



Forest Heath & St Edmundsbury councils

**West Suffolk**

working together

## **Appendix A**

# **West Suffolk Food Safety Service Plan 2018/19**

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## **Preface**

The Food Standard Agency (FSA) Framework Agreement sets out what the FSA expects from local authorities in their delivery of official controls on food law including within service plans.

The Food Law Code of Practice states that each Competent Authority must have an up-to-date, documented Food Service Plan which is readily available to food business operators and consumers. The Plan must be subject to regular review and clearly state the period of time during which the Plan has effect.

The Plan must cover all areas of food law that the Competent Authority has a duty to enforce and set out how the authority intends to deliver Official Controls within its area. The Plan must include imported food responsibilities and the control arrangements in place. The Plan must include reference to the authority's approach to enforcement including its Alternative Enforcement Strategy for dealing with those premises rated as low risk under the Food Establishment Intervention Rating Scheme set.

Working together, Forest Heath District Council and St Edmundsbury Borough Council have developed this document with due regard to all available regulations, conditions, codes of practice, statutory guidance and practical experience of legislation. Should anything in future publications, legislative/regulatory changes or case law impact upon the content of this service plan document, then it will be taken into account and the document may be updated at a later stage and with due consideration to the resource implications for the Regulating Food Authority.

Since 2011, the West Suffolk councils have adopted a single delivery approach whilst retaining political sovereignty. In May 2018, following an application to Government, an Order to dissolve St Edmundsbury Borough Council and Forest Heath District Council and create a new West Suffolk Council was approved by Parliament. It is anticipated that the new West Suffolk Council will become an official legal entity on 1 April 2019.

A new West Suffolk Council will not fundamentally alter the way the food team operates, which are bound by the requirements of the Food Standards Agency's Framework Agreement and the Food Law Code of Practice, with the shared services programme having matured during operation over the previous 7 years.

Throughout this service plan the term "West Suffolk councils" and "The Team" should be read as jointly applying to both Councils' and their Food Authority function. Where the Statement applies to only one of the Councils, it will be stated which one.

This Food Safety Service Plan is meant to be read in conjunction with the Planning and Regulatory Services Business Plan for 2018/19, an extract of which is presented at Appendix 1.

For further information please refer to:

[www.food.gov.uk](http://www.food.gov.uk)

[www.westsuffolk.gov.uk](http://www.westsuffolk.gov.uk)

If you require this information in another format or language, please phone 01284 757400 or email [food&safety@westsuffolk.gov.uk](mailto:food&safety@westsuffolk.gov.uk) to discuss your need.

## **1.0 VISION, PURPOSE, AIMS AND OBJECTIVES**

### 1.1 Service Vision and Purpose

**To protect public health and safety and the environment, by carrying out programmed and reactive interventions, investigations and research to detect, eliminate and/or control hazards by applying fair, transparent and proportionate enforcement.**

### 1.2 Range of functions and activities

The Food Safety function is delivered by the Commercial Environmental Health Team, located within the Environmental Health Service in the Planning and Regulatory Services Directorate.

The range of food safety functions undertaken by the Commercial Environmental Health Team are varied and include the following:

- Programmed interventions/inspections and revisits in food premises for which the West Suffolk councils are the enforcing authority;
- Investigation of complaints concerning food, the full range of food establishments, and food handling practices;
- Providing food safety advice and support to new and existing food business operators, including help by promoting the Food Standards Agency's "Safer Food, Better Business" food safety management system;
- Food sampling in accordance with the programme prepared by the Public Health England and the Eastern Region Food Sampling Group;
- Investigation of suspected and confirmed food poisoning cases and outbreaks, and other notified infectious disease cases;
- Action in respect of Food Alerts issued by Food Standards Agency;
- Acting as "Originating Authority" to food manufacturers and producers within West Suffolk and issuing Health Certificates for those who export foodstuffs;
- Ensuring the removal of unfit food from the food chain by seizure, detention or voluntary surrender;
- Consultees for food safety guidance and policies, planning applications, etc.;
- Food Safety Promotional and Educational Campaigns;
- Health Development in areas related to the functions above, e.g. participation in the Eat Out Eat Well award scheme;
- Checks on inland imported food control at retail, catering and other establishments;
- Registration of all food establishments, including Approvals where appropriate.

### 1.3 Customers

Our customers are varied; however they mainly include the following:

- All members of the public residing in or visiting West Suffolk;

- Food establishments for which we are the responsible enforcing food authority;
- Public Health England;
- Food Standards Agency;
- Local Authorities;
- Trading Standards;
- Port Health;
- Internal Services.

#### 1.4 Aims and Objectives

Within the broader work covered by the Planning and Regulatory Services Business Plan 2018-19, the West Suffolk councils have responsibilities as Food Authorities.

