



FOOD SAFETY SERVICE PLAN 2017-2018

1. FOOD SAFETY SERVICE AIMS AND OBJECTIVES

1.1 Background, Aims and objectives

Background

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, Amendment number 5*. The FSA is an independent monitoring and advisory body that issues guidance to ensure local authorities' delivery of official controls is 'effective, risk-based, proportionate and consistent'.

The Framework Agreement states what the FSA requires from local authorities when planning and delivering food and feed official controls. This Service Plan is Cheltenham Borough Council's plan as to how it will deliver those requirements.

Local authorities are monitored and audited by the FSA through service plans in accordance with the FSA's powers under the Food Standards Act 1999 and the Official Feed and Food Controls Regulations 1999.

Aim

The key food safety function of Cheltenham Borough Council is to ensure that the food sold, offered and stored for sale and entering the Borough is wholesome and fit for human consumption. The overarching aim is to protect public health whilst supporting food business activities.

Our objectives include:

- The regular control of food premises within the Borough in accordance with the Food Law Code of Practice (FLCoP).
- The investigation of the safety and fitness of food including all complaints about the operation of businesses within the Borough.
- To sample foods within the Borough whilst participating in local, regional and national food sampling programmes.
- To ensure we approve and register all food premises within the Borough as required by legislation.
- To undertake appropriate and proportionate food safety enforcement action within the Borough.
- To support food businesses in all stages of their lifecycle, and in particular to provide new business start-up support.
- To undertake Home and Originating Authority duties within the Borough.
- To promote food safety by way of advice and assistance to all food businesses, citizens and visitors of the Borough.

- To administer and promote the national Food Hygiene Rating Scheme (FHRS).
- To undertake Primary Authority Partnership arrangements.
- To control foodborne infectious diseases through the investigation of notifications.
- To move towards greater commercialisation of the service through the Place & Economic Development Transformation Programme.

1.2 Links to Cheltenham Borough Council's corporate strategy for 2017-18

The Corporate Strategy contains four high level outcomes for 2017-18, to support the overall vision of 'We want Cheltenham to be a place where everyone thrives':

- Cheltenham's environmental quality and heritage is protected, maintained and enhanced
- Sustain and grow Cheltenham's economic and cultural vitality
- People live in strong, safe and healthy communities
- Our council can continue to facilitate the delivery of our outcomes for both Cheltenham and its residents.

The Food Service Plan supports these outcomes by working to achieve: improved food safety and hygienic premises; high rating food businesses in the national food hygiene rating scheme (resulting in increased consumer confidence in local businesses); and the control of foodborne diseases – all of which help promote the local economy, as well as protecting the health of the people who live, visit or work in Cheltenham. Advice is also given that directly improves or protects the environmental quality of the town – examples range from pests and other vectors; to the disposal of FOGs (fat or grease in drains).

The ethos of the service is to support and advise food businesses in the borough so that they can grow and thrive safely. There is a high rate of compliance with food law in Cheltenham which is recognised, and a graduated approach to enforcement is exercised when working with non-compliant businesses.

The Service is also part of the Place and Economic Development Commercial Transformation Programme and will work with the programme's lead officers to explore and implement commercial opportunities such as Primary Authority Partnerships, food hygiene training courses and chargeable advisory services. The Service is also working as part of the County Food Safety Liaison Group with regard to implementing chargeable FHRS revisits.

2. BACKGROUND

2.1 Profile

Cheltenham is an attractive and vibrant town serving an extensive catchment area in central and eastern Gloucestershire and the South Midlands. It is ranked in the top thirty regional shopping centres in the UK, third in the South West and has the eighteenth highest consumer expenditure in Great Britain.

The Borough is based on the town of Cheltenham and is mainly urban with some areas of surrounding countryside. It covers an area of approximately 4,680 hectares and has a population of over 110,000.

Cheltenham has a wealth of restaurants and eating places. It hosts a farmers market offering a valuable opportunity to sample local produce, as well as Continental and Christmas food markets. The town offers a wide range of educational and employment opportunities, a year-round programme of festivals and events, plus a strong cultural and sporting profile.

2.2 Organisational Structure

The food safety service is within the Public and Environmental Health team of the Public Protection Department, which forms part of the Environment Division under Mike Redman. The Environment Division is part of the Managing Director of Place and Economic Development's portfolio. The current structure is shown at the end of this plan.

Specialist services such as public analyst and food examiner are provided externally by Worcester Scientific Services, Worcester and The Public Health England Food, Water & Environmental Laboratory, Sutton Coldfield, respectively.

2.3 Scope of the Food Service

The Council is not a Unitary Authority and therefore shares its duties under the Food Safety Act with the Trading Standards Department of Gloucestershire County Council. Cheltenham Borough Council aims to provide a full range of services within its remit offering a balanced approach between education and enforcement, in accordance with the council's graduated enforcement policy.

