

Food Safety Service Plan

2023-2024

Produced for the period:	1 April 2023 to 31 March 2024
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Approved by:	Director of Public Protection

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1. Introduction

- 1.1. The Food Law Practice Guidance (England) (dated March 2021) is issued by the Food Standards Agency (FSA).
- 1.2. It is directed at Competent Authorities (Local Authorities and Port Health Authorities) to:
 - a) assist with the discharge of statutory duties to enforce food law;
 - b) support with the quality, consistency, effectiveness and appropriateness of official food controls and other official activities;
 - c) complement the statutory Food Law Code of Practice (England) (the Code);
 - d) provide general advice on approaches to the enforcement of the law; and to
 - e) safeguard the credibility of the FSA Food Hygiene Rating Scheme (FHRS).
- 1.3. This Food Safety Service Plan is an important part of our business planning process to ensure that national priorities and standards are addressed and delivered locally. It has been developed in line with the guidance detailed in the Food Law Practice Guidance and with due regard to any advice issued by the FSA and the LGA.
- 1.4. The Plan covers all stages of the food chain and all sectors of the food industry, where relevant and sets out the key priorities for 2023/24 and reviews our success in achieving the priorities and actions for 2022/23. It also helps us to:
 - a) follow the principles of good regulation;
 - b) focus on key delivery issues and outcomes;
 - c) provide an essential link with corporate and financial planning;
 - d) set objectives for the future, and identify major issues that cross service boundaries;
 - e) provide a means of managing performance, making performance comparisons; and to
 - f) provide information about our service delivery to key stakeholders.
- 1.5. The Plan covers the period from 1 April 2023 to 31 March 2024. It will be reviewed annually and updated, as part of our business planning process. It will be made readily available to Food Business Operators (FBOs) and consumers.

2. Aims and Objectives

- 2.1. To ensure that food sold or offered for sale within the borough is fit for human consumption, and that the labelling, advertising and presentation of food does not mislead consumers.
- 2.2. To ensure, through inspection and advice, that food premises in the borough maintain standards of hygiene that will minimise the risk of food poisoning.
- 2.3. To investigate all complaints concerning food supplied in the borough.
- 2.4. To seek to ensure services are available and accessible to all the public and business sectors that need them.
- 2.5. To promote healthy lifestyles to businesses within the borough through partnership working.
- 2.6. To maintain a high quality, competent and professional workforce providing best value services to the council taxpayer.

3. Links to Corporate Objectives and Plans

- 3.1. This service plan is an integral part of our corporate planning process. It is complemented by an operational team business plan which is aligned with our Council Priorities and meeting the Authority's business objectives, in any Corporate Plan.
- 3.2. Corporate Plans set out the long-term strategic direction of the Council for the benefit of staff, residents, businesses, partners and regulators. They provide assurance against the delivery of key statutory responsibilities and identify the golden threads that tie projects, policies and strategies together, linking service performance to overall council performance.
- 3.3. As well as any relevant national indicator, it also identifies any cross linkages with our Council Priorities, which are:
 - a) Taking Pride in H&F;
 - b) Doing things with residents, not to them;
 - c) Building shared prosperity;
 - d) Creating a Compassionate Council;
 - e) Being ruthlessly financially efficient; and
 - f) Rising to the challenge of the climate and ecological emergency.

