

<sup>2</sup> Reply to question in the House of Commons, May 25, 1914.

<sup>3</sup> *Problems of Local Government*, pp. 154-5.

These remarks are as applicable to public health officers as to the other departments of a local authority, and indicate a problem which might well be dealt with at some of the congresses of sanitary authorities and officials.

Certain persons following specified occupations and various premises at which business of a special nature is carried on are required by statute to be registered, such registration being, as a rule, a condition preliminary to carrying on or sheltering such business. All dairymen and cowkeepers and all farms and other premises used as dairies must be registered;<sup>1</sup> and no one may produce or sell milk under a "special designation" unless licensed by the appropriate authority.<sup>2</sup> Every midwife must notify to the local authority her intention to practise within their district and repeat the notification in January of each year, the authority being required to keep a roll of such midwives and to send a copy to the Central Midwives Board every January, reporting every change due to death or removal.<sup>3</sup> Persons who employ outworkers in certain trades specified in Special Orders of the Home Secretary are required to send before February 1 and August 1 in each year a list of the names and addresses of such persons to the council of the district in which his business premises are situated. The list thus obtained is examined, addresses in other administrative areas being forwarded to the councils of those districts, and form the basis of a register for the purpose of inspection and supervision.<sup>4</sup>

Before any person may open premises as a common lodging-house it is necessary that he be registered as well as the premises, and it is an offence to carry on such a business unless this has been done by the local authority, which has power to refuse.<sup>5</sup> The local authority has similar powers, but only as regards the premises, in the case of slaughter-

<sup>1</sup> Milk and Dairies Order, 1926, article 6.

<sup>2</sup> Milk and Dairies (Amendment) Act, 1922, s. 3; and Milk (Special Designations) Order, 1923.

<sup>3</sup> Midwives Act, 1902.

<sup>4</sup> Factory and Workshop Act, 1901, s. 107.

<sup>5</sup> Public Health Act, 1875, ss. 76 *et seq.*

houses,<sup>1</sup> offensive trades,<sup>2</sup> and canal-boats;<sup>3</sup> but in the first case the license to use may be an annual one if the Public Health Act Amendment Acts, 1890,<sup>4</sup> has been adopted, and the requirements as regards offensive trades are not in force in rural districts unless the council has obtained urban powers for the purpose.

Premises used for the manufacture of margarine, margarine cheese, milk-blended butter and butter, as well as those in which the business of wholesale dealer in the first three commodities is carried on, must be registered with the local authority, and the registration, which cannot be refused, must be reported to the Ministry of Agriculture;<sup>5</sup> the same conditions are applicable to the businesses of milk importers.<sup>6</sup> The local authority is also required to keep a register of all workshops within their district, the factory inspector supplementing the efforts of the local officials by forwarding notice of the occupation of such premises to the local authority.<sup>7</sup>

For the purpose of the Public Health (Tuberculosis) Regulations, 1912, the duty of keeping a register of notifications of tuberculosis is placed upon the medical officer of health, in whose custody it is to be kept inaccessible to all except persons specially authorized by resolution of the local authority, the county medical officer of health, a local school medical officer, or an official of any Government department authorized for the purpose; the information contained therein is to be regarded as strictly confidential.<sup>8</sup> This register must be revised at least once per quarter and the medical officers of districts into which any registered persons have removed must be notified;<sup>9</sup> and every district

<sup>1</sup> Public Health Act, 1875, ss. 169 and 170, and Rural District Councils (Slaughter Houses) Order, 1924.

<sup>2</sup> *Ibid.*, s. 112, and Public Health Act, 1925, s. 44.

<sup>3</sup> Canal Boats Act, 1877, s. 1.

<sup>4</sup> Section 29.

<sup>5</sup> Food and Drugs (Adulteration) Act, 1928, s. 8.

<sup>6</sup> Public Health (Imported Milk) Regulations, 1926, s. 3.

<sup>7</sup> Factory and Workshop Act, 1901, ss. 127 and 131.

<sup>8</sup> Public Health (Tuberculosis) Regulations, 1912, article XI.

