

COMMUNITY DIVISION

**SERVICE PLAN FOR
FOOD LAW ENFORCEMENT
20-2021**

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

Approved by Licensing & Protection Committee
11th March 2020

INTRODUCTION

This is Huntingdonshire District Council's Twentieth Food Safety Service Plan. It covers all the elements of food safety and hygiene for which the Council has statutory responsibility.

The requirement to have a Service Plan is laid down by the Food Standards Agency (FSA) in its *Framework Agreement on Official Feed and Food Law Controls by Local Authorities, 2010, Amendment number 5*. One of the FSA's aims is to make Local Authorities' delivery of official controls effective, risk-based, proportionate and consistent.*

This Service Plan outlines how Huntingdonshire District Council aim to deliver official food law controls in 2020-21. Any references to work delivered in 2019-20 are based upon data recorded between 1 January 2019 and 31 January 2020. The references to programmed work for 2020-21 are based on predictions made from the risk rated premises database on 31 January 2020.

** Framework Agreement on Official Feed and Food Law Controls by Local Authorities, 2010, Amendment number 5*

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EXECUTIVE SUMMARY 2020-21

AIMS AND OBJECTIVES

The overall aim of the service is to work with businesses and consumers to secure the production, distribution and service of safe and wholesome food within Huntingdonshire. The plan is linked to Huntingdonshire District Council's Corporate Plan 2018 – 2022 which strives to support a safe and healthy environment, deliver economic growth and provide value for money services for the people of Huntingdonshire.

These are the key objectives which contribute to the overall aim of the plan:

- Planned and reactive inspections of registered and approved food establishments
- The investigation of service requests and complaints relating to food and food premises
- Where necessary, the submission of samples of food and water and environmental swabs for analysis
- The investigation of cases and outbreaks of food-borne and food poisoning illnesses.
- Delivery of the Food Hygiene Rating Scheme
- Promotion of key messages for consumer safety

Table 1: Comparison of resources for 2019-20 and 2020-21

| STAFF (Full Time Equivalent (FTE)) | 2019-20 | 2020-21 |
|---|------------------------|------------------------|
| Environmental Health Officers (EHO)* | 3.76* | 3.76* |
| Environmental Health Compliance Officers (EHCO)* | 0.69 | 0.69 |
| Operational Manager (Business) | 0.35 | 0.35 |
| | 4.80 | 4.80 |
| Business Support Staff* | 1.17 | 1.17 |
| Total | 5.97 | 5.97 |
| | | |
| FINANCIAL | 2019-20 | 2020-21 |
| Direct Costs (salaries, NI and pensions) | £253,941 | £241,712 |
| Other Direct costs (specialist equipment, laboratory services and sampling) | £7,565 | £6,935 |
| Transport | £5,722 | £3,950 |
| Total | <u>£267,228</u> | <u>£252,597</u> |
| Income (Primary Authority Partnership, export certificates, delivery of training courses) | <u>-£11,070</u> | <u>-£13,000</u> |
| NET EXPENDITURE | <u>£256.158</u> | <u>£239.597</u> |

* These figures represent the proportion of the establishment posts which is allocated to food law enforcement. This is expected to be 85%. At the present time there is a vacancy of 2.425 (EHO).

** See section 4.1 for a detailed breakdown of these figures.

The reduction in staffing costs reflects the estimated reduction in temporary agency staff during 2020-21

Table 2 – Programmed (proactive) Activity

| Proactive Tasks | Level of activity | | |
|--|--|----------------------------|---------------------------------|
| | Predicted 2019-20 | Actual 2019-20 (-2 months) | Predicted 2020-2021 (+2 months) |
| Planned food hygiene inspections (risk group A-D, in addition to those below) | 373 | 277 | 409 |
| Alternative Enforcement Strategy (AES) (e.g. cake makers and child-minders) | 106 | 25 | 95 |
| Revisits | 50 | 9 | 20 |
| Inspections of new food businesses | 130 | 97 | 130 |
| Inspections of Approved Establishments | 10 | 4 | 2 |
| Primary Authority Partnership Activity – includes requests for advice, attendance at meetings and provision of training* | 20 | 0 | 0 |
| Other proactive visits (food, water and environmental samples/advisory) | 150 | 30 | 100 |
| Prosecutions | 2 | 0 | 2 |
| Formal action (service of notices) | 10 | 0 | 10 |
| Food safety and public health promotion | Ad hoc project work linked to corporate objectives; targeted business support visits; provision of advice during routine interventions; National Food Hygiene Rating Scheme (FHRS); alternative enforcement strategies for low risk businesses and newsletters | | |