The Borough Council food safety service is provided by three appointed and authorised officers in accordance with the requirements of the FSA code of practice. There are two Senior Environmental Health Officers and a Senior Technical Officer. These officers are also responsible for infectious disease control along with other environmental health functions in all food premises within the Borough. The officers are also responsible for food safety advice at events and festivals in the district of Cheltenham, and for monitoring planning and licensing consultations as a means of identifying and engaging with new or developing food businesses.

Also within the scope of the food service are the following functions: sampling (food, water and environmental); primary authority partnerships and the local administration and promotion of the national food hygiene rating scheme.

2.4 Demands on the Food Safety Service

Table 1: The service delivery point

Address	Hours	Contact details
Cheltenham Borough Council Municipal Offices Promenade Cheltenham GL50 9SA	Mon, Tue, Thurs and Fri (09.00-17.00) Wed (09.30- 17.00)	01242 775020 – business support env.health@cheltenham.gov.uk ehbusinesssupport@cheltenham.gov.uk Food safety officers have direct dial phone numbers available to stakeholders and the public.

There is an out of hours emergency service available which addresses the emergency closure of premises, food product withdrawal and outbreaks of food associated disease.

On 31st March 2017 there were 925 food businesses on our database (compared to 1031 at the close of the previous financial year. This 10.3% decrease is mainly due to database cleansing as part of the service catching up with overdue inspections. For example, some smaller category D and E businesses had stopped operating since the date of their last food hygiene intervention.

As is expected for a town like Cheltenham the hospitality and catering sector predominates, the majority being small or medium sized enterprises.

Approved Premises

The council has one premises approved under Regulation (EC) No. 853/2004: Soho Coffee Shops Ltd, approval number UK CT007 EC (meat products). The business is a manufacturer and packer supplying to its own-brand coffee shops.

Specialist or complex processes

The council does not currently have any such processes in its area.

External factors that may impact on service delivery

With such a small team, the programmed food hygiene intervention plan for any given year can be severely disrupted by food poisoning investigations, national food alerts, food sampling and non-food related matters that might require food safety officer resource. It should also be noted that Cheltenham has a vibrant event economy that the council is actively trying to grow, and associated food safety advice adds to demands on the service particularly over the summer. The Service is currently undergoing a prioritisation exercise as part of the Environment Directorate which will a) release capacity by reducing low- or no-priority work and b) inform business cases where more resource is required.

Internal transformation programme

In addition, the council is going through major change as part of its transformation programme and although this will result in a more agile service, it must be recognised that implementation of any new way of working will require resource from the service area.

Detailed project plans are not yet available to indicate levels of resource required. However, project resource can be drawn from the Public & Environmental Health team overall and the wider Directorate if necessary.

2.5 Regulation Policy

Cheltenham Borough Council has adopted and published a corporate enforcement policy which informs all enforcement action undertaken by the Food Safety Service.

The Framework Agreement requires local authorities to take account of the Better Regulation agenda with regard to service delivery and planning. In recent years there have been a number of reviews conducted that have resulted in a change to the nature of regulation. The emphasis being that the regulatory system as a whole should use comprehensive risk assessment to concentrate resources in the areas that need them most. Key principles of the Better Regulation agenda are targeting, proportionality, accountability, consistency and transparency.

In terms of food safety, this means concentrating efforts on those businesses that do not meet the minimum legislative standards, with alternative interventions in those that generally comply.

There is a suite of interventions that focus on outputs and continued improvements in food safety. This allows us to choose the most appropriate and **proportionate** action to be taken to drive up levels of compliance of food establishments with food law whilst being mindful of the regulatory burden on businesses and only intervening where necessary. In addition, we operate an Alternative Enforcement Strategy (compliant with Food Law Code of Practice) which allows us to **target** resource at the highest risk premises through the use of a self-assessment questionnaire for lower risk category businesses. The Service operates a **consistency** framework supported by internal monitoring procedures so that all businesses and individuals receive the same standard of regulation. The Service operates in an open and **transparent** way e.g. through the format of its interventions and associated documentation, reviews of procedures, release of food hygiene intervention reports to consumers upon request, and by taking on board feedback from service users, although it recognises that it could do more in this respect – for example through the establishment of surveys or focus groups. It is anticipated that progress will be made in this area as part of the development of a shared Business Support Team in the Place & Economic Development Group and that service levels are re-assessed and explained to the public and stakeholders as part of the Service's **accountability** measures. The formation, approval and publication of this Plan also helps demonstrate the Service's accountability.

