



CHEL TENHAM
BOROUGH COUNCIL

FOOD SAFETY SERVICE PLAN 2024-2025

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1: Introduction:

The key food safety function of Cheltenham Borough Council is to ensure that the food sold, offered or stored for sale is safe and fit for human consumption. Everyone has a right to expect that the food they eat will not cause adverse health effects.

Our food safety service aims align with our corporate strategy, namely:

- To work together with our partners to ensure businesses thrive.
- To be commercially minded, ensure financial viability and value for money.
- To use data and research to drive improvement.

1.1 Service Aims and objectives:

Service plans ensure that national priorities and standards are addressed and delivered locally. Service plans will also help this Authority to:

- Follow the principles of good regulation.
- Focus on key delivery issues and outcomes.
- Provide an essential link with corporate and financial planning.
- Set objectives for the future.
- Identify major issues that cross service boundaries.
- Provide a means of managing performance and making performance comparisons.
- Provide information on our service delivery to stakeholders.

The Food Standards Agency's (FSA) Covid recovery plan allowed some flexibility in service plan format but since the withdrawal of the plan in April 2023 we have adopted the common format provided with the FSA's [Framework Agreement](#) 'on official food and feed controls by Local Authorities' Amendment number 5 2010 and requirements with section 2.6.1 of the FSA Food Law Practice Guidance, in terms of the information provided.

Following withdrawal of the recovery plan, letters were sent to all Local Authority Chief Executives and section 151 officers in January 2024 to highlight the importance of ensuring that teams are appropriately resourced to deliver the statutory functions as outlined in this plan.

We will meet our aims by:

- Ensuring food businesses have effective food safety controls in place and that our responsibilities as a food Competent Authority (CA) are fulfilled and compliant with agri-food chain legislation.
- Investigating and managing complaints of noncompliance with appropriate enforcement actions.
- Managing food incidents and hazards including outbreaks of food borne illness.
- Conducting reactive and proactive samplings or where sampling is necessary to determine business compliance with legal requirements.

- Conducting pro-active surveillance to obtain an accurate picture of the local business landscape to include new or recently closed businesses and businesses where the overall risk has increased.
- Maintaining the credibility of the Food Hygiene Rating Scheme (FHRS), in particular responding to requests for revisits in line with our documented process.
- Conducting sector specific controls to support trade and enable export.
- Ensuring all officers delivering official controls meet and maintain the competency requirements within the Food Law Code of Practice (FLCOP).

We aim to maintain a level playing field for honest and diligent businesses, whilst reducing the burden on businesses with an intelligence led approach. Service capacity is prioritised at the high-risk food activities and the poorest performing food businesses, with the aim of improving standards across Cheltenham whilst supporting business growth.

1.2 Legal Background:

The Official Control (assimilated) EU Regulations 2017/625 came into force in December 2019. They provide for the execution and enforcement of the food elements on official controls and other official activities which must be performed to ensure the application of food law. They set out a framework of requirements for competent food authorities which have responsibilities for organising and performing official controls and activities to verify compliance with agi-food chain legislation.

The Food Law Code of Practice (England) (FLCOP), 'the code,' outlines how the requirements of (assimilated) regulation EU 2017/625 apply to local authorities.

We have a statutory duty to enforce the requirements of food law and have due regard to 'the code'.

1.3 The Food Standards Agency: (FSA)

The FSA was established in 2000 following some high-profile outbreaks of food borne illness. It is an independent government department working to protect public health and consumer interests in relation to food. It acts as the Central Competent Authority (CCA) and works closely with local authorities to oversee our enforcement activity through the framework agreement. The framework agreement sets out the planning and service delivery requirements based on requirements in 'the code'. It requires Cheltenham Borough Council to have:

- Publicly available, locally approved food service plans.
- Agreed food law enforcement standards.
- Enhanced monitoring data with a focus on outcomes.
- An audit scheme aimed at securing improvements and sharing good practice.

1.4 Department of Food and Rural Affairs (Defra):

Following EU exit in 2020 Defra now has the responsibility for the GB Multi National Annual Control Plan (GB MANCP). This plan is prepared in accordance with (assimilated) regulation EU 2017/625. This demonstrates effective controls are in place for monitoring and enforcing food law. The plan is produced by the FSA. The

GB MANCP includes information about the structure, roles and responsibilities of the various competent authorities involved in monitoring compliance and enforcement. It provides an overview of how competent authorities and other bodies work together. Defra is responsible for animal health and welfare law in England and for policy and regulations on environmental, food and rural issues and international trade (including food import controls).

This service plan outlines the activities and the resources needed to enable delivery.

2. Background.

2.1 Profile of the Local Authority:

Cheltenham is a large spa town in Gloucestershire, England, located on the edge of the Cotswolds. It is one of 6 districts that make up the County of Gloucestershire. The Borough's proximity to main urban areas such as Gloucester and Bristol, combined with the M5 motorway network means that we attract commuters and varied inward, investment opportunities. Cheltenham has a strong local economy made up of mainly of small and medium enterprises (SME's) of light industry, food processing and tourism and is renowned for its sporting and cultural events. We are at the forefront of the UK's expanding cyber industry with our Golden Valley Development, a pioneering garden community integrating hi-tech businesses, residential and leisure uses. ONS statistics from 2021 census show the Borough had a population of 118,836. This is a 2.7% increase since 2011.

[Cheltenham Borough Profile Infographic.pdf](#)
[Cheltenham Census 2021](#)

We have no importers but as an inland authority all officers have specific training and authorisation to deal with illegal imports. Approximately 1.5% of businesses are manufacturers with the majority 41% being restaurant and cafes.