Our aims are:

- To work with businesses and consumers to promote and secure high standards of food safety, and minimise risks to the health of residents and visitors, by ensuring that all food processes, premises and food handlers within West Suffolk maintain good levels of hygiene
- To seek to continually improve health, safety and welfare standards and to reduce health inequalities of all individuals working in and visiting places of work within the district
- To protect public health and safety by carrying out targeted inspections (interventions), enquiries, investigations and research to detect, eliminate and/or control hazards by applying fair, proportionate and transparent enforcement
- To help businesses through smarter ways of regulation to reduce the burden so that they can make a beneficial contribution to the local economy.

These aims are supported by a number of objectives:

1. Carry out an annual planned programme of food hygiene inspections in accordance with Food Standards Agency framework guidance, codes of practice and relevant statutory requirements.
2. Investigate food and food premises complaints and take appropriate action in accordance with our service standards, procedures and national guidance.
3. Inform businesses of their legal obligations under relevant legislation.
4. Carry out routine microbiological sampling in accordance with national guidance and participate in local, regional and nationally coordinated surveys.

5. Investigate and monitor reports of infections and notifiable diseases in partnership with Public Health England.
6. Respond to food alerts issued by the Food Standards Agency in accordance with local and national guidance.
7. Act as originating authority for certain food businesses and investigate or respond to any enquiries made by other authorities or agencies.
8. Provide advice, assistance, training and development opportunities to both businesses and consumers. Help businesses improve their standards by promoting best practice, self-regulation and enhancing the competence skills of employees.
9. Promote food safety and, where appropriate, participate in local and national campaigns.
10. Provide appropriate training and development opportunities for staff to ensure an appropriate level of competence.
11. Work in partnership with other agencies to help secure and promote good food hygiene.
12. Ensure the work of the Service accords with the West Suffolk councils' policies.

#### 1.5 Links to the Strategic Plan

West Suffolk's Strategic Plan sets out what the councils aim to achieve, with our partners, local businesses, communities and residents. This means focusing our efforts and resources in the areas that are the biggest priorities for West Suffolk.

Our strategic priorities are:

- Increased opportunities for economic growth;
- Resilient families and communities that are healthy and active;
- Homes for our communities.

We review our Strategic Plan regularly in order to ensure that it remains relevant and is kept up to date. Progress towards delivery of our Strategic Plan is set out in the West Suffolk annual report.

More information on the Strategic Plan can be found on our website:

[http://www.westsuffolk.gov.uk/Council/Policies\\_Strategies\\_and\\_Plans/strategic\\_plan.cfm](http://www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/strategic_plan.cfm)

#### 1.6 Enforcement Policy

The councils currently have separate written enforcement policies. Work is in progress to refresh the West Suffolk Enforcement Policy, providing a framework for all of our regulatory services, including the food safety service.

The refreshed policy will reflect changes brought about by the Regulators' Code which establishes how non-economic regulators should interact with those they are regulating. The Code requires regulators to:

- Carry out their activities in a transparent way that helps those they regulate to comply and grow;
- Design simple and straightforward ways to engage with and hear the views of those they regulate;
- Base their regulatory activities on risk and share information about compliance and risk; and
- Ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities.

Officers, including those with responsibility for the enforcement of food and health and safety laws, have regard to the Enforcement Policy when making enforcement decisions.

## 2.0 **SERVICE DELIVERY**

### 2.1 Demands on the Food Safety Service

There are 1,880 food establishments registered/approved under food safety legislation in West Suffolk. A profile of registered/approved food establishments classified in accordance with the Food Standard Agency's main use codes is given in Table 1.

**Table 1 - Profiles of registered/approved food establishments in Forest Heath and St Edmundsbury. Source: M3 database 11/04/2018 (2017 figures)**

<b>FSA Category</b>	<b>Number of establishments</b>
<b>Primary producers</b>	39 (43)
<b>Manufactures/Processors</b>	65 (78)
<b>Packers</b>	4 (0)
<b>Importers/Exporters</b>	4 (4)
<b>Distributors/Transporters</b>	60 (55)
<b>Retailers</b>	374 (357)
<b>Restaurants and Caterers</b>	1334 (1327)
<b>TOTAL</b>	<b>1880 (1864)</b>

The number of food establishments approved/conditionally approved under EU Regulation 853/2004 is:

Forest Heath: 7 (2017 = 7)  
 St Edmundsbury: 7 (2017 = 7)

Source: M3 database 11/04/2018

The West Suffolk councils have approved establishments that produce meat, fish, dairy and egg products.

West Suffolk attracts many tourists and visitors due to the range of things to do, from outdoor family fun and historical events to live music. Events and activities such as the Bury St Edmunds Christmas Fayre, Newmarket Races, and Forest Live see the Team working with event organisers and others during the planning and delivery of their events to ensure that the food stored, prepared and served is safe to eat and complies with food safety laws.