3 SERVICE DELIVERY

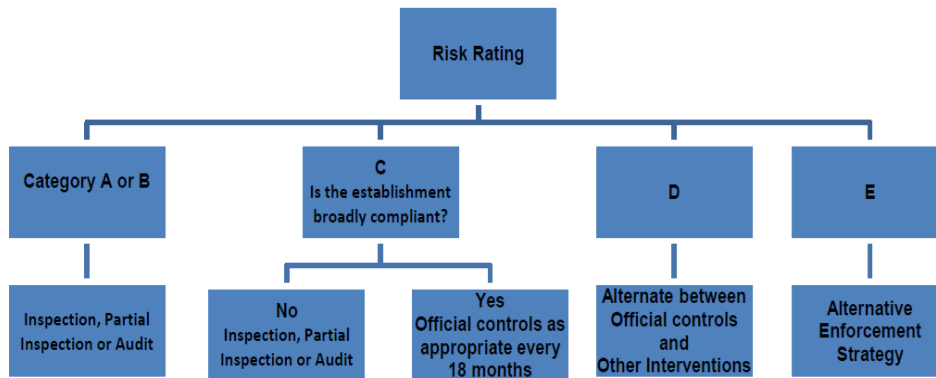
3.1 Interventions at Food Establishments

Intervention Policy

The regulation of food premises is undertaken in accordance with the Food Safety Act 1990 Food Law Code of Practice (FLCoP). All food premises are subject to a detailed assessment based on particular criteria including types of food and method of handling, consumers at risk, level of current compliance in terms of practices, procedures including cleanliness and confidence in management. This numerical calculation is transferred into the categorisation of premises from A to E. Category A premises are inspected a minimum of every 6 months, category B every year, category C every 18 months, category D every two years and category E premises every 3 years.

The Service operates an Intervention Policy which sets out how interventions will be selected and delivered in accordance with the provisions of the Food Law Code of Practice and the FHRS Brand Standard. As a guide the diagram below depicts the Service’s policy with regard the choice of interventions available per risk category.

Figure 1: Intervention policy schematic



The food safety team aim to inspect all non-compliant food businesses within our area within 28 days of the due date. This includes all newly registered premises as they are deemed non-compliant until the first visit and a risk assessment has been undertaken. All non-compliant category A and B premises, i.e. those that fall significantly short of broad compliance will be visited within 28 days of the due date as required by the Food Standards Agency. Other categories of premises that are broadly compliant will be addressed by a combination of official controls and other interventions, such as sampling, alternative enforcement strategies, intelligence/information gathering in accordance with the Food Law Code of Practice.

Further official control visits are made to premises where there are food safety concerns, in particular where the level of current compliance in food safety practices and procedures fall below satisfactory or there is little or no confidence in management. Other visits to food premises may follow a request for advice, complaint or an alleged food poisoning incident. Visits are primarily unannounced with evening/weekend inspections undertaken when required to accommodate the needs of some food businesses, e.g. those that do not open during office hours and markets and festivals held at weekends.

In line with current guidance and the necessity to target ever scarce resource at higher risk activities, we operate an alternative enforcement strategy for category E premises.

Premises profile

The premises profile is given in the table below with figures for the previous financial year in brackets as a comparison:

Table 2: Premises profile as of 31st March 2017

	NO. OF PREMISES
PRIMARY PRODUCERS	0 (0)
MANUFACTURERS + PACKERS	7 (5)
IMPORTERS/EXPORTERS	2 (2)
DISTRIBUTORS/TRANSPORTERS	8 (7)
RETAILERS	162 (178)
RESTAURANTS AND CATERERS	746 (839)
TOTAL	925 (1031)

Number of interventions programmed for 2017-18

The inspections (official controls) due can be broken down into risk categories as follows:

Table 3: Official controls programmed for 2017-18 and revisits estimate

Risk category	Number due for intervention FY 2017 - 2018	Target
Unrated – i.e. new businesses (projected from last year)	145	100%
A	1	100%
B	62	100%
C	144	100%
D	89	100%
E	34	100%
Revisits for compliance (average 30% of official controls p/a)	109	100%
Revisits requested by Food Business Operator under FHRS (based on last FY)	19	100%
Overdue from previous year	0	N/A
TOTAL NUMBER OF INTERVENTIONS	330 Official controls due + 145 new premises visits + 128 revisits = 603 interventions	100%

Estimation of the number of revisits that will be made in 2017-18

According to the Service's statutory return (LAEMS – local authority enforcement monitoring system), last year there were 859 interventions at 575 premises i.e. 284 interventions involved a revisit to a premises. This equates to 33% of overall interventions (a third of interventions undertaken in the previous year were also revisits: 31% revisit rate). In addition, there were 19 revisits requested by Food Business Operators under the FHRS.

For 2017 – 18 it is reasonable to assume a similar level of revisits will be required. 33% of 330 programmed official controls = 109 revisits for compliance + 19 requested revisits = **128 revisits**. It is possible that the demand for requested revisits under FHRS could decrease once the authority begins charging for them or could increase if businesses are attracted by the idea of this service, but as the baseline is small (19) this impact either way should be manageable within existing resource.