2.2 Organisational Structure and Staffing:

Cheltenham Borough Council operates a Leader and Cabinet structure. The Cabinet member for Customer and Regulatory Services is Councillor Martin Horwood. The Chief Executive is Gareth Edmundson and he is responsible for ensuring service aims are translated into effective delivery.

The Leadership team is made up of The Chief Executive, The Director of Finance, Assets and Regeneration, The Corporate Director and Monitoring Officer, The Director of Major Development and Regeneration, The Director of Communities and Economic Development, The Head of Corporate Service, The Director of Finance and Assets, the Housing Strategy and Partnerships Manager and the Director of Housing. The corporate [Structure](#) is currently under revision.

The Public Protection Team is headed by Claire Hughes, Corporate Director and Monitoring Officer. The Head of Public Protection is Louis Krog who manages the Public Protection teams and its separate service areas including food safety, health and safety, environmental protection, private sector housing, Solace (anti-social behaviour partnership) the Neighbourhood Team (envirocrime and anti-social behaviour) and Licensing. He also fulfils the role of the Council's District Emergency Planning Liaison Officer (DEPLO) for the purpose of emergency planning duties under the Civil Contingencies Act 2004.

Each service area above has a team leader responsibly for service delivery.

This plan covers only the food and infectious disease function within the Public and Environmental Health Team shown in Appendix 2.

The current Food Safety and Infectious Disease Team is shown below:

Full Time equivalent (FTE) on food and infectious disease	Role	Years Experience Post Qualification
0.1	Bernadette Reed Team Leader	32
1	Chris Waller Senior Environmental Health Officer (SEHO) (Lead Officer)	4.5
0.8	Neil Bacon Environmental Health Officer (EHO)	35
0.8	Laura Oswald Environmental Health Officer (EHO)/Animal Licensing Officer	0.8
0.1	Technical Business Support Officer (BSO)	0.2
2.8	Total	

Table 1: The Operational Food Safety Team

2.3 Cost of the Service:

Details of budgetary provision are provided in the [Budget reports](#). Costs for the food service relate to staffing. An EHO is grade G, a SEHO grade H and a team leader grade I. Senior management grades are shown in Appendix 1. Sampling costs are contained with the service level agreement with UKHSA.

2.4 Scope of Responsibilities:

Overall responsibility for food law is held centrally but the day-to-day responsibility is split between central and local government. At local level monitoring and enforcement is carried out by 'competent authorities' including Cheltenham Borough Council as a local authority. We are responsible for carrying out 'official food controls' and enforcement of the main body of food law.

This Authority is not a Unitary Authority and therefore shares its duties with the Trading Standards Department of Gloucestershire County Council. Cheltenham Borough Council is responsible for food hygiene and Gloucestershire County Council Trading Standards are responsible for food standards. Where there are areas of overlap, appropriate Memoranda of understanding are in place.

We are not an emergency service and therefore do not have an out of hours food service available which addresses the emergency closure of premises, food product withdrawal and outbreaks of food associated disease. It is expected that any emergency would form part of the emergency planning arrangements through which the duty emergency planning officer would be contacted. This service has not been used during 2023-24.

3 Service Delivery:

3.1 Business registrations and Approvals:

All new businesses involved in food handling must register at least 28 days before they intend to operate. This includes existing food businesses which have changed food business operators. There is no charge for registration, and it cannot be refused. In line with the FLCOP we are required to carry out a full inspection within 28 days of receipt of a valid registration. 158 new food business inspections were carried out between 1 April 2023 and 31st March 2024.

We have 1 premises approved for meat products, Soho Coffee Shops Ltd, approval number United Kingdom CT007 approved under assimilated EU regulation 853/2004. The approval regime is a 'permission' system for premises handling animal products on a business-to-business basis. The business is a small manufacturer and packer supplying to its 3 own-brand local shops. All officers have received general training on approvals for food businesses and the team leader has received specialist training on milk and dairy approvals. We have no specialist or complex processes. Additional training may be needed depending on the nature of any future specialist approval applications or registrations.

3.2 Interventions:

On 1st April 2024 we were responsible for regulating 1102 registered food businesses and 1 approved premises. The business type distribution at 1st April 2024 is shown in Appendix 3. The number of registered businesses fluctuates throughout the year as new business open, businesses change ownership and others close.

Following inspection each business is given a risk rating in accordance with the (FLCOP). The risk rating is graded A-E. This is based on set criteria, which determine potential risk, both inherent risks, which the business operator cannot control, and risks over which the food business operator has full control. It is this rating which determines the frequency of inspection as shown in Fig 1.

The majority of businesses within Cheltenham are currently D rated, requiring an intervention every 2 years, however it is common for some business not to have sustained compliance or allow compliance to fall and thus move between ratings. In 2023/24 391 interventions on A-D rated businesses were carried out.

Figure 1: Intervention policy schematic



The breakdown of current risk ratings is shown in Appendix 4. For 2024/25 we have a minimum of 394 registered businesses which are due an inspection. As an inland authority we consider imported food responsibilities at each intervention. Officers have received training on imported food control and have specific authorisations.

3.3 Alternative enforcement strategy:

The FLCOP allows low risk businesses rated E to be subject to alternative enforcement in line with our documented alternative enforcement strategy. We must ensure that these businesses continue to be subjected to some form of official control whilst recognising the low risk associated with them. In 2023/24 102 interventions for E rated businesses were carried out.

