

## **COMMUNITY DIVISION**

# **SERVICE PLAN FOR FOOD LAW ENFORCEMENT 2015-16**

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



## INTRODUCTION

This is Huntingdonshire District Council's fifteenth 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*. The FSA was established in April 2000 as an independent monitoring and advisory body and it is the Central Competent Authority for England. One of the aims of the FSA is to make Local Authorities' delivery of official controls effective, risk-based, proportionate and consistent.\*

This Service Plan sets out how Huntingdonshire District Council will deliver its food law official controls in 2015-16. It will be reviewed and updated on an annual basis.

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

Chris Stopford  
Head of Community

## **EXECUTIVE SUMMARY 2015-16**

### **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 service is linked to Huntingdonshire District Council's Corporate Plan 2014-2016 and Sustainable Community Strategy 2008-2028, the FSA's Strategy to 2015 and Cambridgeshire's Health and Wellbeing Strategy.

These are the key activities which contribute to the delivery of the overall aim.

- Planned and reactive inspections of registered and approved food establishments
- The investigation of service requests and complaints relating to food and food premises
- The investigation of cases and outbreaks of food-borne and food poisoning illnesses.

**Table One: Changes in resources from 2014-15 to 2015-16**

<b>STAFF (Full Time Equivalent (FTE))</b>	<b>2014-15</b>	<b>2015-16</b>
Environmental Health Officers (EHO)	1.7	1.95
Environmental Health Protection Officers (EHPO)	2.0	1.45
Senior Environmental Health Officer	0.8	0.8
Commercial Team Leader	0.5	0.5
	<b>5.0</b>	<b>4.7*</b>
Admin Support Staff	1.3	1.3
<b>Total</b>	<b>6.3</b>	<b>6.0*</b>
<b>FINANCIAL</b>	<b>2014-15</b>	<b>2015-16</b>
Direct Costs (Employees)	£281,520	£279,140
Overheads (FLARE, Printing, Admin Support Central Support)	£162,010	£151,640
Other Direct costs (specialist equipment, laboratory services and sampling)	£10,300	£6,250
Total	<u>£453,830</u>	<u>£437,030</u>
Income (Primary Authority Partnership, health certificates)	<u>-£5,000</u>	<u>-£10,000</u>
<b>NET EXPENDITURE</b>	<b><u>£448,830</u></b>	<b><u>£427,030**</u></b>

\* Overall the resources within the Commercial Team have decreased and there is a net saving of 0.3 full time equivalent staff (FTE).

\*\* The overall budget for 2015-16 represents a decrease of 4.85% on the previous financial year.

**Table 2 – Programmed (proactive) Activity**

Proactive Tasks	Level of activity	
	Actual 2014-15	Estimate 2015-16
Planned food hygiene inspections (risk group A-D, in addition to those below)	594	450
Alternative Enforcement Strategy (AES) (cake makers child-minders)	163	130
Revisits	129	130
Inspections of new food businesses	145	100
Inspection of temporary food businesses	11	30
Inspection of Approved Establishments	8	5
Primary Authority Partnership Activity – includes requests for advice, attendance at meetings and provision of training*	12	15
Other proactive visits (food, water and environmental samples/advisory)	199	250
Prosecutions	0	1
Formal action (service of notices)	17	20
Food safety and public health promotion	Project work linked to delivery of corporate aims; targeted food business support visits following inspections; advice given at the time of each inspection and the delivery of the targeted interventions; National Food Hygiene Rating Scheme (FHRS); Alternative Interventions to specific business groups including newsletters; development of targeted advice, newsletters, leaflets, website; promoting food safety initiatives; and leaflets providing information on preventing the spread of infectious diseases.	

\*Each activity is charged to Cambridgeshire Catering and Cleaning Services (CCS) in accordance with the agreed cost recovery arrangements.

**Table 3 – Unplanned (reactive) Activity**

Reactive Tasks	Level of activity	
	Actual 2014-15	Estimated 2015-16
Food-related service requests/ complaints and service requests/ complaints re: food businesses	626	600
Food, water and environmental sampling (reactive)	39	20
Infectious disease control - notifications of food-borne/food poisoning illnesses	179	200
FSA food alerts for action	5	20
Advice to business, enquiries/ response to business and consumer queries	Estimated 450+ service requests including support to new and existing businesses; responding to requests from colleagues in other organisations, including other local authorities and central government; and enquiries from the public and businesses on food safety matters, including individuals, voluntary organisations and event organisers.	
Staff development and training	Internal and external training courses, peer review exercises, update events, research	
Service management	Overall supervision and management of service, policy and procedural development. Responding to central government consultations and audits.	

The overall budget for 2015-16 represents a decrease of 4.85% on the previous financial year. It is anticipated that the budget will be sufficient to meet the demands of the service but in the event of a complex investigation or legal case, or the introduction of central sampling charges, then additional resources may be needed.

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

A balanced workload has been proposed for 2015-16 which incorporates a full range of enforcement actions including food safety interventions, advice and guidance. Due to the nature of the service some interventions are carried out during evenings and weekends. The plan is based upon the service remaining fully staffed. If staffing levels are not maintained, then the service will be under-resourced to meet the requirements of the service plan. This is likely to have an impact on the completion of inspection targets (particularly lower-risk businesses) and the delivery of the development plan as outlined below. Major incidents such as an outbreak of food poisoning or lengthy enforcement action would also have a significant impact on the delivery of the service plan.

