



CHELTENHAM
BOROUGH COUNCIL

**FOOD SAFETY
SERVICE PLAN
2018-2019**

DRAFT

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 a sustainable service that protects 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 provide food safety by way of advice and assistance to food businesses, citizens and visitors of the Borough in a commercially sustainable way (eg through the Better Business for All partnership)

- 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 & Growth Transformation Programme.

1.2 Links to Cheltenham Borough Council's Interim Corporate Strategy for 2018-19 and Place Strategy

The place strategy sets out three ambitions for Cheltenham, supported by nine aspirations which form the framework for the 2018-19 corporate strategy (together with a fourth internal transformation ambition).

The Food Service Plan supports the third and fourth ambitions 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).

Ambition 3: Cheltenham is internationally renowned for its culture, heritage, food and sport.

Ambition 4: Cheltenham Borough Council contributes to a thriving Cheltenham and delivers excellent services to its customers

The Food Safety Service is also a key player in delivering the **Place Strategy** as the following examples from the interim corporate strategy demonstrate:

Place Aspiration: Businesses and their workforce thrive

Environmental Health 'Business as usual' contribution:

- Open for business approach with an emphasis on joining up regulatory services and delivering coordinated advice and support;
- 'Better Business for All' Gloucestershire and sustainable service delivery;
- Food safety interventions;
- Food hygiene rating scheme.

Place Aspiration: People and communities thrive

Environmental Health 'Business as usual' contribution:

- Food safety;
- Infectious disease investigations.

Place Aspiration: Cheltenham Borough Council contributes to a thriving Cheltenham and delivers excellent services to its customer

Environmental health contributes to the following priority action:

- Develop the Better Business for All (BBfA) partnership which provides a holistic link between local businesses and the support and regulatory functions of the council and explore and implement sustainable service delivery options (eg consultancy).

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 Growth Transformation Programme and is working with the programme's lead officers to explore and implement commercial opportunities. The Service is also working as part of Gloucestershire Better Business for All and now offers a range of commercial services such as food hygiene rating reassessments; advice and consultancy; and coaching on how to achieve and keep the highest rating. Officers have recently undertaken a training qualification with a view to hosting food hygiene courses.

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 headed by Yvonne Hope, which forms part of the Environment Division under Mike Redman. The Environment Division is part of the Managing Director of Place and Growth's portfolio. The current establishment 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, Porton Down, 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. The team will begin to offer chargeable services and products this financial year.

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 mobile 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 2018 there were 905 food businesses registered on the database, compared to 925 at the close of the previous financial year.

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 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. In addition, the team will also be delivering commercial services such as advice and consultancy in this financial year although the rate of initial take-up is anticipated to be slow. Food safety officers are also members of the council's emergency management team which may require their resource during times of civil emergency, potentially for a prolonged period. The food safety team is part of Gloucestershire Food Safety Group which is currently formalising a 'mutual aid' protocol to mitigate the capacity risks associated with emergency incidents.

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 the shared Business Support Team in the Place & Growth 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.

The service intends to prioritise official controls due over commercial requests for service if there is insufficient capacity at times to deliver both.

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 2018

	NO. OF PREMISES
PRIMARY PRODUCERS	0 (0)
MANUFACTURERS + PACKERS	5 (7)
IMPORTERS/EXPORTERS	3 (2)
DISTRIBUTORS/TRANSPORTERS	7 (8)
RETAILERS	168 (162)
RESTAURANTS AND CATERERS	722 (746)
TOTAL	905 (925)

Number of interventions programmed for 2018-19

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

Table 3: Official controls programmed for 2018-19 and revisits estimate

Risk category	Number due for intervention FY 2018 – 2019	Target
Unrated – i.e. new businesses (projected from last year)	101	100%
A	0	100%
B	42	100%
C	204	100%
D	204	100%
E	26	100%
Revisits for compliance (average 30% of official controls p/a)	142	100%
Revisits requested by Food Business Operator under FHRs (based on last FY)	18	100%
Overdue from previous year	0	N/A
TOTAL NUMBER OF INTERVENTIONS	476 Official controls due + 101 new premises visits + 160 revisits = 737 interventions	100%

Estimation of the number of revisits that will be made in 2018-19

According to the Service's statutory return (LAEMS – local authority enforcement monitoring system), last year there were 637 interventions at 447 premises i.e. 190 interventions involved a revisit to a premises. This equates to 30% of overall interventions (a third of interventions undertaken in the previous year were also revisits: 33% revisit rate). In addition, there were 18 revisits requested by Food Business Operators under the FHRS.