Estimation of resources required e.g. staffing

Caveats:

- The data in the Table 4 (Resource Projection) contains estimates. The Service is currently participating in a time recording project using Idox Uniform, which should produce accurate data about the average time per category intervention or service function as well as the total officer hours each year. It is anticipated that nearly a full year's set of data will be available to inform at the next annual review of this plan.
- The figures in the table below are based on the current system where food safety officers are responsible for the majority of administrative tasks associated with the service including: data entry, letter and report writing, filing, minute taking, FHRS administration, database maintenance, freedom of information requests, etc.
- The Service will seize opportunities to address the point above. The Place and Economic Development commercialisation and prioritisation work has a priority outcome relating to work processes being undertaken at the appropriate pay grade in order to release senior officer capacity for fee earning work and minimise the cost of service delivery. This is aligned to an agile working project which should see officers working more flexibly and making more use of technology, and a shared business support team project which aims to redirect some of the initial demand for senior food officers to support officers instead. This would have the effect of reducing the time/cost per service function/row of the table below.
- Projections do not include management or support time.

Table 4: Resource projection for food service delivery 2017-18

Service function	Projected demand or volume	Estimated time per unit (hours)	Total Food Officer resource required p/a (hours)
Category A interventions	1	5	5
Category B interventions	62	5	310
Category C interventions	144	5	720
Category D interventions	89	4	356
Category E interventions	34	2.5	85
Unrated (i.e. new businesses)	145	5	725
Revisits	128	2.5	320
Complaint investigations (based on last year's data)	126	2.5	315
Infectious disease investigations (based on last year's data)	209	1	209
Business advice (exc unrated businesses) e.g. identified through planning & licensing regimes or service requests	159 planning & licensing 21 other SRs = 180	1.5	270
Festivals and event advice	98	3	294
Mandatory competency training	3 officers	30	90
Internal monitoring, database maintenance and FHRS administration	52 weeks	7	364
Primary Authority Partnerships	1 live partnership	36	36
Food service meetings, regional liaison group, consistency meetings etc. NB: 3 officers attend internal meetings and 1 attends the regional meeting	2 x 1.5 hour food team meetings pcm inc 121s (24/yr) 1 x 1.5 hour consistency meeting pcm (12/yr) 1 x 3 hour regional meeting per quarter (4/yr)	9 4.5 3	108 54 12
Sampling projects & interventions including delivery to lab, UKFSS & follow ups	3720 credits p/a = approx. 148 samples. Sampling projects e.g. disinfection: @ 4 samples per premises. 148/4 = 37 premises/interventions	7	259

Service function	Projected demand or volume	Estimated time per unit (hours)	Total Food Officer resource required p/a (hours)
Project resource eg agile working (awaiting resource estimate from project managers)	One FTE for one day pcm	7.4	89
TOTAL OFFICER HOURS REQUIRED p/a			4621
AVAILABLE OFFICER HOURS per annum 37 hrs. p/w x 52 = 1924 p/a <ul style="list-style-type: none"> - 222 hrs annual leave = 1702 - 30hrs CPD = 1672 - 37 hrs other training or sickness = 1635 - 9 Bank/Public Holidays p/a = 67 hrs = 1568 = 1568 available hours per officer p/a	3 FTE	1568	4704
<p>Assessment of resource: Although there is likely to be sufficient officer resource to deliver this Food Safety Service Plan, it will be by a thin margin (83 officer hours approx.) which could realistically be consumed by one complex investigation, prosecution or infectious disease outbreak. Sections 3.5 and 6.2 discuss how food officer capacity could be released.</p>			

Targeted intervention work including projects

None planned for this financial year – any capacity released from food safety team will support internal transformation projects e.g. agile working and commercialisation.

Priorities relating to locally or nationally driven outcomes

Interventions focus on nationally driven outcomes which include compliance with allergen awareness/management (local delivery for Trading Standards); rare burgers, E Coli 0157 control measures, food fraud, ACT (acting on campylobacter together); and FHRS promotions. The team also actively promote the Primary Authority Partnership scheme during their interactions with businesses.

Locally driven outcomes mainly relate to economic development and internal commercial transformation. The team is keeping a watching brief on the Better Business for All initiative locally.

Participating in the national FHRS consistency exercise is a service priority, as is implementing a refreshed sampling policy and procedures to accompany the team's renewed focus on sampling.

Access to appropriate expertise for the competent inspection of specialised processes listed in Section 2.

There are no complex or specialised process such as smokeries, canneries, dairies, cheesemakers etc in the borough. However, should such a business emerge in the coming year, the neighbouring districts would be approached with regard buying expertise until one of the authority's own food safety officers reached the appropriate level of competency.

3.2 Food Complaints

Food complaints are investigated in accordance with the FSA Code of Practice. The number of food complaints investigated by the food safety team in 2016 - 2017 was 20 (11), with a further 106 (59) complaints relating to the hygiene of food premises. The number of complaints received in the previous year is shown in brackets. There has been some recoding of complaint work which has led to the increase reported for hygiene complaints. In real terms the number of complaints has generally increased..

The service's business support team receives and logs all food and hygiene complaints which are then allocated to a duty officer. The complaint investigation policy involves a risk based filter in order to prioritise response according to factors such as public health implications, premises history and compliance.

