



SERVICE PLAN FOR FOOD LAW ENFORCEMENT 2022-23

**Drawn up in accordance with the
Food Standards Agency Framework Agreement**

Draft for approval by Licensing & Protection Committee on

28 June 2022

1. Service Aims and Objectives

1.1. Aims and objectives

1.1.1. The overall aim of the service is to ensure that food placed or intended to be placed on the market for human consumption which is produced, stored, distributed, handled or purchased within Huntingdonshire is without risk to public health or the safety of the consumer. This is fulfilling our statutory duty under the Food Safety Act 1990 and the Food Hygiene and Safety (England) Regulations 2013. There are several key objectives which contribute to the delivery of the overall aim.

- The delivery of a programme of inspections and other interventions in accordance with the FSA's Code of Practice
- To respond to complaints and requests for service in accordance with any internal service standards
- To respond to any FSA Food Alerts for Action (FAFA) subject to available resources

1.2. Links to corporate objectives and plans

1.2.1. A new Corporate Plan was adopted in 2023 for the period 2023 – 2028. The three key priorities identified are:

Priority 1 – Improving quality of life for local people

Priority 2 – Creating a better Huntingdonshire for future generations

Priority 3 – Delivering good quality, high value-for-money services with good control and compliance with statutory obligations.

The work covered by this service plan largely sits under Priority 3, and consequently a measure of operational performance has been identified in the corporate plan as 'The number of programmed food safety inspections undertaken (cumulative year to date)'.

2. Background

2.1. Profile of the Competent Authority

2.1.1. Huntingdonshire is a large (900 square kilometres) and predominantly rural area forming the most westerly part of Cambridgeshire. Over 40% of the population live in our three largest market towns of St Neots, Huntingdon and St Ives. Village settlements provide the main population centres and facilities outside of the market towns. With an estimated 180,800 residents and 76,900 households in 2021, the population has grown significantly over recent decades (up by 47% since 1981) and is forecast to grow further.

2.1.2. Economic activity (64% of those aged 16+) and employment rates (61.6% of those aged 16+) are both higher than the national average. There are pockets

of higher deprivation within the district but most areas have relatively low levels, as measured by the 2019 Indices of Deprivation. (data from the Corporate Plan 2023 – 2028).

2.2. Organisational Structure

2.2.1. Huntingdonshire District Council operates an ‘Executive Leader and Cabinet’ model of decision-making. Under this model, the executive leader, appoints their own deputy executive leader and cabinet, which comprises seven other councillors.

2.2.2. The food safety service is one of the services provided by specialist officers within the Community service area. The Environmental Health Service Manager is responsible for the day to day operation of Environmental Health Service and they report to the Community Service Manager who in turn reports to the Chief Operating Officer. The Environmental Health Service Manager is supported by a Lead Food Officer acting as the technical expert on food safety related matters.

2.2.3. There are currently five officers (4.5 FTE) with a specific responsibility for the delivery of the food safety service of which approximately 85% of the officer’s available time is dedicated to food safety making a resource of 3.6 FTE. There is vacancy which will be recruited to in 2023/24. The current officers are a combination of Environmental Health Officers and Environmental Health Protection Officers. The remaining 15% of officer time is allocated to Health and Safety work.

2.2.4. Each officer has been allocated a specific geographical area which contains a diverse range of food businesses. The number and type of businesses is consistent with the officer’s knowledge and experience. There is a “buddy” system in place to ensure that at least two officers have some knowledge of specialist or unusual businesses.

2.2.5. The service uses several agencies and companies to support the delivery of official food controls. These are summarised in the table below.

