

**West Suffolk Council  
Food Safety and Health and Safety  
Service Plans**

**2023-2024**

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# Food Safety Service Plan

## 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.

This document has been developed with due regard to all available regulations, conditions, codes of practice, statutory guidance, and practical experience of legislation. Should anything in future publications, legislative or 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.

In 2021/2022 our food service delivery was impacted by the COVID-19 pandemic in which the environmental health resource was focused on responding to the pandemic requirements. Although restrictions eased in 2021/2022 this was only part way through the year and the backlog of food hygiene interventions which had built up, including an increase in food businesses registering during the period continued to impact on service delivery. Since the restrictions were eased, we focused on using additional resources to increase capacity. The Food Safety Service Delivery Plan will continually be reviewed in light of any new FSA requirements. In particular the end of the Recovery Plan and the FSA's plans to implement a revised food hygiene intervention rating scheme expected in year 2023/24.

# **1. 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 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 (CEH) team, located within the Environmental Health Service in the HR, Governance and Regulatory Directorate.

The range of food safety functions undertaken by the CEH team are varied and include the following:

- Programmed interventions, inspections and revisits in food premises for which the West Suffolk Council is 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 UK Health Security Agency 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 endorsement for export documents 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, and so on
- Food safety promotional and educational campaigns
- Health development in areas related to the functions above, for example 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 applications for approval where appropriate.

## **1.3 Customers**

Our customers are diverse and include:

- all members of the public residing in or visiting West Suffolk
- food establishments for which we are the responsible enforcing food authority
- UK Health Security Agency (formerly 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 West Suffolk Council Service Plan 2023-24 for Environmental Health, West Suffolk Council has responsibilities as a food authority.

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 follow good food hygiene practice.
- 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 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 UK Health Security Agency.
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 West Suffolk Council policies.

## **1.5 Links to the strategic framework**

West Suffolk Council's strategic framework sets out what the council aims 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 vision is:

Supporting and investing in our West Suffolk communities and businesses to encourage and manage ambitious growth in prosperity and quality of life for all. Our strategic priorities are:

- Growth in West Suffolk's economy for the benefit of all our residents and UK plc.
- Resilient families and communities that are healthy and active.
- Increased and improved provision of appropriate housing in West Suffolk in both our towns and rural areas.

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

More information on the Strategic Plan can be found on our website: [West Suffolk Council – Strategic framework](#)

## **1.6 Enforcement policy**

The West Suffolk Council Enforcement Policy came into effect on 1 April 2019, providing a framework for all of our regulatory services, including the food safety service.

The policy includes 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. Service delivery

### 2.1 Demands on the food safety service

There are approximately 1853 food establishments registered or approved under food safety legislation in West Suffolk. A profile of registered or approved food establishments classified in accordance with the Food Standards Agency's main use code is given in Table 1.

**Table 1. Profiles of registered or approved food establishments in West Suffolk. Source: LAEMS Data 13 December 2022 (2021) (2020 figures)**

Food Standards Agency (FSA) category	Number of establishments		
	2022	2021	2020
Primary producers	25	27	31
Manufacturers and packers	52	48	45
Importers	2	1	2
Distributors and transporters	73	80	73
Retailers	392	401	356
Restaurants and caterers	1,309	1,385	1,246
<b>Total</b>	<b>1,853</b>	<b>1,942</b>	<b>1,753</b>

West Suffolk Council have approved establishments that produce meat, fish, dairy and egg products. The number of West Suffolk food establishments approved or conditionally approved under EU Regulation 853/2004 is:

15 (2021 = 16) Source: M3 database 25 November 2022

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 CEH team perform out-of-hours inspections where this is necessary, for example some large outdoor events and Sunday or 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, or operated by, the ethnic minorities within West Suffolk – including Chinese or 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 CEH team makes use of translated information made freely available by the FSA through their website. 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 or 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 as a result of age, disability and so on. 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 COVID-19 pandemic**

During the initial UK response to the global COVID-19 pandemic, it was recognised by the Food Standards Agency (FSA) that local authority food safety teams would be taking an active and significant role in helping to manage the pandemic. The FSA communicated in early 2020 that the food safety team resources should focus on the COVID-19 pandemic. Coronavirus legislation that was brought in laid the responsibility of enforcement of certain elements of the legislation with EHO's and other CEH team staff. To enable this, the FSA directed that routine food hygiene inspections of businesses should cease for a period that eventually extended until mid-July 2020.

Whilst the ability to carry out routine food hygiene inspections was reinstated in July 2020, the FSA still recognised, and supported, that local authority resources should be focussed on dealing with the pandemic as the main priority, with certain food safety priorities being maintained.

In June 2021 the FSA issued the COVID-19 Local Authority Recovery Plan, with guidance and advice to local authorities for the period 1 July 2021 to 2023-24, see figure 1 for the plan outline. The plan aims to ensure that during the period of recovery from the impact of COVID-19, local authority resources were targeted where they add greatest value in providing safeguards for public health and consumer protection in relation to food. It also aimed to safeguard the credibility of the Food Hygiene Rating Scheme (FHRS).