3.4 Food Alerts for Action (FAFA)

Significant food incidents are notified to us directly from the FSA via a secure dedicated 'Smarter Comms' platform. Incidents are also notified to us via other partner organisations. The Public & Environmental Health Team Leader will instigate the necessary response and provide the necessary out of hours cover for this service. Where the Authority becomes aware of a serious localised incident or a wider food safety problem, it will notify the FSA in accordance with the FLCOP. Only food alerts for action are recorded on our management system. In 2023/24 we received 2 FAFA. All food alerts for information are available on the FSA website.

3.5 Complaints/Service Requests:

We look at all complaints and prioritise them according to the risk to public health using a complaints filter. In 2023/24 we received 68 complaints about food and food premises, mainly regarding the hygiene of premises.

3.6 Primary Authority/Home Authority Scheme (PA/HA)

This is a statutory scheme administered by the Office for Product Safety and Standards (OPSS) on behalf of the Secretary of State for the Department for Business Energy and Industrial Strategy (BEISS). The scheme ensures that a business with multiple outlets can have the benefit of a single point of contact for advice that supports consistent enforcement across all of its premises. We had a signed partnership with our school contract caterer in 2016 so have experience in managing the scheme should an application be made, and resources allow. We do not currently have a partnership and have not been approached by a business wishing to enter a partnership, but we remain on the list of Councils willing to consider any requests from businesses. We use the information contained within the PA register to inform the way we regulate those businesses who are part of the scheme.

The Home Authority principle operates in situations where no PA arrangement is in place. It maintains and supports the essential elements of the regulatory landscape by regulating at source. We work in accordance with the provisions of the Home Authority Principles as laid down in the [Joint Statement of Commitment](#)

We act as HA for all businesses who have their decision-making base located within Cheltenham or where food is produced and will act on any referrals or requests from Local Authorities.

3.7 Food Sampling:

Our sampling policy sets out our approach to general and specific sampling and a coordinated approach is taken at the Gloucestershire Food Safety Liaison Group.

All samples for analysis, taken under section 29 of the Food Safety Act 1990 in accordance with the Food Safety (Sampling and Qualifications) (England) Regulations 2013 (revision being consulted on) and with the requirements of the FLCOP, are submitted to our appointed Public Analyst, Public Analyst Scientific Services, (PASS) Wolverhampton.

All samples for examination, taken in accordance with regulation 14 of the Food Safety and Hygiene (England) Regulations 2013 and the requirements of the FLCOP, are submitted to the Food Examiner at the UKHSA Food, Water and Environmental Microbiology laboratory Porton, Wiltshire with whom we have a service level agreement in place.

In 2023/24 we submitted 11 samples for examination. Our proactive sampling activity was limited due to resourcing and other competing demands, but it is our intention to sample in accordance with our 2024/25 sampling plan as indicated in Appendix 5. Proactive sampling is programmed in for the first Tuesday in each month. The frequency and topics are subject to change depending on local or national intelligence and resourcing. Currently all officers are authorised as competent for the purpose of sampling under the Food Safety (Sampling and Qualification) (England) Regulations 2013.

We aim to use our entire sampling quota each year. The current allocation 2024/25 within our service level agreement is approximately £4948 which equates to approximately 100 basic sample analysis. Tests include Aerobic colony count, E. coli, Listeria species, Enterobacteriaceae, Coagulase-positive Staphylococci, Salmonella species and legionella in water supplies.

We sample for a number of reasons as outlined in our food sampling policy including:

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

Sampling studies are selected on a number of factors:

We submitted our preferences from the UKHSA lab suggestions based on what is relevant to us locally. We consider intelligence from our liaison group members and align sampling where possible. We liaise with our trading standards colleagues for sampling they are doing locally and we also look at what the FSA are providing

funding for on imported food commodities. We also consider foods which may be less than thoroughly cooked or may pose additional food safety risks.

Unsatisfactory sample results are always followed up with the business concerned to ensure any risk to public health is removed.

3.8 Infectious disease notifications and outbreaks:

The aim of our infectious disease service is 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 at the earliest opportunity in accordance with standard procedures developed by UK Health Security Agency (UKHSA).
- 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 in consultation with the Consultant for Communicable Disease Control (CCDC).

In accordance with the provisions of The Health Protection (Notification) Regulations 2010 the UKHSA Southwest receive notification of suspected disease/infection in patients by registered medical practitioners or of causative agents found in human samples by microbiology laboratories. Food officers within Cheltenham Council work closely with UKHSA to initiate the appropriate public health actions. 154 notifications were received in 2023/24. See Appendix 6 for causative organism. It is understood that there is severe under reporting of food borne illness and the burden on society from the 13 main organisms is immense. [The Burden of Foodborne Disease in the UK 2018](#) Our response to these notifications is in accordance with the 'Standard Operating Procedures for Single Cases of Infectious Disease' issued by the UKHSA Southwest and in accordance with any request from them for enhanced surveillance.

We also received 41 allegations of food poisoning in the absence of a laboratory confirmation. The response to these is intelligence led and varies on a case-by-case basis.

Under section 6 of the Health and Social Care Act 2012, our Director of Public Health has the duty to prepare for and lead the local authority public health response to incidents that present a threat to the health of the population supported by this authority. Under the amended Public Health (Control of Disease) Act 1984 and associated regulations, we have the majority of statutory responsibilities, duties and powers significant in the handling of an outbreak, including appointment of a proper officer whose powers include the receipt of notifications. We have delegated the Proper Officer function to Dr Dom Mellon at UKHSA. In 2023/24 we were involved in the investigation and management of 2 outbreaks found subsequently to be linked to national outbreaks.