Table 1: Provision of External Services

Name of Organisation	Type of Service	Frequency of Service
UK Health Security Agency and East of England Health Protection Team, Thetford and Colindale	Microbiological food and water sampling and advice on infection and disease control	Weekly, as required
Anglian Water, Huntingdon	Chemical and microbiological water sampling	As and when required

Campden BRI	Food and foreign body/ contaminant examinations and identifications	As and when required via annual subscription
Chartered Institute of Environmental Health (CIEH)	Information and advice. Materials for food hygiene courses	As and when required
Food Standards Agency (FSA)	Monitoring of performance, information, advice, food alerts	As and when required

2.3. Scope of the food service

2.3.1. The food safety service covers a wide range of regulatory duties including:

- Programmed and intelligence led food hygiene interventions
- Investigation of complaints relating to food hygiene, or food prepared and sold in the district
- Infectious disease investigation
- Responding to food alerts issued by the FSA
- Responding to planning and licensing applications in relation to food premises
- Sampling
- Provision of advice and information to food businesses

2.3.2. The service is provided by officers employed directly by the council. Approximately 85% of the officer's available time is dedicated to food safety with the remaining 15% being allocated to health and safety work and private water supplies.

2.3.3. The wider environmental health service deals with nuisances, environmental protection, contaminated land, private sector housing and officers from these service areas could be drawn on to support the food service during an incident.

2.4. Demands on the food service

2.4.1. On 1 April 2023 there were 1740 food businesses registered in Huntingdonshire. This is an increase of 39 businesses since 2022-2023. There are a variety of businesses within Huntingdonshire and this number includes 21 primary producers (e.g. farms), 64 manufacturers and packers, 3 importers and 38 distributor/transporters with the remaining businesses comprising retail and catering establishments including restaurants, take-aways, schools, pubs, caring premises, mobile food units and hotels/guest houses.

2.4.2. Food businesses are inspected according to their inspection rating category. The highest risk businesses (category A) are the subject of an inspection, partial

inspection or audit at least every 6 months whereas the lowest risk businesses (category E) are monitored using alternative enforcement approaches. New businesses are classified as “Unrated”. The breakdown of premises by inspection rating category was:

Table 2: Breakdown of food premises by inspection rating category

	A	B	C	D	E	Unrated
As at 31/03/2022	4	46	333	481	713	132
As at 31/03/2023	6	63	290	542	720	53

There are 66 food business outside the rating programme

2.4.3. Food hygiene regulations require certain premises which handle food products of animal origin to be approved by virtue of their nature, scale or complexity. Within Huntingdonshire there are nine approved premises.

2.4.4. There are a number of manufacturing businesses which regularly supply food to non-EU countries and which require an Export Certificate for each consignment, the certificates certify the premises meets legislative requirements. These arrangements support the businesses in question and have generated income of £11,040 in 2023-23 which is similar to the income of £12,240 during 2021-22. The fees for these certificates have been reviewed and increased in 2023-24 to reflect the time required to produce each one.

2.4.5. There are also businesses that use complex equipment such as vacuum packing machines and businesses carrying out complex processes such as sous-vide, cook-freeze and the curing of meat products. Suitably qualified and trained officers carry out interventions in businesses associated with specialist and complex processes and equipment.

2.4.6. The Environmental Health team is based on the first floor of Pathfinder House, St Mary’s Street, Huntingdon although officer largely adopt a hybrid approach basing themselves between the office, home and food premises. Customers can contact officers in the following ways:

- In person or by telephone between 08:45 and 17:00hrs Monday to Thursday, 08:45 and 16:30hrs Friday (01480 388302)
- By fax on 01480 388361
- By email: EnvHealth@huntingdonshire.gov.uk or food@huntingdonshire.gov.uk
- Advice and information about good practice and the service is available on the Council’s website.

Officers are not on standby outside office hours but arrangements are in place FSA, Cambridgeshire Constabulary and UKHSA have an out of hours number to contact a duty director and officers can be asked to respond to major incidents and emergencies during evenings and weekends.