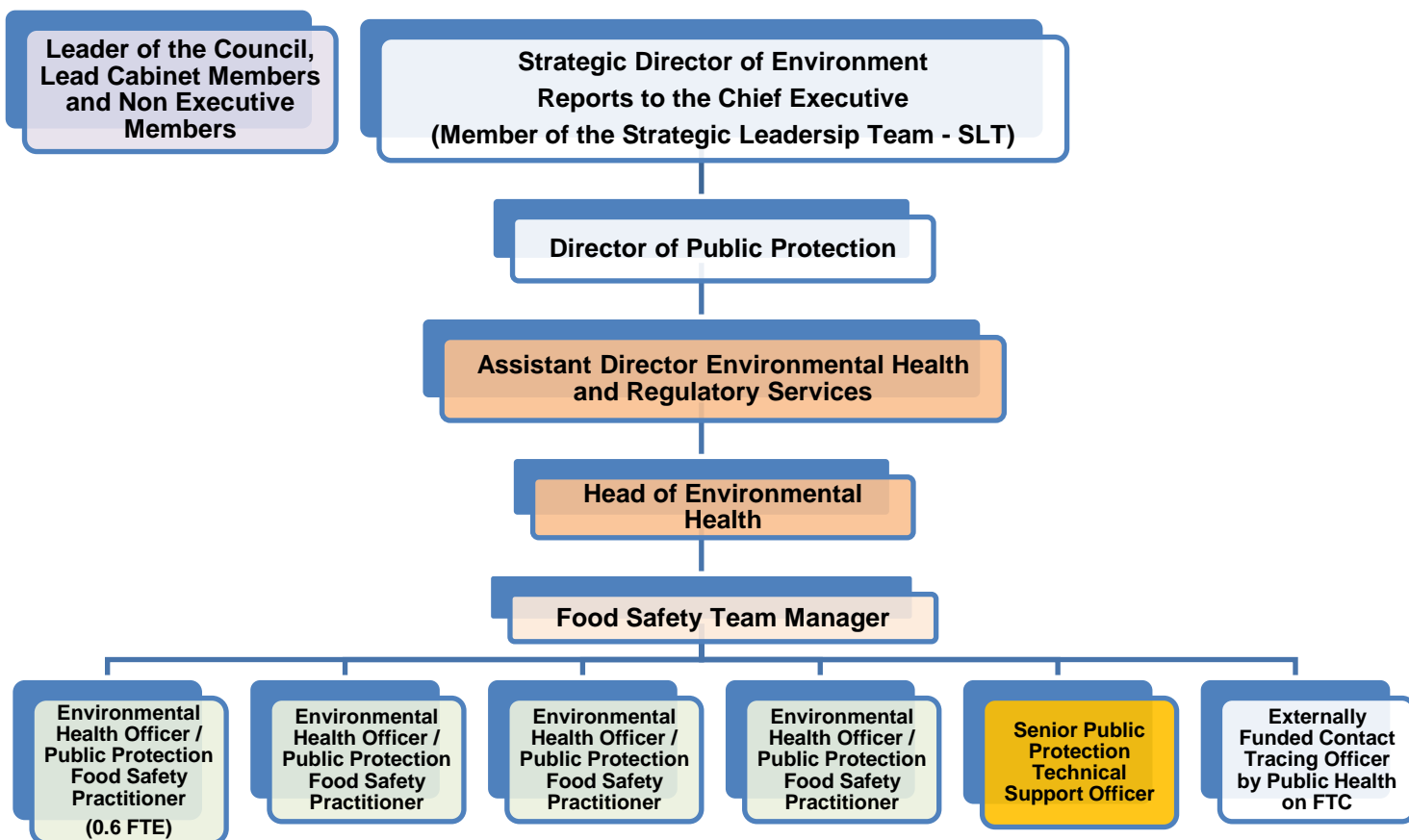
4. Profile of the Local Authority

- 4.1. The latest census shows that the H&F population figure stands at 183,500 people.
- 4.2. Hammersmith & Fulham is one of 13 inner-London boroughs. It is situated in west London, on the transport routes between the city and Heathrow airport. It is a long, narrow borough, running north to south with a river border at its south and south-west side. It is bordered by six London boroughs – Brent to the north, Kensington and Chelsea to the east, Wandsworth and Richmond Upon Thames to the south, and Ealing and Hounslow to the west. Not including the City of London, it is the third smallest London borough in terms of area, covering 1,640 hectares. It has three town centres – Shepherd's Bush, Hammersmith and Fulham and is made up of 21 electoral wards. These range in size from 55 hectares to 344 hectares.
- 4.3. As of the 1 April 2023, there are approximately 1,933 food businesses in the borough with approximately 1557 hygiene inspections due to be carried out this year. These businesses consist mainly of catering establishments, but also include a considerable number of schools, hospitals, residential homes and the prison. The Borough is home to three football clubs, Chelsea, Fulham and Queens Park Rangers.
- 4.4. White City is a prime location for Imperial University and global brands such as L'Oréal have an office site in Hammersmith. In addition, Westfield London Shopping complex is the largest retail park in Europe. There are approximately 96 catering outlets, restaurants, bars, and cafes.
- 4.5. Olympia exhibition hall is currently undergoing a major redevelopment and will have two hotels, an atrium terrace and acoustic hall. Development is likely to be completed within 3 years. Large exhibitions are regularly held, which can contain a large number of temporary caterers and/or exhibitors whose display includes the provision or handling of food.
- 4.6. Hammersmith & Fulham is a socially diverse area with a cosmopolitan population, sharing the advantages and disadvantages of inner-city life. The borough has a diverse ethnic mix. Consequently, persons whose first language is not English operate a sizeable proportion of food businesses.

5. Organisational Structure

5.1. Council services are managed by our [Strategic Leadership Team](#) (SLT) who oversee all strategic policies and key decision reports. H&F Council has a Policy and Oversight Board which oversees the scrutiny work of six committees, called [Policy and Accountability Committees](#) (PACs). The council's [constitution](#) sets out how the council operates, how decisions are made and the procedures which are followed to ensure that it is efficient, transparent and accountable to local people.