Table 3 – Unplanned (reactive) Activity

| Proactive Tasks | Level of activity | | |
|---|-------------------|----------------------------|---------------------------------|
| | Predicted 2019-20 | Actual 2019-20 (-2 months) | Predicted 2020-2021 (+2 months) |
| Service requests/complaints about food and food businesses | 550 | 513 | 550 |
| FHRS re-score requests | Not predicted | 26 | 30 |
| Food, water and environmental samples taken | 25 | 0 | 25 |
| Infectious disease control – notifications of food-borne/food poisoning illness | 80 | 56 | 80 |
| FSA Food Alerts for Action | 2 | 3 | 2 |

The administrative support workload includes producing post-inspection letters; data entries to Civica APP and Anite; taking and recording enquiries and service requests; collating data on infectious diseases; and collating information for the Food Standards Agency.

A balanced programme of work is proposed for 2020 - 21 which incorporates a full range of official food controls. Due to the nature of the service some interventions are carried out during evenings and weekends. The plan is based upon the service being fully staffed.

The impact of Brexit is yet unknown however it is recognised that there may be an impact relating to food hygiene Export Health Certificates issued by local authorities for food stuffs being exported.

DEVELOPMENT PLAN 2020-21

The following developments are planned during 2020-21. This work is in addition to the proactive and reactive work identified in tables 2 and 3. It is linked to the objectives and outcomes identified in the Corporate Plan and any regional or national strategies.

- Procurement of a new Environmental Health Management System and development of a project plan to implement and migrate data to the new system including training for staff and procedures. This project may span over more than one year.
- Review and update SOPs in relation to ROF, the new computer system and remote working initiatives
- Continue to deliver a programme of training courses and briefing events to help food businesses comply with food hygiene requirements and to help them achieve the highest possible food hygiene rating for their business
- Building on the communicating for compliance approach we will provide training for regulators to improve their skills in influencing and supporting business with confidence. The outcome for business will help them meet regulatory requirements and improve growth.
- The Better Business for All (BBfA) Partnership launched in May 2019 working collaboratively to deliver regulatory support priorities targeted at business growth across Cambridgeshire and Peterborough. We will continue working with business support colleagues and will continue to be open to primary authority enquires from businesses whilst improving their regulatory knowledge and making it simpler for them to speak to the person who can best support their needs.
- The Food Standards Agency are moving to a national Online Registration system for all food businesses. It is anticipated that we will move to Stage 1 implementation during 2020-21, this has been delayed from last year.
- Prepare for transition of European legislation into UK law following exit from the EU, ensuring staff are trained and businesses are kept up to date
- To promote the service as widely as possible using all available media outlets and support any relevant national strategies such as the FSA's National Food Safety Week
- To continue to promote the Healthier Options initiative via our website to help local businesses make healthier changes to their menu and food preparation methods.
- Continue to undertake official controls (including proactive food hygiene inspections) in line with the requirements of the Foods Standards Agency code of practice
- We will actively implement any new guidance issued by the FSA regarding allergens
- Continue to provide a reactive food hygiene service responding to the concerns of residents of Huntingdonshire, and the customers of Huntingdonshire food businesses

SECTION 1: FOOD SAFETY SERVICE - AIMS AND OBJECTIVES

1.1 Aims and Objectives

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. 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

The Service Plan supports the Council's Corporate Plan 2018-22. It contributes to several of the Strategic Objectives, with particular reference to the following:

Create, protect and enhance our safe built environment – dealing with significant breaches of food safety requirements which have the potential to put the public at risk

Support people to improve their health and wellbeing – by promoting the Healthier Options Scheme to food businesses in respect of acrylamides via the website.