2.4.7. The following factors can have an impact on the delivery of the Service Plan:

- An outbreak of food poisoning or a work-related death as the same officers covering food safety also cover health and safety in the workplace.
- Major outdoor events during the course of a year which involve food safety, water and health and safety considerations. Officers participate in the Safety Advisory Group.
- Officers may have to respond to FSA Food Alerts for Action. Some can be very time-consuming, particularly if they require action to be taken to identify and if necessary remove suspect or unsafe food from the food chain
- The implementation of changes to existing legislation, Codes of Practice, Government guidance and monitoring arrangements have resource implications for the service.
- The continued implementation of the environmental health information management system used for holding records of food businesses and recording and planning inspections

2.5. Regulation policy

2.5.1. In February 2018 Huntingdonshire District Council adopted a Corporate Enforcement Policy. This sets out its approach to proportionate, transparent, fair and effective regulation and enforcement, following the principles set down in the Regulators Code. This overarching framework is intended to provide customers with a clear understanding of the Council's approach to regulatory and enforcement activity.

2.5.2. In order to promote consistent and proportionate enforcement the service is an active member of Cambridgeshire and Peterborough Food and Safety Group. Senior officers represent the council at these meetings which seek to share best practice and liaise with wider partners. Task and finish groups are periodically set up to develop consistency exercises, training programmes or peer review models.

3. Service Delivery

3.1. Interventions at food establishments

3.1.1. These consist of the "official food controls" specified in the Food Law Code of Practice together with any other activities where the purpose is to monitor compliance with food hygiene law.

3.1.2. The food hygiene intervention rating is used to determine the type of intervention that is suitable for that particular operation. Unannounced inspections are carried out at businesses in categories A, B, C and D unless they are based in a domestic premises. Category A and B interventions may

comprise an inspection, partial inspection or audit at appropriate intervals. Category C premises will be assessed using either a full/partial inspection or audit, until they are deemed broadly compliant, once this is achieved planned interventions may alternate between the above and another type of official control. Category D premises will be subject to alternate official control and non-official controls unless they are also rated 30 or 40 for “type of food and method of handling” when they are restricted to a full/partial inspection or audit. Other official controls comprise food sampling, surveillance, verification visits and audits.

- 3.1.3. The frequency at which businesses must be inspected is outlined in Annex 1 of the Food Law Code of Practice June 2023. Information gathered at inspection is also used to determine the Food Hygiene Rating Scheme (FHRS) score. The FHRS is operated in accordance with the FSA Brand Standard June 2023. Businesses can appeal against their rating and can also request a rescoring visit (subject to the payment of a fee) after the inspection upon which their rating was based. During 2022-23 there have been 18 re-score requests, compared to 13 in 2021-22.
- 3.1.4. Throughout 2022-2023 the Food Standards Agency Recovery Plan has been followed, now the recovery plan has ceased the aim for 2023-2024 is to work through the backlog of overdue D rated premises and undertake programmed inspections for all other premises that have already been inspected as part of the recovery plan and are routinely due for inspection this year. There are approximately 342 overdue D rated premises and 224 A-C rated premises and 53 unrated premises due for an intervention in 2023-2024.
- 3.1.5. The Code of Practice allows local authorities to use Alternative Enforcement Strategies (AES) for Category E businesses. The AES approach typically involves the completion of a self-assessment questionnaire by the business. There are currently approximately 600 Category E businesses overdue, this is largely due to inspections stopping during the pandemic and the restart focussing on the highest risk premises.
- 3.1.6. All officers who carry out official food controls are authorised in accordance with the Code of Practice. Weekly team meetings are held where any complex matters or specialised processes can be discussed, and knowledge shared.
- 3.1.7. Officers will also carry out spot checks at businesses if they have concerns or intelligence about the business or about a specific activity within a business. The outcome of a spot check may affect future planned inspections of the business.

3.2. Food complaints

- 3.2.1. These generally fall into one of the following categories:
 - Complaints about the food premises themselves (e.g. poor staff hygiene,

allegations of pests, poor standards of cleanliness)

- Complaints about the condition or contamination of food (extraneous matter, mould, dirty containers)
- Complaints about food labelling and food information ('use by' dates and allergen information).