The plan provided a framework for re-starting the food hygiene inspection delivery system in line with the Food Law Codes of Practice, for new food establishments and for high-risk or non-compliant establishments, while providing flexibility for lower risk establishments.

The CEH team at West Suffolk has adhered to the FSA direction and guidance issued, ensuring that relevant reactive food safety work has continued.

The volume of the backlog of inspections peaked at 1004 in March 2022. All local authorities have experienced the build-up of a backlog of varying scales; however, the CEH team have been committed to meeting the requirements of the recovery plan during 2021-23 and beyond.

Initially the team carried out inspections to high-risk new food businesses, high-risk food businesses with a history of non-compliance, category A-rated food businesses and approved food businesses, all completed by 31 March 2022.

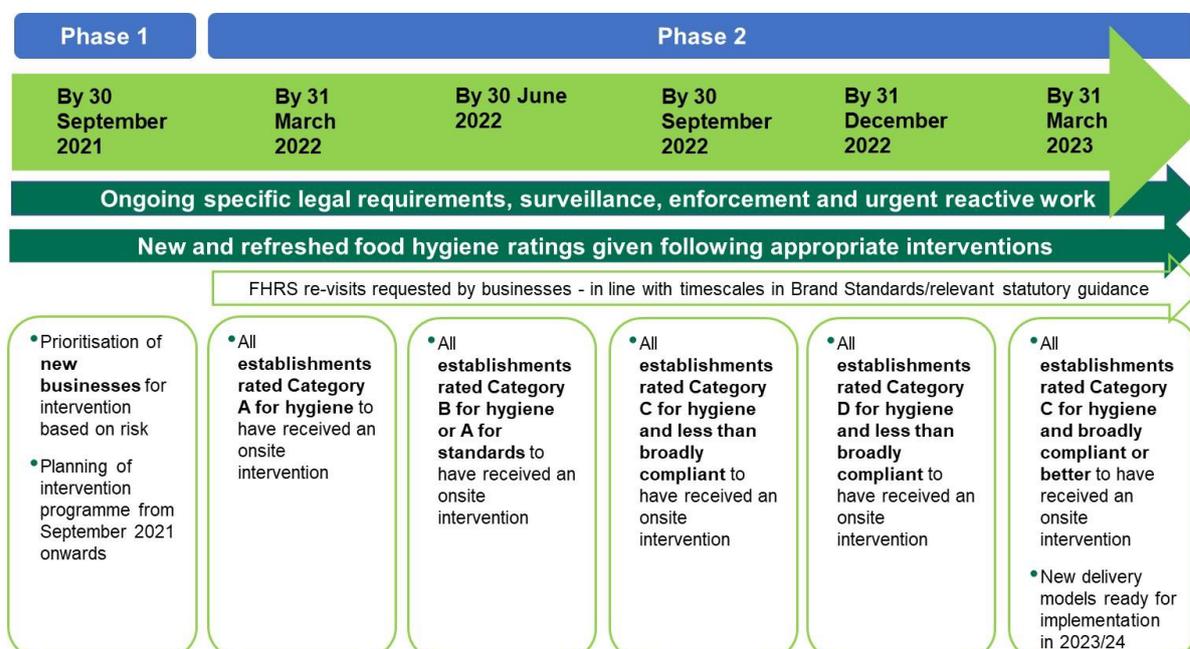
The team then ensured that all category B-rated food businesses were inspected by 30 June 2022 and non-broadly compliant (0-2 Food Hygiene Rating Scheme rating) C-rated food businesses, by 30 September 2022.

The CEH team inspected all non-broadly compliant category D-rated food businesses, by 31 December 2022.

The team is committed to ensuring that all remaining C-rated food businesses will be inspected by 31 March 2023. The number of prioritised inspections, as per recovery plan due by 31 March 2023 are shown below, in table 4b.

The Food Standards Agency have indicated that new inspection programme criteria will be introduced in early 2023, for 2023 to 2024, to enable local authorities to continue to target their staffing resources at the highest-risk food businesses, making use of alternative enforcement strategies to inspect the lowest-risk inspection categories.

**Figure 1 Outline of the Recovery Plan**



## 2.3 Interventions at food establishments

The CEH 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 new 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. It should be noted that new high-risk food establishments are to be prioritised under the FSA's recovery plan, with local authorities deferring the inspection of new low-risk food businesses until a later date. The team are currently seeing a growing number of new food businesses within West Suffolk. These range from small independents to contract changes within set establishments.

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, for example the risk associated with the type of food handled, processing methods, number and vulnerability of customers, and
- the standard of food safety compliance with food law achieved.

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 13 December 2022, 2021, and 2020**

### **Risk Category and number of food establishments in each category**

<b>Year</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>Unrated</b>	<b>Total</b>
2022	3	33	245	659	749	147	1,836
2021	5	27	174	734	632	370	1,942
2020	3	30	219	687	662	152	1,753

The 'Unrated' category consists of either new premises awaiting inspection, outside the inspection programme, or premises requiring database recoding, for example 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 (AES) 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 years	2
Unrated or Uncategorised	-	2

The numbers of food interventions due (including outstanding) up to 31 March 2023 by risk category are shown below, in Table 4a.