The impact of large scale events such as the Secret Garden Party (SGP) and other major organised events needs to be recognised. The 2014 SGP accounted for 103 hours of officer time. This included pre-event liaison with the licensee, attendance at Safety Advisory Group meetings and monitoring compliance before, during and after the event.



## DEVELOPMENT PLAN 2015-16

The following developments are planned during 2015-16. 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.

- Maintain, review and update the Flare premises database so as to improve communication with businesses and identify efficiency savings
- The delivery of a programme of training courses to help food businesses comply with food hygiene requirements and to help them achieve the highest possible food hygiene rating for their business
- To review and develop the Primary Authority Partnership with Cambridgeshire Catering and Cleaning Services and to raise the profile of the partnership with relevant partners
- Consider the feasibility of extending the Primary Authority Partnership Scheme to other businesses
- Maintain the delivery of collaborative work with our key partners such as the Norfolk, Suffolk and Cambridgeshire Health Protection Team, Trading Standards and the Cambridgeshire and Peterborough Food and Occupational Health and Safety Managers Group
- Deliver a joint project with colleagues from County Trading Standards to assess the level of compliance with the requirements relating to the provision of allergen information to consumers
- To maximise the use of social and online media to market and promote the service.
- To support any relevant national strategies such as the FSA's National Food Safety Week.
- To consider the outcome of the Food Standards Agency's review of the Food Law Code of Practice (England); to assess the implications of that review; and to determine the extent to which they impact upon the Council's role as a food authority
- An assessment of the management of food allergens in the child care sector
- To consider the development of a unit within the team, the primary function of which would be to provide advice and support for businesses.

## **SECTION 1: FOOD CONTROL 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 aim, objectives and the Development Plan are intended to support the Council's Corporate Plan 2014-16. In particular they support the following strategic themes: a Strong Local Economy; Working with our Communities; and Providing a Customer Focused and Service-Led Council.

## SECTION 2: BACKGROUND

### 2.1 Authority Profile

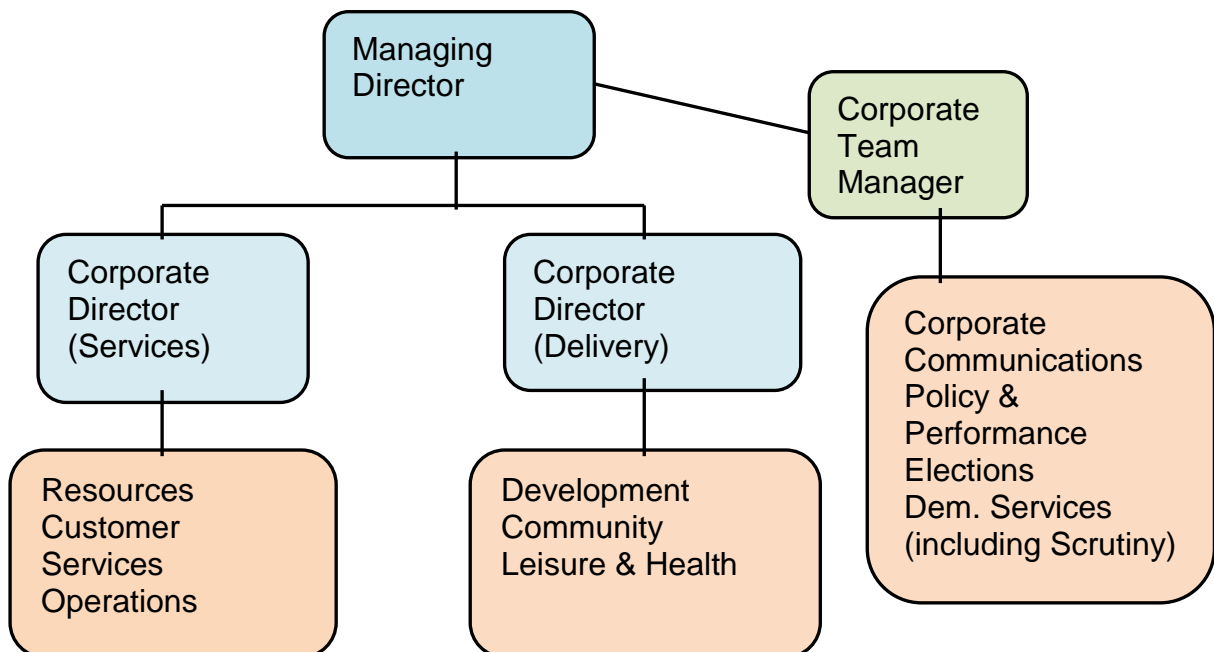
- 2.1.1 Covering almost 360 square miles and situated in the valley of the Great Ouse, the District of Huntingdonshire forms the most westerly part of Cambridgeshire.
- 2.1.2 Huntingdonshire has a population of around 171,000\* which will rise as the local economy continues to expand. The employment rate in the district is 81.2% with 84.5% of people being economically active\*\* and the 2011 census identified 5.2% of the population as non-white and 4.5% of the population as White non British. The main centres are the historic market towns of Huntingdon, St Neots, St Ives, Yaxley and Ramsey.