3.9 Food Hygiene Rating Scheme:

The scheme was launched in 2010 and this authority signed an agreement with the FSA to operate and maintain the scheme at local level. This allows consumers to [Search for ratings | Food Hygiene Ratings](#) and make an informed choice about where they eat and purchase food. The food hygiene rating of 0-5 aligns with the risk rating of A to E. Where a food business operator requests an additional inspection for the purpose of improving their rating then a charge will be made for this additional inspection. In 2023/24 we received 18 requests for revisits. This revisit is separate to revisits carried out for compliance and public health purposes. Display of the rating sticker is not mandatory but the FSA are committed to mandatory display through the introduction of regulation.

3.10 Requests for advice:

In 2023/24 we received 123 requests for advice relating to food safety, mainly regarding opening a new food business.

In most cases advice is provided via our website. In line with our commercialisation project any specific tailored advice over and above a 15-minute phone call may incur a charge in line with our fees and charges schedule.

3.11 Promotional and engagement activities:

Cheltenham Borough Council's website is the main media to publish and signpost important food safety information. We use social media to promote FSA campaigns and during 2023/24 took part in campaigns such as highlighting food allergens in vegan food, festive food tips, and the perfect picnic campaign. Upcoming campaigns include encouraging display of food hygiene rating online and reminding businesses of the legal requirements of registering a food business. We work closely with our communications team to support such campaigns.

3.12 Food Safety Liaison Group:

We continue to be an active member of the group and contribute to the formulation and implementation of the county work plan. See appendix 7. We plan to lead on the Inter authority audit (IAA) on service planning and prioritisation. Resourcing of this will need to be managed. We meet quarterly and Cheltenham currently hold the role of secretary.

3.13 Chargeable services:

Our fees and charges for all services are available on our website. Charges discretionary services are made in accordance with our policy and the FLCOP.

Any terms and conditions applicable to the provision of the service are discussed together with any conflicts of interest and that where applicable that other providers of the service are available. These services are separate to official controls or other official activities. This includes provision of advice as detailed above, arranging sampling on request and certificates of registration for the purpose of export. 55 such request for certificates were received 2023/24. The team leader is required to re validate her competency certificate as the Food Competent Certifying Officer (FCCO) with the Animal and Plant Health Agency (APHA) for any export health certificates. No requests for other discretionary services were received in 2023/24. We are working with Highfields training provider to offer an online food hygiene level 2 certificate on behalf of Cheltenham Council.

Where a business requests an additional visit outside of their programmed inspection for the purpose of improving their food hygiene rating score then a charge will be made for this. 18 requests were received in 2023/24. This is separate from a revisit for the purpose of securing compliance with legislation which is not chargeable.

3.14 Other duties:

The Officers in the food team also have duties in relation some statutory health and safety functions in food premises and other general enforcement of environmental health miscellaneous legislation. They also provide some resilience when necessary to other environmental health functions in emergencies.

They are part of the planning and monitoring response for large scale events including the Cheltenham Gold Cup racing. They would also act in a specialist role as part of the authority emergency planning response under the Civil Contingencies Act 2004. In 2023/24 we received 346 temporary events notice applications and held 12 Safety advisory groups many of which require advice on food safety and are part of our intelligence gathering.

They also monitor planning and licensing consultations as a means of identifying and engaging with new or developing food businesses. In 2023/24 166 planning consultations were received into the environmental protection team as statutory consultees, some of which would be for food businesses. We also periodically check the planning list as a source of open information on food businesses.

3.15 Enforcement:

Business compliance within the Borough is high with 93% of registered businesses rated 3 (satisfactory) or above on the food hygiene rating scheme with 77% rated 5 (very good). Only 1% of businesses are currently recorded as non-compliant.

Our [Corporate Enforcement Policy](#) sets out the guiding principles by which legislation will be enforced. It provides an enforcement framework in accordance with:

- The Central and Local Government Concordat on Good Enforcement.
- The Legislative and Regulatory Reform Act 2006.
- The Regulators Compliance Code.
- The Crime and Disorder Act 1998.
- The Regulatory Enforcement and Sanctions Act 2008.

In developing this plan, we have given due regard to the requirements of the Regulators code to guide our regulatory activities, namely to:

- Carry out our activities in a way that supports those we regulate to comply and grow.
- Provide simple and straightforward ways to engage with those we regulate.
- Base our regulatory activities on risk.
- Share information about compliance and risk.
- Ensure clear information, guidance and advice is available to help those we regulate meet their responsibilities to comply.
- Ensure our approach to regulatory activities is transparent.

In 2023/34 we issued 588 letters (detailing minor and major contraventions), 13 Hygiene Improvement notices and 1 Voluntary Closure. We carried out 20 revisits.

A revisit to secure compliance will always be carried out when a business is non-compliant.

3.16 Intelligence:

Intelligence is information which has been evaluated and assessed as to its reliability and relevance. The recording, evaluating and sharing of information is central to intelligence led work operating effectively. It helps us prioritise resources effectively by identifying risks and threats on a local regional and national level.

The food team receives information from a number of sources, both proactively and reactively, open and closed. This may be from people, complaints, whistleblowers, members of the public, other food business operators, EHOs, Trading Standards Officers and other regulators. (The National Food Crime Unit (NFCU) is the designated body to receive whistle blower reports).

It may also come from technical sources, CCTV, business records and financial documents, sampling data, public analyst reports, open source reports, articles in the media, previous prohibitions and convictions, planning applications, planning lists, business rates and other internal departments, Rapid Alert for Food and Feed, Border Notifications, the Early Warning System (EWS), the National Monitoring Plan and the Likelihood Risk Dashboard.