<sup>9</sup> *Ibid.*, 1921.

medical officer of health must furnish the county medical officer with a quarterly statement showing <sup>1</sup>—

- (a) The number of cases on his register at the commencement of the quarter.
- (b) The number of cases notified for the first time during the quarter.
- (c) The number of cases removed from the register during the quarter, giving name, address and reason for removal.
- (d) The number of cases remaining on the register at the end of the quarter.

Separate figures being given for males and females and for pulmonary and non-pulmonary cases.

As will be seen from the few specimen headings of registers appended to this chapter, the information recorded varies considerably, a register of margarine or similar factories or wholesale warehouses or of dairies and cowsheds containing four heads, whilst those of common lodging-houses or canal-boats gives much detailed information. As a rule a separate book is kept for each subject, the result being that the vast majority of the pages in each are blank and likely to remain so for ever. A much more economical method is to have a few loose leaves ruled for each subject and kept in one volume by one of the "loose-leaved ledger" devices; such a volume would cost less, occupy less room, and save time in reference or in writing-up, since all or any registrable premises could be at once turned up without moving.

Both medical officers of health and sanitary inspectors are required to keep records of their official activities, and the reports upon various branches of their work which are specifically demanded of them necessitate such a course; but the methods to be adopted are seldom designated and are determined in general by imitation and habit. In the case of houses inspected for the purposes of Section 8 of the Housing Act of 1925, however, the Ministry of Health have specifically and fully enumerated the information to be contained in the records which must be kept by every

<sup>1</sup> Public Health (Tuberculosis) Regulations, 1924.

local authority.<sup>1</sup> Such records are for a limited purpose, but they could and should be extended to include all premises within the district, and would in that case form the basis upon which a sanitary survey of the whole area might be built. The records may be kept in a book or books or on separate sheets or cards. Each system has its advocates, but the last two methods have the merit of elasticity, a great advantage in all districts where building operations are still going on, as every new house can be entered upon a sheet or card and placed in its correct position relative to other premises. A specimen page or card for this purpose is given, together with a page of what may be termed an inspection index. The latter may not comply strictly with the regulations, since it does not directly give all the information asked for; but this can be found by reference to the inspector's inspection book, the book in which reports are made to the authority to obtain its sanction to the service of statutory notices, and the books in which copies of letters and notices are kept, and it has the great advantage of enabling anyone to determine, almost at a glance, the particular portions of the district which have, for good or bad reasons, lacked inspection over a series of years.

#### FORM OF CARD RECORD

Address :

Description :

Water Supply :

Drainage :

Closet Accommodation :

Paving, etc., Yard.

#### Provision for refuse :

Date of Inspection.	Inspected by	Reason for Inspection.	Defects Found.	Action Taken.	Rent and Tenancy.	Remarks.
			Sketch Plan of Drainage on Back			

<sup>1</sup> Housing (Consolidating) Regulations, 1925.

## FORM OF INSPECTION INDEX

Road, Street or Lane					
No.	Description, etc.	1928.	1929.	1930.	1931.
1	6 and retail shop (Grocer's) M.; w.c.	$\frac{1}{2}$ D.			
2	5 S.L. (1) C.; w.c.	$\frac{3}{5}$ C. (7/6)			
3	5 P. W; E.C.	$\frac{2}{4}$ S.F. (7/-)			
4	6 T. (2) C.; w.c.'s (2)	$\frac{5}{4}$ S.F. (4/6 each) $\frac{2}{6}$ C.			

*Abbreviations.*—Figure = No. of rooms. Tenancy—P = private; S.L. = sub-let; T. (1 or 2 etc.) = tenements. Water Supply—M. = from main; C. = from cistern; W = from well. Closet Accommodation—w.c. = water-closet; E.C. = earth closet. Reason for particular inspection—C. = complaint; D. = after diphtheria; S.F. = after scarlet fever, etc. The fractions indicate day and month of inspection; in red ink if a notice is served, in black ink if not.

Such a system saves much time in entering up, enables speedy reference to sources of further information, and adequately serves the purpose for which such a record is required; and the rents, inserted in parenthesis will ultimately form a valuable index of rent movements.