5.2. The Food Safety Public Protection Team sits within the Environment Department. The chart below shows where the food service fits in, under the Strategic Director of Environment. The Director, Assistant Director, Head of Service and Team Manager have management oversight and responsibility for the operational delivery of official food controls. All Environmental Health Officers in the Food safety team have specialist responsibility for food hygiene and food standards.



Provision made for specialist services provided: Where expert opinion or advice is sought, the authority has arrangements in place with private and public bodies. Main contacts are:

- Euofins Scientific - Public Analyst (food analysis and examination)
- UKHSA

6. Scope of the Food Service

- 6.1. The Food Safety Public Protection Team enforces food safety requirements in food premises and carries out hazard spotting for breaches of health & safety law.
- 6.2. For matters of evident concern, they are supported by officers in the Health and Safety Public Protection Team who are responsible for enforcing health & safety in food premises where the local authority is the enforcing authority. This provides officers with a varied caseload and reduces service vulnerability. This is done through targeted programmed and scheduled inspections and re-visits.
- 6.3. The food safety officers are also responsible for responding to food standards (labelling and composition) and food hygiene complaints, food alerts, investigation of food poisoning notifications and outbreaks, food sampling programmes, pest infestation of food premises, dealing with general enquiries from members of the public and giving advice to local businesses.

7. Demands on the Food Service

- 7.1. A breakdown of the different types of food premises is as follows:

Type of premises	Number
Approved Premises	2
Manufacturer / Packer	28
Importer / Exporter	5
Distributors / Transporters	7
Retailer	422
Restaurant / Caterers	870
Caring Establishment	112
Home Caterers	3
Hotels / Guest House	37
Mobile Food Unit	42
Schools / College	83
Supermarkets / Hypermarket	55
Take-way	145
Pub /Club	122
Total Number of Premises	1933

- 7.2. Officers provide guidance on imported foods and approved premises. The latter are included amongst the A, B, C and D rated premises, as part of the annual inspection programme. They require prior approval in order to operate and be issued with an approval number to demonstrate compliance with food law. Samples are regularly taken to ensure that the products are safe to eat.
- 7.3. The majority of food service requests are received by email and the remainder by telephone calls. Calls are handled by the Corporate Call Centre staff or referred direct to the 'Duty Officer', using the shared telephone number for the Food Safety Public Protection team and the Health & Safety Public Protection team. The food service is available between 9:00am - 5:00pm Monday to Friday, but it is sometimes necessary for duties to be carried out outside these hours. The Environmental Public Protection team is available to deal with food related emergencies outside normal office hours.

7.4. Access to our Food Safety Service and service delivery points are as follows:

By post: Food Safety Public Protection Team, Town Hall, King Street, London, W6 9JU

By telephone: on 020 8753 1081 (*Ask for the Food Safety Duty Officer*)

Out of hours: 020 8748 8588

By e-mail: foodandsafety@lbhf.gov.uk

Website: <https://www.lbhf.gov.uk/business/food-safety>

7.5. Events are held in the borough annually and officers visit businesses selling high risk foods.

7.6. The borough is host to the precursor Wimbledon men's lawn grass Cinch tennis championship held at the Queens Club. This sees a sizeable crowd of 10,500 (excluding staff) and there are numerous hospitality areas and food pop ups. Polo in the Park has a attendance of 30,000 over a weekend and has a similar food provision. Other yearly borough events include the Armed Force Event, Boat Race, Eid Festival, Wandsworth Bridge Fayre, Pop up Cinema Screen, Parsons Green Village Fair, Oktoberfest and John Parnham Funfair which include large speciality markets and food fests. All of these require dedicated officer time pre-event advice, site inspections and a post event report. Most traders are not registered with the council, so this work is in addition to the scheduled inspection programme. This year, officers will also support with the King's Coronation.

7.7. The % of businesses whose first language is not English is currently unknown.

7.8. The resources allocated to the food safety service plan will be adapted to meet the demands on the service outlined in this plan.

8. Regulation Policy

8.1. All authorised officers have been sent a copy of the [enforcement policy](#), which is available on the Council web site. The policy reflects the requirements detailed in paragraph six of the [Regulators' Code](#). Our approach to enforcement is to adopt efficient and effective measures, which improve regulatory outcomes without imposing unnecessary burdens.

9. Interventions at food establishments

9.1. The Food Safety Public Protection Team are responsible for approximately 1933 premises, ranging from large manufacturers to one-person operations. The establishment's profile can be seen above under Section 7.