For 2018 – 19 it is reasonable to assume a similar level of revisits will be required. 33% of 476 programmed official controls = 142 revisits for compliance + 18 requested revisits = **160 revisits**. It is possible that the demand for requested revisits under FHRS could decrease now that the authority charges for them or could increase if businesses are attracted by the idea of this service, but as the baseline is small (18 in 2017-8 and 19 in 2016-17) 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 time records using Idox Uniform, which should enable the analysis accurate data about the average time per category intervention when management reports are developed. Service request data is also being developed.
- 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. However the Place & Growth 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. The service now shares a business support team and intends 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 2018-19

Service function	Projected demand or volume	Estimated time per unit (hours)	Total Food Officer resource required p/a (hours)
Category A interventions	0	5	0
Category B interventions	42	5	210
Category C interventions	204	5	1020
Category D interventions	204	4	816
Category E interventions	26	2.5	65
Unrated (i.e. new businesses)	101	5	505
Revisits	160	2.5	400
Complaint investigations (based on last year's data)	130	2.5	325
Infectious disease investigations (based on last year's data)	178	1	178
Business advice (exc unrated businesses) e.g. identified through planning & licensing regimes or service requests	17 planning & licensing (inc street trading and objects on the highway) were logged for compared to 159 previous year – projection of 60 for 2018-19	45 mins	60
Festivals and event advice	12 were logged for food officer comments compared to 98 previous year – projection of 50 for 2018-19	2	100
Mandatory competency training	3 officers	30	90
Internal monitoring, Lead Officer duties, Food Safety Week and other promotions, database maintenance and FHRS administration	52 weeks	7	364
FSA digital registration project	One officer	10	10

Service function	Projected demand or volume	Estimated time per unit (hours)	Total Food Officer resource required p/a (hours)
Food service meetings, regional liaison group, consistency meetings etc. NB: 3 officers attend internal meetings & the team leader attends the regional meeting	2 x 1.5 hour food team meetings pcm inc 121s (24/yr)	9	108
	1 x 1.5 hour consistency meeting pcm (12/yr)	4.5	54
Sampling projects & interventions including delivery to lab, UKFSS & follow ups	3720 credits p/a = approx. 148 samples. Sampling projects e.g. ice: @ 4 samples per premises. 148/4 = 37 premises/interventions	7	259
TOTAL OFFICER HOURS REQUIRED p/a			4564
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: According to the resource projection, there is sufficient officer resource to deliver this Food Safety Service Plan, with a margin of 140 officer hours approx which will be used for income generation and service improvements.</p>			

Service function	Projected demand or volume	Estimated time per unit (hours)	Total Food Officer resource required p/a (hours)
<p>However, it must be noted that this capacity could be consumed by complex investigations, prosecutions, an infectious disease outbreak, civil emergency or staff absence.</p> <p>A key outcome of both the agile working project and Place & Growth transformation is that work is undertaken by the appropriate paygrade. The food safety service will be delivered according to this principle, supported by centralised shared resource such as Business Support.</p>			

Targeted intervention work including projects

No targeted intervention project work planned for this financial year – any capacity released from food safety team will support income generation. However, food officers will continue to request gas safety certificates during food inspections to refer to Health & Safety colleagues and will always report Matters of Evident Concern.

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 updated guidance; focus on listeria in care homes; allergens, food fraud, acrylamide regulations awareness; and FHRS promotions. The team also actively promote the Primary Authority Partnership scheme during their interactions with businesses.

