



Food Service Plan 2019-2020

1.0 Introduction

Broxtowe Borough Council (the Council) is committed to ensuring that food produced, sold or consumed in the district is safe to eat and does not pose a risk to public health.

This Food Service Plan sets out how the Council will deliver the elements of food safety and hygiene for which the Council has enforcement responsibility.

The requirement to have a Food Service Plan is laid down by the Food Standards Agency (FSA) in its Framework Agreement on Local Authority Food Law Enforcement. The FSA was established in April 2000 as an independent monitoring and advisory body and is the central competent authority responsible for food safety in the UK.

2.0 Food Safety Service Aims and Objectives

2.1 Aim

To maintain, and where possible improve, the health and wellbeing of residents and visitors to the borough of Broxtowe and the success of local food businesses by ensuring the safe production, processing, handling, storage, distribution and sale of food in the district.

2.2 Objectives

- To meet the standard set out in the Framework Agreement issued by the Food Standards Agency
- To ensure that food is safe to eat and free from extraneous matter
- To keep accurate records of all food enforcement activities and maintain an accurate register of food businesses in the district
- To carry out food hygiene interventions in accordance with the minimum inspection frequencies and to standards determined by the Food Standards Agency
- To encourage standards of hygiene higher than the minimum acceptable in law
- To increase the knowledge of food handlers and the general public about the principles and practice of food hygiene
- To deal with food alerts in accordance with Food Standards Agency guidance
- To investigate complaints relating to food premises or food sold in the borough of Broxtowe

- To investigate notified cases of food and water borne illness and take effective action to control the spread of infection
- To sample and risk-assess private water supplies
- To effectively and efficiently meet the needs of the public and businesses using our service and to respond positively to challenges
- To respond to planning and licensing consultations as a statutory consultee.
- To support and promote schemes and initiatives which improve the health of customers of food businesses (e.g. Healthy Options Takeaway (HOT))
- To undertake surveillance, inspection and sampling of foods and food contact materials including imported food

3.0 Links to Broxtowe's Corporate Plan

The Council's priorities are detailed in the Corporate Plan 2016-20.

The Food Service Plan accords with the Council's Vision which is: *"Broxtowe...a great place where people enjoy living, working and spending leisure time"*

The Food Service Plan contributes directly to the Business Growth and Health priorities in the Corporate Plan which are:

New and growing businesses providing more jobs for people in Broxtowe and improved town centres

People in Broxtowe enjoy longer, active and healthy lives

4.0 Organisation structure and staffing

The food safety service is currently contained in the Environmental Health section within the Public Protection Division. All officers and the service are directly managed by the Chief Environmental Health Officer resulting in a flat management structure. The Chief Environmental Health Officer reports to the Head of Public Protection.

The establishment provides for seven suitably qualified officers who are able to undertake food safety, occupational health and safety, licensing, registrations, private water supply and infectious disease investigation duties. This comprises of the Chief Environmental Health Officer, five Environmental Health Officers (including one part time officer) and one part time Environmental Health Technical Officer (who is qualified to the Higher Certificate in Food Premises Inspection standard).

Administration support is provided by another department which also supports other teams. In 2018/19 the staffing allocation equated to 2.4 Full Time Equivalent (FTE) for food safety duties - although there was a delay in recruiting resulting in a six month gap in staffing and during this time an Environmental Health Technical Officer

post was upgraded to an Environmental Health Officer post. Additional resource had been allocated to the food safety service following external audit by the FSA and following review to catch up with a backlog of overdue low risk interventions.

5.0 Staff Development and Competency

The Council are accredited by the Investors in People programme. All officers are subject to regular appraisal and participation in competency assessments and authorisation frameworks for the relevant service areas. Specific Continuing Professional Development (CPD) requirements as required by the Food Law Code of Practice, membership of the Chartered Institute of Environmental Health or equivalent professional bodies are also adhered to. It is essential that Officers are up to date in legislation and enforcement issues and the service utilises free and low cost training courses available in addition to completing specific job training as required and utilising tools such as the Regulators Development Needs Assessment (RDNA) and cascade training through the team as appropriate.