We use intelligence to inform our Service plans, proactive projects, food sampling programmes, targeted enforcement work, complaints, service requests and investigations.

When new information becomes available that suggest the nature of a food business activity has changed or the level of compliance has changed we will:

Reconsider the intervention rating and the appropriateness of the next planned intervention.

Decide if it is appropriate to conduct an investigation, inspection or audit to investigate further.

Document the reason for our decision.

Any concerns around food fraud and serious criminality in the food chain will be reported to the National Food Crime Unit (NFCU)

All Officers have received training on food crime intelligence.

We will share intelligence centrally where necessary working closely with the Local Authority Intelligence Co-ordination Team (LAICT), the NFCU, the Incidents and Resilience Unit, the Imports Delivery Team and other Local Authorities and regulators.

4 Resourcing:

Based on a predicted minimum service demand for 2024/25 as shown in Appendix 8 current resource is considered sufficient to carry out our statutory duties and maintain officer competency but does not give much scope for added value activities such as entering a Primary Authority Partnership and investigating prolonged events such as outbreaks. It does not offer much scope for staff personal development and participation in wider corporate projects. It should be noted that the demand from the

inspection programme fluctuates from year to year with less demand this year than last, but this is cyclical, so demand may increase in 2025/26. In addition, there is no nationally recognised model for determining resource requirements to effectively deliver a food service. Until such a model is developed it is difficult to establish a robust estimate of the real level of resources required within this authority. The FSA have committed to develop and publish a methodology for local authorities to use when determining resources. This will function alongside their new approach of clustering local authorities for the purpose of comparing performance. Methodology for estimating resources will be reviewed when this model is available.

Prior to March 2023, the demands on the service were driven by the Covid recovery plan. From April 2023 the covid recovery plan was withdrawn and local authorities were expected to return to business as usual and bring all inspections back in line with the requirements of the FLCOP. We met our official control requirements for high and medium risk businesses, but we had a backlog of low-risk E rated businesses of 142. We put this as a priority for action with a plan in place to address the backlog. This included upskilling the technical business support officer (through external and internal training and supervision) to carry out some interventions in line with our alternative enforcement strategy and offering overtime for existing authorised officers. This backlog has now been reduced to 56. These have been allocated between the 3 officers and can be dealt with during Q1 of 2024.

5 Quality assessment and internal monitoring:

5.1 Performance reports to the FSA:

A new mechanism for monitoring and reporting on the delivery of food controls by local authorities will be introduced by the FSA which will replace the previous method of reporting through the Local Authority Enforcement Monitoring System (LAEMS) which was removed in 2022. This will ensure the FSA receive data in a more timely manner. This will be reconfigured to collect new data and support a transition to a more intelligence-based risk assessment approach. Data set change is required to reflect the significant changes in the operating environment. It will result in a more qualitative assessment of local authority performance focusing on achievement of outcomes within the food system with less emphasis on inputs and outputs. In the interim, survey returns to the FSA will be provided in April and October providing prescribed information on resourcing, interventions and activity. The FSA are also developing KPIs for Local authorities and will be communicated in due course.

5.2 Internal monitoring; Qualitative and quantitative

The Public and Environmental Health Team leader and the Lead Food Officer monitor the qualitative and quantitative work of the food safety team.

We have documented policies and/or procedures for all of the activities as required under the FLCOP. A list can be found at Appendix 9. All officers have undergone consistency training and training against the policies to ensure the consistency and quality of interventions. All officers subscribe to ABC Food Law training platform and are signed up to the Regulators Companion which provide ongoing high quality training to ensure competency.

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 undertaken when quarterly inspection lists are produced from the information management system Uniform Idox.

Officers perform a monthly team consistency exercise and quality check on premises reports against the FLCOP and the Brand Standard; internal monitoring checks are carried out in 121s on a monthly basis to ensure compliance with the FLCOP for interventions. Accompanied visits occur quarterly with feedback provided to officers. Feedback is given in team meetings. A County Liaison group training day was held in Sep 2023 and we are in the process of planning an inter authority audit to share good practice to be led by Cheltenham Council. This authority is also introducing a new appraisal system of an annual goal setting meetings and 3 monthly periodic reviews. We will use this to ensure we align with the authority's needs and regulatory service demands.

We take part in the FSA annual national consistency exercises and consider the findings in the summary reports.

The team leader is responsible for monitoring internal food key performance indicators (KPI). They are reported internally on a quarterly basis. They were previously monitored through our Clearview performance management platform however we are in the process of migrating to a new platform Verto within the next 6 months. Our current KPIs look at:

- % of new food businesses inspected with 28 days of registration
- % of food businesses inspected within 28 days of due date
- % of Food Businesses which are broadly compliant

5.3 Review against the Service plan:

Any major deviation from the set KPIs are shown as a RAG system (Red Amber Green) and are escalated to the Head of Service for early intervention and implementation of appropriate measures. Food Service plans are submitted each year for approval by cabinet and are included on the forward plan for June.

As part of the FSA audit programme under powers in section 12 of the Food Standards Act 1999, this Authority was audited in October 2023 for service planning and prioritisation. This audit report is not published and is for internal use only with a general anonymised summary report for all rounds of FSA audits available online. The recommendations on providing additional detail within the service plan has been considered within this report. Additional detail has been included on sampling, how we intend to deal with the backlog of low rated businesses, a reference to the corporate enforcement policy, additional information on our approved premises details on the future resourcing of the service and additional details on internal monitoring.

