



# **FOOD SAFETY SERVICE PLAN 2025-2026**

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## **1. Service Aims and Objectives:**

### **1.1 Aims and Objectives:**

The Official Control Assimilated Law: Regulation (EC) No. 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 agri-food chain legislation.

The Food Law Code of Practice (England) (FLCoP), 'The Code,' outlines how the requirements of Assimilated Law: Regulation (EC) No. 2017/625 apply Local Authorities.

This Authority has a statutory duty to enforce the requirements of food law and have due regard to 'The Code'.

The key food safety function of Cheltenham Borough Council is to comply with the above and 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.

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.

This plan follows the prescribed format provided with the Food Standards Agency's (FSA's) [Framework Agreement](#) 'on official food and feed controls by Local Authorities' Amendment number 5 2010 and requirements within section 2.6.1 of the FSA's Food Law Practice Guidance, in terms of the information provided.

### **1.2 Priority Aims and Objectives:**

- 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 non-compliance with appropriate enforcement actions.
- Managing food incidents and hazards, including outbreaks of food poisoning and foodborne illnesses.
- Conducting reactive and proactive sampling or where sampling is necessary to determine business compliance with legal requirements.

- Conducting proactive 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 food 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 for high-risk food activities and the poorest performing food businesses, with the aim of improving standards across Cheltenham, whilst supporting business growth.

### 1.3 Corporate Objectives:

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.

### 1.4 Operational Performance Measures and Key Milestones 2025/26:

Operational Performance Measures:

Measure	Reporting Frequency	Target	Q1	Q2	Q3	Q4
% of high-risk premises (Category A, B and C) inspected within 28 days of the due date	Quarterly	100%	100%	100%	100%	100%
Broadly Compliant premises (Rated 3 and above on the FHRS scheme)	Quarterly	95%	97%	97%	99%	99%
% of new businesses inspected within 28 days of registration (or opening date)	Quarterly	95%	100%	98%	99%	89%

## **Key Milestones in 2024/205:**

- Maintained a fully resourced team with continued professional development in line with The Code and with the Chartered Institute of Environmental Health (CIEH) Regulations.
- Bi-annual statutory reports to FSA on Official Control activity.
- Statutory data return to HMRC within required time frame and data set.
- Internal monitoring in line with current operational performance indicators.
- Corporately funded project of provision of mobile technology (tablets) to Officers 'in the field', streamline site inspections reports, capturing information at source, linking with current data management systems and providing an immediate report to business operators.
- Testing a basic and enhanced resource modelling tool on behalf of the FSA and providing constructive feedback to inform the next phase.

## **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 is close to main urban areas such as Gloucester and Bristol with access to the M5 motorway network. 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 world class development with the cyber innovation centre at its heart, integrating hi-tech businesses, residential and community 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 Safety and Communities is Councillor Victoria Atherstone. The Chief Executive is Gareth Edmundson and he is responsible for ensuring service aims are translated into effective delivery. The [Senior Management Structure Chart](#) is here.

The Leadership team is made up of The Chief/Deputy Chief Executive, Director of Governance Housing and Communities, Head of Corporate Services, Director of Finance and Assets, Director of Major Developments and Regeneration, Director of Planning, Housing Transformation Director, Governance Risk and Assurance Manager, Director of Housing, Communities and Customer Services.

The Public Protection Team is headed by Paul Jones Deputy Chief Executive and Executive Director for Finance and Assets. The Head of Public Protection is Louis Krog who; manages the Public Protection teams and its separate service areas, including: food safety, infectious diseases, health and safety, animal licensing, environmental protection, private sector housing, licensing and Solace (anti-social behaviour partnership). 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.

The Public Protection structure at in Appendix 1 shows where the food safety function sits within the Authority.

The Public and Environmental Health teams (PEH) are overseen day-to-day by the Public and Environmental Health Manager.

This Service Plan covers only the food and infectious diseases function.

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

Full Time Equivalent (FTE) on Food Safety and Infectious Diseases	Role	Years Experience Post Qualification
0.2	Public and Environmental Health Manager/(FCCO)	34
1	Senior Environmental Health Officer (SEHO)/(Lead Officer)	5.5
0.8	Environmental Health Officer (EHO)	36
1	Environmental Health Officer (EHO)/Animal Licensing Officer	2
<b>3.0</b>	<b>Total</b>	

### 2.3 Provision of Professional Services:

Food analysis is provided by the Public Analyst Scientific Services (PASS) i54 Business Park, Valiant Way, Wolverhampton, WV9 5GB, 01902 627200.