The Team perform out-of-hours inspections where this is necessary, e.g. some large outdoor events and Sunday/farmers' markets. Some food businesses that are open for business at night, at weekends or in the early hours of the morning, are identified for occasional inspection at these times.

There are a large number of food businesses associated with and/or operated by the ethnic minorities within West Suffolk - including Chinese/Cantonese, South Asian, Turkish, Greek, Thai, Portuguese and Polish. The majority of food businesses run by these groups are takeaways, restaurants and retail shops. The Team makes use of translated information made freely available by the FSA, e.g. advisory leaflets. Additional translation services may be used where there is a legal requirement to do so, where it is necessary to help ensure that Food Business Operators understand where action needs to be taken to protect against serious risk to public health, or to assist in efficient and effective service delivery. These additional translation services are rarely needed as part of our routine work.

Correspondence with food business operators or customers known to have a poor understanding of English may be provided in appropriate languages/alphabets advising the recipient of the legal importance of the letter and the need to obtain a full translation.

Several food businesses cater specifically for people who are vulnerable e.g. as a result of age or disability. This is taken into account by appropriate risk scoring criteria used in the risk rating of such premises to determine intervention and inspection frequencies.

## 2.2 Interventions at Food Establishments

The Team aims to ensure that food in the West Suffolk area is fit for human consumption, and that outbreaks of food poisoning and other infectious diseases are controlled. To achieve this, inspections and interventions at food establishments are carried out using a risk-based approach, in accordance with the Food Law Code of Practice. Specialist computer software is used to record all food business establishments. These records are kept up to date and are used to administer the programme of risk-based inspections and other interventions.

The Food Law Code of Practice requires that all food establishments should receive an initial inspection. This should normally take place within 28 days of registration or from when the Authority becomes aware that the establishment is in operation. This reflects the importance of ensuring new food establishments are complying with food law.

Food establishments are risk-rated using criteria set out in the Food Law

Code of Practice. Establishments receive a risk rating according to:

- the nature of their business, e.g. the risk associated with the type of food handled, processing methods, number and vulnerability of customers; and
- the standard of food safety achieved, i.e. compliance with food safety law.

Establishments may be rated as higher risk either because of the high-risk nature of the food and processing methods at their business, because of the low standards of food safety, or a combination of both. Establishments receive a risk rating ranging from A (highest risk) to E (lowest risk). Unrated establishments include new businesses that are waiting for an inspection to be carried out. Some establishments are outside the risk-based intervention and inspection programme, such as primary producers.

Profiles of the food establishments by risk are shown below in table 2.

**Table 2 - Profiles of food establishments according to risk. Source: M3 database 11/4/2018 (2017)**

<b>Risk Category and number of food establishments in each category</b>					
<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>Unrated*</b>
8 (7)	41 (38)	234 (238)	647 (648)	690 (708)	260 (230)

\*The "Unrated" category consists of either new premises awaiting inspection, outside the inspection programme, or premises requiring database recoding e.g. as a non-food premises.

The minimum intervention frequency as required by the Food Law Code of Practice, and the estimated time per intervention for each risk category, are set out below in table 3.

It should be noted that all estimated times in the following sections are based on our previous experience.

The range of available interventions for food establishments includes inspections, monitoring, surveillance, verification, audit, sampling, education, advice, coaching, information and intelligence gathering. The regulatory burden is minimised by selecting the most appropriate intervention for the risk category of the establishment. Alternative enforcement strategies include the use of questionnaires for lower risk category E food business establishments.

**Table 3 – Food Law Code of Practice minimum intervention frequency and locally estimated time per intervention for each risk category.**

<b>Category</b>	<b>Minimum intervention frequency</b>	<b>Estimated time per intervention (hours)</b>
A	6 months	6
B	12 months	6
C	18 months	5



D	24 months	3
E	Alternative enforcement every 3	2
Unrated / Uncategorised	-	2

The numbers of food interventions due (including outstanding) for 2018/19 by risk category are shown in Table 4.

**Table 4 - Number of food interventions due, including outstanding 2018/19 (2017/18). Source: M3 database 11/04/2018 (2017)**

Risk Category	Number Due 2018/19	Estimated Time to complete (Hours)
A	8 (6-monthly inspection) (7 (6-monthly inspection))	96 (84)
B	42 (35)	252 (210)
C	151 (161)	755 (805)
D	290 (394)	870 (1182)
E	375 (422)	750 (844)
Uncategorised	22 (18)	44 (36)
<b>TOTAL</b>	<b>888 (1037)</b>	<b>2767 (3161)</b>

The food interventions at lower-risk premises that were not completed in 2017/18 will be carried forward into 2018/19 and are shown below in table 5.