\* HDC Area Population statistics (Office for National Statistics, Mid-2012)

\*\* NOMIS official labour market statistics, Office for National Statistics May 2014

### 2.2 Organisational Structure

- 2.2.1 The food safety service is one of the services provided by officers within the Commercial Team which in turn is part of Community Services. The Commercial Team is one of a number of 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 after consultation with the Chairman and Vice Chairman of the Licensing and Protection Panel. The Council's current structure is shown in Figure 1.



**Figure 1: Huntingdonshire District Council's Organisational Structure**

2.2.3 The Commercial Team Leader (CTL) is responsible for the operational management and co-ordination of the food safety service. The CTL also fulfils the statutory role of Lead Food Officer. The CTL is supported by a Senior Environmental Health Officer.

2.2.4 The officers regularly involved in the provision of the food service are shown in Table 4 below:

Commercial Team Leader (CTL)	The Council's Lead Food Officer. Strategic management of the team and development of the annual Service Plan. Day-to-day management of the service, performance monitoring, training and development, and delivery of an operational caseload. <b>(0.5 FTE)</b>
Senior Environmental Health Officer (SEHO)	Proactive and reactive food safety work. Day-to-day reviews of inspection files, provision of technical and legal advice, reviews of enforcement notices and recommendations for prosecution. <b>(0.8 FTE)</b>
Environmental Health Officer	Proactive and reactive food safety work. <b>(0.75 FTE)</b>
Environmental Health Officer	Proactive and reactive food safety work. <b>(0.8 FTE)</b>
Environmental Health Officer	Proactive and reactive food safety work. <b>(0.40 FTE)</b>
Environmental Health Protection Officer	Proactive and reactive food safety work. <b>(0.8 FTE)</b>
Environmental Health Protection Officer	Proactive and reactive food safety work. <b>(0.65 FTE)</b>
	<b>Total of 4.7 FTE Officers</b>

**Table 4: Commercial Team officers routinely involved in the delivery of food law enforcement**

2.2.5 Based upon previous years it is anticipated that just over half of the available resources will be allocated to planned work, of which 75% will be for programmed inspections of food premises. This equates to 2.7 FTE for planned work and 2.0 FTE for unplanned (reactive work).

2.2.7 Table 5 below gives details of the services provided by external agencies:

<b>Name of Organisation</b>	<b>Type of Service</b>	<b>Frequency of Service</b>
Public Health England (PHE), Thetford and Colindale.	Microbiological food and water sampling and advice on infection and disease control	As required
Public Analyst (Lincolne, Sutton and Wood), Norwich	Analysis of food samples	Ad hoc
Anglian Water, Huntingdon	Chemical and microbiological water sampling	Ad hoc
Insect Research and Development Ltd, Medical Entomology Centre Cambridge	Insect identification	Ad hoc
BIS Better Regulation Delivery Office	Primary Authority support and Regulators Code information and guidance	On going
Campden BRI, Chipping Campden	Food and foreign body/contaminant examinations and identifications	Ad hoc
Chartered Institute of Environmental Health (CIEH)	Information and advice. Materials for food hygiene courses	Ad hoc
Food Standards Agency (FSA)	Monitoring of performance, Information and advice	Ad hoc
Local Government Association (including the Knowledge Hub)	Information and advice	Ad hoc
Cambridgeshire County Council (including Trading Standards)	Information and advice	Ad hoc

**Table 5: External Service Provision (Food Safety Function)**

### **2.3 Scope of the Food Service**

Officers delivering the food service form part of the Commercial Team and are responsible for these areas of work:

- 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

- 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 Neighbourhoods Team to investigate complaints about refuse, drainage and odour nuisance associated with food businesses
- Consultee for premises licences and planning applications.

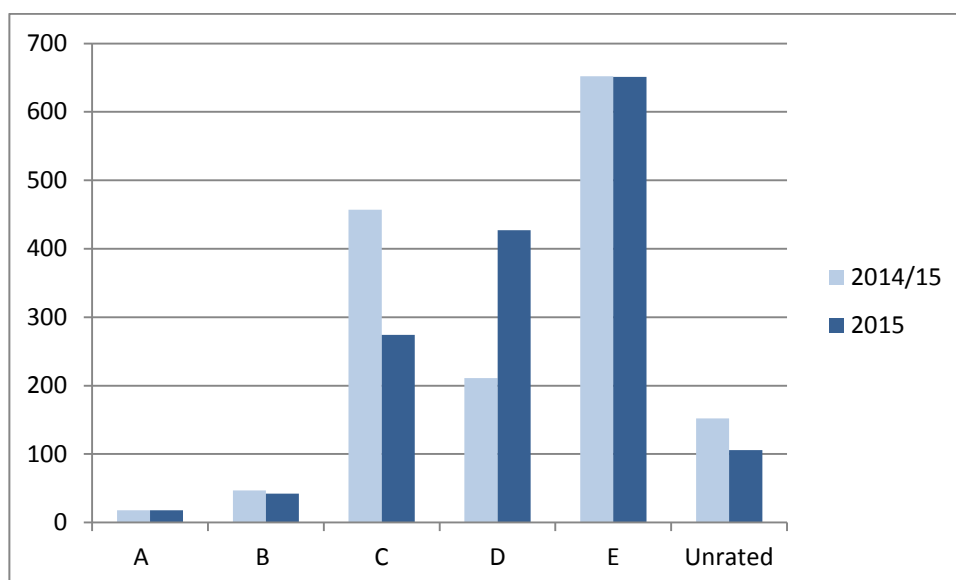
## 2.4 Demands on the Food Service

2.4.1 At the time of writing there were 1590 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 at events such as the Secret Garden Party. The breakdown of businesses by type according to the Food Standards Agency (FSA) classification is shown in Table 6.