**Table 4a. Number of food interventions due, including outstanding up to March 2023. Source: M3 database 13 December 2022**

<b>Risk category</b>	<b>Number due up to March 2023</b>	<b>Estimated time to complete (hours)</b>
A	2	12
B	4	24
C	74	370
D	237	711
E	345	690
Uncategorised	147	294
<b>Total</b>	<b>809</b>	<b>2101</b>

**Table 4b. Number of prioritised food hygiene interventions based on the Food Standards Agency Recovery Plan**

<b>Recovery plan description</b>	<b>Number due up to March 2023</b>
All establishments rated Category A	2
All establishments rated Category B	4
All establishments rated Category C and less than broadly compliant	6
All establishments rated Category D and less than broadly compliant	0
All establishments rated Category C and broadly compliant or better	63
<b>Total</b>	<b>75</b>

**Table 4c. Inspections due April 2023 – March 2024**

<b>Risk category</b>	<b>Number due up to March 2024</b>	<b>Estimated time to complete (hours)</b>
A	0	0
B	23	138
C	143	715
D	221	663
E	128	256
Uncategorised	240	480
<b>Total</b>	<b>755</b>	<b>2252</b>

Unable to classify category A as they will come through from current inspections during the course of the year. Uncategorised will be new inspections from registrations, this is an approximately figure for the year but will fluctuate. The table above does not include any back log inspections.

The total number food hygiene interventions carried out by the CEH team during April 2022 -December 2022 are shown below, in Table 5. Alongside the figures from previous years.

**Table 5. Number of food interventions completed during April 2022 December 2022 and for previous years. Source: M3 database 13 December 2022.**

<b>Risk category</b>	<b>April 2022 – December 22</b>	<b>2020 -2021</b>	<b>2021 - 2022</b>	<b>2019 - 2020</b>
A	4	3	2	7
B	25	2	11	28
C	99	5	141	123
D	193	9	261	206
E	109	6	15	81
Other	72	27	30	3
<b>Total</b>	<b>502</b>	<b>55</b>	<b>532</b>	<b>448</b>
AES Questionnaire	66	115	17	38

It should be noted that the reduced number of interventions carried out during 2020-21 reflected the diversion of CEH officers from food safety and other activities to COVID-19 activities, as mentioned on pages 8-9. This diversion of staff resource was in accordance with a direction issued by the Food Standards Agency at the beginning of the pandemic that recognised the key role CEH team staff would play during the pandemic, providing advice and guidance and carrying investigation and enforcement activities.

Food safety interventions are undertaken following documented procedures. The date of a primary inspection may be brought forward, for example in response to local intelligence, 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, for example 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). On 16 December 2022, **98.5%**, (2021 = 98.5%) (2020 = 98.3%) of FHRS-rated West Suffolk food businesses were rated **3-5**. Businesses that have a good level of compliance with food safety law will receive the top rating of **5**. On 16 December 2022, **85.6%** (2021= 87.4%) (2020 = 87.2%) of FHRS-rated West Suffolk food businesses were rated **5**.

Interventions are undertaken more frequently for poorly compliant businesses due to the increased food safety risk identified. These interventions aim to achieve better and sustained compliance rates at poorly compliant food businesses. Revisits of poorly compliant businesses are carried out to secure the necessary improvements to protect public health. However, it should be noted that these revisits do not lead to an automatic review of their FHRS

rating, and some businesses choose not to apply for a re-rating visit. Such businesses can be seen to have a low FHRS rating for a long period of time, however the CEH team will have carried out the necessary intervention visits to ensure any critical improvements have been made.

The CEH team received 11 requests for a re-rating inspection between 1 April 2022 and December 2022, no requests for a re-rating inspection during 2020-21, reflecting the very low number of food safety inspections carried out during this time period.

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.

## 2.4 Food hygiene practices or hygiene of premises complaints

Officers investigate food complaints in accordance with documented procedures and, where necessary, liaise with a business' primary authority during the course of investigations. Officers also check the primary authority website to ensure that any published inspection plan is adhered to. In determining an appropriate course of action, the team take into consideration any reports received from the primary authority and the food business identified as the cause of the complaint and will have regard to the West Suffolk Council Enforcement Policy.

**Table 6. Food hygiene complaints 2022-23. Source: M3 database 16 December 2022 (2021)**

<b>Complaint type</b>	<b>Number (2021 in brackets)</b>	<b>Estimated time per task (hours)</b>	<b>Estimated time to complete (hours) (2021 in brackets)</b>
Unsatisfactory practices	25 (26)	6	150 (156)
Unsatisfactory premises	29 (26)	6	174 (156)
Food complaint (biological)	2 (0)	6	12 (0)
Food complaint (foreign body)	8 (8)	6	48 (48)
Food complaint (labelling)	0 (3)	5	0 (15)
Food complaint (other)	23 (24)	5	115 (120)
Food complaint (chemical)	0 (2)	4	0 (8)
Food complaint	3 (0)	6	18 (0)

<b>Complaint type</b>	<b>Number (2021 in brackets)</b>	<b>Estimated time per task (hours)</b>	<b>Estimated time to complete (hours) (2021 in brackets)</b>
(undercooked)			
<b>Total</b>	<b>90 (89)</b>		<b>517 (503)</b>

It should be noted that during 2020-21 the UK was subject to a number of COVID-19 lockdowns. Whilst many businesses were able to diversify into takeaway food offerings for their customers, businesses have indicated that there was a significant reduction in the number of customers during the pandemic, which is reflected in the much lower number of complaints received by the CEH team.