6. Factors affecting service delivery

6.1 Backlog from Covid-19

The FSA covid recovery plan was formally withdrawn in April 2023 with the expectation that all Local Authorities bring their inspections back in line with the requirements of the FLCOP. We had a back log of approximately 142 low risk (E rated) inspections in March 2023. These businesses needed an intervention in line with our alternative enforcement strategy as the risks may have increased. We have upskilled our technical business support officer to carry out suitable interventions and

also offered overtime to our existing officers to clear this back log. As at 1st April 2024 the back log was reduced to 56 and they will be subject to an intervention over the next 3 months within current resourcing capacity.

6.2 Staff development and Competency:

This plan can only be effectively delivered by fully competent officers. The FLCOP competency framework for officers carrying out Official Food Controls was revised and is currently under review as part of the modernisation of the food delivery model. Our officer authorisation process is linked to and determined by the competency framework. Following extensive training and supervision all staff are now fully competent to deliver official controls but should there be any changes in staff, service delivery may be compromised due to the FLCOP competency requirements.

6.3 Recruitment and Retention:

Due to the challenges in recruitment within environmental health nationally, the public protection team applied for and were selected to be one of 6 Councils taking part in the LGA pilot 'skills pathway project' to explore recruitment and retention opportunities. We are part of the Environmental Health work stream, (other streams with nationally recognised LA shortages were finance, digital and IT, civil engineering and legal) This project runs alongside the FSA study to understand the barriers to recruitment and the flow of new officers into the profession.

We currently have no vacancies within the food safety team having made recruitment a priority. We are at risk of losing existing staff due to retirement, ill-health, career changes and/or to other authorities. As the pool of qualified officers reduce we work with our HR team to retain existing staff.

We are exploring the recruitment of apprentices through the new degree apprentice pathway to becoming an EHO or food safety practitioner.

6.4 The modernisation of the delivery model:

When implemented, the new model will redefine the expectations of local authorities enabling us to make more effective use of resources to address risks in the food system. This intelligence led model is in the pilot stage with full implementation later in 2024. It also includes the use of artificial intelligence to predict FHRS ratings for newly registered establishments to assist with triaging and prioritisation. Any such changes to processes will require training during the transitional period. There may be implications for our information management which may need to be reconfigured. This may have a cost implication although major changes in this area have been put on hold by the FSA.

In conclusion, subject to the above it is considered that we will have sufficient resource to meet the minimum current expectations with the FLCOP and requirements from the FSA. This is based on the establishment profile in the Cheltenham area, numbers of new business registrations received, the number of staff within the food team, analysis of historic service data, a 'time and motion' study of all our food activities and maintenance of a duty officer system. However, the considerable uncertainty of the current operating environment must be recognised.

6.5 Change in Local Business Profile:

Currently we do not have any specialist or complex processes to regulate, nor many large manufacturers or importers. Should this change significantly then additional training and additional resource may be needed to reflect the additional service demands.

The above risks have been highlighted in the corporate risk register where appropriate.

7 Areas for improvement:

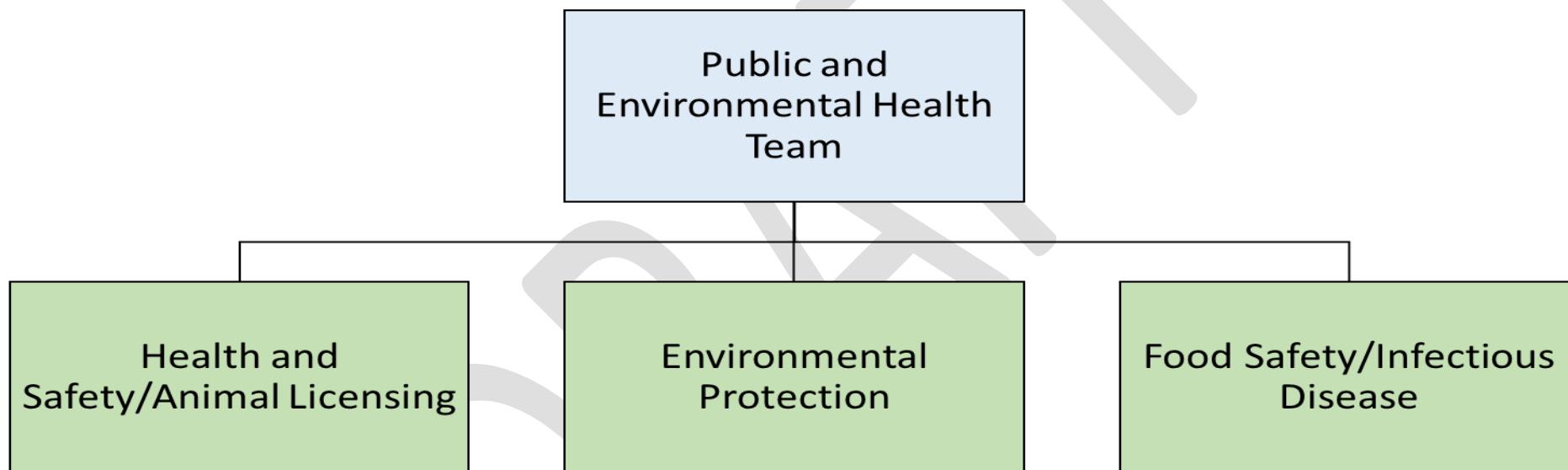
As part of our commercialisation project, we aim to better utilise technology during our inspections. The food team are trialing the use of electronic forms and devices to replace handwritten forms. A case will be put to the commercial and income generation team for a wider roll out if appropriate. This is an opportunity to review our aide memoires with more emphasis on recoding information on imported food controls.