**Table 5 - Number of food interventions being carried forward into 2018/19 (2017/18) Nb. Figures included in Table 4 above. Source: M3 database 11/04/2018 (2017)**

Risk Category	Outstanding	Estimated Time to complete (Hours)
A	0 (0)	Included in Table 5
B	0 (0)	
C	0 (13)	
D	67 (90)	
E	187 (191)	
Uncategorised	12 (9)	
<b>TOTAL</b>	<b>266 (303)</b>	

Missed lower-risk inspections, arising as a result of access issues such as infrequent and erratic trading or because the team resources were focused on higher-risk premises during a recent period of staff shortages, will continue to be picked up during 2018/19. Work to clear the outstanding lower-risk inspections is being carried out in close liaison with the Food Standards Agency's Regulatory Delivery Assurance Team as part of their standard review of local authority intervention activity.

Interventions are undertaken following documented procedures. The date of a primary inspection may be brought forward, e.g. in response to a complaint,

a new food registration, a material change in the business, receipt of information from the FSA, an outbreak, or being a seasonal business that may be closed at the time of the next date due. Other reactive interventions are carried out at other times, e.g. in response to customer complaints, alleged cases of food poisoning, food hazard warnings, sampling, revisits and requests for advice.

Most food businesses that supply food direct to the public receive a rating under the Food Hygiene Rating Scheme (FHRS). These ratings range from **0** (urgent improvement necessary) to **5** (very good). Businesses that receive a rating of 0, 1 or 2 have a poor level of compliance with food safety and hygiene law.

Businesses that are broadly compliant with food safety and hygiene law will receive at least a rating of **3** (satisfactory), and on 31 March 2018 over 97% in West Suffolk were rated **3-5**. Businesses that have a good level of compliance with food safety law will receive the top rating of **5**.

Interventions will be undertaken more frequently for poorly compliant businesses as their risk-rating is reviewed. These interventions aim to achieve better and sustained compliance rates at poorly compliant food businesses. Revisits of poorly compliant businesses due in 2018/19 will be carried out as necessary.

Changes to the Food Law Code of Practice in 2017 have enabled local authorities to offer fast-tracked visits at the request of the business for FHRS re-ratings on a chargeable basis. The introduction of fast-tracked visits benefit businesses by removing the initial 3-month standstill period prior to a current FHRS re-rating visit. In addition, there will be no limitation in the number of re-rating requests from a business, which is currently limited to only one FHRS re-rating visit following a routine inspection.

Other Suffolk local authorities charge for FHRS re-ratings; our decision to delay introduction has been in order to allow sufficient experience of other local authorities to inform how we apply charging locally.

To ensure consistency with the other Suffolk local authorities, ensuring fairness and business equality across Suffolk businesses, and to provide businesses with improved opportunities for FHRS re-ratings, a charge is to be introduced for FHRS re-ratings in West Suffolk. The charge will be set at £110 per re-rating visit, consistent with other Suffolk authorities, and will apply to all requests for a FHRS re-rating. Uptake will be monitored with future pricing reviewed periodically based on experience.

For information:

Proposed for West Suffolk	£110
Waveney/Suffolk Coastal	£115
Babergh/Mid Suffolk	£100
Ipswich	£120

The charge of £110 for West Suffolk was chosen as the median of our peer authorities in Suffolk.

Other national charges of note, from data supplied by London Borough of Hackney benchmarking exercise:

Borough of Poole	£71 (lowest in UK)
London Borough of Wandsworth	£206 (highest in UK)
UK average	£156.90.

Research, using data from other Suffolk authorities, indicate that there will be a slight increase in the number of re-rating requests following the introduction of the charges. Our own experience over the last two years is that out of around 750 businesses inspected each year, between 20 and 30 businesses (4%) request a re-rating. A proportion of these could choose to opt for a fast-track re-rating inspection.

At this time, no announcement has been made about when mandatory display of FHRS ratings will be introduced, however this could significantly increase the number of businesses who may opt for a fast-tracked visit. This would impact on the staff resources currently available within the Team and will be reviewed accordingly.

Any fast-tracked re-rating visit will be carried out in accordance with the FHRS Brand Standard and the CEH team work procedures which are being revised to accommodate this change.

The Team have worked closely and successfully with several businesses to actively promote improved ratings following interventions at those businesses, through the use of media and social media.

The Trading Standards Department of Suffolk County Council has responsibility for food standards matters. Liaison arrangements are in place through the Suffolk Food Liaison Group to develop joint work plans and to help ensure that matters of joint interest, such as food labelling, imported food, BSE controls, animal by-products, avian influenza and genetically modified foods are discussed. Joint visits with Trading Standards Officers are made where appropriate. Copies of all food registrations received are forwarded to Suffolk County Council's Trading Standards Department.

### 2.3 Food hygiene practices/hygiene of premises complaints

Officers investigate food complaints in accordance with documented procedures and, where necessary, liaise with Primary, Originating and Home Authorities during the course of investigations. In determining an appropriate course of action, the Team take into consideration any reports received from the Primary, Home or Originating Authorities, and the food business identified as the cause of the complaint, and will have regard to the Councils' Enforcement Policy.