Food examination is provided via a service level agreement with UK Health Security Agency (UKHSA) Porton Down, Wiltshire, 01980 616775.

### 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 2024/25.

## 2.5 Demands on the Food Team:

Food Related	Non-Food Related
Food inspections and interventions for all registered food businesses in line with the FLCoP and associated enforcement.	Supporting the planned priority proactive health and safety regulatory work when it is related to food businesses; identifying matters of evident concern e.g. gas safety.
Investigation of complaints relating to food and/or premises.	Providing resilience within other environmental health disciplines for duty Officer cover, when necessary e.g. health and safety and skin piercing activities.
Food sampling – reactive and proactive.	One Food Officer is the Authorised Officer for Animal Licensing activities. Plans are in place to transfer this function to the Licensing Team.
Investigation of allegations and confirmed cases of food poisoning and foodborne diseases (single cases and outbreaks).	They are part of the planning and monitoring response for large scale events including the Cheltenham Gold Cup. They would also act in a specialist role as part of the Local Authority emergency planning response under the Civil Contingencies Act 2004. In 2024/25 we received 288 temporary events notice applications and held 12 Safety advisory Groups (SAGs), many of which require advice on food safety and are part of our intelligence gathering.
Responding to Food Alerts.	They also monitor planning and licensing consultations as a means of identifying and engaging with new or developing food businesses. In 2024/25 210 planning consultations and 28 street trading applications were received into the Environmental Protection Team as statutory consultees; some of which would be for food businesses.
Application of the Home Authority, Originating Authority and Primary Authority principles.	
Approval of product specific premises.	
Operation of the Food Hygiene rating scheme.	
Management of the Food Safety Database.	
Provision of technical food safety advice at events through the Events Consultative Group and Safety Advisory Group (SAG).	
Health export certification and letters of attestation.	
Policy and procedure formulation and review.	

As of 1<sup>st</sup> April 2025 we regulated 1102 registered food businesses. We carried out 545 business interventions in 2024/25. The breakdown of businesses by risk ratings as of 1<sup>st</sup> April 2025 is shown below.

Breakdown of food premises by risk ratings:

<b>Risk Rating</b>	<b>No. of Food Businesses in Rating April 2024</b>	<b>No. of Food Businesses in Rating April 2025</b>
A inspection every 6 months	0	0
B inspection every year	19	13
C Inspection every 18 months	204	200
D inspection every 2 years (can alternate with another intervention in some cases)	529	540
E Alternate Enforcement Strategy	350	312
Unrated	29	37
<b>Total</b>	<b>1131</b>	<b>1102</b>

The majority of food business lie with the risk category of C, D and E but food businesses may move between categories.

Breakdown of Food Premises by 'Main Use':

<b>Business Type</b>	<b>No.</b>
Restaurant/ Café/ Canteen	328
Small Retailer	118
Restaurant and Caterers-other	117
Takeaways	102
Pubs/ Clubs	93
Caring Premises	85
Schools/ Colleges	65
Mobile Food Units	52
Other Retail	42
Supermarket/ Hypermarket	36
Manufacturers/ Packers	24
Hotel/ Guest House	24
Distributors/ Transporters	12
Importers/ Exporters	2
Primary Producer	2
<b>Total</b>	<b>1102</b>

## 2.6 Enforcement Policy:

The Food Law Code of Practice (England) (FLCoP), 'The Code,' outlines how the requirements of Assimilated Law: Regulation (EC) No. 2017/625 apply to Local Authorities.

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



Our [Corporate Enforcement Policy](#) sets out the guiding principles, by which legislation will be enforced 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 Service 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.

Business compliance within the Borough is high with 99% of registered businesses classed as 'broadly compliant' (currently rated 3 (satisfactory) or above on the Food Hygiene Rating Scheme (FHRS)).

In 2024/25 we issued 433 warning letter (detailing minor and major contraventions) 5 Hygiene Improvement Notices and 1 Voluntary Closure.

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

### **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. 166 new food business registrations were received between 1<sup>st</sup> April 2024 and 31<sup>st</sup> March 2025.