3.2.2. Complaints are allocated to officers on an area basis and are prioritised on a risk basis. This approach may mean it is appropriate for the complaint to be dealt with at the next routine intervention or an intelligence led intervention may be required.

3.2.3. Based on previous years it is estimated that there is expected to be about 500 complaints/requests for service in 2023-24, which is in line with previous years (540 complaints/requests for service were received in 2022-23). Progress against this will be reported quarterly.

3.3. Home Authority and Primary Authority

3.3.1. The council does not have any home authority or primary authority arrangements in place. If resourcing allows in future, and it is in line with corporate priorities to support local businesses in this way, opportunities to undertake a primary authority arrangement would be explored.

3.4. Advice to business

3.4.1. Officers provide information and advice to businesses to help them comply with the law and to encourage the use of best practice. This is part of our enforcement policy and is achieved through a range of activities including:

- Advice to new businesses
- Advice during the course of inspections and other visits
- Site visits on request - where appropriate and resources allow
- Proactively contacting businesses to comment on plans at the planning application stage
- Proactively contacting businesses to comment on applications for premises and temporary licences
- Participating in Safety Advisory Group
- Maintenance and development of the website with links to the FSA's website.
- Key information issued via Council website and social media by the Communications Team
- Provision of food hygiene training

3.4.2. These activities are integrated into the service's general interventions and food safety promotion functions. There were 232 requests for advice in 2022-23 from existing food businesses or new food businesses and it is anticipated there will be a similar number in 2023-24.

3.5. Food sampling

3.5.1. Sampling is a recognised official food control. In 2023-24 the commitment to sampling will continue following the UKHSA on targeted studies. UKHSA does not currently charge for the analysis of samples.

3.5.2. Sampling is undertaken by all officers working in the service.

3.5.3. All sampling will be carried out in accordance with relevant legislation, the Code of Practice issued under the Food Safety Act 1990, guidance on the sampling intervention designed by UKHSA and the departmental Standard Operating Procedure (SOP).

3.6. Food safety incidents

3.6.1. FSA food alerts for action will be dealt with in accordance with:

- the departmental SOP
- the Food Law Code of Practice issued under the Food Safety Act 1990 and
- any instructions issued by the FSA.

3.6.2. Most food alerts are Product Withdrawal Information Notices or Product Recall Information Notices which require little or no action. There are a significant number of allergy alerts but these too require little or no action or are dealt with by Trading Standards Officers (TSOs). Occasionally TSOs may ask for our support. Food Alerts for Action (FAFA) and ad hoc requests for action may have an impact upon programmed work but the numbers are relatively low.

3.6.3. Given the nature of food alerts, it is impossible to predict the likely demands and requisite resources with any accuracy. If a food alert is associated with a business based within Huntingdonshire then officers will be expected to devote more time to that alert than to one which originates elsewhere.

3.7. Liaison with other organisations

3.7.1. The Council recognises the importance of ensuring its enforcement approaches are consistent with those of neighbouring local authorities. Officers have access to the LGA Knowledge Hub and there is dialogue and liaison in a number of settings:

- Cambridgeshire and Peterborough Food and Safety Group (CPFSG)
- Cambridge Water Company Liaison meetings
- Anglian Water Liaison meetings
- Tascomi User Group
- FSA regional events
- UKHSA/Environmental Health liaison days
- CIEH update events

3.7.2 The CPFSG promotes consistency between officers and authorities and where possible produces common policies and procedures. Where appropriate, subgroups can be convened to deal with a specific issue. The membership

includes Lead Food Officers from Cambridgeshire and Peterborough as well as representatives from UKHSA, the FSA and Trading Standards.

3.7.3 There is routine liaison and contact with officers from Development Control, Planning Enforcement, Building Control, Business Rates, Fraud, Licensing and Legal as well as liaison and consultation with the Town Centre Managers where appropriate.