**Table 6 - Food Hygiene Complaints 2017/18 (2016/17). Source: M3 database 11/04/2018 (2017)**

2.4

Food Sampling Policy Complaint Type	Number	Estimated Time per Task	Estimated Time to complete (Hours)
Unsatisfactory Practices	53 (44)	6	318 (264)
Unsatisfactory Premises	24 (38)	6	144 (228)
Food Complaint (Biological)	1 (2)	6	6 (12)
Food Complaint (Foreign Body)	14 (14)	6	84 (84)
Food Complaint (Labelling)	2 (0)	5	10 (0)
Food Complaint (Other)	60 (76)	5	300 (380)
Food Complaint (Chemical)	1 (1)	4	4 (4)
Food Complaint (Undercooked)	5 (9)	6	30 (54)
<b>Total</b>	<b>160 (184)</b>		<b>896 (1026)</b>

Microbiological food sampling makes an important contribution in protecting the general public and discharging the Councils responsibility in food law enforcement. Microbiological food sampling is used as part of a planned approach to gather information about the microbiological quality, and possible presence of harmful microorganisms, in particular foods which are produced and/or sold locally. Based on this information appropriate action can be taken to protect the consumers.

The councils are committed to providing the resources necessary to carry out a sampling programme. Environmental Health Officers are responsible for undertaking the food sampling functions. The councils have a food sampling programme for microbiological purposes. The food sampling is prioritised to concentrate upon one or more of the following criteria:

- foods which are produced within the Councils' districts;
- the risk ratings of the premises; and
- any local, regional or national coordinated sampling surveys or programmes.

The majority of food samples, including hygiene swabs, are taken informally, for the purpose of monitoring, surveillance and intelligence gathering. Formal samples will be taken where enforcement action is anticipated and these samples will be taken in full compliance with the legislation, relevant Code of Practice and consideration of the Councils' Compliance and Enforcement Policy.

Official laboratories as designated by the FSA will be used for samples obtained during the sampling programme. The designated laboratory is the Public Health England Laboratory at Collindale, London. Other samples will be sent to the Council's Public Analyst, Public Analyst Scientific Services Limited.

Samples are recorded using the Northgate M3 database. The FSA's UK Food Surveillance system (UKFSS) has now been decommissioned by the FSA due to performance issues, an alternative is likely to be introduced in the next few years.

Samples may be taken during manufacturing/production processes for the purposes of ensuring food safety and establishing the effectiveness of the critical controls in the process. The manufacturer will be notified of the result of any such sample analysis or examination.

The councils do not currently act as a Home Authority or Primary Authority for any food business. Where sampling identifies a problem with food manufactured outside the districts, the relevant primary, home or originating authority will be notified and a copy of the certificate of analysis or examination will be forwarded to them.

Food sampling will not normally be undertaken as a constituent part of food safety inspections. It may take place if, during the inspection, the authorised officer identifies a particular problem that needs further investigation.

Samples of food received as a food complaint may require microbiological examination, chemical analysis or expert identification.

Where a particular premises or food produced in the districts is implicated with a case, or cases, of foodborne disease, food samples may be taken and submitted for examination, for the purpose of identifying any likely source of infection, and controlling any risk to public health. These samples are likely to be formally taken and examined.

Food samples may be taken and submitted as part of a special investigation, e.g. in response to a food hazard warning or other intelligence received about potential food safety and quality issues.

**Table 7 - Food Samples 2017/18 (2016/17) against anticipated in 2018/19. Source: M3 database 11/04/2018 (2017)**

	<b>Number of Samples</b>	<b>Estimated Time Per Sample (Hrs)</b>	<b>Total Time (Hrs)</b>
Actual 2017/18 (2016/17)	132 (42)	2.5	330 (105)
Anticipated 2018/19	150	2.5	375

## 2.5 Control and Investigation of Outbreaks and Food Related Infectious Disease

The Team will assess and respond accordingly to reports of communicable diseases, including food-associated illness. The investigation of outbreaks of food poisoning is conducted in liaison with the Consultant in Communicable Disease Control (CCDC), having regard to the Norfolk, Suffolk and

Cambridgeshire Joint Communicable Disease Incident/Outbreak Management Plan. Information relating to certain infections will be collected as a matter of urgency and passed to the Anglia Health Protection Team, Public Health England, in accordance with the East of England Standard Approach to Investigating Gastro-Intestinal Disease Cases.

The Team response to a report of communicable disease, including food-associated illness, is undertaken following documented procedures.

**Table 8 - Gastrointestinal disease cases notifications 2017/18 (2016/17) against anticipated in 2018/19. Source: M3 database 11/04/2018 (2017)**

	<b>Number of Reported Cases (Individuals)</b>	<b>Time Per Case (average)</b>	<b>Total Time (Hrs)</b>
Actual 2017/18 (2016/17)	93 (145)	2	186 (290)
Anticipated 2018/19	100	2	200

Joint civil contingency and emergency stand-by arrangements exist to respond to suspected or confirmed outbreaks of infectious disease or food poisoning with either the potential to cause serious harm or death to any person, or debilitating illness or disease to significant numbers of people, or illness or disease to particularly vulnerable populations.