We have 1 premises approved for meat products, Soho Coffee Shops Ltd, Approval Number: United Kingdom CT007, approved under Assimilated Law: Regulation (EC) No. 853/2004. The Approval Regime is a 'permission' system for premises handling products of animal origin on a business-to-business basis. The business is a small manufacturer and packer supplying to its own-brand local shops. All Officers have received general training on approvals for food businesses and the PEH Manager has received specialist training on milk and dairy approvals. We have no specialist or complex processes currently. Additional training may be needed depending on the nature of any future specialist approval applications or registrations.

### 3.2 Interventions:

On 1<sup>st</sup> April 2024 we were responsible for regulating 1102 registered food businesses and 1 approved premises. 396 programmed interventions were due between 1<sup>st</sup> April 2024 and 31<sup>st</sup> March, as shown below:

Rating	No. of Programmed Interventions Due
A	9
B	12
C	165
D	134
E	76
<b>Total</b>	<b>396</b>

'The Code' allows for a variety of different interventions, some classed as 'Official Controls' (inspections, audits, verification, surveillance and sampling visits) and other classed as 'other interventions' (advisory and educational visits, information and intelligence gathering visits). The choice of intervention depends on a number of factors e.g. whether it is a new business, the current risk rating and the Officer's professional opinion. Officers are encouraged to use the full range of interventions available to them. Fig 1 shows the choice on intervention based on risk.

**Figure 1: Intervention Option Based on Risk:**



Following an inspection, partial inspection or audit 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.

The majority of businesses within Cheltenham are currently D rated, requiring an intervention every 2 years. However, it is common for some businesses not to have sustained compliance or have allowed compliance to fall and thus will move between ratings.

### **Interventions carried out 2024/2025:**

<b>Type of Intervention</b>	<b>No.</b>
Inspection/ Audit	437
Verification/ surveillance	63
Sampling	6
Advice/ Education	1
Information/ Intelligence Gathering	38
<b>Total interventions</b>	<b>545</b>

### **3.3 Alternative Enforcement Strategy (AES):**

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 to monitor any increased risk whilst recognising the low risk associated with them.

### **3.4 Food Alerts for Action (FAFA):**

Significant food incidents are notified to us directly from the FSA via a secure dedicated 'Link' platform. Incidents are also notified to us via other partner organisations. The Duty Officer will check for notifications on a daily basis and will initiate the response. 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. In 2024/25 we received 2 FAFA, one of which required approximately 1.5 weeks' worth of FTE resource.

### **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 2024/25 we actioned 57 complaints about food safety concerns and food premises; mainly regarding the hygiene of a premises. We also responded to 35 allegations of food poisoning.

### **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 Primary Authority Partnership (PAP) with a school contract caterer in 2016 and therefore have experience in managing this scheme should an application be made, and if resources allow. We do not currently have a PAP and have not been approached by a business wishing to enter a PAP during 2024/25. However, 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 the Cheltenham Borough 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 (GFSLG).

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

All samples sent 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 2024/25 we carried out 8 sampling visits and submitted 11 samples for examination. Our proactive food sampling activity was limited due to resourcing and other competing demands. However, our sampling allocated credits were used for an in-depth project on hygiene standards within tattooing and piercing premises; carried out by Officers within the Health and Safety Team. It is our intention to sample in accordance with our 2025/26 Food Sampling Plan as indicated in Appendix 2. Proactive sampling is programmed for the first Tuesday of 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 remains the same as last year at £4,948. This equates to approximately 100 basic sample analysis (2-6 enumeration and 1 pathogen detection = 25 credits 1 credit = £1.83) 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 e.g. new product and/ or process.
- Informal sampling to assist with giving advice to businesses.
- Resampling from previously unsatisfactory results.

Sampling studies are selected based on a number of factors:

We submitted our preferences from the UK Health Security Agency (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 THE UKHSA.
- Where a source is identified take appropriate action to ensure risk of spreading is controlled.
- Protect the wellbeing 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 notifications of suspected diseases/ infections in patients by registered medical practitioners or of causative agents found in human samples at microbiology laboratories. Food Officers within Cheltenham Council work closely with UKHSA to initiate the appropriate public health actions. 176 notifications were received in 2024/25. Those relating to food are shown below.

Notifications of food poisoning/ foodborne diseases 2024/25:

Causative Organism	No.
Campylobacter	124
Giardia	17
Cryptosporidium	14
Salmonella (generic)	13
Paratyphoid	1
<b>Total</b>	<b>169</b>

It is understood that there is severe under reporting of foodborne 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. This includes 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 2024/25 we were involved in the investigation and management of 1 outbreak.