9.2. The food premises profile of the borough is constantly changing. All premises are risk rated at the time of inspection so there are constant shifts in categories. If a premises changes its type or scale of operation this may also have an impact on its risk rating.

9.3. The category of the premises, i.e. A – E, is defined by scoring premises around potential hazards associated with the business and food safety compliance, this then relates to the interval between inspections.

9.4. The profiles for food hygiene and food standards by Category, shown on the next page are correct as of 1 April 2023.

Category	Risk	2023/24 Food Hygiene	Food Hygiene Frequency	2023/24 Food Standards (Labelling & composition)	Food Standards Frequency
A	High	2	6 Months	3	12 Months
B	High	76	12 Months	547	24 Months
C	Medium	203	18 Months	1339	5 Years
D	Low	667	24 Months		
E	Low	492	3 Years		
Unrated	Variable	117	28 Days	246	
Total		1557		2135	

9.5. The borough is divided into four areas; an officer is allocated an area and is responsible for inspections, complaints and enquiries related to the premises within their district.

9.6. There are currently two premises that have been '**Approved**' under retained EU Law. These premises are:

Name of Approved Premises	Products Handled
Approved Premises A	Manufacture prawn fishcakes using skinned and boned fish and sell a range of Japanese sliced meats including Wagyu Beef.
Approved Premises B	Fish Processing

9.7. All food hygiene/standards inspections are carried out in accordance with the requirements, specified in the Food Standards Agency (FSA) Code of Practice and our **Inspection Procedure**. Any feeding-stuff premises in the borough will be subject to inspection by Trading Standards and this process is currently co-ordinated by London Trading Standards.

9.8. Interventions are key to improving compliance with food law by food business operators. The range of possible interventions allows authorised officers to use their professional judgement to apply a proportionate level of regulatory and enforcement activity to each business. Interventions fall into either official controls or non-officials controls as follows:

Official Controls	Non-Official Controls
<ul style="list-style-type: none"> ➤ monitoring ➤ surveillance ➤ verification ➤ audit ➤ inspection ➤ sampling and analysis 	<ul style="list-style-type: none"> ➤ targeted education & advice ➤ information & intelligence gathering

9.9. The full range of food safety interventions also includes advisory visits, revisits to check compliance and food sampling visits.

9.10. Where significant breaches of hygiene regulations have been identified, a revisit will take place to ensure improvements have been made and/or breaches rectified. Where the officer has confidence in the business and only minor contraventions are found, it is down to their professional judgement to determine the need for a secondary visit.

9.11. The team receives approximately 30 requests for a food hygiene re-rating inspections per annum (Food businesses are able to request a re-rating after they have made improvements). There is a charge of £320.40 (reviewed annually) for this service as it requires an additional inspection to be carried out.

- 9.12. The authority participates in the [FSA Food Hygiene Rating for London authorities](#) (FHRS). Based on historical requests, we estimate that we will carry out at least 30 revisits to rescore FHRS.
- 9.13. The Authority has a competent workforce and good relationships and networks with other local authorities and the FSA to ensure that we have access to adequate appropriate expertise to carry out competent inspections of any specialised processes. Officers use guidance materials provided by the FSA, the Chartered Institute of Environmental Health (CIEH) and websites such as <https://www.regulatorscompanion.info/food-and-feed-standards>.
- 9.14. Our team business plan outlines our framework/policy on interventions. We also have documented procedures in place which detail how they will be selected in individual cases. The plan is aligned with priorities relating to nationally or locally driven outcomes, compliance with new legislation or improved compliance with existing legislation and other central government initiatives.
- 9.15. The FSA's Roadmap during the pandemic, focussed on high-risk premises. It is estimated that additional staffing resources will be required in 2023/24 to complete the full backlog of D rated premises (*which require an official control*).
- 9.16. Targeted intervention activity that the Authority carries out, that requires additional officer resources include the Healthier Catering Commitment (HCC).
- 9.17. H&F is one of the London local authorities, taking part in the Healthier Catering Commitment (HCC) scheme. The voluntary scheme is run by London Boroughs, with support from the Mayor of London, the London Food Board and ALEHM.
- 9.18. As of 1 April 2023, there are 29 businesses in H&F which met the HCC criteria and were awarded HCC status. These are listed on our [website](#).
- 9.19. Officers will work with businesses (new and existing) to ensure they are fully compliant with allergen requirements as detailed by the Food Information Regulations 2014.