## 2.6 Food Safety Incidents

Arrangements are in place to receive FSA Food Alerts for Action and take specified action on behalf of consumers.

During 2017/18, 78 food alerts were notified by the FSA. Very few of these required formal action, i.e. dedicated visits to local food establishments. All food alerts are logged and recorded on our specialist database.

**Table 9 - Food Alerts Requiring Action 2017/18 (2016/17) against anticipated in 2018/19. Source: M3 database 11/04/2018 (2017)**

	<b>Number of Alerts requiring local action</b>	<b>Time Per Case (average)</b>	<b>Total Time (Hrs)</b>
Actual 2017/2018 (2016/17)	0 (3)	4	0 (12)
Anticipated 2018/2019	2	4	8

## 2.7 Primary Authority and Home Authority Schemes

The Regulatory Enforcement and Sanctions Act 2008 introduced into law the principle of the Primary Authority (PA). All local authorities are required, by law, when considering enforcement action against a business with multiple outlets, to follow advice agreed between the business and its PA. The purpose of these requirements is to achieve greater consistency in enforcement action in large, multi-outlet businesses.

The Team supports the PA and Home Authority (HA) schemes. Where PA partnerships are registered with the Regulatory Delivery (formerly the BRDO), an officer will contact the PA to ensure that proposed actions are not contrary to appropriate advice that the PA has previously issued.

## 2.8 Advice to Business

The Team actively support businesses to help them grow and become a success. The Team provides advice to businesses, for example:

- the promotion of information guidance notes to assist businesses comply with the law and good food hygiene practices;
- directing enquiries to relevant sources of competent and reliable advice, e.g. FSA website;
- distribution of FSA and other guidance to businesses relating to specific and topical issues;
- provision of advice to businesses during and following inspections;
- mailshots;
- through the West Suffolk Environmental Health Facebook page; and
- responding to requests for advice from businesses and members of the public.

**Table 10 - Requests for Advice 2017/18 against anticipated in 2018/19. Source: M3 database 11/04/2018 (2017)**

	<b>Number</b>	<b>Time Per Case (average)</b>	<b>Total Time (Hrs)</b>
Actual 2017/2018 (2016/17)	212 (248)	4.5	954 (1116)
Anticipated 2018/2019	250	4.5	1125

Many of these enquiries and advice requests take time for the officers to research and compile the advice, often very specialised, with some requiring visits to the premises.

The Team takes all such opportunities to engage with businesses, e.g. when a food registration form is received, etc. to provide advice by telephone or by visits to the premises. The advice visits enable businesses to commence their operations in a safe manner and in compliance with regulations, with appropriate signposting to other departments for further guidance relating to licensing, planning, building control, available grant funding, etc. This proactive support enables the business to receive the higher FHRS food ratings at their initial food hygiene inspection, essential for a new business to present to

customers.

The Team contributes updates to the councils' website pages and social media content. These offer a range of information on setting up a new business, Safer Food Better Business, commonly used forms to download, how to make complaints or make an enquiry, general food safety information and a link to the FSA's website for more information.

The Team recognises the importance of social media as a highly effective means of communicating and engaging with the public. The Team maintains the West Suffolk Environmental Health Facebook page, posting articles relating to all Environmental Health Service teams. The Facebook page is used to provide general food safety information and guidance, to actively promote the Eat Out Eat Well awards and to publicise press articles that relate to our positive support of local businesses. An Eat Out Eat Well award Facebook post in early April 2018 had a reach of over 5,000 people.

## 2.9 Better Business for All

Supported by Regulator Delivery (RD) within the Department for Business Energy and Industrial Strategy (BEIS), we are working with other regulatory services and the New Anglia Local Enterprise Partnership (LEP), covering Norfolk and Suffolk, to develop better ways of working to improve the effective and efficient delivery of regulatory services. The core aims of the Better Business for All initiative are to:

- Raise the profile of the regulatory services provided by local authorities;
- Improve the co-ordination of information flows between the various regulators;
- Develop a greater understanding of what businesses need from local regulators;
- Improve stakeholder access to regulatory information and guidance.

## 2.10 Liaison with other Organisations

The Team has extensive liaison in place with a wide range of other organisations. For food safety matters these include:

- Food Standards Agency;
- Suffolk Food Liaison Group;
- Eastern Region Co-Ordinated Food Sampling Group;
- CCDC and the Anglia Health Protection Team, Anglia and Essex Public Health England Centre;
- DEFRA;
- Immigration Compliance and Enforcement Team - East of England (Home Office);
- West Suffolk Council's Planning and Building Control teams (to review relevant applications);
- Trading Standards/Environmental Health Departments nationally as required;
- Care Quality Commission;
- Suffolk Adult Safeguarding Board; and



- Suffolk Regulatory Services and New Anglia Local Enterprise Partnership Working Group.