Performance target: A target has not been set for the resolution of these complaints as that depends upon the most appropriate course of enforcement action for each complaint on a case by case basis. The principle is to instigate investigation or advise the complainant why no action is possible, as soon as possible (so that 'end to end times' can be demonstrably reduced) and at least within three working days. 100% of all complaints received were actioned.

Resource: each complaint can take approximately 2.5 hours to investigate including preparation; site visit and travelling time; communication with primary authority, head office, customers; database entry; production of letters etc. and any resultant follow up required. Based on 2016-17 data, 315 officer hours are required for this function per annum.

3.3 Primary Authority Principle and Home Authority Principle

The Council will consult at an appropriate level with the Primary Authority for any food business, in accordance with the principles laid down in The Food Safety Act 1990 Code of Practice and BIS guidance. It is a Primary Authority for Edwards & Ward and it is anticipated that a maximum of 36 officer hours would be required in the coming financial year to support this.

The Council does not currently act as a Home Authority. The Home Authority Principle is where businesses have outlets in more than one local authority area, and/or supply goods or services beyond the boundaries of one local authority, the council in the district of the head office can act as the focal point for other regulators across the country.

3.4 Advice to Businesses

It is the policy of the Service to provide assistance to local food businesses when requested to help them comply with the legislation and to encourage the use of best practice. This is achieved through a range of activities including:

- Advice given during inspections and other visits to premises
- Provision of advisory leaflets
- Responding to service requests and enquiries
- Attendance at Event Consultative Groups to advise on food safety at public and community events.
- Advice given in response to planning and licensing applications.

Whilst the resources of the Food Safety Service will always be used in proportion to the risk to public health, every effort will be made to accommodate requests for advisory visits to food premises. The wider service is exploring charging for advice as part of the commercialisation programme and the food service is specifically working on bringing in charging for FHRS revisits. It is likely that chargeable business advice and event advice packages will be designed and proposed to Members as part of this work, and to enhance the business advice offering.

Resource:

Enhanced coding is needed in order for the service to truly capture its interactions with businesses but based on the information available, the service worked with 142 new food businesses in 2016 – 17 (resource projection included in estimate required for official controls) and engaged with other businesses through approximately 159 planning and licensing applications, and also received 21 direct requests for advice (this service is not currently marketed or promoted). It is estimated that each interaction takes approximately 1.5 hours, therefore the projected annual resource is 270 officer hours to 'stand still'.

3.5 Food Sampling

The food service did not fully participate in Public Health England coordinated cross-regional food sampling programmes or national studies in 2016-17 (2 samples were taken) as the priority was to catch up on overdue interventions and to implement the recommendations of the FSA audit action plan.

Policy

The Authority's sampling policy states the following reasons for sampling:

- Investigation of food contamination, food poisoning and complaints
- Imported food responsibilities.
- Primary Authority/Originating Authority responsibilities
- Food sampling defined by statute e.g. shellfish
- Use of sampling as part of an Official Control
- Participation in EU co-ordinated control programmes
- Participation in nationally co-ordinated sampling programmes
- Participation in regional sampling programmes
- Sampling related to local products/events/initiatives relevant to Cheltenham Borough Council
- Continued use of the UK Food Surveillance System (UKFSS)
- Surveillance/Intelligence sampling to identify foods that could pose a hazard
- Sampling on request of a food business e.g. new product and/or process
- Informal sampling to assist with giving advice to businesses
- Resampling from previously unsatisfactory results

Analysis/examination of Samples

All samples for analysis, taken under section 29 of the Food Safety Act 1990 in accordance with the Food Safety (Sampling and Qualifications) Regulations 2013 and with the requirements of this Code, will be submitted to the appointed Public Analyst at a laboratory accredited for the purposes of analysis, and which appears on the list of official food control laboratories. Cheltenham currently has an agreement with Worcester Scientific Services, Worcester.

All samples for examination, taken in accordance with regulation 14 of the Food Safety and Hygiene (England) Regulations 2013 and the requirements of this Code, will be submitted to the Food Examiner at a laboratory accredited for the purposes of examination, and which appears on the list of official food control laboratories. Cheltenham BC currently has an agreement with Food, Water and Environmental Microbiology laboratory Porton, Wiltshire.

Other samples

Other samples such as Hygiene check swabs will be used within food premises to check on the efficiency of cleaning and disinfection. These fall outside the sampling programme and the number and type will be determined according to local needs.

2017 – 18 Sampling Surveys

The sampling projects identified so far in 2017 – 18 are:

Table 5: National and Cross-Regional Sampling Surveys 2017-18

Year	2017-18											
National Surveys *												
Months of sampling:	A	M	J	J	A	S	O	N	D	J	F	M
Study 60 paan leaves etc												
Cross Regional Surveys												
Disinfectant bottles												
Plant based nutritional supplements												
Other study to be advised												
Other study to be advised												

Resource:

The Authority is given around 3720 sampling credits free of charge each year. This equates to approximately 148 samples. Sometimes it may benefit a complaint investigation if samples are taken but generally the majority of credits are put towards national and cross-regional sampling surveys. The Service intends to maximise opportunities presented by sampling credits, in accordance with its Sampling Policy and to use its credit allowance in the financial year. It is likely that multiple samples (average of four) will be taken from each premises selected for the surveys to provide more meaningful results and to be resource-effective.