10. Food Complaints

- 10.1. Officers aim to investigate food/hygiene complaints within 1–5 working days. In the last financial year (2022/23), the food officers dealt with 488 food complaints. This included service requests relating to hygiene, pests, refuse etc.
- 10.2. It is difficult to predict how many complaints will be received this year, but the team is currently resourced to deal with a similar level of demand.

11. Home Authority and Primary Authority

- 11.1. The home authority principle is a scheme that provides contact points for advice and guidance to maintain public protection, encourage fair trade and develop a consistent approach to enforcement.
- 11.2. Primary Authority is a statutory mechanism that enables businesses, trade associations and other co-ordinated groups to receive assured advice from a single local authority. It helps to improve confidence, certainty and safety outcomes.

- 11.3. The Council currently has no formal Home Authority or Primary Authority agreements in place with any food businesses in the borough. However, our ***Home Authority Principle Procedure*** would be followed for any Home Authority arrangements, should the need arise.
- 11.4. This authority will use the Primary Authority Register to support the operation of the Primary Authority scheme. This will include checking the register to see which businesses have a Primary Authority Partnership (PAP) in place and any published inspection plans that must be followed or to notify primary authorities of proposed enforcement actions against businesses in partnerships.
- 11.5. Where applicable, this authority will only take on Home Authority or Primary Authority agreements, where we are confident that there are the sufficient resources required in place for meeting and advising those businesses; developing inspection plans for those businesses; and responding to notifications and enquiries from other enforcing authorities.

12. Advice to Businesses

- 12.1. Officers respond to enquiries or requests for advice from existing businesses or those planning to set up a food business in the borough. Prospective food premises proprietors are provided with a wide range of advice using information on the Food Standards Agency's website (some of which are available in other languages) relating to food safety and are advised on the range of training courses that are available to them and their staff.
- 12.2. In 2022/23 the number of requests for advice to businesses was 556. Officers also provide advice to businesses as part of our overall policy of interventions.
- 12.3. It is difficult to predict how many requests for business advice will be received this year, but the team is currently resourced to deal with a similar level of demand, as last year.
- 12.4. Officers have become aware during food safety inspections that some food businesses do not receive sufficient support especially when setting up a new business, as courses are now delivered online. This does not allow the candidate to ask any questions, or for the course to be tailored to the needs of the candidate. One important need is to support those with poor English literacy including those who are not able to understand and read English. We regularly find food handlers who have completed online training but are still unaware of the basics.
- 12.5. Environmental Health Officers (EHOs) deliver two training workshops for businesses, each year, for the new Food Hygiene Level 2 course.
- 12.6. Officers work collaboratively with the Economic Development team who support businesses and enterprise and also the Business Improvement Districts (BIDs) in the Hammersmith and Fulham area to support the council's [Industrial Strategy](#) and economic growth.

13. Food Sampling

- 13.1. The Council's Food Sampling Policy details how the sampling programme is drawn up. Priority is given to sampling in response to complaints about alleged incidents/outbreaks of food poisoning. The remainder of the food sampling programme is aligned to national surveys by the Food Standards Agency, the North-West London Food Sector Group, UKHSA and local priorities.

- 13.2. Survey samples are taken informally or formally, as agreed with the organising body, and are taken in accordance with the **Food Sampling Procedure**. Where appropriate, samples are sent off for expert opinion. The Council has appointed Eurofins Scientific as its Public Analyst and food examiners but is currently experiencing delays in receiving the sample results.
- 13.3. In 2022/23 there were 28 samples submitted. It is anticipated that the team is currently resourced to deliver the 2023/24 food sampling programme.

14. Food Safety Incidents

- 14.1. Food Alerts are dealt with in accordance with the FSA Code of Practice and our **Food Alerts Procedure**. These are invariably unpredictable, and may require immediate action, which means the deployment and re-direction of staff resources at short notice.
- 14.2. In 2022/23 there were 61 food recalls and 10 food alerts. It is anticipated that the team is currently resourced to respond to any food safety incidents received in 2023/24.

15. Liaison with Other Organisations

- 15.1. To assist in ensuring that enforcement action taken by this authority is consistent with those in neighbouring local authorities, liaison with the following bodies occurs:

Official control bodies and government inspectorates

- a) Food Standards Agency
- b) BEIS/OPSS

H&F has no specific representation on Government working groups or committees.