## 2.11 Food Safety Promotion

The Team promotes food safety using materials made available by the FSA or produced in-house that are intended for businesses or the public. Examples include:

- helping business operators meet regulations on food hygiene through promoting and supporting the FSA's Safer Food Better Business packs;
- the use of FSA materials during Food Safety Week;
- the development of guidance for market stalls trading in West Suffolk;
- the writing of articles for distribution to businesses by external organisations.

We support the annual Crucial Crew events promoting food safety messages to year 10 school children. In July 2017, 819 children attended the Crucial Crew event in Bury St. Edmunds. The Team plans to participate at Crucial Crew events across West Suffolk as the opportunity arises.

The Team also actively support the Bury St Edmunds Christmas Fayre and other events, with the whole Team carrying out high-profile interventions at relevant stalls each year.

## 2.12 Healthy eating – Eat Out Eat Well

The Team actively promote the Suffolk Eat Out Eat Well (EOEW) award scheme, encouraging businesses to develop and promote healthier options in their menus and premises. We achieve this by promoting the scheme during routine inspections and other visits, providing information and advice to interested groups and businesses, and by the publication and promotion of EOEW award successes through their social media and corporate media outlets.

As at 30 April 2018, the councils have awarded 58 EOEW awards to businesses in West Suffolk. With some businesses subsequently changing ownership or closing, there are currently 50 West Suffolk businesses holding an award, incorporating 6 Bronze, 20 Silver and 24 Gold (2017 = 29). The total number of awards issued as at 30 April 2018 in Suffolk was 130 (2017 = 77).

We set ourselves an ambitious target to award the 50<sup>th</sup> EOEW award at the end of August 2017. Whilst this target was just missed, we were able to successfully publicise the 40<sup>th</sup> EOEW award at the Bury Food and Drink Festival on August bank holiday. The award was presented on the event's main stage by Jo Churchill MP and received wide and positive publicity in the press and on social media.

In November, the West Suffolk business, T'n'S Catering at Stoke College, was become the 100<sup>th</sup> recipient of an EOEW award in Suffolk. The award was presented at a special event held at the Harbour Inn in Southwold, receiving widespread positive publicity.

In December, the councils presented the 50<sup>th</sup> EOEW award to the Riverside House Hotel in Mildenhall. This award was positively promoted in the local press and on social media.

The Team have also been involved in the piloting of the Suffolk Take Out Eat Well (TOEW) award scheme due to be launched in the autumn of 2018.

### 3.0 **RESOURCES**

#### 3.1 Financial Allocation

Details of budgetary provision are included as annual corporate budgets, published annually on our website.

The Councils maintain their own legal services to provide support to service areas. There is also financial provision made to enable the use of external legal services, where appropriate.

#### 3.2 Staffing Allocation

The Team consists of (Full Time Equivalent FTE):

Commercial Environmental Health Team Leader	1.0 FTE;
Environmental Health Officers	3.8 FTE;
Technical Officer	0.4 FTE.

The Councils' current staff allocation is considered sufficient to meet the responsibilities within the service plan. Additional unplanned work may require reprioritisation within the plan in the event of its occurrence.

The Commercial Environmental Health Team Leader is the Lead Officer for food hygiene and food safety matters, in accordance with the Food Safety Act Food Law Code of Practice.

In addition to the food safety work undertaken by the Team, the officers also carry out many other statutory and discretionary duties, including accident investigations, health and safety regulation and enforcement, managing the West Suffolk Safety Advisory Group, active participation in other groups such as the Mid-Anglia Environment Safety and Health Group, skin piercing registration and regulation, smoke free regulation and enforcement.

These additional duties, and those within this Food Safety Service Plan, are carried out by a professional team of Environmental Health Officers who have the qualifications, knowledge, skills and experience to undertake such a wide variety of activities.

The Technical Officer post, created in September 2016, is a developmental one. The current Technical Officer started a Post-Graduate course at Birmingham University in September 2017 and has successfully passed all assignments to date. This 2-year course will subsequently enable them to carry out the full range of food safety interventions and enforcement and is due to be successfully completed in June 2019. The officer will be gaining practical

experience and training during this period as they carry out their usual duties.

### 3.3 Staff Development Plan

The Councils have a staff performance review scheme. As part of the scheme, officers formally discuss and agree individual performance targets and training/personal development plans with their line manager every 12 months. Progress with the plan is reviewed periodically so any issues can be raised and addressed.

Relevant training areas are identified to ensure the requirements for authorised officers in accordance with the Food Law Code of Practice are met. The FSA's Authorised Officer Competency Assessment form is used to help identify training and development needs.