The Environmental Health section is responsible for all aspects of food hygiene and safety, private water supplies and infectious disease control, as well as a range of other duties.

In terms of food safety services, responsibilities include:

- Inspection of food premises in accordance with the Food Law Code of Practice
- Registration of food businesses
- Approval and inspection of businesses producing foods of animal origin
- Investigation of complaints about food and hygiene at food premises
- Promotion of documented food safety systems
- Promotion of the National Food Hygiene Rating Scheme
- Sampling of food for microbiological examination
- Investigation of food borne infection
- Investigation of food poisoning outbreaks
- Imported food control
- Sampling
- Food alerts (food hazard warnings)
- Provision of advice and guidance including participation in events that promote food safety and supporting new and proposed food businesses
- Food hygiene training courses

As part of the provision of a complete service, the section works in conjunction with the following partner organisations:

- The Food Standards Agency

- Department for Environment Food and Rural Affairs (DEFRA)
- The Health and Safety Executive
- Public Health England
- Other local authorities including Trading Standards as appropriate
- Public Analyst

The Council is also represented on the following working groups:

- Nottinghamshire Food Liaison Group
- Nottinghamshire Food Sampling group
- Nottinghamshire Licensing and Registration Sub Group
- Infection Liaison Committee
- Nottinghamshire Regulatory Managers Group

These groups also contribute to regional and national working groups.

6.0 Enforcement Protocol

The enforcement protocol has been approved by the Council and reflects the intention of the service to meet the requirements of criminal investigation laws and the Regulators Compliance Code.

7.0 Demands on the Food Service

The following paragraphs outline the various demands on the service.

7.1 Number of Premises

As at 1 April 2019, there were 883 food premises on the Broxtowe food data base. The table below shows the number of each type of food business in each category.

Premises category	Total number of premises in category
Producers	4
Manufacturers/Packers	22
Importers	2
Distributors	5
Retailers	202
Restaurants and Caterers	648
	883

7.2 Interventions at Food Establishments

The Council uses the Food Hygiene Intervention Rating Scheme as detailed in the Brand Standard for the National Food Hygiene Rating Scheme and the Food Law Code of Practice to determine the frequency that food premises should be inspected. This ensures that all premises are inspected at an appropriate minimum interval determined by their individual risk rating. The risk rating is based on the nature of

food handling undertaken, the level of compliance with legal requirements and confidence in food safety management systems. The minimum frequency varies from six monthly to three years depending on the assessed risk category.

Additional interventions and officer time are directed at those businesses which fail to meet basic compliance with food safety. Ratings of businesses meeting the criteria contained in the Brand Standard are published on the Broxtowe and Food Standards Agency websites as part of the National Food Hygiene Rating scheme.

As at 1st April 2019, the breakdown of food businesses by category in the district was as follows:

Priority	Premises category	Premises Score	Frequency of Inspection	Total number of Premises in Category
A	High	92 or higher	6 months	13
B	High	72 to 91	12 months	56
C	High	52 to 71	18 months	194
D	Low	31 to 51	24 months	251
E	Low	0 to 30	Alternative Interventions (36 months)	316
Unrated	Other		New premises within 28 days of registration	53
Total				883
Outside Programme	Other			22

A specific database is used to generate and record interventions. This database is also used to extract data to upload to the national Food Hygiene Rating Scheme website, the Local Authority Enforcement Monitoring System (LAEMS) annual data return to the FSA, the Health and Safety Executive/Local Authority Enforcement Liaison Committee (HELA) return to the Health and Safety Executive (HSE) and other statutory returns (e.g. Drinking Water returns to DEFRA)

The premises score includes weightings for complex processes, type of food handled, number of consumers, vulnerable groups, condition of the structure of the premises and confidence in management etc. Category A premises are usually manufacturers or premises with a poor compliance history. Category E premises are usually retailers of packaged ambient food or wet sales pubs etc.