At the periodical meetings of the committee having charge of sanitary administration reports of the work performed during the intervening periods are presented by the medical officer of health, sanitary inspector, medical superintendent of the hospital, and the public analyst, sanction is asked for action needing it, and matters upon which instructions are required are presented. The information contained in these reports forms the basis of the annual reports which must be made by the various officers.<sup>1</sup> Towards the end of each year the Ministry of Health issues a circular to local authorities indicating the lines upon which the report of the medical officer of health must be drawn. For 1926 the minimum was prescribed as follows: <sup>2</sup>

<sup>1</sup> Sanitary Officers Order, 1926, articles 14 (3) and 19 (15).

<sup>2</sup> Circular 743, December 20, 1926.

- (1) Information under the following heads:
- Statistics and Social Conditions of the Area.
  - General Provision of Health Services for the Area.
  - Sanitary Circumstances of the Area.
  - Housing.
  - Inspection and Supervision of Food.
  - Prevalence of, and Control over, Infectious Disease.
- (2) A statement of any noteworthy conditions prejudicial to the health of the area . . . Observations in regard to the character and results of any important measures affecting the public health taken in the area, or recommended, but not so far carried out.
- (3) A statement of any important change made during the year in the public health services which cannot be conveniently dealt with under headings given in appendix to circular.
- (4) A statement of any special action taken during the year in the area to arouse public interest in the prevention of ill-health.
- (5) A summary of important special reports, if any, made during the year.

In the Appendix to the Circular the headings under (1) above are extended thus:

(a) *Statistics and Social Conditions:*

Area, population (at last census and estimated for year), inhabited houses, number of families or separate occupiers, rateable value and sum represented by a penny rate; social conditions, including chief occupations, of people and influence on public health. Extracts from vital statistics (births and deaths) in form given.

(b) *Health Services:*

Number, situation, nature, extent and sufficiency of hospitals for fever, small-pox, tuberculosis, maternity, children, and others.

Institutional provision for unmarried mothers, illegitimate and homeless children.

Ambulance facilities for infectious and non-infectious and accident cases.

Clinics and treatment centres.—Maternity and child welfare centres; day nurseries, school clinics; tuberculosis dispensaries, treatment centres for venereal diseases.

List of public health officers indicating whole- and part-time officers, and noting special diplomas or certificates of qualification and other public offices held by them.

Professional nursing in the home for general and for infectious disease.

Number of midwives practising in area; and employment of, or subsidy to, practising midwives by the local authority.

Arrangements for chemical work; and reports by public analyst if deemed desirable.

A list of local Acts, special local Orders, general adoptive Acts and bye-laws relating to public health, in force, and the dates at which they became operative.

(c) *Sanitary Circumstances*.—Water. Pollution of rivers and streams. Drainage and sewerage. Closet accommodation—conversion from conservancy to water-carriage system. Scavenging. Sanitary inspection of area<sup>1</sup>—a classified statement of the number of premises visited, defects or nuisances discovered and action and the result of action taken. Smoke abatement. Number and character of premises which can be controlled by Bye-laws or Regulations and action taken or needed in regard thereto.

(d) *Housing*.—A statement showing number of new houses erected with and without State assistance, number of inspections under Housing Act and

<sup>1</sup> This includes the report of the sanitary inspector.

results, and proceedings taken under various powers.

(e) *Inspection and Supervision of Food*.—Milk supply. Meat and other foods. Action taken under Food and Drugs and kindred Acts and regulations.

(f) *Prevalence of and Control over Infectious Diseases*.—A review of the prevalence of notifiable and other infectious diseases and statement of use made of various methods of prevention. Particulars of use made of facilities for cleansing and disinfection of verminous persons and things and disinfection of premises and articles exposed to infection. Tabulated statements of (1) cases of disease notified, showing number admitted to hospital, and deaths, classified in age-groups; (2) cases of ophthalmia neonatorum notified, with indication of place of treatment, effects on vision and deaths; and (3) new cases and deaths from tuberculosis (pulmonary and non-pulmonary), distinguishing the sexes and age-periods. Information as to any action taken under the Public Health (Prevention of Tuberculosis) Regulations, 1925, and Public Health Act, 1925, section 62.

The sanitary inspector is required<sup>1</sup> as soon as practicable after the 31st day of December in each year, to furnish the medical officer of health with a tabular statement containing the following particulars:

(a) The number and nature of inspections made by him during the year.

(b) The number of notices served during the year, distinguishing statutory from informal notices.

(c) The result of the service of such notices.