## **2.5 Food sampling**

Microbiological food sampling makes an important contribution in protecting the general public and discharging the council's 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 or sold locally. Based on this information appropriate action can be taken to protect the consumers.

West Suffolk Council is committed to providing the resources necessary to carry out a sampling programme and the CEH team are responsible for undertaking the food sampling functions. Microbiological food sampling is carried out to a national and regional programme coordinated through the UK Health Security Agency (formerly PHE) and the Suffolk Food Safety Liaison Group. The food sampling is prioritised to concentrate upon one or more of the following criteria:

- foods which are produced within West Suffolk
- the risk ratings of the premises
- any local, regional or national coordinated sampling surveys or programmes.

The majority of food samples, including environmental 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 with consideration of the West Suffolk Council Enforcement Policy.

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

Samples are recorded using the NEC M3 database.

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

West Suffolk Council does not currently act formally as a primary authority for any food business. Where sampling identifies a problem with food manufactured outside the districts, the relevant primary 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 identified 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 of food produced in West Suffolk is implicated in 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 also be taken and submitted as part of a special investigation, for example in response to a food hazard warning or other intelligence received about potential food safety and quality issues.

**Table 7. Food samples 2022-23 against anticipated in 2023-24. Source: M3 database 25 November (2021)**

<b>Year</b>	<b>Number of samples</b>	<b>Estimated time per sample hrs)</b>	<b>Total time (hrs)</b>
Actual 2021-2022	5	2.5	12.5
Actual 2022-2023	11	2.5	27.5
Anticipated 2023-24	20	2.5	50.0

It should be noted that food sampling activities were reduced as the CEH team prioritised the COVID response during 2020 and 2021. However, food sampling activity will increase during 2023-24 in accordance with the Food Standards Agency’s recovery plan. During the period of January to March 2023 we hope to undertake sampling in line with the current Surveys that are agreed with UKHSA, using our COVID resource officer to assist with delivery.

## **2.6 Control and investigation of outbreaks and food related infectious disease**

The CEH 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 and Outbreak Management Plan. Information relating to certain infections will be collected as a matter of urgency and passed to the Anglia Health Protection Team, UK Health Security Agency, in accordance with the East of England standard approach to investigating gastro-intestinal disease cases.

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

**Table 8. Gastrointestinal disease cases notifications 2022-23 against anticipated in 2023-24. Source: M3 database 16 December 2022**

	<b>Number of notifiable cases (individuals)</b>	<b>Number of food poisoning complaints</b>
Actual 2021-2022	1	59
Actual 2022-2023	3	34
Anticipated 2023-24	15	60

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.

While it is encouraging that the number of formally notified food poisoning dropped to just three notifications, it should be noted that during 2020-21 the CEH team received 183 coronavirus notifications that required investigation or follow-up. Possible reasons for the reduced number of food poisoning notifications could include:

- fewer GP consultations due to COVID procedures at GP's
- fewer stool samples submitted due to COVID procedures at GP's
- consumers taking extra hygiene precautions due to COVID procedures, such as enhanced and more frequent hand washing
- consumers not reporting illness that could have been contracted in their own homes during the various national lockdown's

## **2.7 Food safety incidents**

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

During 2020-21, 71 food alerts were notified by the FSA, compared to 151 in 2019-20. Very few of these required formal action, that is dedicated visits to local food establishments. All food alerts are logged and recorded on our specialist database.

**Table 9. Food alerts requiring action 2022-23 against anticipated in 2023-24. Source: M3 database 16 December 2022**

	<b>Number of alerts requiring local action</b>	<b>Time per case (average)</b>	<b>Total time (hours)</b>
Actual 2020-2021	9	4	36
Actual 2022 -2023	3	4	12
Anticipated 2023-24	8	4	32

## 2.8 Endorsement for Export (formerly Export Health Certificate)

A number of West Suffolk food businesses export products outside the EU, a process that requires each consignment to be accompanied by an Endorsement for Export (EfE).

The UK's exit from the EU, BREXIT, reached its conclusion on 31 December 2020. The current trade arrangements in place with the EU have not necessitated the need for EfE's to be issued for products being exported into the EU from the UK.

All approved West Suffolk food businesses who had confirmed to the FSA that they currently export Products of Animal Origin (POAO) to the EU and would continue to do so after BREXIT was obtained and processed to enable them to export to the EU without the requirement to be accompanied by an EfE. West Suffolk Council also took steps to become listed as a supplier of EfE's where only a certificate of attestation was required by the destination country.

During 2021 the CEH team launched an online EfE offering. The CEH team are offering an electronically signed and emailed EfE, where destination countries allow for this. Wet-signed hard copy EfE's will continue to be available on request.