3720 credits = approx. 148 samples

148 samples/4 samples per premises = 37 premises surveyed/sampling official controls/complaint investigation samples

Estimated 7 hours officer time for each premises interaction including data entry, site visit and sampling; travel to lab, paperwork and follow up visit and/or paperwork.

37 premises x 7 hours = 259 officer hours required per annum.

Resource assessment and mitigation

The Service should have sufficient resource to deliver its responsibilities under the Framework Agreement within current processes, although this situation could change in the event of a food incident or complex investigation. In the past this has meant that sampling is under resourced. The service aims to release food safety officer capacity by:

- Automating some of the event, planning, licensing and complaint advice (totaling @ 879 hours annually at present) which in itself might release the 259 hours required for sampling
- Moving some of the less specialist environmental health work to a new shared support team (the current prioritisation exercise will inform this)
- Submitting a business case to the Place & Economic Development budget for a Regulatory Support Officer who could undertake some of the sampling (although it is recognised this post would ideally need to be self-financing to align with the commercial element of new posts).

3.6 Control & Investigation of Outbreaks & Food Related Infectious Disease

The measures to be taken to control the spread of infectious diseases are contained in various acts of Parliament and their associated Regulations. This legislation places a duty on local authorities to control the spread of food poisoning and food and water borne diseases.

Annual notifications vary from year to year with a noticeable increase in Norovirus outbreaks in recent years. These outbreaks are often associated with closed settings which have a more vulnerable group of clients, for example care homes. Intervention in these outbreaks takes up a significant amount of officer time.

The policy in respect of this service is to:

- To administer and implement our statutory responsibilities relating to the control of infectious disease.
- Investigate all notifications of food poisoning cases and likely sources of infection whether confirmed or not at the earliest opportunity.
- Where a source is identified take appropriate action to ensure risk of spreading is controlled.
- Protect the well-being of individuals at risk by taking action to contain the spread of infection and provide advice and information regarding personal hygiene, food handling and control of infection.
- Exclude food handlers and people working with high-risk groups from work in consultation with the Consultant for Communicable Disease Control (CCDC).
- A Countywide “Outbreak Control Plan” is operated including standardised food poisoning investigation questionnaires.

Performance target: to action 100% of infectious disease notifications within two working days unless the potential risk to public health requires a same day response (e.g. *E Coli 0157*)

Table 6: Number of Infectious Disease Notifications by year

Financial year	Number of Infectious Disease Notifications	Performance (actioned within two working days)
2016-17	209	100%
2015-16	183	100%
2014-15	196	100%

Resource projection: 209 cases x 1 hour average per investigation = 209 hours per annum

3.7 Food Safety Incidents

The Food Standards Agency operates a system to alert the public and food authorities to serious problems concerning food that does not meet food safety requirements.

Food alerts vary in significance and require an appropriate response. Some are of high priority and require immediate action. This may involve contacting and/or visiting food premises and taking immediate action under powers contained in Food Legislation. Others are for information only.

All alerts are received directly from the Food Standards Agency via a secure dedicated computer network system. The Public & Environmental Health Team Leader will instigate the necessary response and provide the necessary out of hours cover for this service. Approximately 100 FSA messages are received annually for circulation to food safety officers.

Where the Council becomes aware of a serious localised incident or a wider food safety problem, it will notify the Food Standards Agency in accordance with the Code of Practice.

The responsive element of work associated with individual alerts can vary significantly but the majority are alerts for information rather action. Alerts for action are assigned to the Duty Officer as part of their reactive caseload alongside complaint and infectious disease investigations. An average of four alerts for action about a food business or food product in Cheltenham's district is received each year and does not usually require more than one officer's input for more than 2 hours, depending on the nature and scale of the incident.

3.8 Liaison with Other Organisations

The Council is committed to ensuring that the enforcement approach it adopts is consistent with other enforcing authorities. This takes place through regular meetings and attendance by the manager at the Gloucestershire Food Safety Group. This group comprises of peer representatives of each of the District and Borough Councils in the County, Publica (shared regulatory services); the County Council Trading Standards Service, the Food Standards Agency's Regional Representative and, PHE Laboratory Service.

The forum provides a mechanism for discussion of relevant food matters, the provision of training on a county-wide basis, the formulation of policy, documentation and guidance and co-ordinated responses to Government and Central Agencies.

The service will also take part in a proposed public health group monitoring local trends in infectious diseases and was part of a recent county-wide outbreak training day called Operation Brimstone.