The like duty of officers of a port sanitary authority are similarly prescribed, but are necessarily more circumscribed in the conditions and things to which they relate.

The content of these annual reports is considerably extended by the provisions of Acts imposing special sanitary

<sup>1</sup> Sanitary Officers Order, 1926, article 19 (15).

duties. The medical officer of health not only has to notify the factory inspector of any case where a woman, young person or child is employed in a workshop in which no abstract of the Act is affixed,<sup>1</sup> and to report to him whatever action has been taken as regards any complaint forwarded by him to the medical officer of health,<sup>2</sup> but he is required to report specifically, in his annual report, on the administration of the Act in workshops and workplaces, and to send a copy of such report to the factory inspector.<sup>3</sup> This is usually summarized in five tabular statements as follows :

- (1) Number of inspections made, notices served, and prosecutions undertaken in reference to each class of premises.
- (2) Number and nature of defects found and remedied, or referred to the factory inspector.
- (3) Number of outworkers in the specified trades, and administrative action and results.
- (4) Number of workshops on the register, important classes being specially enumerated.
- (5) A summary of miscellaneous administrative matters.

All sanitary authorities are required to furnish the Ministry of Health with an annual report of their administration of the Canal Boats Acts, 1877 and 1884, and the regulations thereunder within twenty-eight days of December 31st of each year,<sup>4</sup> the information required being prescribed as follows :<sup>5</sup>

- (1) Arrangements for inspection, and name, address and remuneration of inspector.
- (2) Number and condition of boats inspected, and their occupants.
- (3) Infringements of the law as regards registration, notification of change of master, certificates, marking, overcrowding, separation of sexes, cleanliness,

<sup>1</sup> Factory and Workshop Act, 1901, s. 133.  
<sup>2</sup> *Ibid.*, s. 5.  
<sup>3</sup> *Ibid.*, s. 132.  
<sup>4</sup> Canal Boats Act, 1884, s. 3.  
<sup>5</sup> Local Government Board Circular, December 17, 1909.

ventilation, painting, provision of water cask, removal of bilge water, notification of infectious disease, admittance of inspector.

- (4) Legal proceedings and results.
  - (5) Other steps taken to secure compliance with the law.
  - (6) Infectious diseases dealt with and measures of isolation adopted.
  - (7) Detention of boats for cleansing and disinfection.
- In case of registration authorities :
- (8) Number of boats on register, showing—
    - (a) Number believed to be in use or available.
    - (b) Number not traced.
    - (c) Number registered and re-registered on account of structural alterations.

The regulations as to unsound food require a record to be kept by the sanitary authority of any articles of food destroyed or disposed of under their provisions, and the medical officer of health's report contains an abstract of such records, together with an account of the proceedings taken to give effect to the regulations.<sup>1</sup>

Each public analyst is required to furnish quarterly reports to the local authority appointing him, specifying the number of articles analysed by him and the results of all such examinations, preferably in a tabular form as under :<sup>2</sup>

ANALYSES.

Article.	Number Examined.				Number Adulterated, etc.			
	Formal.	Informal.	Private.	Total.	Formal.	Informal.	Private.	Total.
Total								

<sup>1</sup> Public Health (Unsound Food : First Series) Regulations, 1908, Article VII, and Local Government Board Circular thereon, September 16, 1908.  
<sup>2</sup> Memorandum (36/Foods) issued by the Ministry of Health, January, 1927, on Procedure under the Sale of Food and Drugs Acts, etc.

## ADULTERATED SAMPLES, ETC.

Serial No.	Article.	Whether Formal, Informal or Private.	Nature of Adulteration or Irregularity.	Observations.

The sum paid in respect of each analysis was :—

These reports must be transmitted to the Ministry of Health, with information under other heads of which the following are the most important :

- (1) Administrative action in regard to samples reported against.
- (2) Administrative action in regard to offences other than adulteration.
- (3) Action under Acts other than the Food and Drugs Acts.
- (4) Information as to "appeal to the cow" samples.
- (5) Preservatives.
- (6) Comparison of milk samples.
- (7) Action under Milk (Special Designations) Order.