Inspections with a Hygiene Rating of 0, 1 and 2 (on a scale of 0 to 5) and businesses in categories A and B usually generate a revisit. Additional revisits are generated at the request of the food business operator to review their food hygiene rating, where there are customer complaints, for new business start-ups and where major alterations or refurbishments are planned.

7.3 Food and Water Sampling

Sampling of food, including imported food, water, and materials in contact with food is carried out as part of a county, regional and national sampling programme. Food samples for microbiological examination are sent to the Public Health Laboratory at York. Other food samples and private water supplies are sent to the Public Analyst in Leeds.

7.4 Control and Investigation of outbreaks and infectious diseases related to food, water, travel or recreational activities.

The service has a policy to investigate any suspected cases of infectious disease to minimise spread of infection. A matrix exists regarding the cases to be investigated and liaison takes place with Public Health England. The greatest number of notifications are currently for campylobacter but unless these are in a high-risk group (under one year old / food handler or carer / associated with a known outbreak), these cases are not logged or investigated. Samples are currently sent to the laboratory at Birmingham for analysis.

7.5 Food Safety Alerts, Product Recall Information and Allergy Alerts.

The policy of this service is to respond appropriately to food alerts and intelligence, to investigate food safety incidents and generate food alerts as necessary in accordance with the requirements of the Food Safety Code of Practice and associated Practice Guidance.

7.6 Health and Food Safety Education and Promotion

The service participates, where resources permit, in targeted local and national activities and interventions

8.0 Service Data for 2018/19

8.1 Food Hygiene Interventions in 2018/19

Inspections undertaken (by category of premises)

A	B	C	D	E	Unrated	TOTAL
26	104	156	135	79	189	883

8.2 Number of revisits in 2018/19

98 revisits

8.3 Requests for Service 2018/19

Requests for service include concerns regarding the condition of the premises, or food with microbiological or physical contamination.

Hygiene of Premises	Food Complaints	Other Food Related Enquiries
46	39	119

8.4 Enforcement Action (Premises) 2018/19

Informal Warnings	322
Improvement Notices	1
Hygiene Emergency Prohibition Notices	2
Hygiene Emergency Prohibition Orders	2
Voluntary Closure	3
Seizure, Detention, Voluntary surrender of food	0
Simple Cautions	0
Prosecutions	0

Hygiene Emergency Prohibition Notices are served where an imminent risk of injury to health has been identified and action is required to stop a food business or process from operating. Any notices served must be followed by an application to the Magistrates' Court within three working days for an Order confirming such action.

8.5 Food and Water Sampling

108 food and water samples were taken in 2018/19

Type of sample	Number taken
Prepared/Ready to eat dishes	10
Food – Dairy/Eggs/Fish/Fruit/Veg/meat products	53
Materials in contact with food	28
Other swabs/surfaces/hand contact points	17
Total	108

8.6 Control and Investigation of outbreaks and infectious diseases related to food, water, travel or recreational activities in 2017/18

32 reports of suspected or confirmed cases of infectious disease were notified to the service in 2017/18 which required investigation.

Cases investigated comprised of salmonella, giardia, cryptosporidium, hepatitis and suspected illness following consumption of food and water.

8.7 Food Safety Education and Promotion in 2018/19

The service participated in targeted local and national activities and interventions and the Healthy Options Takeaway (HOT) initiative

9.0 Performance Monitoring

9.1 The Food Service aspect of Environmental Health has a number of performance indicators which are monitored as part of the Community Safety Business Plan.

These are:

- Food Inspections – High Risk - Inspect all businesses due for inspection in accordance with a pre-planned programme based on risk. Target 100%
- Food Inspections – Low Risk - Inspect all businesses due for inspection in accordance with a pre-planned programme based on risk. Target 100%
- Food - Respond to specific complaints about practices procedures and conditions which may prejudice health in the short term within one working day of receipt, and non-urgent complaints / general requests for advice within five working days of receipt. Target 100%
- Infectious Disease - Respond to notifications within one working day and requests for advice and information as soon as practicable within five working days of receipt. Target 100%
- Satisfaction of businesses with local authority regulation service. Target 100%

Performance information in respect of these indicators for the last three years is given below.