A review of the fees charged was undertaken due to the changes made regarding electronic and wet signed copies. The new process for providing electronic email EfE's have indicated that a reduced fee of £21.01 per EfE from 4 October 2021. The fee charged for wet-signed hard copy EfE's has changed to £63.03, on 1 April 2022, these fees have been calculated on a cost-recovery basis.

**Table 10. Endorsement for Exports (Efe) issued during 2022-23 against anticipated in 2023-24. Source: M3 database 20 December 2022**

Year	Number of EfE's issued	Fee charged per EfE	Income generated
Actual 1 April 2022 - 20 December 2022	683	(190 - £63.03) (493 - £21.01)	£11,975.70 + £10,357.93 = £22,333.63
2021 - 2022	608 hardcopies 400 electronic	£39 £21.01	£23,712 + £8,404 = £32,116
2020 - 2021	856	£39	£33,384
Anticipated 2023-24	1150 total (250 Hard copy 900 Electronic)		£15,757.50 + £18,909 Total = £34,666.50

## 2.9 Primary authority

The Regulatory Enforcement and Sanctions Act 2008 introduced into law the principle of 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 CEH team supports the PA schemes. Where PA partnerships are registered with Department for Business, Energy and Industrial Strategy (BEIS), an officer will contact the PA to ensure that proposed actions are not contrary to appropriate advice that the PA has previously issued.

The CEH team will support requests from appropriate business for West Suffolk Council to become the PA for that business. Costs incurred by the authority in the setting up and management of the PA arrangement can be recovered from the business.

## 2.10 Advice to business

The CEH 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, for example the FSA website
- distribution of FSA and other guidance to businesses relating to specific and topical issues
- provision of advice to new and existing businesses during and following inspections
- mailshots
- through the West Suffolk Environmental Health Facebook page
- responding to requests for advice from businesses and members of the public.

**Table 11. Requests for advice 2022-23 against anticipated in 2023-24. Source: M3 database 19 December 2022**

Year	Number	Time per case (average)	Total time (hours)
Actual 2020-2021	230	4.5	1,035
Actual 2022 -2023	142	4.5	639
Anticipated 2023-24	440	4.5	1,980

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 CEH team takes all opportunities to engage with businesses, for example when a food registration form is received, 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, and so on. 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 CEH team contributes updates to the West Suffolk Council 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 lodge complaints or make an enquiry, general food safety information and a link to the FSA's website for further information.

The CEH team recognises the importance of social media as a highly effective means of communicating and engaging with the public. The CEH 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 promote schemes such as the Eat Out Eat Well and Take Out Eat Well awards, and to publicise press articles that relate to our positive support of local businesses.

### **2.11 Liaison with other organisations**

The CEH 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 Suffolk Health Protection Team, Suffolk UK Health Security Agency
- 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 and Environmental Health Departments nationally as required
- Care Quality Commission
- Suffolk Adult Safeguarding Board
- Suffolk Regulatory Services and New Anglia Local Enterprise Partnership Working Group

### **2.12 Food safety promotion**

The CEH 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 have previously supported the annual Crucial Crew event promoting food safety messages to year 10 school children. During the COVID pandemic this event was not held, though a separate virtual version was organised by the police. If the events continue to be held in West Suffolk, the CEH team will participate at them as they provide an important opportunity to give basic food hygiene advice to a large number of children who then share the advice with friends and family.

The CEH team also actively supports the Bury St Edmunds Christmas Fayre and other events, with the whole team carrying out high-profile interventions at relevant stalls each year that the fayre and events are held.

### **2.13 Healthy eating – Eat Out Eat Well and Take Out Eat Well**

The active promotion of the Suffolk Eat Out Eat Well (EOEW) and Take Out Eat Well (TOEW) award schemes have been paused during the COVID-19 pandemic. This is to ensure that staffing resources can be focussed on dealing with the COVID-19 work. This group has now been restarted alongside public health.

## **3. Resources**

### **3.1 Financial allocation**

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

The council maintains utilises Legal Services provision shared with several other Suffolk local authorities. There is also financial provision made to enable the use of external legal services, where appropriate.

### **3.2 Staffing allocation**

There have been a number of changes to the CEH team staffing allocation during 2022, with the addition of several contractors to support the COVID-19 response work, some of whom are shared with other Suffolk local authorities. It was also agreed, to allow two of the CEH team to reduce their hours on a permanent basis to 0.8 FTE (Full Time Equivalent). The reduction in hours have enabled the creation of a new additional EH Technical Officer post, with the recruitment to this post taking place from September 2022.

The CEH team consists of (on 31 December 2022):

<b>Position</b>	<b>Full time equivalent</b>
Commercial Environmental Health Team Leader	1.0
Environmental Health Officer (EHO)	2.6
Environmental Health Technical Officer (EHTO)	1.8
<b>Total</b>	<b>5.4</b>

It should be noted that the team currently have a 1.0 FTE EHO vacancy following staff resignation in October 2022. This vacancy is due to be advertised in January 2023.

In addition to the above, the CEH team also have (funded through Suffolk Public Health):

- 1.0 FTE contractors carrying out COVID-19 work who is unable to carry out food safety work
- 1.0 FTE contractor who is able to carry out some food safety work
- 1.4 FTE contractor who are able to carry out food safety work
- 1 FTE contractor who will be carrying out food safety work upon commencement of their contract in January 2023.