Resource

1 x 3 hour regional meeting per quarter (1 FTE attendance) = 12 hours p/a

Internal meetings:

1x 1.5 hour inter-officer consistency meeting pcm (3 FTE attendance) = 54 hours p/a

2 x 1.5 hour food team meetings pcm (3 FTE attendance) = 108 hours p/a

3.9 Food Safety promotional work and other non-official control interventions

The service is not planning any proactive promotional work or non-official control interventions in 2017-18 because of its commitment to the internal transformation programme. However, if any campaigns (eg FHRS) are suggested by the FSA, the service will participate if sufficient resource is available at the time.

The service will continue to utilise the council's Communications team with regard food safety or FSA press campaigns eg Food Safety Week.

4 RESOURCES

4.1 Financial Allocation

The Food Safety Service budget for 2017 - 18 is £200,200 which is an increase from £171,200 in the previous year because of central time allocation. This budget includes staffing, travel, subsistence, I.T. development, legal action and office overheads necessary as part of the food safety enforcement function. Recharges for I.T. support, Human Resources, accountancy, audit, insurances, communications, and asset management are also included.

There is not a separate sampling budget.

The Council always seeks to recover costs following successful legal proceedings wherever possible, and is re-prioritising its functions to release capacity for income generating work.

4.2 Staffing Allocation

There are two full time Senior Environmental Health Officers and one full time Senior Technical Officer in the food safety team who are widely experienced in food safety. All officers have completed a competency framework assessed by the Lead Officer and are Authorised Officers according to their competency and experience as required by the Competency Framework. The 3 FTEs are dedicated to the delivery of the food safety service.

The food safety service shares a 0.6 FTE Business Support Team Officer as the point of customer contact and for registering commercial premises etc, and is about to engage in a shared support team project. The BST officer does not have a role according to the Code of Practice but the service will explore the possibility of developing this role into a Regulatory Support Officer if funding for training etc becomes available

The food safety service is headed by Yvonne Hope (Head of Service) who is currently seconded to Tewkesbury Borough Council and managed by Sarah Clark (Team Leader) who is also joint Acting Head of Service in the interim.

No contractors are currently engaged by the service.

It is projected that there are sufficient officer hours available to deliver this Service Plan although it should be noted that the 'buffer' of approximately 83 officer hours could be taken with just one complex investigation, legal case or infectious disease outbreak. Mitigation is discussed in sections 3.5 and 6.2.

4.3 Staff Development Plan

The Council has an annual review system of staff, this process includes training needs. The food safety team holds regular meetings to review and distribute workloads in addition to monthly 1-2-1 meetings for all the team. Any training needs required for new legislation, guidance etc. are discussed and actioned at these meetings.

Food safety regulators are required to achieve a minimum of 20 hours of continued professional development every year to include 10 hours specifically on food topics. The service encourages cascade training as a mechanism to disseminate new guidance and further staff development.

The council's policy is to use a corporate system to record training and CPD. The current system is in the process of being replaced.

5 QUALITY ASSESSMENT

5.1 Quality assessment and internal monitoring

All officers use standard inspection/audit forms and have undergone consistency training.

The Uni-Form database (which also forms the Public Register of food premises) is audited on a fortnightly basis for data accuracy before upload to the Food Hygiene Rating Scheme portal.

Data checking is also undertaken when quarterly inspection lists are produced.

Officers have a monthly consistency check with each other; internal monitoring checks are carried out in 121s; and accompanied visits occur quarterly. Feedback is given in team meetings. Liaison group training is arranged where possible and the authority participates in inter-authority audits when they are planned.

6 REVIEW

6.1 Review against the Service Plan

6.1 1 Progress

Last year's progress in food safety includes:

- Successfully completed all due and overdue food hygiene interventions by time of annual service plan review (31 were outstanding at year end)
- In-depth investigation into an allergen case, which will result in prosecution
- Participation in county wide epidemiological training 'Operation Brimstone'
- continuing a high standard of broadly compliant businesses included in the food hygiene rating scheme
- Determined a Food Hygiene Rating Scheme appeal on behalf of Tewkesbury Borough Council

- Implemented a complaints filter to target resource where it is most needed
- Assessment of all unrated 'new' food businesses
- Prioritisation of visits to non-compliant food businesses and use of alternative enforcement strategy
- 837 written warnings of non-compliance with food hygiene legislation (compared to 311 the previous year)
- Official controls carried out in 532 premises
- Received and actioned 183 infectious disease notifications
- Continued to implement FHRS FSA audit action plan
- Participation in internal food safety audit
- Investigated 126 complaints
- Undertook 209 infectious disease investigations

6.1.2 Performance monitoring

a) Statutory Performance Monitoring

Each local authority must submit a statutory return to the FSA on their official food controls each year through the Local Authority Enforcement Monitoring System. Monitoring tables can be viewed on the FSA website: <http://www.food.gov.uk/enforcement/monitoring/laems/mondatabyyear> although it can take some time for the latest data to be published.

b) 'Broadly Compliant' premises and the National Food Hygiene Rating Scheme

Cheltenham Borough Council participates in the national Food Hygiene Rating Scheme, which is a public interface to food hygiene standards in premises that sell food direct to the final consumer. Each food business in the scheme is given a food hygiene rating ranging between 0 (urgent improvement necessary) and 5 (very good) after it has been inspected, and the level of compliance with food safety and hygiene legislation is reflected in the rating - a rating of 3 and above indicates the premises is broadly compliant, for those businesses not excluded or exempt from having a rating. The website can be viewed at www.ratings.food.gov.uk

The measure of how many food premises in the district are 'broadly compliant' with food safety legislation has been kept as local management performance indicator since it was discontinued as a national one.