Some medical officers of health content themselves with a bald statement of fact sufficient to comply with the requirements of the Ministry of Health, but others, grasping the advantages which their position gives them, not only illumine their reports with detailed explanations, but by the collection and comparison of data are able to suggest theories of the greatest value. Such reports often serve a useful purpose by focussing public attention upon some insanitary conditions, and on this account some local authorities have endeavoured, generally unsuccessfully, to alter or amend reports which reflected unfavourably upon their use of the powers they possess. The reports are carefully considered by officers of the Ministry of Health, and frequently form the starting-point of efforts of the

Department to persuade or compel the local authority to carry out works required to improve the sanitary condition of the district. The Ministry has not yet attempted, except in the case of vital statistics and one or two other matters,<sup>1</sup> to summarize the general work of sanitary officials throughout the country. Some years ago a President of the Local Government Board stated that "he had been struck by the fact that hitherto there had been no adequate means of collating and diffusing information on the many questions with which the Board was concerned. In fact, there was no intelligence department."<sup>2</sup> He expressed his intention of setting up an intelligence department which should have made it possible to formulate under a few significant headings the main activities of the health department of each local authority. Such a statement would be useful in several ways, particularly by affording an approximate test of the activity of each authority in enforcing the provisions of sanitary legislation, and by giving an incentive,

## REGISTER OF SLAUGHTER-HOUSES

Date of Registration.	Date of Licence.	No. of Licence.	Christian and Surname and Address of Owner of Premises.	Christian and Surname and Address of Occupier of Premises.	Sanitation of Slaughter-house	No. of Animals for which Accommodation is provided on the Premises.				General Condition of Premises.	Remarks.
						Oxen.	Calves.	Sheep.	Swine.		

<sup>1</sup> Administration of the Canal Boats and Food and Drugs Acts are two exceptions.

<sup>2</sup> The Right Hon. H. Samuel in the House of Commons, June 18, 1914.

through shame or emulation, to the more backward authorities to increase their efforts.<sup>1</sup>

REGISTER OF COMMON LODGING-HOUSES

No.	Date of Registration.	Name of Keeper of Lodging-house.	Name of Deputy-Keeper.	Residence of Keeper.	Situation of Lodging-house.	No. of Rooms set apart as Bedrooms.	Cubical Contents of Bedrooms.	No. of Lodgers allowed in each Bedroom.	Whether whole or part of such House (and what part) is used as Common Lodging-house.	Name of Officer by whom House was Inspected.	Date of Inspection.	Date of Approval.	Date of Certificate of Character	Names of Ratepayers by whom Certificate was signed.	Condition.	Remarks.

REGISTER OF WHOLESALE DEALERS IN MARGARINE AND MARGARINE CHEESE AND MILK BLENDED BUTTER

No.	Date of Registration.	Name and Address of Applicant for Registration.	Situation of Premises on which business of Wholesale Dealer is carried on.	Name and Address of Owner or Occupier carrying on Business.

<sup>1</sup> For more detailed information on this subject, see Public Health section of *Municipal Office Organisation and Management*, W. Bateson (Ed.), and *Organisation and Administration of the Public Health Department*, by W. A. Leonard.

CHAPTER XXII

TOWN PLANNING AND IMPROVEMENT

As a unit of the local administration the public health department is engaged in the discovery and abatement of nuisances, the regulation of particular trades and premises, the investigation into and isolation and treatment of infectious disease, the provision of various services for the welfare of mothers and children, and the protection of the food supply. These functions are, as a rule, peculiarly personal; they bring the department into relation, not with the community as a whole, but with individuals or small groups of individuals. It is for this reason that the possession of courtesy, tact and a wide knowledge of men and affairs is particularly essential for officials of the department.

The sanitary authority is, however, endowed with other powers and duties which involve complex engineering and architectural questions, the construction of various works and buildings, and often the establishment of special departments with officials equipped with experience, knowledge and skill peculiar to the service in which they are engaged. Such subjects of sanitary administration as the regulation of streets and buildings, the provision of houses for the working classes, town planning, sewerage and sewage and refuse disposal works, water supply, and the provision of public abattoirs, markets, baths and washhouses, burial grounds and crematoria, are, as a rule, matters with which the surveyor or engineer has to deal, at least until they are handed over to the special department into the care of which some of them are usually placed. But all of them affect the public health, and several are, either by order of the