Develop more resilient communities to help people help themselves – the provision of information and advice to businesses and to the wider public ensures that those businesses who achieve compliance are rewarded and the public can use this information to inform their decisions on where to eat

Accelerate business growth and remove barriers to growth – the provision of compliance advice to new and emerging businesses in order to help them “get it right first time” (see 3.5); support of the primary authority scheme to include new businesses, aiding compliance, issuing assured advice and encouraging economic growth

Become a customer focused organisation – dealing with new and established businesses in an advisory and educative way in order to build sustainable and trusting relationships at an early stage (see 3.5) and maintain these to ensure compliance throughout the lifecycle of the business.

SECTION 2: BACKGROUND

2.1 Authority Profile

- 2.1.1 Covering almost 360 square miles and situated in the valley of the Great Ouse, the District of Huntingdonshire forms the most westerly part of Cambridgeshire. It is the largest district in the County by both land area and population. The population is 173,600 and is forecast to grow to around 210,000 by 2036.
- 2.1.2 The employment rate in the district is 79.3% with 81.8% of people being economically active. 98% of businesses are classified as small or micro (Office for National Statistics; nomis Oct 2018-Sept 2019). The main centres are the market towns of Huntingdon, St Neots, St Ives, Yaxley and Ramsey.

2.2 Organisational Structure

- 2.2.1 The food safety service is one of the services provided by officers within the Business Team which in turn is part of the Community Division. The Business Team is one of the teams which reports to the Head of Community.
- 2.2.2 Through the Council's Scheme of Delegation the food safety service has delegated responsibility for food safety enforcement and the Head of Community has the authority to instigate legal proceedings according to the Council's Constitution.
- 2.2.3 The Operational Manager (Business) is responsible for the day to day management and co-ordination of the food safety service supported by a Lead Food Officer acting as the technical expert on food safety related matters.
- 2.2.4 There are seven officers in the Business Team with specific responsibility for the delivery of the food safety service. The Operational Manager (Business) is supported by a team of Environmental Health Officers and Environmental Health Protection Officers. The team is also responsible for enforcing health and safety regulation, the smoking in public places legislation infectious diseases legislation and private water supply legislation. The staffing resources allocated to the food safety service are shown in Table 4 below. Data indicates that about 85% of officers' time is spent on food safety activities and this is reflected in the figures shown in brackets.

Table 4: Food Safety Service resources

| Post | Duties and Responsibilities |
|--|---|
| Operational Manager (Business) – full time | The Council’s Lead Officer. Operational management of the team and development of the annual Service Plans. Senior technical advisor on licensing matters within the service area. Contributes to the corporate management of the Community Division. (0.35 FTE) |
| Environmental Health Officer – full time | Proactive and reactive food safety work. Senior technical advisor on Health & Safety related matters (0.85 FTE) |
| Environmental Health Officer – full time | Proactive and reactive food safety work. (0.85 FTE) |
| Environmental Health Officer – part time | Proactive and reactive food safety work. (0.78 FTE) |
| Environmental Health Officer – part time | Proactive and reactive food safety work. (0.43 FTE) |
| Environmental Health Officer/ Environmental Health Protection Officer – full time | Proactive and reactive food safety work. (0.85 FTE) |
| Environmental Health Protection Officer – part time | Proactive and reactive food safety work. Lead Food Officer, Senior technical advisor on food safety (0.69 FTE) |
| | Total of 4.8 FTE Officers |

2.2.5 The service uses several agencies and companies to support the delivery of official food controls. These are summarised in Table 5 below.

Table 5: Provision of External Services

| Name of Organisation | Type of Service | Frequency of Service |
|---|---|-------------------------------------|
| Public Health England (PHE), 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 | Ad hoc |
| Campden BRI | Food and foreign body/contaminant examinations and identifications | Ad hoc via annual subscription |
| Chartered Institute of Environmental Health (CIEH) | Information and advice. Materials for food hygiene courses | Weekly |
| Food Standards Agency (FSA) | Monitoring of performance, Information and advice | Daily Communication |
| Drinking Water Inspectorate | Monitoring private water supplies, information/advice | Annual returns and ad-hoc enquiries |

2.3 Scope of the Food Service

The food safety service consists of the following elements

- Food safety advice and enforcement, proactive and reactive, including interventions, inspections, requests for service and working with businesses, including event organisers, other regulators and members of the public
- Provision of health certificates for exported foods which may increase with Brexit
- Investigations and control of food poisoning and food-borne disease and other relevant infections as a result of information from businesses, members of the public and at the request of the Consultant in Communicable Disease Control (CCDC)
- Responding to food alerts and requests for action from the Food Standards Agency
- Sampling of food and water supplies
- Working with the People Team to investigate complaints about refuse, drainage and odour nuisance associated with food businesses
- Consultee for premises licences and planning applications.