We are looking at utilising alternative pathways to officer registration in conjunction with the LGA, FSA and the Chartered Institute of Environmental Health (CIEH) and our internal learning and development team including the use of the apprenticeship levy for the EH degree apprenticeships and the level 4 Regulatory Support Officer apprenticeship.

We will focus on proactive sampling and have streamlined our alternative enforcement interventions.

8. Review:

This plan, its format and content will be reviewed annually as a minimum to include all requirements and recommendations of the new food delivery model and the FSA. It will be reviewed periodically in consideration of experience gained and the results of internal monitoring as described above.



Breakdown of Food Business by Use

Business Type	
Restaurant/Café/Canteen	299
Restaurant and caterers- other	153
Small retailer	124
Take away	101
Pubs/Clubs	99
Caring premises	101
Schools/colleges	66
Mobile Food Units	35
Hotel/Guest House	34
Supermarket/Hypermarket	33
Other Retail	29
Manufacturers/Packers	19
Distributors/Transporters	9
Total	1102

Breakdown of food premises by risk ratings

Risk Rating	Number of businesses in Rating
A inspection every 6 months	0
B inspection every year	19
C Inspection every 18 months	204
D inspection every 2 years (can alternate with another intervention in some cases)	529
E Alternate enforcement strategy	350

Year	2024-25											
Month of sampling	A	M	J	J	A	S	O	N	D	J	F	M
Proactive												
Study 80- Cheese pasteurised/unpasteurised												
Study 81- Tattoo/piercing – green soap/disinfectants												
Study 82– Reactive study- Eggs												
FSA Funded Sampling – Imported Foods TBC												
Approved premises												
Local sampling study – Sushi												
Reactive												
Sampling from complaints												
Sampling as part of official controls												
Sampling at the request of a FBO												

Causative Organism	Notifications Received
Cryptosporidium	9
Campylobacter	108
Salmonella	17
Giardia	11
Dysentery	1
Hepatitis A	3
Total	149

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COUNTY FOOD SAFETY GROUP DRAFT WORKPLAN 2024/25**Date of last update: 5th March 2024**

Time Period	Area of Work	Project Leads	Update
April 2024	FSA data returns	All	Done
From May 2024	FSA Webinars	FSA	
Jun 2024	Submission of Service Plans for approval	All	
Jun 2024	Submission of data for the Health Protection Board (HPB)	All	
September 2024	Training day	TBC	
Oct 2024	FSA data returns	All	
TBC 2024	Inter-Authority Audit on Service Planning	All	
Ongoing	Participation in National and regional sampling studies and local Sampling Plans	FSA	
TBC	Rebrand of Better Business for All pack to focus on carbon footprint	TBC	
TBC	Project on Single-use plastics with new legislation coming out and a focus on becoming carbon neutral	TBC	
From Nov 2024	Update of policies and procedures required by the FLCOP	TBC	

Service function	(Demand) estimated	Estimated time per unit (H)	Equivalent Officer hours
Cat A due	2	5 x 2	10
Cat B due	13	5	65
Cat C due	157	5	785
Cat D due	137	4.5	616.5
Cat E plus 10% site visit due	144 +14 = 158	2.5	395
New registrations	150	5	750
Complaints	68	2.5	170
Allegation of food poisoning	45	1	45
Infectious disease notification and investigation	154	1	154
Request for advice	123	0.5	61.5
Event submissions	73	0.5	36.5
SAG meetings	12	2	24
SAG event spot checks	12	3	36
Revisits	20	2.5	50
Food business operator requested revisits	18	2.5	45
Food Alert for Action	2	3	6
Data base maintenance surveillance	1/4	5h	20
Export certificates/FCCO work	50	0.5	25
Food safety liaison group	3h every 3 months	3 x 4	12
Reactive sampling	10	7	70
Proactive sampling	40	5	200
Emergency planning	each 1/4	2	8
Site surveillance checks	each 1/4	2	8
Policy and procedure updates/training	x 24	3	72
Outbreaks	2	37 x 2	74
Project work/County work plan/IAA	1/4	4 x 7 + 37	65
KPI Performance data management	1/4	4 x 2	8
Internal monitoring	1/month	12 x 3	36
Service planning	1/year	1 x 37	37
Data returns	2/year	2x10	20
Total			3904.5
Available officer hours	52 x 2.8 x 37	37	5387.2
Annual leave	2.8	222	-621.6
Bank holidays	7 x 2.8	7.4	-154.04
CPD	30	4	-90
Sickness	2.8 x 2 x 37	37	-207.2
Other statutory training	10	2.8	-28
Total available hours			4286.36
Shortfall/surplus			+381.86

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List of documents procedures and arrangements