Professional body working groups, food liaison advisory groups and Co-ordinating Bodies

- c) London Food Co-ordinating Group (*liaison other Competent Authorities*)
- d) North-West London Food Sector Group (*liaison other Competent Authorities*)
- e) ALEHM (*liaison other Competent Authorities*)

Health Organisations

- a) Hammersmith NHS Trust
- b) UK Health Security Agency (UKHSA)

Other External Professionals

- a) Public Analyst - Eurofins
- b) OFSTED
- c) Police
- d) Fire Service
- e) Various voluntary organisations

Internal Liaison

Considerable liaison also takes place with other services within the Authority, these are:

- a) Trading Standards Team (weights and measures and advice on food descriptions)
- b) Health and Safety Team
- c) Licensing Team (entertainment venues and licensed premises)
- d) Environmental Public Protection Team (cross working regarding pollution/noise in food premises, and for food emergencies outside of normal office hours). Details of responses to incidents are sent to foodandsafety@lbhf.gov.uk and are followed up by the Duty Officer from 9:00am the following morning.
- e) Events Team
- f) Press Office
- g) Town Centre Managers
- h) Planning and Building Control Services
- i) Legal Services
- j) Public Health

15.2. The above is a mixture of informal and any formal liaison with voluntary groups and other public sector bodies, other services within the Authority and local/regional groups.

15.3. The team is currently resourced to attend, participate and to liaise with the above forum/groups.

16. Food Safety and Standards Promotional Work

16.1. In recent years the promotion of food safety and food hygiene to the general public has been limited. Like many local authorities the resources for education programmes have to come from existing staff and budgets. In order to meet the requirements of the FSA Code of Practice, priority is given to the inspection programme.

16.2. The team supports food safety/standards promotional work, where it can, which would typically be participating in the FSA's Food Safety Week annual themed campaign.

16.3. It is estimated that the team is currently resourced to participate in planned food safety and standards promotional work.

16.4. In relation to information/intelligence gathering work, officers will carry out a mixture of visits, emails and phone calls to gather intel from Category D rated businesses. Information about new and existing food businesses will also be gathered from the internet and other open-source channels that are available. The information gathered is fed into our inspection plans. This will be monitored monthly by Food Safety Team Manager to evaluate its effectiveness and action by officers, will include:

- a) Telephoning and speaking to the FBO or sending an email.
- b) Checking that they are still trading, if there are any changes in what they are doing, or changes within management or contact details.
- c) Offering advice and coaching over the phone or by email. Where changes include a new FBO, use of Vac pack, E.Coli and other high risks) an inspection will be considered.
- d) Checking that there are waste and pest control contracts in place.
- e) Checking that there is a Food Safety Management System in place.
- f) Making them aware of H&F's forthcoming Foundation in Food Hygiene training.
- g) Sending an email to confirm any phone conversations and advice given.

17. Control and Investigation of Outbreaks and Food-Related Infectious Disease

- 17.1. UKHSA is the appointed body to receive all notifications. Where it becomes apparent that more than one person is affected the UKHSA is informed of this fact and the possibility of an outbreak considered. Outbreaks are investigated in accordance with UKHSA guidelines and our **Outbreak Control Procedure** and our **Infectious Disease Notifications, Investigations and Outbreaks Procedure**, which outlines our policy on the investigation of food poisoning notifications.
- 17.2. Where a problem of wider importance is discovered, relevant food enforcement authorities and the FSA will be notified in accordance with the FSA Code of Practice.
- 17.3. Notifications from doctors of a patient suffering food borne disease will be followed up and dealt with according to the (UKHSA) Guidelines and our documented **Infectious Disease Investigation Procedure**.
- 17.4. In 2022/23 there were 81 reported alleged food poisoning complaint and 81 Food-Related Infectious Disease notifications. It is estimated that the team is currently resourced to deliver respond to any food safety incidents received in 2023/24.

18. Financial Allocation

- 18.1. The total budget for the Food Safety Public Protection Team for 2023/24 is £556,800, of which £339,200 is allocated to the staffing budget. The total team budget includes non-controllable costs which includes, overheads, ICT costs and other costs such as procurement, human resources, corporate services, finance and property management. The 2023/2024 budget for these costs is £193,500, of which £62,700 is allocated to ICT.
- 18.2. The total 2023/2024 budget for controllable costs is £363,500, of which £6,100 is allocated to transport-related expenditure, £9,800 is allocated to supplies and services and £8,200 for support services and third-party payments. Under supplies and services, £5,000 is allocated to legal costs, £1,000 to equipment and £1,500 for sampling.
- 18.3. Where available, the authority will use any grant funding to make any service improvements. FSA grant funding of £1,500 was allocated to H&F in March 2023 for the improvement of data quality. This funding was used for officers carry out a data cleansing exercise of food standards data on our premises database.
- 18.4. The overall level of expenditure involved in providing the service for 2023/24 is expected to be similar to the expenditure in 2022/23, due to the reliance on agency staff and fixed term contract officers to meet the FSA's expectation of dealing with the backlog. Currently there are no plans for permanent growth or reduction of the team's resources.