2.4 Demands on the Food Service

2.4.1 There are currently 1533 food businesses on the database. This figure includes home-based cake-making businesses, child-minders and businesses based outside of the district but which trade within it. It does not include businesses which only trade occasionally or temporarily within the district such as at Continental Markets or community events. The breakdown of businesses by type according to the Food Standards Agency (FSA) classification is shown in Table 6.

Table 6: Breakdown of food businesses in Huntingdonshire by FSA classification

| | |
|--|------|
| Primary Producers (e.g. farms) | 31 |
| Manufacturers/Packers | 43 |
| Importers | 4 |
| Distributor/Transporters | 54 |
| Food Retailers | 290 |
| Caterers – restaurants, cafes, hotels, mobile traders, pubs, clubs and takeaways | 1049 |
| Outside district | 62 |
| Total | 1533 |

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 is shown in table 7 below.

Table 7: Breakdown of food premises by inspection rating category

| | A | B | C | D | E | Unrated |
|------------------|---|----|-----|-----|-----|---------|
| As at 31/01/2019 | 1 | 46 | 247 | 505 | 488 | 115 |
| As at 31/01/2020 | 3 | 67 | 283 | 453 | 494 | 114 |

2.5 Approvals and Specialist/Complex Processes

2.5.1 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 9 approved premises: 3 approved for meat products; 4 approved for egg packing; 1 for meat and smoked fish; and 1 as a cold store.

2.5.2 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.

2.6 Delivery of the Service

2.6.1 The Business Team is based on the first floor of Pathfinder House, St Mary's Street, Huntingdon. Customers can contact officers in the following ways:

- In person or by telephone between 9am and 5pm Monday to Thursday, 9am and 4.30pm 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 have been made with the FSA, Cambridgeshire Police and Public Health England so that officers can be asked to respond to major incidents and emergencies during evenings and weekends.

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

- An outbreak of food poisoning or a work-related death.
- Major outdoor events during the course of a year which involve food safety, water and health and safety considerations, the most significant in recent years being the Secret Garden Party. Preparation for such large-scale events can account for 80 hours of officer time, however it is not envisaged that this particular event will continue to run in its current format.
- 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.
- There are two food businesses which regularly export food products to countries outside the EU. These products require a Export Health Certificate and additional checks may need to be carried out before the certificate is issued. 149 certificates were issued during the last year. It is recognised that this could increase significantly due to Brexit.
- The implementation of changes to existing legislation, Codes of Practice, Government guidance and monitoring arrangements have resource implications for the service.
- Following a period during 2019 – 20 of unsuccessful recruitment it is considered that this will continue to affect the delivery of a pro active service during 2020 – 21 as the team concentrates on reactive matters.

2.7 Enforcement Policy

2.7.1 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. The Food Safety Enforcement Policy has been amended to reflect the new policy.

- 2.7.2 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.

SECTION 3: SERVICE DELIVERY

3.1 Delivery Mechanisms

- 3.1.1 There are four key drivers which contribute to the service outlined in Section 1. 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 Safety Week).

- 3.1.3 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.

3.2 Interventions at food businesses

- 3.2.1 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. There are around 600 businesses that will require some sort of intervention during 2020-21. Around 500 will become due during the period 2020 - 21 and approximately 100 could be carried forward from 2019-20.

- 3.2.2 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 and B, these 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. The Code of Practice allows local authorities to use Alternative Enforcement Strategies (AES) for category E businesses.