The Team ensures that all enforcement officers are appropriately qualified and receive regular training to maintain and improve their level of competency. All officers are expected to have access to the equivalent of at least 20 hours update training, which is monitored through the team's internal Service Plan. A mixture of both internal and external training is provided for officers to achieve this aim. Following the recent decision by the Food Standards Agency to cease the provision of free training opportunities for EHO's, Suffolk authorities are working collaboratively to ensure that adequate training opportunities are available for all officers in the future.

## 4.0 **QUALITY ASSESSMENT**

### 4.1 Quality Assessment

The Team has a range of documented procedures which are subject to monitoring and review. In 2015/16 a countywide common procedure template, aligned to the 2015 Food Law Code of Practice, was designed. The documented procedures are currently being reviewed by the Team to reflect changes in the 2017 Food Law Code of Practice and the FHRS brand standard.

### 4.2 Inter Authority Audits and Peer Review

The principle of inter authority audits (IAA) is fully supported. The Team has previously undertaken inter-authority inspection and quality monitoring, with some benchmarking against our similar neighbouring authorities of Babergh and Mid Suffolk District Councils. Peer review also takes place amongst the team, e.g. discussions during team meetings and joint visits.

### 4.3 Internal Monitoring Arrangements

The Team is implementing the following arrangements to assist in assessing and improving the quality of the work carried out:

- reviewing the documented work procedures;
- checking samples of post-inspection reports, letters and notices;
- undertaking a number of shadow-inspections or follow-up visits;

- file reviews during team meetings;
- performance reviews during team meetings based on the Food Safety Service Plan and the Environmental Health Service Plan; and
- one-to-one meetings.

The contents of statutory notices will be discussed and agreed with the Team Leader or other colleagues before service, where appropriate.

#### 4.4 Benchmarking

The Food Standards Agency (FSA) publishes on their website the food safety enforcement activity carried out by all local authorities in the UK. This information is collated from the Local Authority Enforcement Monitoring System (LAEMS) statistical returns provided by local authorities and provides a useful tool for benchmarking performance with other local authorities. The FSA also reports this performance data to Government and Europe.

Monitoring performance against the standards set out in the West Suffolk Councils Food Safety Service Plan will be via management meetings and the corporate Balanced Scorecard.

## APPENDICES

Appendix 1: Extract from the Planning & Regulatory Services Business Plan 2018-19

# Planning & Regulatory Services Business plan 2018/19

**Assistant Director: David Collinson**

**Portfolio Holder(s):**

**Councillor Sara Mildmay-White (Housing Standards)**

**Councillors Alaric Pugh and Lance Stanbury (Development Management & Environmental Health)**

**Service Managers:**

**Development Management: Rachel Almond**

**Environmental Health: Peter Gudde**

**Housing Standards: Andrew Newman**

Forest Heath & St Edmundsbury councils



**West Suffolk**  
working together

<b>General Action / objective</b>	<b>Link to strategic priority</b>	<b>Funding</b>	<b>Timing</b>	<b>Monitoring</b>	<b>Lead Officer and Portfolio Holder(s)</b>	<b>Other services / partners involved</b>
Develop and implement plans to align the directorate with corporate initiatives including Single Council and General Data Protection Regulations	All priorities	Within existing revenue budget	2018/19	Directorate	Service managers/ Councillors Pugh & Stanbury	Policy/Legal Teams
Develop partnerships to support business growth whilst securing effective compliance Progress development of Growth Agenda with Growth team	Increased opportunities for economic growth  Families and communities that are healthy and active	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	Growth Team
Act as the corporate lead to develop the New Anglia 'Better Business for All' approach to smarter business regulation	Increased opportunities for economic growth  Being more commercial	Within existing revenue budget	2017/18	Service	Peter Gudde/ Councillors Pugh & Stanbury	Growth Team/Policy Team
Respond to all service requests according to set performance targets	Increased opportunities for economic growth  Families and communities that are healthy and active  Homes for our communities	Within existing revenue budget	2017/18	Service/Balanced scorecard	Service managers/ Councillors Pugh & Stanbury	

Undertake targeted and proportionate enforcement in accordance with national guidance and corporate enforcement policies Update and amalgamate Corporate Enforcement Policy Audit and update warrants for entry across the service	Increased opportunities for economic growth  Families and communities that are healthy and active  Homes for our communities	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	All teams involved in enforcement
Maximise electronic working and improve on-line access to advice and support to promote customer self-service	Increased opportunities for economic growth  Families and communities that are healthy and active  Homes for our communities	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	DM, LLC, Customer Services
Enhance social media tools to promote the service	Increased opportunities for economic growth  Families and communities that are healthy and active  Homes for our communities	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	IT
Extend, where appropriate, the commercial culture to service delivery	Being more commercial	Within existing revenue budget	2017/18	Service	Service managers/ Councillors Pugh & Stanbury	