2008/2009 was a baseline year with less than 70% of our food premises being broadly compliant. As at 31st March 2017, 97% of rated food premises in Cheltenham were broadly compliant (n=882/911). This met the target of 97% for premises in broad compliance and was a 1% increase on last year.

In 2015-16, the figure was 96% (n=990/1031) and in 2014-15 it was 94%.

All unrated new businesses are automatically non-compliant at first, so are excluded from this calculation. A full breakdown by risk category is provided below. Officers have scheduled revisits according to the intervention policy and are only able to change the risk rating to reflect compliance if a full or partial re-inspection, or audit is completed with the business rather than a visit to verify non-compliances have been rectified.

Table 7: Percentage of food businesses which are broadly compliant with food safety legislation

Profile of premises in broad compliance with food law	Broadly compliant	Total no. of premises	% broadly compliant
Premise Rating - A	0	1	0%
Premise Rating - B	56	69	81.2%
Premise Rating - C	274	284	96.5%
Premise Rating - D	308	313	98.4%
Premise Rating - E	244	244	100%
Totals	882	911	96.8%

For 2017-18, the target is to end the year with 97% of rated premises broadly compliant with food safety legislation.

c) Grow the number of food businesses with a rating of 3 or more

At year end there were 846 Cheltenham food premises with a rating of 3 or higher out of 945 food premises on the national Food Hygiene Rating Scheme website. This equates to 90% with a rating of 3 (generally satisfactory) or higher. This indicator is reported to Divisional Management Team on a quarterly basis and is also reported in the corporate plan.

At the end of 2015-16, this figure was 92% (n=875/953) and for 2014-15 it was 93% (n=975/953)

A **target number of interventions** is not set on an annual basis as the number of premises opening and closing or changing food liability throughout the year means such a target would not be meaningful. However, it is necessary to assess the percentage of planned interventions delivered per risk rating category in order to inform resource allocation and ensure the authority complies with its duties in accordance with the FLCoP.

6.1.3 Review against Service Plan

The following table gives the targets and results for 2016-17 for inspections due per risk category – **snapshot as of 31.03.2017** (all due interventions have since been completed)

Table 8: Food hygiene interventions achieved 1st April 2016 – 31st March 2017

Risk Category	Interventions due	Interventions achieved	Target set
A	7	7 = 100%	100%
B	103	103 = 100%	100%
C	283	263 = 92.9%	100%
D	189	187 = 98.9%	100%
E	167	158 = 94.6%	100%
Unrated ie 'new'	142	142 = 100%	100%
TOTAL	891	860 = 96.5%	100%

The overall intervention rate of 96.5% against the authority's self-set target of 100% is a significant achievement considering the starting position at the beginning of the financial year and outside contractual issues with the completion of some work programmes. The in-house food safety officers have since completed the remaining due and overdue inspections.

The target for 2017-18 is to complete 100% of all interventions due.

6.2 Identification of any variation from the Service Plan

The Service did not significantly vary from the Plan. It contracted services to undertake overdue inspections although there were in-year difficulties with contracts not being completed in some cases. The shortfall (eg revisits) were picked up by the in-house team in addition to their usual caseload.

In 2017-18, there could be variance from the service plan if a resource gap occurs due to a food-related incident (for example an infectious disease outbreak or an in-depth investigation). For example, the service used 40 officer hours on one relatively straight forward investigation in 2016-17 involving one victim and a small number of witnesses. To reiterate: There is a small margin of available resource if the service is to deliver its responsibilities under the Framework Agreement within current processes. The service aims to mitigate this by:

- Automating some of the event, planning, licensing and complaint advice (totaling @ 879 hours annually at present) which in itself might release the 259 hours required for sampling
- Moving some of the less specialist environmental health work to a new shared support team (the current prioritisation exercise will inform this)
- Submitting a business case to the Place & Economic Development budget for a Regulatory Support Officer who could undertake some of the sampling (although it is recognised this post would ideally need to be self-financing to align with the commercial element of new posts).

6.3 Areas of improvement

Although the review of the service plan does not indicate any immediate areas for improvement, it does support the development of the service in terms of resource and commercialisation. For example, some of the technical data entry and customer focused tasks could be a development opportunity for support officers (or for a new Regulatory Support Officer). This would release food safety officer capacity to better deliver its food safety statutory functions eg inspections; support business economic development; undertake sampling and/or explore commercial opportunities including the provision of training courses.

Comments on service development in general are provided throughout this Plan.