- 3.2.3 Category E businesses are suitable for AES approaches which typically involve the completion of a self-assessment questionnaire by the business. Of the businesses due for an intervention in 2020-21, 130 are in category E. Other interventions that are not official controls include education, advice, coaching at a food establishment and information and intelligence gathering.
- 3.2.4 There are approximately 276 businesses on the database at which the nature of the operation is either temporary, so low as to present little or no public health risk or unlikely to be viewed as a food business by the general public. These premises cannot be removed from the database but are excluded from the scope of the Food Hygiene Rating Scheme. The available resources mean it is very unlikely that they will be inspected but they may be captured by AES approaches or visited in response to complaints.
- 3.2.5 The planned inspections in Table 2 do not include inspections of brand new businesses or those which change hands during the year. Nor do they include inspections of temporary or occasional businesses at markets, fairs or large public events. There could be as many as 200 unplanned interventions in 2020-21.
- 3.2.6 Food businesses that fail to comply with significant statutory requirements must be subject to appropriate enforcement action and revisit(s). Such businesses will be identified by a compliance score of 15 or higher for hygiene and/or structure and/or a confidence in management score/control procedures score of 20 or higher as laid out in the Intervention Rating Scheme described in the Food Law Code of Practice (2017). It is estimated that about 15% of inspections will require some follow up action to check compliance. This could mean up to 50 revisits.
- 3.2.7 The frequency at which businesses must be inspected is outlined in Chapter 5 of the Food Law Code of Practice December 2017. 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 November 2018. 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 2019-20 there have been twenty six re-score requests, compared to Five in 2018-19, Four other enquiries and Four appeals. At least as many should be anticipated in 2019-20.
- 3.2.8 All officers who carry out official food controls are authorised in accordance with the Code of Practice.

3.2.9 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.

3.3 Complaints

3.3.1 These generally fall into one of the following categories:

3.3.2 Complaints about the food premises themselves (e.g. poor staff hygiene, allegations of pests, poor standards of cleanliness)

3.3.3 Complaints about the condition or contamination of food (extraneous matter, mould, dirty containers)

3.3.4 Complaints about food labelling and food information ('use by' dates and allergen information).

3.3.5 Based on previous years it is estimated that there will be about 200 such complaints in 2020-21. Table 3 shows the total number of food-related service requests, complaints and queries, the numbers of which have increased steadily over the last few years.

3.4 Primary Authority Scheme

3.4.1 Primary Authority is based on legal partnerships between businesses and local authorities. The scheme was originally launched in 2009 but has since expanded so all businesses can benefit from access to relevant, authoritative tailored advice.

3.4.2 Following the dissolution of our partnership with Cambridgeshire Catering Services we no longer have any active agreements.

3.4.3 In line with corporate priorities to support local businesses, further opportunities to develop the primary authority scheme will be pursued. Moving forward the Primary Authority Pilot currently being set up with South Cambridgeshire, Peterborough and Signpost 2 Grow will offer an opportunity to engage with business on this topic, fulfilling the commitment within the Industrial Strategy to support businesses to access primary authority advice.

3.5 Advice to Businesses

3.5.1 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
- Targeted business support visits to poor performing businesses
- Site visits on request and where appropriate (e.g. prior to the opening of a brand new business)
- Proactively contacting businesses to comment on plans at the planning application stage
- Proactively contacting businesses to comment on applications for

- premises and temporary licences
- Publication and distribution of a food and safety newsletter to all businesses
 - Maintenance and development of the website with links to the Food Standards Agency's website.
 - Key information issued via Council website

3.5.2 These activities are integrated into the service's general interventions and food safety promotion functions. There have been over 150 requests, in the first 10 months of 2019-20 for advice and training this year, it is expected that there will be at least as many in 2020-21.

3.6 Food and Environmental Sampling

3.6.1 Sampling is a recognised official food control. In 2020-21 the commitment to sampling will continue and where appropriate it will be used as an alternative to carrying out a full inspection.

3.6.2 Public Health England (PHE) doesn't charge for the analysis of samples. In 2004 an MTP bid was approved to cover the cost of sampling in the event that PHE reversed its policy but to date it has not been necessary to release this funding.

3.6.3 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 particular sampling intervention designed by PHE and the departmental Standard Operating Procedure (SOP).

3.7 Control and Investigation of Food-related Infectious Diseases

3.7.1 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.

3.7.2 There have been 56 food poisoning notifications so far this year which is continuing the recent trend of declining reports of confirmed cases of food borne illness.