9.2 Food Inspections 2018/19

Category	Number of inspections due 2018/19	No of inspections undertaken	Percentage completion
A	26	26	100%
B	104	104	100%
C	156	156	100%
Total High Risk	286	286	100%
D	135	135	100%
E	79	79	100%
Total Low Risk	214	214	100%

In addition 189 inspections of previously unrated premises were undertaken.

2013/14, 2014/15, 2015/16, 2016/17 and 2017/18

Year	Percentage of High Risk Inspections Completed	Percentage of Low Risk Inspections Completed
2013/14	91%	46%
2014/15	89%	34%
2015/16	82%	34%
2016/17	88%	61%
2017/18	100%	97%

9.3 Response to Service Requests within Target Times

Service Type	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Food Safety	98%	96%	98%	99%	98%	97%
Infectious Disease Notifications	87%	100%	100%	84%	100%	91%
Consultations	93%	95%	95%	98%	97%	95%

9.4 Satisfaction of Businesses with Local Authority Regulation (Includes Licensing)

2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
95%	95%	92%	90%	91%	95%*

*Less than 20 questionnaires returned so not a representative sample – no longer sent out after September 2018. No longer a national indicator

10.0 Proposed Inspection Programme 2019/2020

Priority	Premises category	Total number of Premises in Category	Inspections due 2019/20
A	High	13	26
B	High	56	56
C	High	185	123
D	Low	251	145
E	Low	325	29
Unrated	Other	53	53
Total		883	432
Outside Programme	Other	5	0
Total including Outside Programme	Mixed	888	432

There has been a significant number of new business premises registrations being submitted to the Council and which require intervention within 28 days.

11.0 Issues for 2019/2020

- To ensure implementation of the Food Standards Agency 'Regulating Our Futures' programme to modernise food safety enforcement and ensure it is sustainable for the future
- To continue to monitor the resource provided to food safety enforcement to ensure it is adequate to meet the demands of the service, including new food business interventions in a timely manner
- To continue to provide effective food and registration interventions prioritising high-risk and non-compliant premises
- To continue to carry out follow up interventions to 0,1 and 2 rated premises to secure improvements
- To continue to provide a competent team to deal with these areas of service delivery
- To continue to use the full range of enforcement tools available to protect the safety, health and welfare of visitors, residents and workers within the borough and to support compliant businesses
- To sign up at least 12 businesses to the HOT (Healthy Options Takeaway) Award
- To continue to participate in the National Food Hygiene Rating Scheme
- To continue to implement changes to animal licensing activities.
- To reconsider whether charges for Food hygiene re-visits to review food hygiene ratings should be introduced.

12.0 Identification of variation from the Service Plan

A large number of new premises registrations (over 100 per year) have been received which require on-going intervention. Resource must be continued to be allocated to monitoring premises with a Food Hygiene Rating of 0, 1 or 2 to ensure improvements in standards is achieved.

We have not achieved our target of signing up 12 HOT premises per year, even with the assistance of Everyone Health.

We have a high number of low risk premises due for intervention in 2019/20 due to the completion of a high number of inspections in 2017/18 to catch up with a backlog of inspections.

Animal Licensing continues to be resource intensive, implementing the new legislation and assessing premises which may now require licensing.

Continued priority of reactive work and occupational safety interventions is also necessary.

13. Further Information

Local Authority food enforcement statistics are published at

<https://data.food.gov.uk/catalog/datasets/069c7353-4fdd-4b4f-9c13-ec525753fb2c>

Future food enforcement comparisons will be made based on 'the balanced scorecard' and a review of monitoring data may be required to continue to reflect national monitoring schemes.