Cheltenham is one of eight local authorities chosen by the Food Standards Agency for their digital registration of food businesses pilot this year, as part of the Regulating Our Future reform programme.

Locally driven outcomes mainly relate to economic development and internal commercial transformation. The team now offers commercial services as part of Gloucestershire Better Business for All and is Secretary for the Gloucestershire Food Safety Liaison Group.

Participating in the national FHRS consistency exercise and local consistency events is a service priority.

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 2017 - 2018 was 32 (20), with a further 98 (106) complaints relating to the hygiene of food premises. The number of complaints received in the previous year is shown in brackets. The numbers of complaints are fairly stable from one year to the next.

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 up to 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 2017-18 data, 325 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.

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

The food safety service provides 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
- Chargeable advice and consultancy; FHRS revisits
- 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.
- Better Business for All Partnership eg Growth Hub referrals

The service also intends to offer food related training courses and events, and its two Senior Environmental Health Officers are currently studying for a teaching and training qualification. A business case is being developed with the licensing service with regard offering accredited Training Centre services.

Resource:

Enhanced coding is needed in order for the service to truly capture its interactions with businesses.

In 2016-17 the service engaged with 159 food businesses through planning and licensing applications and 98 through the events process. However last year in 2017-18 this number dropped considerably whilst the agile working move and shared support team were implemented (17 planning and licensing consultations and 12 events were logged for food officer comment). It is the service's intention to resume this activity with the business support team handling standardised responses, which would release senior office capacity for specialist work.

It is estimated that each planning and licensing consultation interaction takes approximately 45 mins and each event takes up to 2 hours. It is estimated that food officers will be involved in 62 planning and licensing consultations in 2018-19 and 50 event (although this resource should tail off during the year as more non-specialist work is moved to Business Support). Therefore, the projected resource is 160 officer hours.

3.5 Food Sampling

The food service participated in the Public Health England coordinated national Study 62 in 2017-18 relating to Ready to Eat chilled Eastern European food. Eleven microbiological samples were taken at six premises and all but two results were satisfactory. The two unsatisfactory results were followed up by food safety officers to ensure the business received the appropriate advice to address them.

Sampling 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 could 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.

2018 – 19 Sampling Surveys

The sampling projects identified so far in 2018-19 are shown below. The team has begun participating in National Study 64 and the Cross Regional Ice Machine study already.

Table 5: National and Cross-Regional Sampling Surveys 2018-19

Year	2018-2019											
National Surveys *												
Months of sampling:	A	M	J	J	A	S	O	N	D	J	F	M
Study 64 RTE Pastry products												
To be advised												
To be advised												
Cross Regional Surveys												
Ice Machines												
To be advised												
To be advised												
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 sampling 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 which in itself will release specialist officer capacity
- Moving some of the less specialist environmental health work to the shared business support team
- Potentially 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. The service has participated in Operation Brimstone and Summer Rose public and environmental health emergency planning exercises regionally.

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)
2017-18	178	100%
2016-17	209	100%
2015-16	183	100%
2014-15	196	100%

Resource projection: 178 cases x 1 hour average per investigation = 178 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 which used to be manually distributed to food safety officers by the team leader, but this is now co-ordinated through an information platform 'Smarter Comms'.

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 also take parts in any local public health groups convened to monitor local trends in infectious diseases.

Resource

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 2018-19 because of its commitment to the internal transformation programme. However, the service will maximise any opportunities to promote food safety that arise in the coming year eg through Marketing Cheltenham.

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

4 RESOURCES

4.1 Financial Allocation

The Food Safety Service budget for 2018 - 19 is £200,200 which is the same as the previous financial year. 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 the service is reviewing 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 has contributed its 0.6 FTE Business Support Team Officer to a shared business support team as part of the agile working project. The service has been assured of greater resilience and cross-training in this shared team who act as a specific point of customer contact and register commercial premises etc. The BST officers do not have a role according to the Code of Practice but the service will explore the possibility of developing a Regulatory Support Officer if funding for training etc becomes available.