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

3.8 Food Safety Incidents

- 3.8.1 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.

- 3.8.2 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.
- 3.8.3 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.

3.9 Liaison with Other Organisations

3.9.1 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
- Flare User Group
- Food Standards Agency regional events
- Public Health England/Environmental Health liaison days
- Chartered Institute of Environmental Health update events

3.9.2 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 Public Health England, the Food Standards Agency and Trading Standards.

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

3.10 Food Safety and Public Health Promotion

Subject to resources, the proposals for 2020-21 include the following:

- Promotion of online food hygiene training and provision of CD ROMs
- Promotion of the National Food Hygiene Rating Scheme (FHRS)
- Production of food safety newsletters sent to all businesses on our database
- Ad hoc lectures to schools and community groups upon request
- Hygiene and food safety linked press releases

- Maintenance and development of relevant information on the Council's website
- Providing support to existing businesses and to new businesses on food safety legislation, compliance and best practice
- Promotion of Healthier Options via our website to encourage local businesses to offer healthy food choices to customers.

3.11 Food Intended for Export

3.11.1 There are two manufacturing businesses which regularly supply food to non-EU countries and which require an Export Health Certificate for each consignment. These arrangements support the businesses in question and have generated income of £ 11,070 during 2019-20.

3.11.2 The exit from Europe is likely to have a significant impact with regards to food exports. Whilst legislation is yet to be announced the FSA have indicated that the requirement for local authorities to inspect food premises that export food beyond the UK and the requirement to issue food Export Health Certificates may increase significantly. The current position is that certificates are only required to countries beyond the EU.

SECTION 4: RESOURCES

4.1 Financial Allocation

4.1.1 The budget for 2020-21 is shown in Table 8 below

Table 8: Food Safety Service Budget 2020-21

| | 2020-21 |
|--|----------------|
| Direct Costs | £ |
| Employees | |
| Salary (NI, Pension, training) | 241,712 |
| Transport, mileage | 3,950 |
| | 247,062 |
| Other | |
| Equipment, furniture and materials | 1,330 |
| Offices expenses | 2,334 |
| Services | 153 |
| Printing and Postage | 1,750 |
| Personal Protective Equipment | 323 |
| Training Expenses | 220 |
| Books and Publications | 400 |
| Subscriptions | 425 |
| | 6,935 |
| Total | 253,597 |
| Income | |
| Costs recovered (Export Certificates, Primary Authority Partnership, delivery of training courses and fees for FHRS re-score visits) | -11,000 |
| Total Expenditure | 238,997 |

4.1.2 The overall budget for 2020-21 remains largely the same as 2018-19 with a 1% increase in staffing costs.

4.1.3 The estimated income of £11,000 comprises fees for export certificates and FHRS re-score visits plus income from the delivery of training courses and business briefing events. Income fell short in 2019-2020 as less training and primary authority support was delivered than anticipated, but there was an increase in the number of health certificates issued. The actual income was £13,348.50

4.1.4 All officers requesting remote access to the Council network have been allocated a laptop computer (PC) enabling access to databases, word

processing, internet/intranet capability, e-mail and spreadsheet packages. All the laptops have been upgraded with remote access to the Council anywhere network so that they are available for improved out-of-office working and wireless enabled for touchdown working in HDC controlled premises. In addition the roll out of new mobile phones has enabled officers to receive e-mails and access the internet whilst carrying out duties on the district.

- 4.1.5 In the event of a serious or major incident or a large outbreak of food poisoning or food-borne illness requiring additional resources, officers from the Business Team will assist in the first instance and if necessary officers can be drafted in from other Environmental Health teams to support the response.
- 4.1.6 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

4.2 Staffing Allocation for the Food Service

- 4.2.1 Food law enforcement and compliance advice activities are provided by officers from the Business Team. The team is led by the Operational Manager (Business) and contains another six authorised officers, three of whom work full time. The team is supported by the Business Support Team.
- 4.2.2 Staff must be appropriately trained and are required to undertake 20 hours of continuing professional development every year to maintain their competency. All officers have an annual personal development plan which sets out training requirements and is reviewed monthly. 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, Public Health England and the Chartered Institute of Environmental Health.