<b>Primary Producers</b>	<b>41</b>
<b>Manufacturers/Packers</b>	<b>38</b>
<b>Importers</b>	<b>1</b>
<b>Distributor/Transporters</b>	<b>41</b>
<b>Food Retailers</b>	<b>273</b>
<b>Food Caterers</b>	<b>1138</b>
<b>Outside district</b>	<b>58</b>
<b>Total</b>	<b>1590</b>

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

2.4.2 The breakdown of premises by inspection rating category is shown in Figure 2 below.



**Figure 2: Category of food premises by Risk Rating  
2014-15 and 2015-16**

The most significant change is the number of premises in categories C and D. This is largely attributable to changes in the methods by which premises are categorised. These changes were introduced in the 2014 Food Law Code of Practice which was introduced in April 2014.

#### 2.4.3 Approvals and Specialist/ Complex Processes

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: three establishments approved for meat products; four establishments approved for egg packing; one establishment approved for re-wrapping gelatine; and one establishment approved as a cutting plant.

There are also businesses using complex equipment such as vacuum packing machines and businesses carrying out complex processes such as 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.

#### 2.4.4 Delivery of the Service

The Food Service is located on the first floor of Pathfinder House, St Mary's Street, Huntingdon. Service users may contact officers in the following ways:

- In person or by telephone between 9 am and 5 pm Monday to Thursday, 9 am and 4.30 pm Friday (01480 388302)
- By fax on 01480 388361
- By e-mail: [EnvHealth@huntingdonshire.gov.uk](mailto:EnvHealth@huntingdonshire.gov.uk) or [food@huntingdonshire.gov.uk](mailto: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.

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

- There were just over 200 food poisoning notifications in 2014-15, just over 60 of which required an investigation. Officers can be called upon to respond to unforeseen emergencies within this work area (such as dealing with a major food poisoning outbreak or incident) at any time and this places significant demands on resources
- Officers could be called upon to investigate a serious workplace accident
- There are several outdoor events during the course of a year which involve food, water and health and safety considerations. These include events at Huntingdon Racecourse, Wood Green Animal Shelter and the Secret Garden Party together with an increasing number of festivals, continental markets, fêtes, fairs and events which create an additional workload for the team
- Officers responded to seven Food Alerts for Action from the FSA last year. Some can be very time-consuming, particularly if they require action to be taken to ascertain 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 Health Certificate and additional checks may need to be carried out before the certificate is signed
- The implementation of changes to existing legislation, Codes of Practice, Government guidance and monitoring arrangements and compliance with the FSA and BRDO have resource implications for the service
- The service has a Primary Authority Partnership agreement with Cambridgeshire County Council's School Meals Service which may have resource implications (see section 3.4 for more detail).

## **2.5 Enforcement Policy**

2.5.1 Huntingdonshire District Council has signed up to the Enforcement Concordat and endorses and follows the principles laid down in the Department of Business, Innovation and Skills Regulators' Code. The Council has regard to the Code for Crown Prosecutors when making enforcement decisions. The Food Safety Enforcement Policy was produced with regard to the Regulators' Code and has been endorsed by the Licensing and Protection Panel.

2.5.2 In order to promote consistent and proportionate enforcement the food safety service is an active member of Cambridgeshire and Peterborough Food and Occupational Health and Safety Managers' Group. Officers from the food safety team attend regular meetings and subgroups can be set up to develop specific enforcement protocols and peer review models.



## SECTION 3: SERVICE DELIVERY

### 3.1 Delivery Mechanisms

3.1.1 There are four key drivers which contribute to the service which is 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 knowledge and experience of the officer together with any limitations imposed by the Code of Practice. In the case of larger businesses or those with unusual processes, there is a “buddy” system in place which ensures that at least two officers have some knowledge of those businesses.

### 3.2 Interventions at food businesses

3.2.1 These consist of the “official food controls” specified in the Code of Practice together with any other activities where the purpose is to monitor compliance with food hygiene law. At the time of writing there are 514 businesses that will require some sort of intervention during 2015-16.

3.2.2 Businesses in categories A, B, C and D will normally receive an unannounced full or partial inspection. The Code of Practice allows local authorities to use Alternative Enforcement Strategies (AES) for low risk businesses.

3.2.3 Category E businesses are suitable for AES approaches whilst at category D businesses interventions can alternate between official controls and other interventions. Of the 514 businesses due for an intervention in 2015-16, 216 are in category D and 49 are in category E.

3.2.4 This figure does not include inspections of brand new businesses or those which change hands during the year. Nor does it include inspections of temporary or occasional businesses at markets, fairs or large public events. It is estimated that these will account for an additional 150 interventions in 2015-16.