It must be noted that these contractors are contracted only until the end of March 2023 due to funding restrictions.

The CEH team will also be supporting an environmental health apprentice over the next 4 years.

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 CEH 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 and Health and Safety Service Plan, are carried out by a professional team of Environmental Health staff who have the qualifications, knowledge, skills and experience to undertake such a wide variety of activities.

### **3.3 Staff development plan**

The council has a staff performance review scheme. As part of the scheme, officers formally discuss and agree individual performance targets, training and 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 CEH 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 (30 hours for certain staff). A mixture of both internal and external training is provided for officers to achieve this. Following the 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. Quality assessment**

### **4.1 Quality assessment**

The Food Safety Service Plan is reviewed annually and will consider the following:

- performance and resources available over the previous 12 months
- observations from Members and the Commercial Environmental Health Team

- responses to feedback from local businesses and the community
- advice and guidance issued by the FSA during the year.
- new legislative requirements within food as well as the other areas under CEH remit review into impact this has had over the last 12 months.
- priority for all reactive work relating to food, health and safety and infectious disease.

## **4.2 Inter-authority audits, peer review and FHS consistency**

The principle of inter-authority audits (IAA) is fully supported. The CEH 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 Suffolk authorities through the Suffolk Food liaison Group and amongst the team, for example discussions during team meetings and joint visits. Consistency exercises are carried out amongst Suffolk authorities and discussions around multiple site operators.

The Food Standards Agency issue a National FHS Consistency Exercise each December, which the CEH team always complete, ensuring that the interpretation of the regulations and guidance are consistently being applied in relation to the FHS rating scheme.

## **4.3 Internal monitoring arrangements**

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

- checking samples of post-inspection reports, letters and notices
- undertaking a number of shadow-inspections or follow-up visits
- performance reviews during team meetings based on the Food Safety and Health and Safety Service Plan and
- one-to-one meetings

The contents of statutory notices will be discussed and agreed with the CEH Team Leader, or other suitably experienced 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 central Government.

During 2020 the FSA removed the requirement for a full LAEMS data submission due to the ongoing COVID-19 pandemic response. A much simplified version return was completed by West Suffolk Council within the specified deadline.

The FSA require a 'temperature check' return to be completed quarterly, this required by the FSA of all local authorities, which West Suffolk Council have

complied with.

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

### **Summary of priorities for 2023-2024**

- To make sure implementation of the Food Standards Agency recovery plan for 2023-24, to include the plan for the FSA's new delivery of model.
- To continue to monitor the resource provided to food safety enforcement to ensure it is adequate to meet the demands of the service, including new food business interventions in a timely manner. To continue with the timely food safety interventions.
- Continue internal monitoring of officers and review regularly.
- Review competency frameworks (There is a requirement in the Food Law Code of Practice and Guidance to monitor professional competency and consistency. Officers have completed self-assessments under this framework. These self-assessments need to be reviewed by the lead officer for food and practical onsite assessments of inspection techniques undertaken.)
- Develop officer's training plans.
- Continue Lead Officer upskilling.
- Manage and update Food Safety pages on the Council's web site.
- Continue to implement electronic processes for customers to access the service.
- Continue to support businesses and work with Trading Standards to achieve compliance with Food Information to Consumers regulatory requirements in respect of food allergens.
- Continue with the database migration to improve use of the database, making improvements to allow improved customer facing services. Storing our data and information electronically.

# Health and Safety Service Plan 2023-24

## Preface

West Suffolk Council is both an employer and a health and safety regulator and is part of the overall health and safety system for Great Britain. This service plan covers the work of the council as a regulator for certain health and safety activities, rather than its role as an employer.

The Commercial Environmental Health (CEH) team within the Environmental Health service works in partnership with the Health and Safety Executive (HSE), other local authorities, private businesses and with other internal services where appropriate to regulate statutory health and safety provisions and to provide enforcement, education, guidance, and emergency intervention to ensure the health and safety of employees and other persons.

Part of this work involves appointing persons as Authorised Inspectors under the Health and Safety at Work etc. Act 1974 to regulate health and safety in West Suffolk.

This health and safety service plan provides a summary of the work which has been undertaken and a commitment to work which will be undertaken.

## 1 Vision, purpose, aims and objectives

### 1.1 Service vision and purpose

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

### 1.2 Aims and objectives

Within the broader work covered by the West Suffolk Council Service Plan 2023-24 for Environmental Health, West Suffolk Council has responsibilities as a health and safety enforcing authority.

Our aims are:

- To focus resources on proactive enforcement of the relevant statutory provisions and provide advice and education in high-risk workplaces in order that duty holders are able to achieve and maintain a good standard of compliance.
- To investigate workplace accidents in accordance with the incident selection criteria guidance.
- To respond to health and safety related aspects of civil emergencies and serious workplace incidents, including fatalities, where the council has enforcing responsibility.
- To help businesses, through smarter ways of regulation to reduce the burden, by providing advice and support to help them achieve a good standard of compliance and safe working conditions so that they can make

a beneficial contribution to the local economy.

