

COMMUNITY DIVISION

Draft SERVICE PLAN FOR FOOD LAW ENFORCEMENT 2018-19

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

March 2018

INTRODUCTION

This is Huntingdonshire District Council's eighteenth 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 could deliver official food law controls in 2018-19. Any references to work delivered in 2017-18 are based upon the latest available data recorded for that period. Unless otherwise stated this covers the period between 1 April 2017 and 21 February 2018. The references to programmed work for 2018-19 are based on predictions made from the database at the time of writing the plan and these figures will be confirmed in a subsequent report.

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

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Head of Community

EXECUTIVE SUMMARY 2018-19

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 2016-18.

These are the key objectives which contribute to 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
- 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.

Table One: Comparison of resources for 2017-18 and 2018-19

STAFF (Full Time Equivalent (FTE))	2017-18	2018-19
Environmental Health Officers (EHO)*	2.905*	2.905*
Environmental Health Compliance Officers (EHCO)*	1.54	1.54
Operational Manager (Business)	0.35	0.35
	4.80	4.80
Business Support Staff	1.17	1.17
Total	5.97	5.97
FINANCIAL	2017-8	2018-19
Direct Costs (salaries, NI and pensions)	£292,839	£292,839
Overheads (FLARE, Printing, Admin Support Central Support)	£107,059	£107,059
Other Direct costs (specialist equipment, laboratory services and sampling)	£5,100	£5,100
Total	<u>£404,998</u>	<u>£404,998</u>
Income (Primary Authority Partnership, export certificates, delivery of training courses)	<u>-£21,675</u>	<u>-£21,675</u>
NET EXPENDITURE	<u>£383,323</u>	<u>£383,323**</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 are vacancies of 0.85 (EHO) and 0.85 (EHCO). Both posts are subject to recruitment.

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

Table 2 – Programmed (proactive) Activity

Proactive Tasks	Level of activity	
	Provisional 2017-18 (actuals as at 21 st February 2018)	Predicted 2018-19
Planned food hygiene inspections (risk group A-D, in addition to those below)	320	379
Alternative Enforcement Strategy (AES) (e.g. cake makers and child-minders)	54	174
Revisits	23	50
Inspections of new food businesses	158	130
Visits to Approved Establishments	9	4
Primary Authority Partnership Activity – includes requests for advice, attendance at meetings and provision of training*	4	4
Other proactive visits (food, water and environmental samples/advisory)	131	150
Prosecutions	0	2
Formal action (service of notices)	1	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	

*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	
	Provisional 2017-18	Predicted 2018-19
Service requests/ complaints about food and food businesses	507	550
Food, water and environmental samples taken	26	25
Infectious disease control - notifications of food-borne/food poisoning illnesses	73	80
FSA Food Alerts for Action	0	2

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 programme of work is proposed for 2018-19 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.

DEVELOPMENT PLAN 2018-19

The following developments are planned during 2018-19. 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 General Data Protection Regulations 2018 will impact on how we store and use data that we hold requiring systems to be reviewed and updated. Engage with 3C ICT and the worksmart project to ensure that we have software that supports an agile workforce that can work remotely and efficiently.
- Review and update SOPs in relation to changes in GDPR, the Code of Practice and the Working Practice Guidance
- 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
- Introduce principles supporting communicating for compliance, with a focus on getting right first time, briefing on new requirements to reduce acrylamide in foods, early engagement with the 18 businesses that are due an inspection and are not currently broadly compliant.
- Continue to deliver, promote and expand Primary Authority Partnerships
- Engage 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
- 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 to help local businesses make healthier changes to their menu and food preparation methods, supporting the Healthy Weight Strategy for Cambridgeshire and the Ramsay Pathfinder Pilot.
- Develop Better Business for All so the partnership can begin to work collaboratively to deliver regulatory priorities across Cambridgeshire.

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 2016-18. 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 the availability of safe nutritious food will be signposted in the community

Develop more resilient communities to help people help themselves – the provision of information and advice to businesses and to the wider public

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); expansion 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