### **3.9 Food Hygiene Rating Scheme (FHRS):**

The FHRS 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 decision about where they eat and purchase food. The food hygiene rating awarded (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. This requested revisit is separate to revisits carried out for compliance and public health purposes. Display of the rating sticker is not mandatory, but the FSA is committed to mandatory display through the introduction of regulation. The Food Team are responsible for uploading all data from our information management system, Uniform IDOX, to the FHRS portal for public display. This upload is done every 2 weeks and is in accordance with the FHRS Brand Standard IT Guidance.

### **3.10 Requests for Advice:**

In 2024/25 we received 111 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 Education and Promotional 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 such as the campaign 'Safer Food means Better Business'. We work closely with our communications team to support such campaigns.



### **3.12 Food Safety Liaison Group (FSLG):**

We continue to be an active member of the FSLG and contribute to the formulation and implementation of the County Work Plan. See appendix 3. Following our audit by the FSA on service planning and prioritisation, the PEH Manager and Lead Food Officer led on the County inter-authority audit (IAA). This was a significant and important piece of work. We are currently summarising the findings and will report them to the FSA.

### **3.13 Chargeable Services:**

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

Any terms and conditions applicable to the provision of any such service are discussed together with any conflicts of interest and it is made clear that there are other providers of said services 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 attestation for the purpose of export.

56 requests for attestations were received 2024/25. The PEH Manager is required to revalidate her Competency Certificate as the Food Competent Certifying Officer (FCCO) with the Animal and Plant Health Agency (APHA) for any export health certificates; for which there is a charge. The Lead Food Officer will obtain an FCCO Certificate this year. We continue to work 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 apply for this. 13 requested revisits were received in 2023/24. This is separate from a revisit for the purpose of securing compliance with legislation; which is not chargeable. However, such compliance revisits do not change the Food Hygiene Rating. Apart from the requested revisits referred to above, no requests for discretionary services were received in 2024/25.

### **3.14 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 to 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, complainants, 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.

Information may also come from technical sources, CCTV, business records, 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 suggests 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, and work 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 2025/26, as shown in Appendix 4, current resource is considered sufficient to carry out our statutory duties and maintain Officer competency. We do not have much scope for added value activities, such as: entering a Primary Authority Partnership and full engagement in corporate projects. In the event of an emergency, we would consider our Mutual Aid arrangements with Local District Authorities, if necessary.

It must be noted that 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 which can be compared to similar Authorities. At their board meeting in December 2023, the FSA committed to develop and publish a methodology for Local Authorities to use when determining resources. In Feb 2025, this Authority took part in the first iteration of the user acceptance testing of a time and motion toolkit. This toolkit is now in the validation test phase. The document estimating Officer resourcing will be refined once the toolkit has been fully approved for use.

#### **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 was introduced by the FSA. This replaced the Local Authority Enforcement Monitoring System (LAEMS), which was removed in 2022. This will ensure the FSA receive data in a 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 enforcement activity. The FSA are also developing KPIs for Local Authorities; which will be communicated in due course.

## **5.2 Internal monitoring; Qualitative and Quantitative:**

The Public and Environmental Health Manager and the Lead Food Officer monitor the qualitative and quantitative work of the Food Safety Team based on the operational performance indicators.

We have documented policies and /or procedures for all activities as required under the FLCoP. A list can be found at Appendix 5. 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 competency training.

The Uniform Database (which also forms the Public Register of food premises) is audited on a fortnightly basis for data accuracy before uploading 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 also given in team meetings. 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 Exercise' and consider the findings in the summary reports.

The PEH Manager is responsible for monitoring internal performance indicators. Our current operational indicators 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 (rated 3 or above).

## **6. Review:**

### **6.1 Review Against the Service Plan:**

Any major deviation from the above indicators 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.

## **7. Factors Affecting Service Delivery:**

### **7.1 Staff Development and Competency:**

This Service Plan can only be effectively delivered by fully competent Officers. The Competency Framework for Officers carrying out Official Food Controls is currently under review as part of the modernisation of the 'Food Delivery Model'. The new framework is expected in June/July 2025. Our Officer authorisation process is linked to and determined by the Competency Framework, which will be amended accordingly. Following extensive training and supervision, all staff are fully competent to deliver Official Controls. However, should there be any changes in staff service delivery may be compromised due to the FLCoP competency requirements.