The food safety service is managed by Sarah Clark (Team Leader). Yvonne Hope is the Head of Service for the Public Protection Department which contains food safety amongst other functions.

No contractors are currently engaged by the service.

It is projected that there are sufficient officer hours available to deliver this Service Plan.

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 interventions by time of annual service plan review
- Delivered the first commercial undertaking with a neighbouring authority
- Joint work with Trading Standards on allergen cases
- Continuing a high standard of broadly compliant businesses included in the food hygiene rating scheme
- Assessment of all unrated 'new' food businesses
- Prioritisation of visits to non-compliant food businesses and use of alternative enforcement strategy
- Participated in agile working project and are now agile workers (utilising laptops, iPhones and remote working)
- Contributed to Public Health England National Sampling Study 62
- 434 written warnings of non-compliance with food hygiene legislation (compared to 837 the previous year which we now believe to be a mapping error)
- 1 Improvement Notice served
- 637 Official Controls carried out in 447 premises
- Gas Safe certificates requested at every LA enforced food business visited to support priority H&S interventions
- Investigated 130 complaints
- Undertook 178 infectious disease investigations
- Tested the new FSA Smarter Comms Platform as part of a pilot group
- Active member of Gloucestershire Better Business for All
- Secretary of Gloucestershire Food Safety Liaison Group

These achievements are particularly commendable as the team were 0.5 FTE short across the financial year due to officer sickness absence.

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 2018, 97% of rated food businesses in Cheltenham were broadly compliant (n=882/905).

This met the target of 97% for premises in broad compliance.

Previous years' figures for comparison:

2016-17: 97% (n=882/911)
2015-16: 96% (n=990/1031)
2014-15: 94%

All unrated new businesses are automatically non-compliant at first, and are included in 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	0	-
Premise Rating - B	44	46	95.7%
Premise Rating - C	260	263	98.9%
Premise Rating - D	347	350	99.14%
Premise Rating - E	231	231	100%
Totals	882	905	97.46%

For 2018-19, 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

There are currently 847 Cheltenham food businesses with a rating of 3 or higher out of 876 on the national Food Hygiene Rating Scheme website. This equates to 97% with a rating of 3 (generally satisfactory) or higher, which is a 7% increase on last year. This indicator is reported to Divisional Management on a quarterly basis.

In 2016-17, this figure was 90% (n=846/945)

In 2015-16, it 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 2017-18 for inspections due per risk category – **snapshot as of 31.03.2018** (all due interventions have since been completed)

Table 8: Food hygiene interventions achieved 1st April 2017 – 31st March 2018

Risk Category	Interventions due	Interventions achieved	Target set
A	9	9 = 100%	100%
B	104	104 = 100%	100%
C	254	253 = 99.6%	100%
D	126	126 = 100%	100%
E	93	44 = 47%	100%
Unrated ie 'new'	101	101 = 100%	100%
TOTAL	687	637 = 92.7%	100%

It must be noted that the statutory return (LAEMS) reported 49 Category Es and 1 Category C inspection unachieved which conflicts with the council's own records at year end. We believe this is due to a recording error so have asked the FSA for overdue premises information. According to CBC data, 100% of due interventions were completed.

The overall intervention rate of 92.7% (according to the statutory data report) against the authority's self-set target of 100% is a significant achievement considering that one of the two Senior food safety officers was on sick leave for six months of the financial year.

The target for 2018-19 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. The Senior food safety sickness absence was anticipated and the service planned accordingly.

In 2018-19, 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). 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 as described in section 3.5 and reproduced here:

- Automating some of the event, planning, licensing and complaint advice which in itself will release specialist officer capacity
- Moving some of the less specialist environmental health work to the shared business support team
- Potentially 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

The review of the service plan clearly supports the development of the service in terms of resource and commercialisation. For example, some of the technical data entry and customer focused tasks should now be moved to business support or technical function. 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.