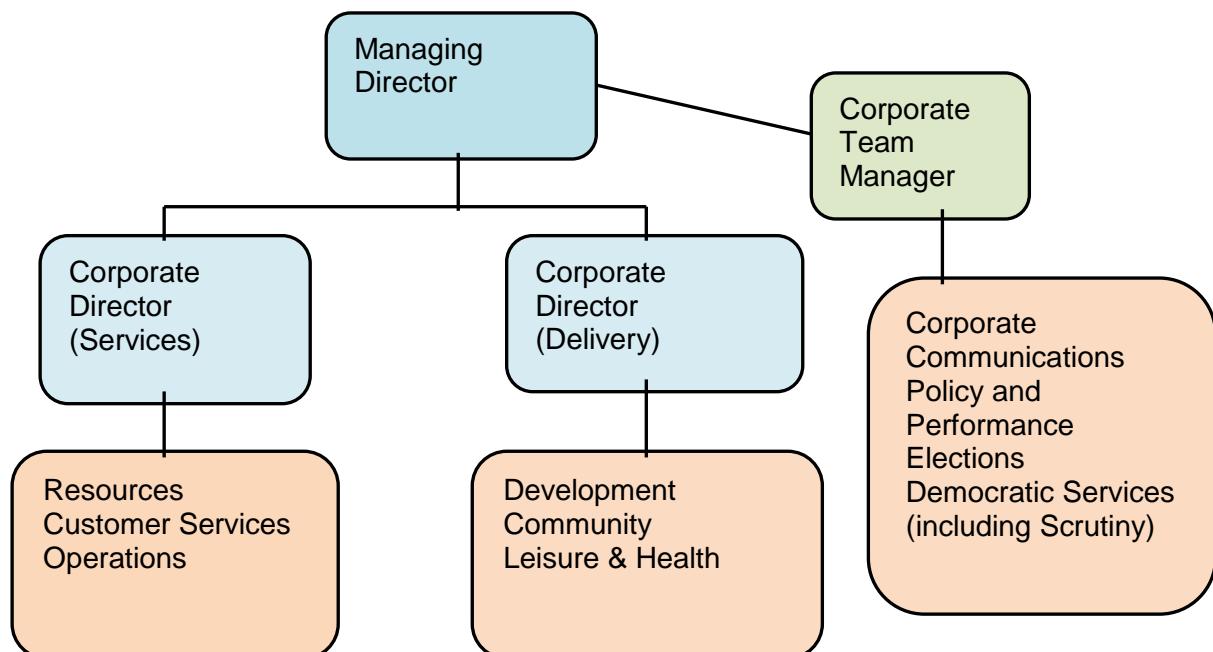
2.1 Authority Profile

- 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 78.8% with 80.5% of people being economically active. 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. The Council's current structure is shown in Figure 1.

Figure 1: Huntingdonshire District Council's Organisational Structure



- 2.2.3 The Operational Manager (Business) is responsible for the day to day management and co-ordination of the food safety service and also fulfils the statutory role of Lead Food Officer.

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 health and safety regulation and the smoking in public places 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 Food Officer. Operational management of the team and development of the annual Service Plans. Senior technical advisor on food safety, health and safety and 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. (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. (0.69 FTE)
	Total of 4.8 FTE Officers

* Both posts are vacant but have been advertised and are subject to the recruitment process.

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	As required
Anglian Water, Huntingdon	Chemical and microbiological water sampling	Ad hoc
Campden BRI	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

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
- 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 1503 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)	35
Manufacturers/Packers	46
Importers	2
Distributor/Transporters	56
Food Retailers	273
Caterers – restaurants, cafes, hotels, mobile traders, pubs, clubs and takeaways	1028
Outside district	63
Total	1503

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 31/03/2017	3	47	266	445	529	105
As at 21/02/2018	5	47	249	479	508	115

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 eight approved premises: three approved for meat products; three approved for egg packing; one approved as a cutting plant; one for smoked fish; and one 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 Health Certificate and additional checks may need to be carried out before the certificate is issued. 80 certificates have been issued so far this year.
- The implementation of changes to existing legislation, Codes of Practice, Government guidance and monitoring arrangements have resource implications for the service.

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 approved in 2015 will be refreshed 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 Occupational Health and Safety Managers' Group. The Operational Manager (Business) represents the council at these meetings. 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. At the time of writing there will be around 800 businesses that will require some sort of intervention during 2018-19. Around 550 will become due during the period 2018-2019 and approximately 260 could be carried forward from 2017-18.

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 2018-19, 174 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 275 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 2018-19.
- 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 25% of inspections will require some follow up action to check compliance. This could mean up to 125 revisits.
- 3.2.7 The frequency at which businesses must be inspected is outlined in Chapter 5 of the Food Law Code of Practice March 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 June 2017. 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 2017-18 there have been 14 re-score requests, 11 other enquiries and no appeals. At least as many should be anticipated in 2018-19.
- 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:

- Complaints about the food premises themselves (e.g. poor staff hygiene, allegations of pests, poor standards of cleanliness)
- Complaints about the condition or contamination of food (extraneous matter, mould, dirty containers)
- Complaints about food labelling and food information ('use by' dates and allergen information).

3.3.2 Based on previous years it is estimated that there will be about 200 such complaints in 2018-19. 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 The service supports the Primary Authority Scheme and the Council has one 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 published guidance. In 2017-18, the number of hours were reduced to a maximum of 50 hours. So far this year, the service has provided 34 hours of support, generating £2,250.

3.4.3 In line with corporate priorities to support local businesses, further opportunities to develop the primary authority scheme will be pursued.