- To operate the service in accordance with the National Local Authority Enforcement Code and the Regulators Compliance Code to protect public health and safety by carrying out targeted inspections, interventions, enquiries, investigations and research to detect, eliminate and control hazards by applying fair, proportionate and transparent enforcement.

Accidents and ill health at work can cost money and ruin lives. Good health and safety is good business – and it’s the law. At West Suffolk our overall aim is to work with others to protect people’s health and safety by ensuring risks in the changing workplace are managed properly.

## **2.0 Service delivery**

### **2.1 The national code**

We follow the Health and Safety Executive (HSE) ‘National code’ for local authorities, to ensure consistent and proportionate inspection and enforcement. This code has legal effect as HSE guidance under section 18(4) of the Health and Safety at Work etc. Act 1974 and must therefore be the standard to which services are operated to ensure ‘adequate arrangements for enforcement’ are met.

The code sets out the expectations for a risk-based approach to targeting regulatory interventions and recognising that the primary responsibility lies with the business that creates the risk. The council’s regulatory role involves ensuring the effective and proportionate management of risks, supporting business, protecting the community, and contributing to the wider public health agenda.

### **2.2 The national strategy**

The council commits to playing its part to implement the themes of the national strategy, ‘Protecting people and places’ 2022 to 2032 and the work to be undertaken in this regard is set out later in this service plan.

The six strategic themes are:

- Reduce work-related ill health, with a specific focus on mental health and stress.
- Increase and maintain trust to ensure people feel safe where they live, where they work and, in their environment.
- Enable industry to innovate safely to prevent major incidents, supporting the move towards net zero.
- Maintain Great Britain’s record as one of the safest countries to work in .
- Ensure West Suffolk Council remains a great place to work, and we attract and retain exceptional people.

### **2.3 Scope of the health and safety service**

The health and safety service covers the following areas of work:

- Health and safety interventions as part of a national priority, a significant local issue or where there is sufficient intelligence to require intervention

- Health and safety inspections of higher risk businesses and revisits
- Health and safety enforcement
- Raising health and safety standards through education and awareness, this includes working with businesses as part of the growth agenda
- Health and safety advice and guidance to a variety of stakeholders, including the public, employers, event organisers, partner enforcement agencies (for example emergency services)
- Dealing with issues of health and safety concern and complaints
- Incident and ill health investigations
- Maintaining a cooling tower register
- Reviewing and responding to planning and licensing applications received for health and safety consultation
- Processing registrations for new skin piercing premises or practitioners, carrying out inspections and providing advice as appropriate

The service is delivered predominately in normal office hours, but also out of normal working hours to inspect businesses when operational or where circumstances such as accident investigations demand that officers remain on site. There is also a continual reactive service for emergencies, which includes the investigation of fatal or very serious workplace incidents.

## **2.4 Section 18 compliance**

Section 18 of the Health and Safety at Work etc. Act 1974 (HASWA) puts a duty on the Health and Safety Executive (HSE) and local authorities (LAs) to make adequate arrangements for enforcement of health and safety law.

The HSE has published guidance (National Local Authority Enforcement Code) to assist local authorities in achieving the s.18 principles and standards.

The council recognises the need to provide a competent inspectorate. The code has provided guidance for the training and competence of inspectors. All authorised inspectors will be appropriately qualified and through this service plan the council commits to them receiving regular training to maintain and develop their competence.

Section 26 of the Health and Safety at Work etc. Act 1974 allows local authorities to indemnify inspectors appointed under that Act under specified circumstances. As set out in the corporate enforcement policy it is the policy of the council to indemnify inspectors appointed under that act against the whole of any damages and costs or expenses which may be involved, if the council is satisfied that the inspector honestly believed that the act complained of was within their powers and that their duty as an inspector entitled them to do it, providing the inspector was not willfully acting against instructions.

The authority recognises and affirms the importance of achieving and maintaining consistency to their approach in making all decisions concerning enforcement action. All enforcement decisions are made in line with our enforcement policy and with reference to the HSE's Enforcement Management Model (EMM) where necessary and appropriate. The corporate enforcement policy covers all the council's enforcement activities.

Inspectors apply the principles of the EMM in all their regulatory actions, but they will only formally apply the EMM and record the outcome in certain circumstances, such as the service of an improvement notice or where evidence

and professional opinion suggests the consideration of a prosecution.

Where a management review is needed, this will be undertaken by the Commercial Environmental Health Team Leader with responsibility for Health and Safety or by the Food, Safety and Licensing Manager.

Liaison with primary authorities, lead authorities or other regulatory bodies is a useful means of determining previous compliance when making assessments of health and safety management compliance, preventing duplicity in enforcement and ensuring consistency in approach. The service will continue to liaise with other parties. All statutory enforcement notices are subject to internal peer review prior to service to ensure accuracy and enforceability.

### **3.0 Demands on the health and safety service**

Much of the work undertaken over recent years has been reactive, either through advice and guidance within the scope of the council's CEH team or through accident investigations. We recognise that our proactive initiatives have significantly reduced over several years due to the service demands for reactive investigation and other work streams.