- 3.2.5 It is estimated that about 25% of programmed interventions will require some sort of follow up action to check compliance. This equates to about 130 revisits.
- 3.2.6 The intervention frequency is outlined in Annex 5 of the Code of Practice and this information is also used to determine the Food Hygiene Rating Scheme (FHRS) score. The FHRS is operated in accordance with the FSA Brand Standard which allows businesses to appeal and request a rescored visit after the inspection upon which their rating was based. In 2014-15 there were 24 such requests and at least as many should be anticipated in 2015-16.
- 3.2.7 All officers undertaking food hygiene interventions and inspections including specialist and complex processes, investigating complaints, responding to service requests, giving advice and taking samples, are authorised in accordance with the Code of Practice.
- 3.2.8 Officers will also carry out spot checks at businesses if they have concerns or intelligence about the business or a specific operation within a business. The outcome of a spot check may affect future planned inspections of the business.

### **3.3 Food Complaints**

- 3.3.1 This work generally falls into one of the following broad categories:
- Complaints about food businesses such as hygiene, pests, food poisoning, and food handlers
  - 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).
- 3.3.2 Based upon previous years it is estimated that there will be about 200 such complaints in 2015-16. Table 3 shows the total number of food-related service requests, complaints and queries: this has risen steadily over the last five years and is up by just over a third since 2009-10.

### **3.4 Primary Authority Scheme**

- 3.4.1 The food safety service supports the Primary Authority Scheme. The Commercial Team Leader is the Council's nominated officer for its partnership with Cambridgeshire County Council's School Meals Service.
- 3.4.2 The partnership was established in August 2013. It was agreed that the Council would provide a maximum of 100 hours of support per year and that the cost would be recovered in accordance with BRDO Guidance.
- 3.4.3 In 2014 the service provided 83.25 hours of support. Some of this was associated with the initial setting up of the partnership rather than the development of inspection plans and assured advice. It is expected that more time will be devoted to these activities in 2015-16 without exceeding the agreed 100 hours.

### **3.5 Advice to Businesses**

3.5.1 Officers provide information and advice to businesses to help them to 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)
- Reference to published and online resources such as the FSA 'Safer Food Better Business' (SFBB) pack
- Responding to enquiries from food business operators and food handlers
- Proactively contacting businesses to comment on plans at the planning stage
- Proactively contacting businesses to comment on applications for premises and temporary licences
- Targeted mail shots about legislative and policy changes and in response to FSA food alerts for action
- Twice yearly 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.

3.5.2 These activities are integrated into the service's general interventions and food safety promotion functions. In 2014 there were 273 requests for advice and training from businesses and consumers and it is anticipated that there will be at least as many in 2015-16.

3.5.3 The service supports the Cambridgeshire Local Business Partnership Group.

### **3.6 Food Sampling**

3.6.1 Food sampling activities will be delivered in accordance with the sampling policy. In particular, samples will be taken from the following types of business:

- those engaged in the handling or preparation of high-risk foods
- those producing and placing on the market food which has been identified in national or regional sampling programmes
- those supplying or placing on the market food or water subject to FSA requests for action, consumer complaints, intelligence or officers' concerns and
- those with private water supplies (if applicable).

3.6.2 Public Health England (PHE) provides free sample analysis for an allocated number of samples. In 2004 an MTP bid was approved to cover the cost of sampling in the event that PHE reversed its policy. To date it has not been necessary to release this funding: HDC is a member of the Cambridgeshire and Peterborough Food and Occupational Health and Safety Managers' Group and

all the members share information to ensure that any unused allocations can be taken up by other authorities. The service did not incur any charges for sampling in 2014-15 but this can't be guaranteed in the future. The service will aim to take approximately 80 samples this year.

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 and the departmental Standard Operating Procedure (SOP).

3.6.4 Samples will be analysed or examined by the laboratories authorised by the Council, details of which are set out in Table 5.

### **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 aim of any investigation is to identify the source and cause of the infection and prevent further spread.

3.7.2 It is estimated that approximately 200 notifications will be received in 2015-16. This figure reached a peak of 310 in 2010-11, dropped to 146 in 2012-13, since when there has been a small increase year-on-year. In 2014-15 there were just over 200 notifications of which 140 were Campylobacter infections which did not warrant an investigation. In the event of a large outbreak there would be significant resource implications.

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.

3.7.4 The departmental Standard Operating Procedure (SOP) and the joint PHE/LA outbreak control plan were both reviewed in 2014.

### **3.8 Food Safety Incidents**

3.8.1 FSA food alerts 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 generally 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 small. In 2014 there were only seven FAFA requests.

3.8.3 Given the nature of food alerts, it is impossible to predict the likely demands and requisite resources with any accuracy. It is estimated that there will be

20-25 in 2015-16. If a food alert is associated with a business which is 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 Occupational Health and Safety Managers' Group (CPFOHSMG)
- Cambridge Water Company Liaison meetings
- Anglian Water Liaison meetings
- Cambridgeshire Local Business Partnership Group
- Flare User Group
- Food Standards Agency regional events
- Public Health England/Environmental Health liaison days
- Trading Standards/Environmental Health liaison days
- Chartered Institute of Environmental Health update events

3.9.2 The CPFOHSMG 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 senior food law enforcement officers from Cambridgeshire and Peterborough as well as representatives from Public Health England and the Food Standards Agency.