SECTION 5: QUALITY ASSESSMENT

5.1 Quality Assessment

- 5.1.1 The Operational Manager (Business) working closely with the Lead Food Officer is responsible for the overall monitoring of the service. In general terms the service is monitored internally in accordance with Standard Operating Procedure (SOP) CT04. The practical arrangements include the following
- Reviews of premises inspection records in accordance with SOP CT04
 - Observed and accompanied inspections
 - Periodic reviews of policies and procedures
 - Team meetings – programmed work is monitored against targets; reactive work is monitored with reference to management and closure of service requests
 - Annual values based performance appraisal, quarterly formal and frequent informal one-to-ones

- Peer review and consistency exercises led by the CPFSG
- Peer review and consistency exercises led by the FSA.

5.1.2 There are several SOPs which cover the different aspects of the service. They will be subject to on-going review in 2020-21 to reflect changes in the code of practice, practice guidance and FHRB Brand Standard.

SECTION 6: REVIEW

6.1 Review against the Service Plan

6.1.1 The Service Plan is supported by an action plan and performance measures. Progress will be reported to the Chief Operating Officer.

6.1.2 Progress will be reported in terms of the following indicators:

- Any agreed performance targets
- Any agreed targeted outcomes
- The Service Plan from the previous year.

6.2 Variations from the 2019-20 Service Plan

6.2.1 The Food Standards Agency Framework Agreement requires every Local Authority to review the previous year's performance against its service plan. The review must identify where the Authority was at variance from the service plan and, where appropriate, the reasons for that variance.

6.2.2 This review details the performance of the food service during 2019-20 and outlines any significant issues that impacted on the delivery of the service. The major impact during the year has resulted from vacant posts within the team which arose during the year. As we were unsuccessful in attracting appropriately qualified and experienced individuals to these posts a decision was taken to create one career graded positions which was open to individuals nearing completion of the baseline qualification. This post was filled and the individual is now working towards qualification and appropriate competency over the next two years.

6.3 Programmed Work

6.3.1 The 2019-20 Service Plan estimated that 619 planned inspections of food businesses would be carried out, 373 of which would be full or partial inspections of premises in categories A, B, C and D.

6.3.2 During the period of this plan, 403 full or partial inspections have been undertaken along with advisory and intelligence gathering visits that were made. Current figures show that 91% of premises inspected received a food hygiene rating of 3 or above. This is due to current staffing vacancies that have not been filled during 2018 to present date

6.3.3 Four visits have been made to approved establishments which produce and/or handle products of animal origin (including meat products, and egg packers).

6.3.4 Any outstanding inspections at 31 March 2020 will be carried forward and prioritised within the 2020-21 programme.

6.4 Reactive Work

6.4.1 The Food Hygiene Rating Scheme (FHRS) is a beneficial tool for consumers enabling them to identify standards of food hygiene practiced at a particular outlet. The power of consumer choice can impact on food businesses with lower ratings so the scheme has safeguarding measures to ensure the operator can request a rescore visit or appeal a rating. The Brand Standard specifies the ways in which such requests must be handled. 26 requests have been made for re-inspections which entails additional visits to premises. Four appeals were received following inspection, two were successful and two did not change the score.

6.4.2 The service has received over 500 complaints, enquiries and requests for service or advice. Complaints related to suspect or contaminated food, unhygienic premises including pest infestations or poor hygiene practices. Just under half were enquiries from existing or potential businesses and the remainder were made up of requests for export certificates, Primary Authority Partnership enquiries and FHRS enquiries.

6.5 The 2019-20 Action Plan

6.5.1 The Service Plan contained an action plan for the year. Those commitments are reviewed below:-

Maintain, review and update the Flare premises database so as to improve communication with businesses and identify efficiency savings, now superseded by procurement of new EH software system.

A business case and capital bid were prepared during 2019-20 and funding has been agreed as part of the 2020-21 budget process on a joint procurement for Huntingdonshire, Cambridge City and South Cambridgeshire Environmental Health and Licensing and the Home Improvements Agency. This project will roll into the 2020-21 work plan and beyond to ensure capacity.

Review and update Standard Operating Procedures in relation to changes in the Code of Practice and the Working Practice Guidance completed partially but carried over to 2020-21

The update of Standard Operating Procedures is ongoing as changes are anticipated with both the FSA's Regulating our Futures Programme and the EU exit.