3.8. Food safety promotional work

3.8.1. The main priority for the year will be the inspection programme.

3.8.2. There are four key drivers which contribute to the service and work priorities. In broad terms they are as follows:

- **Intervention driven:** work which is largely determined by the FSA Food Law Code of Practice. In the main this consists of programmed inspections and interventions at frequencies prescribed by the Code of Practice together with revisits and enforcement action in accordance with the Enforcement Policy
- **Demand driven:** work in response to complaints and requests for advice and guidance; investigation of food poisoning notifications; responses to FSA Food Alerts (in particular those which require action); and liaison with other Council services in support of wider corporate objectives
- **Intelligence driven:** responses to credible or verifiable information which suggests a risk to public health
- **Education driven:** the provision of advice, education and support to businesses and consumers; supporting national campaigns and strategies which are in the interests of public health and/or consumer safety (e.g. food hygiene related campaigns by the FSA).

3.9. Control and investigation of outbreaks and food related infectious disease

3.9.1. The Council has appointed the Consultant in Communicable Disease Control (CCDC) from UKHSA as the 'Proper Officer' under the Public Health (Control of Disease) Act 1984.

3.9.2. Officers will investigate food-related infectious disease notifications in accordance with protocols agreed with the Consultant in Communicable Disease Control (CCDC), Anglian Water and Cambridge Water Company. The general aims of any investigation are to identify the source and cause of the infection and prevent further spread.

4. Resources

4.1. Financial allocation

4.2.

4.2.1. The budget for 2022-23 is shown in the Table below

Table	2023-24
Direct Costs	£
Employees	
Salary (NI, Pension, training)	225,100
Transport, mileage	4,000
	229,100
Other	
Equipment, furniture and materials	1,450
Premises hire	600
Laundry	380
Catering	180
Printing and postage	1,350
Training expenses	1,000
Books and Publications	640
Subscriptions	2,000
	7,600
Total	236,700
Income	
Costs recovered (Export Certificates,-17,100 delivery of training courses and fees for FHRS re- score visits)	
Total Expenditure	219,600

4.2.2. The estimated income of £17,100 comprises fees for export certificates, delivery of training courses and FHRS re-score visits.

4.2.3. In the event of a serious or major incident or a large outbreak of food poisoning or food-borne illness requiring additional resources, officers undertaking food safety and health and safety work as part of their usual work will assist in the first instance and if necessary officers can be drafted in from the wider Environmental Health team to support the response.

4.2.4. There are no financial restrictions placed upon legal action, each case being considered on its merits. In the event of enforcement action that would place unforeseen demands on resources, local authorities can apply for financial support from the FSA but this fund is discretionary and may be withdrawn at any time.

4.3. Staffing allocation

4.3.1. Food law enforcement and compliance advice activities are provided by specialist officers from the Environmental Health Team. The team is led by the Environmental Health Service Manager and contains another five authorised officers, all of whom are fully authorised. The Environmental Health Team is supported by three Business Support Assistants (2 FTE).

4.4. Staff development plan

4.4.1. Staff must be appropriately trained and are required to undertake 20 hours of continuing professional development every year to maintain their competency. Currently all members of the team are subscribed to the ABC on-line training service which delivers accessible modular packages in specific areas of food law. This is also supplemented by training organised by authorities within the Cambridgeshire and Peterborough Food and Safety Group, UKHSA, FSA and the CIEH.

5. Quality Assessment

5.1. Quality assessment and internal monitoring

5.1.1 The Environmental Health Service Manager is responsible for the overall monitoring of the service and works closely with the Lead Food Officer. In general terms the service is monitored internally in accordance with Standard Operating Procedure (SOP) CT04. The practical arrangements include the following

- Review of premises inspection records
- Observed and accompanied inspections
- Periodic reviews of policies and procedures
- Weekly team meetings
- Programmed work is monitored against targets
- Reactive work is monitored with reference to response time and closure of service requests
- One-to-ones between the Environmental Health Service Manager and Officers
- Peer review and consistency exercises led by the CPFSG
- Peer review and consistency exercises led by the FSA

5.1.1. There are several SOPs which cover the different aspects of the service. They are subject to on-going review to reflect changes in the code of practice, practice guidance, FHRS Brand Standard and changes within the service structure that were finalised in January 2023.