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**

3.10.1 Subject to resources, the proposals for 2015-16 include the following:

- FSA Food Safety Week – hygiene promotion targeted at consumers
- Food safety advice and information aimed at local consumers to support any FSA national campaigns
- Promotion of online food hygiene training and provision of CD ROMs
- The delivery of Level 2 and Level 3 food hygiene training courses
- Promotion of FSA Safer Food Better Business packs and associated training
- 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, when appropriate, including summer and Christmas
- Maintenance and development of food safety guidance packs and advisory leaflets for businesses and consumers

- 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
- Briefing sessions for new and existing food business operators on the implications of new and changing food safety legislation and in response to national events
- Attendance at relevant trade and business seminars to promote the work of the service and promotional materials
- Work with Cambridgeshire Business Partnerships to promote food safety and health improvement
- Provision of Alternative Interventions

## SECTION 4: RESOURCES

### 4.1 Financial Allocation

4.1.1 The budget for 2015-16 is shown in Table 7 below:

<b>Direct Costs</b>	<b>£</b>
<b>Employees</b>	
Salary (NI, Pension, training)	261,710
Supplies, transport	17,430
	<b>279,140</b>
<b>Other</b>	
Books & Publications	350
Printing	200
Materials	3,000
Equipment	1,500
Laundry	600
Water sampling	600
	<b>6,250</b>
<b>Overheads</b>	
Admin Support	57,500
Legal	0
Application charge - FLARE	7,370
Financial Services	270
Printing	1,800
Head of Community	9,270
Central Support	75,430
	<b>151,640</b>
<b>Total</b>	<b>437,030</b>
<b>Income</b>	
Costs recovered (Health Certificates; Primary Authority Partnership)	-10,000
<b>Total Expenditure</b>	<b>427,030</b>

**Table 7: Food Safety Service Budget 2015-16**

- 4.1.2 The overall budget for 2015-16 is 4.85% lower than 2014-15. It is anticipated that the budget will be sufficient to meet the demands of the service but in the event of a complex investigation or legal case, or the introduction of central sampling charges, then additional funds may have to be sought.
- 4.1.3 There is an anticipated income of £10,000 from the Primary Authority Partnership and from charging food businesses for the cost of certificates for food which is exported outside the EU. However, the funding from charging companies for issuing health certificates may change if the Government reviews this process.
- 4.1.4 All officers requesting remote access to the Council network have access to a laptop computer (PC) containing database, word processing, internet and intranet access, e-mail and spreadsheet packages. All the laptops have been upgraded with remote access to the Council network so that they are available for use by staff for out-of-office working and wireless enabled for touchdown working in HDC controlled premises. A number of officers have Blackberries as part of the service's commitment to mobile working.
- 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, then officers from within the Commercial Team will assist in the first instance and if necessary additional officers can be drafted in from the Neighbourhoods Intervention Team to assist. Reciprocal arrangements are in place between authorities in Cambridgeshire to allow staff to assist neighbouring authorities should the need arise.
- 4.1.6 The sum allocated to legal costs is based upon anticipated demand assessed over previous years, but should it prove insufficient then a request would be made to the Council for extra funds. There has been no occasion to date when this has been necessary, nor are financial restrictions placed upon legal action, each case being considered on its merits. In the event of enforcement action being required, such as the need to investigate an alleged food fraud or a likely risk to public health, such as alleged illegal meat slaughtering, which will result in unexpected resource implications, Local Authorities can apply for financial support from the FSA but this fund is at the discretion of the FSA and may be withdrawn at any time

## **4.2 Staffing Allocation for the Food Service**

- 4.2.1 Food law enforcement and educational activities are provided by officers from the Commercial Team (6.23 FTE) with support from the department's Administration Team. The CTL manages the Commercial Team with support from the Senior Environmental Health Officer (SEHO). Currently the Commercial Team consists of seven officers. The resources allocated to food law enforcement amount to 4.7 FTE. The administration support amounts to 1.3 FTE.
- 4.2.2 Of the seven posts, five are currently EHO posts and two are Environmental Health Protection Officer posts.



### **4.3 Staff Development Plan**

- 4.3.1 Officers are provided with whatever training is necessary to fulfil the requirements of the Code of Practice and any other centrally issued guidance. Where possible this is provided in-house.
- 4.3.2 Accredited CIEH food hygiene courses can only be delivered by suitably qualified and competent trainers who have satisfied the CIEH requirements. In order to ensure that there is a sufficient number of accredited trainers to deliver a programme of level 2 and level 3 food hygiene courses, resources have been made available for three members of staff to complete the CIEH level 3 Education and Training Skills programme.

## SECTION 5: QUALITY ASSESSMENT

### 5.1 Quality Assessment

5.1.1 The service is monitored internally in accordance with Standard Operating Procedure (SOP) CT04. External and third party monitoring is also used. In general terms those arrangements consist of the following:

- Reviews of premises inspection records in accordance with SOP CT04
- Commercial Team Leader (CTL) carries out observation visits with other officers
- Periodic reviews of policies and procedures
- Six weekly team meetings – programmed work is monitored against target; reactive work is monitored with reference to management and closure of service requests
- Annual PDR meetings and six monthly review meetings
- Peer review and consistency exercises led by the CPFOHSMG
- Peer review and consistency exercises led by the FSA.