- Delivered a limited programme of training courses and briefing events to help food businesses comply with food hygiene requirements and to help them achieve the highest possible food hygiene rating for their business
- Through Better Business for All initiative continue to promote principles supporting communicating for compliance, with a focus on getting it right first time, holding 2 events during the year, producing an information booklet and developing an animated video for use by HDC.

- The initial acknowledgement to food businesses following registration has been revised utilising clean language to convey the key elements required to achieve a high food hygiene rating. We are continuing to write to businesses with an FHRS of less than 3 to advise them of ways to improve their rating and invite them to a meeting to discuss their performance where appropriate.
- Engaged with the FSA in developing ideas for the future of food law regulation as contained in the Regulating our Future proposals, contributing to research and policy development as required
- Prepare for transition of legislation into UK law following exit from the EU, ensuring staff are trained and businesses are kept up to date.
- Information and updates have been monitored via the FSA communications platform. The Government's European Union (Withdrawal) Act converts the current official controls into UK law as they apply at the moment of exit. However this is currently subject to the outcome of the ongoing negotiations following Brexit.
- Continued to promote the service as widely as possible using all available media outlets and support any relevant national strategies such as the FSA's National Food Safety Week.
- Where possible we have continued to use promotional material from the FSA to convey food safety messages and promote the food hygiene rating scheme to consumers. This has mainly been by the use of twitter. Press releases following enforcement action have also served to highlight the role of the service in assuring food safety.
- Develop Better Business for All so the partnership can begin to work collaboratively to deliver regulatory support priorities targeted at business growth across Cambridgeshire.
- Progress has been steady with the partnership agreeing terms of reference and gaining support of the Public Service Board and the Combined Authority. The work plan developed has delivered a regulator's advice pack and an information video to promote regulatory compliance, A coordinator is in place across the partnership in order to sustain delivery and drive the programme forward.

6.6 Action Plan for 2020-21

- 6.6.1 The service is committed to the delivery of official food controls and in accordance with the Code of Practice will target inspection resources to the highest risk premises using flexibility to undertake partial inspections and non-inspection interventions for broadly compliant/lower risk businesses. The service will respond to complaints, enquiries and requests for service in accordance with internal procedures and with regard to public health risk.
- 6.6.2 Subject to resources the service will also make the following commitments to the Council's corporate aims and objectives.
- Implementation of a new Environmental Health Management System and a

project plan to implement and migrate data to the new system including training for staff and procedures. This project may span over more than one year.

- Review and update SOPs in relation to ROF, the new computer system and remote working initiatives.
- Continue where possible to deliver a programme of training courses and briefing events to help food businesses comply with food hygiene requirements and to help them achieve the highest possible food hygiene rating for their business. During 2019/20 three food hygiene courses have been delivered.
- Confidence. The outcome for business will help them meet regulatory requirements and improve growth.
- The Better Business for All (BBfA) Partnership will launch formally in May working collaboratively to deliver regulatory support priorities targeted at business growth across Cambridgeshire and Peterborough. As part of the work plan we will be participating in a Primary Authority Pilot. Working with business support colleagues we are promoting primary authority to small businesses whilst improving their regulatory knowledge and making it simpler for them to speak to the person who can best support their needs.
- The Food Standards Agency are moving to a national Online Registration system for all food businesses. It is anticipated that we will move to Stage 1 implementation during 2019-20.
- Prepare for transition of legislation into UK law following exit from the EU, ensuring staff are trained and businesses are kept up to date
- To promote the service as widely as possible using all available media outlets and support any relevant national strategies such as the FSA's National Food Safety Week
- To continue to promote the Healthier Options initiative through our website to help local businesses make healthier changes to their menu and food preparation methods.
- Continue to undertake official controls (including proactive food hygiene inspections) in line with the requirements of the Foods Standards Agency code of practice.
- Continue to provide a reactive food hygiene service responding to the concerns of residents of Huntingdonshire, and the customers of Huntingdonshire food businesses.

This document will be considered as a live working document and be kept under review through team meetings and regular monitoring meetings with the Chief Operating Officer.