### **7.2 Recruitment and Retention:**

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.

Due to recruitment challenges within the Environmental Health profession, we continue to explore alternative ways to recruit. In 2024, we used our apprenticeship levy to internally recruit an Environmental Health Degree Apprentice through the new 'Chartered Institute of Environmental Health Apprentice Pathway'. We are also currently onboarding a Regulatory Compliance Officer Apprentice. Although, it is hoped they will be part of the Private Sector Housing Team. However, should the need arise, they have cross-cutting regulatory skills which can be used in any of the Public Protection Team's disciplines.

### **7.3 The Modernisation of the Delivery Model:**

Much of the proposed modernisation to the Food Hygiene Delivery Model was put on hold in 2024, as the FSA focused on changes to the Food Standards Delivery Model. Work streams are still ongoing including national level regulation, improvements to the FLCoP, enhanced registration and revision of the Competency Framework. Any changes will require extensive engagement with Officers. Any significant changes may also require changes to our Information Management System.

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 Borough, 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.

#### **7.4 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.

#### **8. Areas for Improvement:**

As part of our commercialisation project, we aim to better utilise technology during our inspections. A corporate project is underway with the Food Team and Private Sector Housing Team using tablets on site to capture information in real-time and use electronic forms to replace handwritten forms. We are exploring the use of IDOX, in-house and 3<sup>rd</sup> party apps to see how efficiency can be improved 'in the field'.

We will have a stronger focus on proactive sampling.

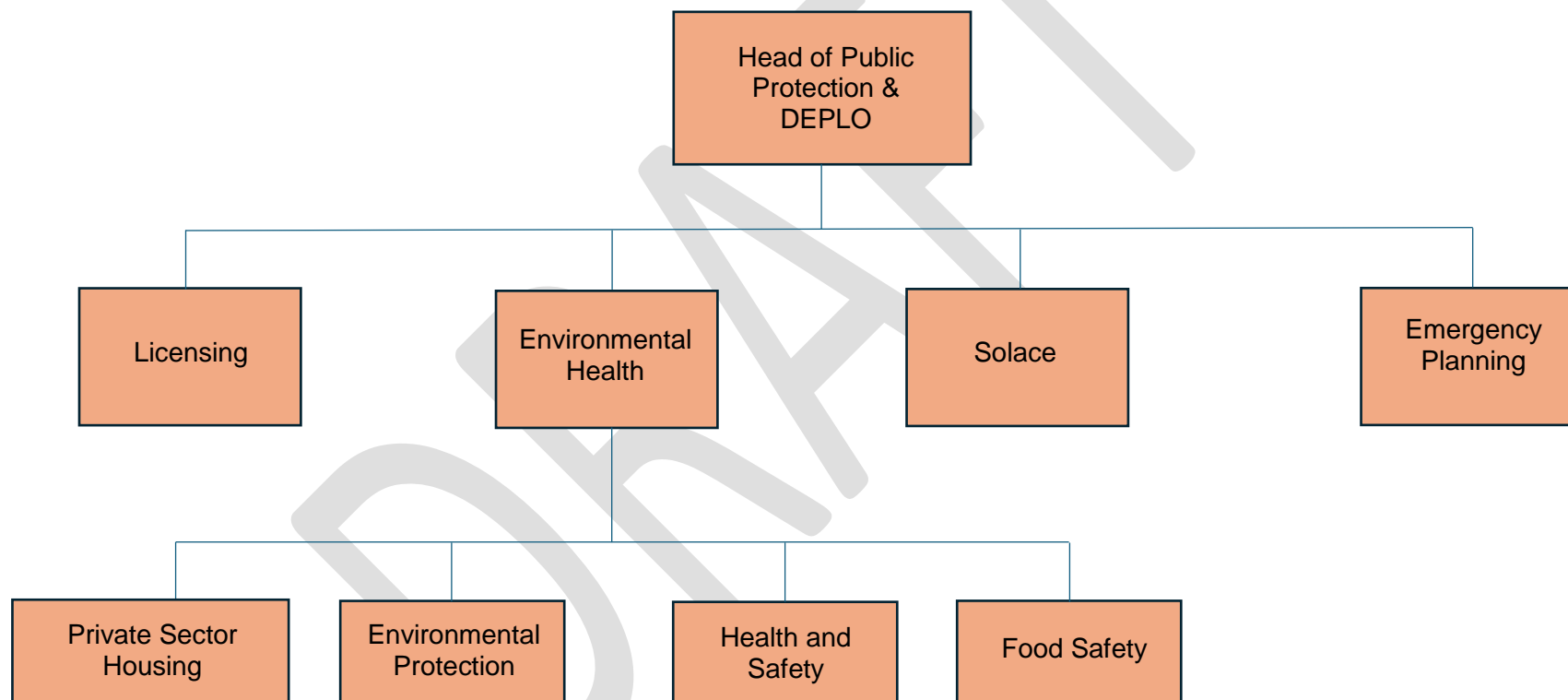
We continue to streamline our alternative enforcement interventions.