5.1.2 SOPs have been developed to cover the whole service. There are five combined SOPs, the scope of which also covers the health and safety service and 17 SOPs which refer specifically to the food safety service. They were all reviewed in 2014.

## **SECTION 6: REVIEW**

### **6.1 Review against the Service Plan**

- 6.1.1 Historically the Service Plan has been initially presented to the Licensing and Protection Panel and presented to full Council for approval. This process is unnecessarily cumbersome and it is hoped that it can be streamlined in time for 2016-17.
- 6.1.2 This Service Plan is supported by an action plan and performance measures. Progress will be reported to the Head of Community on request and to the Council's Management Team at least quarterly.
- 6.1.3 Progress will be reported in terms of the following indicators:
- Any agreed performance targets
  - Any agreed targeted outcomes
  - The previous years' Service Plan.

### **6.2 Variation from the 2014-15 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 2014-15 and outlines any significant issues that impacted on the delivery of the service.
- 6.2.3 The Senior Environmental Health Officer left the Authority on 31 December 2014. She had her own operational caseload as well as providing the bulk of the day to day monitoring of programmed work. In particular she reviewed officers' inspection records, enforcement notices and recommendations for prosecution.

### **6.3 Programmed Work**

- 6.3.1 The 2014-15 Service Plan estimated that almost 700 planned inspections of food businesses would be carried out, of which 392 would be full or partial inspections of premises in categories A, B, C or D. The projected figures suggest this target will be met although some category D inspections might not be carried out.
- 6.3.2 The priority has been to complete all the inspections of the highest risk businesses (categories A and B). At the time of writing there is no reason why those inspections will not be completed.
- 6.3.3 The 2014-15 Service Plan acknowledged the high number of low risk businesses (category E) that hadn't been inspected for several years and made a commitment to address this issue. It is well known that food businesses diversify to meet changing customer demands and it was important to determine whether any of the category E premises warranted closer attention. This was

identified in the development plan for 2014-15 and is covered in section 6.6.4.

6.3.4 Eight inspections were carried out at approved establishments which produce and/or handle products of animal origin (including meat-cutting plants, meat products, and egg packers).

#### 6.4.1 Reactive Work

6.4.1 The levels of reactive work have not placed any unexpected or excessive demands on the service. There have been no prosecutions and far fewer enforcement notices have been served. However two businesses volunteered to close because of poor hygiene conditions rather than face formal prohibition procedures and prosecution.

6.4.2 The commitment to the Food Hygiene Rating Scheme (FHRS) does place unforeseeable demands on the service. Food businesses can request a rescored visit or appeal against a rating and the Brand Standard specifies the ways in which those requests must be handled. There have been almost 40 such requests in 2014-15 each of which generated at least two additional visits.

6.4.2 The service received almost 650 complaints, enquiries and requests for service or advice. Almost one third of these related to suspect or contaminated food, unhygienic premises or poor hygiene practices. Another third were enquiries from existing or potential businesses. The remainder were made up of requests for export certificates, Primary Authority Partnership enquiries, FHRS requests and enquiries about the provision of food hygiene training.

### 6.5 The 2014-15 Development Plan

6.5.1 Section 6.3 of the 2014-15 Service Plan contained a development plan for the year. The following tables outline those commitments together with a review of performance.

**Table 8 - Service Improvements**

Commitment	Performance
Maintain, review and update the food premises database and include business email addresses so as to improve communication with businesses and identify efficiency savings.	<i>The food premises database is managed in accordance with Standard Operating Procedure F02. It is updated on an incremental basis using information collected during routine interventions, reviewed periodically (via team meetings) and subjected to an annual check prior to the submission of the Local Authority Enforcement Management System (LAEMS) return to the Food Standards Agency. An ever increasing amount of routine correspondence is sent via email subject to the constraints of any legal processes.</i>
Maintain and review the Council's food service website content and customer information access through social media, including Facebook, Twitter and 'Shape Your Place'.	<i>A variety of social and web-based media were used to promote the Food Hygiene Rating Scheme. Typically these promotions were timed to coincide with Christmas, Mothers' Day, Valentine's Day and Bank Holidays but also to support national strategies such as Food Safety Week and to promote BBQ safety.</i>
Resume delivery of targeted sampling, specifically in relation to national and local initiatives, and as a result of local intelligence or	<i>A total of 37 samples have been submitted since 1 April 2014. Although this represented a "resumption of targeted sampling" there were far fewer samples submitted than we intended. This was due in part to teething problems associated with the</i>