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
- 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. There have been 203 requests for advice and training this year, it is expected that there will be at least as many in 2018-19.

3.6 Food and Environmental Sampling

3.6.1 Sampling is a recognised official food control. In 2018-19 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 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 68 food poisoning notifications, 42 of which required an investigation. This compares to 81 notifications (58 investigations) in 2016-17.

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 Occupational Health and Safety Managers Group (CPFOHSMG)
- 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 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 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

3.10.1 Subject to resources, the proposals for 2018-19 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 food hygiene training courses and business briefing events
- 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
- Seasonal 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
- 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
- Promotion of Healthier Options 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 £ 5,600 during 2017-18.

SECTION 4: RESOURCES

4.1 Financial Allocation

4.1.1 The budget for 2017-18 is shown in Table 8 below

Table 8: Food Safety Service Budget 2017-18

Direct Costs	£
Employees	
Salary (NI, Pension, training)	286,115
Supplies, transport	6,724
	292,839
Other	
Materials	1,000
Postage	750
Books and Publications	640
Printing (internal)	600
Hire of rooms	600
Corporate Subscriptions	500
Laundry	380
Maintenance of Equipment	250
Equipment	200
Catering	180
	5,100
Overheads	
Admin Support	26,319
Customer Services	6,734
Finance	119
Audit and Risk	39
Corporate Finance (non CM)	15
Procurement	12
Central Support	73,821
	107,059
Total	404,998
Income	
Costs recovered (Export Certificates, Primary Authority Partnership, delivery of training courses and fees for FHRS re-score visits)	-21,675
Total Expenditure	383,323

- 4.1.2 The overall budget for 2018-19 remains the same as 2017-18.
- 4.1.3 The estimated income of £21,675 comprises costs recovered through the Primary Authority Partnership, 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 2017-2018 as less training and primary authority support was delivered than anticipated.
- 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 network so that they are available for out-of-office working and wireless enabled for touchdown working in HDC controlled premises.
- 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 teams to support the response.
- 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. This hasn't been necessary to date and 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 only 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.

SECTION 5: QUALITY ASSESSMENT

5.1 Quality Assessment

5.1.1 The Operational Manager (Business) 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 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 There are several SOPs which cover the different aspects of the service. They will be subject to on-going review in 2018-19 to reflect changes in the code of practice and practice guidance.

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 Head of Community on request and to the Council's Management Team on a monthly basis.

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 2017-18 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 2017-18 and outlines any significant issues that impacted on the delivery of the service. The major impact during the year has resulted from staff changes creating two vacant posts within the team. It has proved difficult to recruit the appropriately qualified and experienced individuals to these vacancies thus far, however the process is continuing and it is hoped that the current round of advertising will generate some suitable candidates.

6.3 Programmed Work

6.3.1 The 2017-18 Service Plan estimated that 574 planned inspections of food businesses would be carried out, 444 of which would be full or partial inspections of premises in categories A, B, C and D. 56 of these premises have since ceased trading.

6.3.2 There have already been 320 full or partial inspections (including 64 new businesses), 4 sampling visits and 10 advisory visits made. Outstanding inspections include 3 Category A and 6 Category B inspections; of the category C and D premises 73% have been visited.

6.3.3 4 visits were made to approved establishments which produce and/or handle products of animal origin (including meat-cutting plants, meat products, and egg packers).

6.4 Reactive Work

6.4.1 During the year it has been necessary to instigate enforcement action on one food business. Notices have been served for lack of training, management control, cross contamination and poor cleaning. One business agreed to close

temporarily because of poor conditions which presented a risk to public health and another closed for deep cleaning as a preventative measure following an outbreak of norovirus.

6.4.2 The commitment to the Food Hygiene Rating Scheme (FHRS) whilst beneficial to consumers and businesses does place unforeseeable demands on the service. Food businesses can request a rescoring visit or can appeal against a rating and the Brand Standard specifies the ways in which those requests must be handled. There have been 20 such requests in 2017-18 each of which generated at least two additional visits. However, there have been no appeals by food businesses against the score they have received following inspection.

6.4.3 The service has received almost 450 complaints, enquiries and requests for service or advice. One in three related to suspect or contaminated food, unhygienic premises 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 2017-18 Action Plan

6.5.1 Section 6.6 of the 2017-18 Service Plan contained an action plan for the year. The following tables outline those commitments together with a review of performance.