19. Staffing Allocation

- 19.1. The Food Safety Team has a full establishment of staff that comprises of 1 FTE Food Safety Team Manager and 3.6 FTEs Environmental Health Officers (EHOs). However, like numerous other local authorities we have had to rely on agency EHOs to assist us to carry out high risk inspections as required by the FSA. The team structure chart can be seen under section 5 above.

19.2. All officers in the team work on food law enforcement and related matters. 4.6 FTE permanent Environmental Health Officers are competent to carry out high risk inspections and serve Hygiene Emergency Prohibition notices. The Senior Public Protection Technical Support Officer and a Fixed Term Contract Officer assist with non-official controls for Category D and E premises which includes intelligence gathering and Alternative Enforcement Strategies.

20. Staff Development Plan

20.1. The development of staff is seen as a key factor to providing quality services to the community and to encourage personal development of staff to enable them to be more effective in their work and to progress within the Authority. The team's CPD performance tracker includes the range of training completed annually, by all food officers.

20.2. Training needs and officer development are discussed and identified at team meetings, appraisals and 121s or throughout the year as changes in the law occur. This training takes priority over other courses or seminars that may be available throughout the year. Records of relevant qualifications and training undertaken are kept by the Food Safety Team Manager on a shared drive and on individual staff personnel files.

20.3. All new officers have their competency and abilities assessed against that detailed in our **Authorisation and Competency Procedure**, written in accordance with the FSA Code of Practice. Officers who have not enforced food law for some time will receive update training and will be monitored in accordance with the Code of Practice. All officers are required to complete a minimum of 10 hours continuing professional development (CPD) food training each year, to comply with the Code of Practice.

20.4. Officers attend various external training sessions organised by the FSA, ALEHM, UKHSA, CIEH as well as in-house training. Officers will attend training over the year to meet their annual 20 hrs CPD requirement and to refresh their knowledge.

20.5. From time-to-time contractors are employed to undertake food inspections. Qualifications and experience are checked and an accompanied inspection by the Food Safety Team Manager is undertaken. The inspections will then be monitored in accordance with our **Monitoring Procedure**.

20.6. We have one apprentice in the team (*the Senior Public Protection Technical Support Officer*) who is due to complete the Environmental Health degree at Middlesex University, in 2024.

21. Quality Assessment and Internal Monitoring

21.1. Record keeping of our food safety work is mostly computer-based and all activities and actions taken are recorded on the premises database. Subsequent programmed inspections and other targeted actions are calculated by the database and scheduled in Outlook calendars. Each month officers are provided with a list of inspections due. Progress is regularly monitored to ensure that any deviation from the plan is identified and corrected.

21.2. The Food Safety Team Manager verifies that the work done by an officer conforms to the Monitoring Procedure. Accompanied inspections are also undertaken to ensure that officers are consistent and meet the standard required.

21.3. The premises database is regularly checked against details from other sources such as internet searches etc. to identify any database inaccuracies. Premises listed as vacant are visited to see if they have re-opened and officers then update the database with their findings.

- 21.4. The work of the team is subject to scrutiny by the Food Standards Agency, Cabinet Members and Senior Managers in the Authority.
- 21.5. The other monitoring arrangements currently in place to assist in the assessment of performance against the Standard, are as follows:
- a) accompanied inspections by the Team Manager to ensure a consistent approach.
 - b) participation in FSA consistency exercises
 - c) customer satisfaction surveys
 - d) sample audits of food files and associated paperwork
 - e) sample audits post enforcement action being taken
 - f) performance and development reviews
 - g) performance monitoring of officer targets and target response times
 - h) 1:1s, appraisals and team meetings with all team members
- 21.6. The above helps with the identification of issues with consistency and competency. Performance figures are produced for the senior management team monthly and reviewed at quarterly intervals.
- 21.7. Customer satisfaction surveys are sent to food businesses following an inspection by officers and to complainants following the closure of a food or food hygiene complaint. The results/responses from surveys are monitored by the Food Safety Team Manager.
- 21.8. The survey questions seek comments, views and feedback on the manner of conduct of the visiting/investigating officer with regard to timekeeping, politeness, helpfulness and some of the Equality Act 2010 protected characteristics (*age, sex, race, disability*), of the respondent.
- 21.9. Currently there are no agreed inter-authority audit or peer review arrangements and we do not use any externally accredited or self-assessment models. However, the authority regularly participates in benchmarking exercises with other London Local Authorities.