We will review all our policies and procedures.

#### **9. Review:**

This Service Plan, its format and content will be reviewed annually as a minimum and will be reviewed periodically to reflect any changes in the regulatory landscape. It will be reviewed periodically in consideration of experience gained and the results of internal monitoring, as described above.

Public and Environmental Health Structure:



## Appendix 2

Sampling Plan 2025/26												
Month of Sampling	A	M	J	J	A	S	O	N	D	J	F	M
<b>Proactive</b>												
Study 83 – dried fruit, seeds and nuts.												
Study 84 – root veg.												
Study 85 – TBC.												
Additional Studies TBC.												
Local Sampling Study – Sushi.												
Local Sampling Study – Steak Tartare.												
<b>Reactive</b>												
Complaints												
As part of Official Controls												
At request of FBO												

**COUNTY FOOD SAFETY GROUP DRAFT WORKPLAN 2025/26****Date of last update: 4 March 2025**

<b>Time Period</b>	<b>Area of Work</b>	<b>Project Leads</b>	<b>Update</b>
April 2025	FSA data returns	All	
From May 2025	FSA Webinars	FSA	
May 2025	Submission of Service Plans for approval	All	
May 2025	Submission of data for the Health Protection Board (HPB)	All	
September 2025	Training day	TBC	
Oct 2025	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	Project on single-use plastics with new legislation coming out and a focus on becoming carbon neutral	TBC	
From Nov 2025	Update of policies and procedures required by the FLCoP	TBC	

# Estimated Officer Resourcing:

# Appendix 4

Service Function	Estimated Demand Unit (Hours)	Estimated Time Per Unit (Hours)	Equivalent Officer Hours
Cat A due	2	7	14
Cat B due	13	7	91
Cat C due	157	6	942
Cat D due	137	4.5	616.5
Cat E plus 10% site visit due	144 +14 = 158	2.5	395
New registrations	150	7	1050
Complaints	68	2.5	170
Allegations of food poisoning	45	1	45
Infectious disease notifications and investigations	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	5	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
<b>Total Demand</b>		<b>4391.5</b>	
Available Officer hours	52 x3 x 37	37	5772
Annual leave	3	222	-666
Bank Holidays	7 x 3	7.4	-155.4
CPD	30	4	-120
Sickness	3 x 2 x 37	37	-296
Other statutory training	10	3	-30
<b>Total available hours</b>		<b>4504.6</b>	
<b>Shortfall/ Surplus</b>		<b>+113.1</b>	

**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 Assimilated Law: Regulation (EC) No. 852/2004 and Assimilated Law: 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	Officers 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 that 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 and that they 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 Diseases	Competent Authorities must have a procedure(s) to ensure that the control of outbreaks of food related infectious diseases, and the investigation of notified food related infectious diseases 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 Sampling Policy must set out the Competent Authority's approach to food sampling.
Contingency Plan	The Contingency Plan must set out what the Competent Authority would do in an emergency.
Service Plan	The Service Plan must cover all areas of food law that 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 Service plan must be submitted for approval by a relevant member forum or relevant Senior Officer.
Intervention Programme	The Intervention 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 for.
Sampling Programme	The Sampling Programme must set out the details of the Competent Authority's intended risk-based food sampling priorities.
Training Programme	The Training programme must ensure that Authorised Officers undertaking Official Food Controls and other Official Activities receive appropriate training.
Alternative Enforcement Strategy (AES)	The AES must set out how the surveillance of food business establishments that can have Alternative Enforcement Strategies applied to them will be conducted.

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