Table 9 – Promotion and Improvement of the Service

Commitment	Performance
Maintain, review and update the food premises database and include business email addresses so as to improve communication with businesses and identify savings	<i>The food premises database is managed in accordance with Standard Operating Procedure F02. It is updated using information collected during routine interventions, reviewed periodically (via team meetings) and subjected to an annual check prior to the submission of the annual return to the Food Standards Agency. There are about 1500 food business records on the database of which almost two thirds contain an email address. An increasing amount of routine correspondence is sent via email subject to the constraints of any legal processes.</i>
Review and update SOPs to take account of the changes associated with the restructure of the Community Division	<i>This is ongoing, SOPs are being updated to reflect these changes as well as changes to the Food Law Code of Practice and Food Law Working Guidance.</i>
To promote the service as widely as possible using all available media outlets	<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. The team has its own Twitter account and regularly submits articles to Key Issues and other council publications.</i>
To progress and further develop the sampling strategy to assist in the delivery of our targeted intervention programme.	<i>Whilst sampling has been undertaken during the 2017-18 Plan no progress has been made in aligning sampling with delivery of our targeted intervention programme.</i>

Table 10 – Business Support

Commitment	Performance
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	<i>The structure and content of the course provided by the team has been reviewed owing to a change in the way the Chartered Institute of Environmental Health provided the course. The CIEH as the awarding body have developed a new approach called “Partners in Professionalism”. Three courses have now been delivered with a high pass rate amongst those taking the exams.</i>
To implement the Healthier Options initiative to help local businesses make healthier changes to their menu and food preparation, supporting the Healthy Weight Strategy for Cambridgeshire	<i>Initial training has been delivered to officers to enable them to promote this initiative. Several businesses have expressed an interest and are developing their pledges towards gaining their award.</i>

Table 11 – Partnership Working

Commitment	Performance
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	<p><i>The partnership is now into its fifth year. The profile of the partnership has been maintained by regular contact with senior CCS staff. Discussions this year have focussed on developing an inspection plan and providing assistance with some site-specific issues</i></p> <p>Extending the scheme to other businesses <i>Changes to the scheme introduced by the Enterprise Act 2016 enable all UK businesses to benefit, including pre-start-ups. Government target is for 250,000 businesses to be in Primary Authority by 2020. Despite this target the same Act has introduced some pressures for two tier authorities to get involved as they are less able to provide the full range of services some businesses want.</i></p> <p><i>There are no new partnerships to report however this will remain a priority for 2018-19.</i></p>
Maintain collaborative work with our key partners and fellow regulators	<p><i>This is ongoing work through the established networks and groups. Specific examples</i></p> <ul style="list-style-type: none"> • <i>Working with the Department of Business, Energy and Industrial Strategy (BEIS) to trial the Communication for Compliance Project – has led to development of a workstream in 2018-19 to restyle initial communication with food businesses so that they have a clear understanding of what they need to do to get a high score on their initial inspection</i> • <i>HDC are leading on Better Business for All in partnership with Regulatory Delivery and the Growth Hub. An exploratory workshop was held with representation of regulatory services and business support colleagues in the County and an agreement made to form a partnership. Work is continuing to draft terms of reference and a work plan for the group including support for resources from central government.</i>

Table 12 – Supporting the National Agenda

Commitment	Performance
Monitor the FSA's commitment to the introduction of a mandatory requirement for food business to display their food hygiene rating and to introduce appropriate enforcement protocols	<i>FSA have committed to introducing mandatory display of ratings at food outlets in England. It is expected that this will form part of the roll out of the Regulating our Futures changes once the supporting legislation has gone through parliament.</i>
Monitor the FSA's ideas for the future of food law regulation as contained in the Regulating our Futures proposals and respond accordingly	<i>The FSA have held two workshops this year to update regulators and help shape the emerging policy. Committee have been briefed regularly on developments. The service have recently been asked to provide live systems data to support the research into and development of the process around enhanced registration of food businesses.</i>
To support any relevant national strategies such as the FSA's National Food Safety Week	<i>A variety of social and web-based media were used to promote Food Safety Week and the national "Our Day" project</i>

6.6 Action Plan for 2018-19

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.

- Maintain, review and update the Flare premises database so as to improve communication with businesses and identify efficiency savings. The General Data Protection Regulations 2018 will impact on how we store and use data that we hold requiring systems to be reviewed and updated. Engage with 3C ICT and the worksmart project to ensure that we have software that supports an agile workforce that can work remotely and efficiently.
- Review and update SOPs in relation to changes in GDPR, the Code of Practice and the Working Practice Guidance
- 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
- Introduce principles supporting communicating for compliance, with a focus on getting right first time, briefing on new requirements to reduce acrylamide in foods, early engagement with the 18 businesses that are due an inspection and are not currently broadly compliant.
- Continue to deliver, promote and expand Primary Authority Partnerships
- Engage 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
- 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 to help local businesses make healthier changes to their menu and food preparation methods, supporting the Healthy Weight Strategy for Cambridgeshire and the Ramsay Pathfinder Pilot.
- Develop Better Business for All so the partnership can begin to work collaboratively to deliver regulatory priorities across Cambridgeshire.