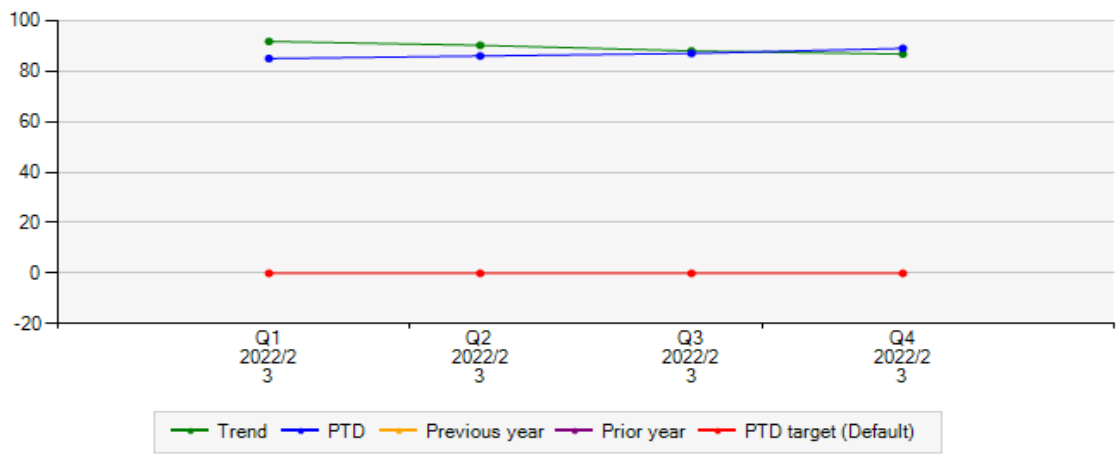
Type	Requirement
Approvals	Competent Authorities must have a procedure(s) to ensure that there is a clear and consistent process for Food Business Operators (FBOs) to follow when applying for approval of their food business establishments, in accordance with Regulation (EC) No 852/2004 and Regulation (EC) No 853/20041
Food business establishment database	Competent Authorities must have a procedure(s) to ensure that the Competent Authority's database of food business establishments is accurate, reliable, and up to date
Food incidents and alerts	Competent Authorities must have a procedure(s) to ensure that food incidents and alerts initiated and/or responded to by Competent Authorities are dealt with effectively, and within a timely manner
Officer Authorisation	Staff performing official food controls and other official activities must be duly authorised. Competent Authorities must have a procedure(s) to ensure that authorised officers (including the lead food officer(s)) engaged in official food controls and other official activities hold a suitable qualification (or equivalent) and they are competent and experienced in accordance with Chapter 3 of the Code and the Practice Guidance, where relevant to their level of authorisation and the range of tasks performed
Control verification	Competent Authorities must have a procedure(s) to ensure that official food controls and other official activities are carried out consistently and effectively to a high standard, in conformance with relevant legislation, the Code, relevant centrally issued guidance and the Competent Authority's own documented policies and procedures. It must set out how the Competent Authority carries out risk-based internal monitoring. A record must be made of all internal monitoring and kept for 2 years.
Corporate Complaints	Competent Authorities must have a procedure(s) to ensure that complaints about the Competent Authority are investigated in accordance with centrally issued guidance, a record is made of all

	complaints received and of the actions taken
Food complaints	Competent Authorities must have a procedure(s) to ensure that complaints about food and food business establishments are investigated in accordance with the Code, centrally issued guidance and the Competent Authority's policies and procedures
Sampling	Competent Authorities must have a procedure(s) to ensure that samples are taken in accordance with the Code, the Practice Guidance, the Competent Authority's policies and procedures and relevant legislation, and that where unsatisfactory results are received, appropriate action is taken in accordance with the Competent Authority's sampling and enforcement policy
Equipment	Competent Authorities must have a procedure(s) to ensure that equipment is properly maintained, calibrated, and is removed from service when found to be defective
Official food controls and other official activities	Competent Authorities must have a procedure(s) to ensure that the full range of official food controls and other official activities carried out by the Competent Authority are effective and appropriate, are carried out in accordance with the Code, relevant legislation and in an impartial and consistent manner
Enforcement	Competent Authorities must have a procedure(s) to ensure that any follow up action or enforcement action taken by the Competent Authority is in accordance with the Code, the Practice Guidance and the Competent Authority's enforcement policy
Control and investigation of outbreaks and food related infectious disease	Competent Authorities must have a procedure(s) to ensure that the control of outbreaks of food related infectious disease, and the investigation of notified food related infectious disease is carried out in accordance with centrally issued guidance
Information	Competent Authorities must set-up, maintain and implement appropriate back-up systems for any electronic databases, and systems or documented procedures that have been designed to minimise the risk of corruption or loss of information held on its databases and ensure that reasonable security

	measures are in place to prevent access and amendment by unauthorised persons
Registration	Competent Authorities must have procedures and/or arrangements in place to ensure that there is a clear and consistent process for FBOs to follow when applying for registration of their food business establishments
Conflict of Interest	Competent Authorities must have procedures and/or arrangements in place to ensure that staff performing official food controls and other official activities are free from any conflict of interest
Sampling policy	The policy must set out the Competent Authority's approach to food sampling
Contingency plan	The plan must set out what the Competent Authority would do in an emergency
Service plan	The plan must cover all areas of food law the Competent Authority has a duty to enforce, be documented in accordance with Chapter 2 of the Practice Guidance and the Framework Agreement. It must set out how the Competent Authority intends to deliver and resource official food controls and other official activities in its area, and address any variance in meeting the outcomes of the previous service plan. A performance review must be carried out at least once per year and be documented. The plan must be submitted for approval by a relevant member forum or relevant senior officer
Intervention programme	The programme must be established and implemented in accordance with the requirements of Chapter 4 and ensure that interventions are effective, appropriate and consistent. It should include all food business establishments for which the Competent Authority has food law enforcement responsibility
Sampling programme	The programme must set out the details of the Competent Authority's intended risk-based food sampling priorities
Training programme	The programme must ensure that authorised officers undertaking official food controls and other official activities receive appropriate training
Alternative Enforcement Strategy (AES)	The strategy must set out how surveillance of food business establishments that can have Alternative Enforcement Strategies applied to them, will be conducted

Performance Monitoring
% of Food Businesses Broadly Compliant

Appendix 9



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