5.1.2. Monthly data on the number of food hygiene inspections undertaken is reported monthly to the Operations Board as it is identified as a performance indicator in

the Corporate Plan.

5.1.3. Quarterly monitoring reports will be prepared for Licensing and Protection Committee. The activities reported on have been more clearly defined for 2023-24 and are presented in Appendix 1. A breakdown will be provided of programmed inspections and additional indicators have been added for the number of requests for export certificates. The predicted activity for infectious disease control has been significantly reduced to reflect that since the pandemic fewer notifications are coming through from the UK Health Security Agency and minor adjustments have been made to other levels of predicted activity.

6. Review

6.1. Review against the service plan

6.1.1. The focus of activity in 2022-23 has been following the FSA Recovery Plan. At the end of the year there were only four inspections outstanding that should have been completed according to the recovery plan.

6.1.2. There were 671 inspections completed during the year, this was under the number required to achieve the predicted activity (and complete all overdue inspections) but is a much higher number of inspections than those that would be due in a 'normal' year.

6.1.3. No interventions took place using the alternative enforcement strategy. It is anticipated that this work with Category E premises will take begin in 2023-24, the data will also be cleansed to refine any issues from the migration of data from one information management system to another in April 2021.

6.1.4. There were 364 complaints and service requests about food and about/from food businesses, this was slightly lower than anticipated.

6.1.5. Work has continued to implement the new environmental health and licensing information management system that went live in April 2021. A significant amount of data cleansing has taken place to ensure records show accurate planned inspection dates following data migration issues. Online food hygiene registration is now integrated into the system.

6.2. Identification of any variation from the service plan

6.2.1. At the end of the year there were only four inspections outstanding that should have been completed according to the recovery plan.

6.2.2. There are no significant areas of variation to be reported.

6.3. Areas of improvement

6.3.1. The service is committed to the delivery of official food controls in accordance with the Code of Practice.

6.3.2. The service will respond to complaints, enquiries and requests for service in accordance with internal procedures and with regard to public health risk and will be reported quarterly.

6.3.3. Areas of improvement identified are:

- The continued implementation of the new environmental health and licensing information management system to improve reporting, data accuracy and online services for customers.
- Updating the Standard Operating Procedures now the service structure has been confirmed, this work will begin in 2023/24.
- Continually review processes to ensure they are the most efficient possible
- Movement to a digital inspection system, the app linked to the environmental health and licensing information management system is currently under development so it is likely in 2023/24 there will be opportunities to test this

Appendix 1: Food Safety Service Plan: Programmed and predicted activity 2023-2024

Activity	Predicted activity 2023-24	Total activity 2022-23
Programmed food hygiene inspections A breakdown will be reported for: <ol style="list-style-type: none"> 1) Programmed inspections 2) Initial inspection (new business or new FBO) 3) Aborted/no access or closed premises inspections (aim to minimise) 	719	671
Alternative Enforcement Strategy (AES) (e.g. cake makers and childminders)	300	0
Revisits to check compliance following a food hygiene inspection	30	34
Mentoring / business support visits (previously included in other proactive visits)	15	15
Sampling visits (previously included in other proactive visits)	20	20
Food, water and environmental samples taken	100	115
Prosecutions and cautions	2	1
Formal action (service of notices, closures)	10	0
Complaints and service requests about food and about/from food businesses	350	364
Requests for export certificates	120	139
FHRS re-score requests (low is good)	20	18
Infectious disease control - notifications of food-borne/food poisoning illnesses (low is good)	10	8
FSA food alerts for action	10	14