22. Review against the service plan

- 22.1. We will carry out a documented qualitative and quantitative performance review of delivery against the plan, annually.
- 22.2. Each year, the plan will be submitted for approval, by a director. We will keep records, as an audit trail to show that the plan has received appropriate approval.
- 22.3. Officers will identify imported foods from other countries, during inspections, to determine if that food has been imported legally. This will involve checking the labelling, invoices and cross-referencing against import lists. In 2022/23 our diligent checks led to the seizure of food at one site, where some food had been illegally imported.
- 22.4. The FSA's current requirement is to inspect new businesses, within 28 days of them being registered. We understand that is timescale currently under review. Due to the backlog of inspections after COVID, this has not always been possible. To minimise risks, officers will proactively review the list of new 'unrated' premises to prioritise the order in which they are visited, according to perceived risk. Our 2023/24 target is that 85% of new 'unrated' businesses will be inspected within 3 months of their start dates.

22.5. We use the [National Enforcement Priorities](#) (NEPs) for food hygiene to assist us in maintaining standards and safeguarding public health. In 2023/24 we will give priority to the identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production, during the completion of our annual intervention programme. Enforcement activities have been developed and will be implemented with due consideration of the NEPs, as outlined under section 9. This sets out how and at what level official food controls will be provided, in accordance with the Food Law Code of Practice.

22.6. The process of reviewing the plan will be commenced in March/April each year based on:

- a) performance and resources available over the previous 12 months;
- b) responses to feedback from local businesses and the community;
- c) observations from Cabinet Members and food officers in the team;
- d) advice and guidance issued by the Food Standards Agency;
- e) review of annual targets;
- f) the number of inspections completed annually; and
- g) other food related projects completed.

22.7. Key Achievements Planned and completed in 2022/2023 are listed below.

- a) Officers carried out 100 % of our programmed Food Hygiene Inspections following the FSA's Recovery plan for our As, Bs, Cs (broadly & less than broadly compliant) and Ds less than broadly compliant;
- b) We investigated all food complaints within 5 working Days;
- c) Officers took part in educating different teams in the Council about our food safety work.
- d) Officers were involved in signing up 9 businesses with a FHRS above 3, onto HCC.
- e) The food Team held two subsidised Food Hygiene Level 2 in catering training courses for businesses.

22.8. The table on the next page provides a summary of Enforcement Action between 1 April 2022 and the 31 March 2023.

Types of Enforcement	Number of Interventions
Hygiene Improvement Notices served	4
Emergency Prohibition Notices served	0
Cases referred to legal	0
Simple Caution issued	1
Seizure of food notice served	1
Voluntary Closures accepted	8

22.9. We will report on our delivery of the service plan, as part of our annual review and provide an update of the plan, during monthly and quarterly performance monitoring updates and in monthly and specific Cabinet Member Briefings for Senior Managers and our Lead Cabinet Member. This will include consideration and updates of resource demands and availability, any anticipated shortfall in being able to deliver the planned intervention programme and any additional action required.

23. Identification of any variation from the service plan

23.1. Between July 2021 and April 2023, food safety inspections were carried out in accordance with the [FSA's Recovery plan](#).

- 23.2. For 2023/24 team resources will be devoted to resuming and completing the annual food safety inspection programme, which is a variance, from the previous two years.
- 23.3. There are no plans to deviate from the plan, but we anticipate that it will be challenging to complete the backlog of D rated premises, with the current staff resources.
- 23.4. Any variances against the Food Safety Service Plan, would only relate to D rated premises. Regular and ongoing monitoring will be carried out, including regular 1:1 and team meetings with officers, to check performance against the plan.
- 23.5. The Authority carries out additional food safety work for events in the borough, due to the possible risks posed, but these do not contribute to the annual inspection programme.
- 23.6. Where permissible, non-official controls will be used to achieve the same objective, as outlined below, under areas of improvement.

24. Areas of improvement

- 24.1. Our aim is to continually improve the Food Safety Service bringing better value and making it more efficient and effective and capturing any productivity, efficiency, or financial savings.
- 24.2. Our plans for improvement and service development, identified as necessary from our review of the service plan and our quality assessment and internal monitoring are to:
- a) Ensure that our plans to configure and implement the new NEC premises database system, improve the provision for data quality, performance monitoring and reporting;
 - b) Upskill and use other officers in the division to maximise the officer resource in the authority that can support our food safety work with non-official controls;
 - c) Explore how NEC's Merlin Mobile Software will remove the need for paperwork currently in use during food inspections.
 - d) Follow up on the Intelligence Database (IDB) training that was attended in 2023/24 to improve how the Team shares and uses intelligence to tackle food fraud.
 - e) Carry out basic equalities monitoring on our enforcement actions.