concerns.	<i>implementation and use of the UK Food Surveillance System Information Network (UKFSSiNet), in addition to which the team hasn't had the benefit of a designated member of staff to coordinate the sampling programme.</i>
Review the current strategy for dealing with 'low risk' category E food businesses and deliver targeted educational and official control interventions to low risk food businesses.	<p><i>The Service Plan For Food Law Enforcement 2014-15 (Table 6 p.21) reported that there were almost 700 "low risk" (category E) premises on the database, many of which hadn't been visited for several years. Many such businesses are included within the scope of the Food Hygiene Rating Scheme and will remain "Not Yet Rated" unless an inspection is carried out.</i></p> <p><i>There is a perception that the failure to rate low risk businesses places them at an economic disadvantage when compared to higher risk businesses which could be inspected as often as twice per year: however the Council must ensure that its resources are deployed in accordance with public health risk.</i></p> <p><i>In order to balance these conflicting demands, a project was delivered to target the category E premises which handled the widest range of food and/or those which were most likely to have diversified since the last inspection. A self-declaration questionnaire was used to capture up to date information about the businesses, the analysis of which identified those which warranted a full inspection.</i></p>
Continue to review existing and identify any new private water supplies within the district and carry out appropriate risk assessments as required by legislation.	<i>The implications of the Private Water Supplies Regulations 2009 are kept under constant review, with particular reference to the guidance from the Drinking Water Inspectorate (DWI) and the impact on high profile and popular temporary events such as the Ramsey 1940s Weekend and the Secret Garden Party. The team has maintained contact with event organisers and provided appropriate advice. An advisory leaflet entitled "Drinking Water at Temporary Events" has been produced which can be provided to anyone planning such an event.</i>

**Table 9 – Business Support**

<b>Commitment</b>	<b>Performance</b>
Deliver targeted business support, educational and enforcement interventions for high-risk businesses which consistently demonstrate poor compliance (ratings between 0 and 2).	<i>Businesses which have a poor track record of compliance can elect to have a Business Support Visit during which an officer will focus on the most significant or recurrent problems. Thirteen businesses have been visited since 1 April 2014.</i>
Deliver educational and advisory business support to new businesses to support compliance and promote food safety standards.	<i>Number of new business information letters sent out – 49 New Business Support Visits - 4 Responding to requests for advice - 207 up to 28/2/15 of which 46% were from start-up or new businesses</i>
Facilitate delivery of, or deliver, relevant training to businesses.	<i>Two CIEH Level 2 courses have been delivered One CIEH Level 3 course has been delivered A short "toolbox" training session was provided specifically for HDC Street Rangers in order to support compliance at markets</i>
Consider the development of a unit within the team to provide business support and promote economic development.	<i>Not considered but remains on the agenda</i>

**Table 10 – Partnership Working**

<b>Commitment</b>	<b>Performance</b>
Maintain the Primary Authority Partnership (PAP) with Cambridgeshire County Council's School Meals Service and consider the feasibility of extending the Primary Authority Partnership Scheme to additional businesses.	<i>The PAP is well into its second full year. There are now two documents on the secure PAP website and discussions have commenced about the development of Assured Advice on the subject of the control of allergens. There have been tentative enquiries from other businesses but none have led to any further discussions.</i>
Continue collaborative working with strategic partners, including Trading Standards and Public Health England, in areas of mutual interest such as Food Information Regulations, allergens, illegal meat, imported foods and the Public Health Agenda.	<i>The Senior EHO played a significant role in the organisation and delivery of the joint Public Health England/Local Authority Liaison Day on 9 July 2014. The introduction of the Food Information Regulations provided the impetus for some long overdue collaborative working with Trading Standards colleagues with whom we share responsibility for the enforcement of the regulations in food businesses.</i>

**Table 11 – Supporting the National Agenda**

<b>Commitment</b>	<b>Performance</b>
Provide and display promotional materials to support the 2014 FSA National Food Safety Week.	<i>The theme for Food Safety Week 2014 was "Don't Wash Your Chicken". The key messages were promoted between 16 and 22 June using a variety of social media and by working with HCR104fm. The Commercial Team Leader took part in a live radio interview on 16 June 2014.</i>
Carry out a project to assess the management of allergen risks in food businesses within the wider childcare sector.	<i>This project was put on hold pending the introduction of the Food Information Regulations 2014. The regulations were introduced on 13 December 2013 and this piece of work has been carried over to 2015-16.</i>

## **6.10 Action Plan for 2015-16**

6.10.1 The service is committed to the delivery of "official food controls" in accordance with the Code of Practice in order to fulfil the Council's role as a food authority. The service will also respond to complaints, enquiries and requests for service in accordance with internal procedures and with due regard to public health risk.

6.10.2 The service will also endeavour to meet the following commitments in order to make a contribution to the Council's corporate aims and objectives.

- Maintain, review and update the Flare premises database so as to improve communication with businesses and identify efficiency savings
- The delivery of a programme of training courses to help food businesses comply with food hygiene requirements and to help them achieve the highest possible food hygiene rating for their business
- To review and develop the Primary Authority Partnership with Cambridgeshire Catering and Cleaning Services and to raise the profile of the partnership with relevant partners

- Consider the feasibility of extending the Primary Authority Partnership Scheme to other businesses
- Maintain the delivery of collaborative work with our key partners such as the Norfolk, Suffolk and Cambridgeshire Health Protection Team, Trading Standards and the Cambridgeshire and Peterborough Food and Occupational Health and Safety Managers Group
- An assessment of the management of food allergens in the child care sector
- To maximise the use of social and online media to market and promote the service.
- To support any relevant national strategies such as the FSA's National Food Safety Week.
- To consider the outcome of the Food Standards Agency's review of the Food Law Code of Practice (England); to assess the implications of that review; and to determine the extent to which they impact upon the Council's role as a food authority
- To consider the development of a unit within the team, the primary function of which would be to provide advice and support for businesses.