Recently there have been a number of high-profile accidents, which have led to serious injuries and court action.

Commercial Environmental Health are planning a targeted health and safety project in the summer of 2023, which will lead to proactive visits to workplaces, with the aim of assessing conditions, providing business advice, and taking enforcement action where necessary. We have seen an increase in accident frequency and severity, so it is hoped that proactive contacts will improve standards/reduce accident rates. The project will focus on workplace transport and pedestrians as the main aim. It is hoped that these visits will result in a decrease in the number of accidents within the targeted sector. This work will be started by an intern next Summer to assist in gathering information this health and safety project to allow us to provide some targeted Health and safety work. Alongside workplace transport and pedestrian safety, some attention will be given to inflatable activities and safe use, as well as some work focused on skin piercing activities.

#### **3.1 Investigation of accidents and complaints**

The CEH team receive notifiable incidents both from the HSE Incident Contact Centre and sometimes directly from employers. Allegations of inadequate health and safety practices or hazardous situations are also received.

Investigations are targeted on activities that give rise to serious risks or where hazards are least well controlled and have resulted in a fatality, major injury or occupational disease, as defined in the Reporting of Diseases and Dangerous Occurrence Regulations 2013.

Investigation work places a significant demand on the CEH team but is also a good source of intelligence regarding business compliance. The number and seriousness of accident notifications received can vary significantly from year to year. Nationally it is believed that there continues to be significant under reporting in this area.

### 3.2 Health and safety interventions and achievements

All reported work-related accidents notified to the service were reviewed based on incident selection criteria. The highest risk incidents were selected for further investigation and have either been brought to proper conclusion or are ongoing currently. All of our ongoing investigations involve triable either way offences under the act which means the time period for investigation is unlimited subject to no unnecessary delays by the service. The CEH team have been involved in 8 serious investigations recently and all involve a large amount of resource. The seriousness of these accidents does mean that this impacts the food delivery plan due to resource.

**Table 1. Accident notifications received 2022-23 against anticipated in 2021-23. Source: M3 database 19 December 2022 (2020)**

	Number	Time per case (estimated hrs)	Total time (hrs)
<b>Actual 2021 -2022</b>	139	6	834
<b>Actual 2022-23</b>	92	6	552
<b>Anticipated 2023-24</b>	180	6	1080

We have continued to maintain the cooling towers register to aid rapid investigation of potential sources in the case of a Legionella outbreak.

We also continue to inspect new businesses that require registration for skin piercing activities including tattooing, micropigmentation, electrolysis, body piercing and acupuncture. These inspections involve looking at the structure of the proposed work environment, equipment, sterilisation procedures, clinical waste arrangements and infectious disease control.

The CEH Team Leader co-ordinates and chairs the West Suffolk Safety Advisory Group in reviewing health and safety issues, including COVID controls and food safety, for large scale public events planned within West Suffolk. The CEH team regularly participates in SAG meetings and has good partnership working arrangements with other enforcement bodies. Our involvement with the SAG enable event organisers to obtain the best advice and guidance to proactively deliver safe events for the public. See table 2 for information regarding SAG events. New measures are due to be implemented by Government regarding Martyn's Law in relation to terrorist threats.

**Table 2. SAG Events and numbers of meetings**

	Number of events	Number of events to SAG meeting	Time per event – 15 hours
<b>Actual 2020 -2022</b>	23	10	150 hours
<b>Actual 2022-23</b>	30	12	180 hours
<b>Anticipated 2023-24</b>	40	15	225

### 3.3 Formal enforcement intervention

In accordance with the West Suffolk Enforcement Policy we take enforcement action in those businesses where there is significant risk or poor compliance

history, in a graduated manner. In the first instance we will generally try and resolve health and safety contraventions informally, however we have the enforcement tools of both an 'Improvement' or 'Prohibition' notice that may be used as deemed necessary by the inspector. Notices hold a legal status, where the recipient does not comply with the notice to the satisfaction of the inspector within the timescale specified, a prosecution may follow.

## **4.0 Overview of key service challenges in 2023-24**

The team has seen a gradual decrease in proactive health and safety interventions occurring for several years, however, the team continues to investigate all serious accidents that meet the investigation criteria and to deal with complaints.

The team are continuing their investigations into one fatality and have also undertaken several other major investigations during 2021-23 and into this year, some of which remain ongoing during 2023-24.

### **4.1 Intervention plan**

An intervention plan for health and safety will be used. These interventions will be overseen and managed by the CEH Team Leader and are compliant with the National Local Authority Enforcement Code and supplementary guidance, LAC 67/2 (revision 11).

LAC 67/2 provides guidance to local authorities on setting priorities and targeting interventions. Our work plan for 2023-24 includes national priorities set by the HSE, local priorities and an inspection programme to meet the expectations of this guidance. It should be noted that not all national priorities will be undertaken, some do not apply to West Suffolk businesses.

Furthermore, the CEH team are members of the Suffolk Health and Safety Liaison Group that are involved in implementing local priority projects and peer reviewing health and safety activities between the Suffolk authorities. These local projects enable us to share and optimise resources, identify and share good practice and promote effective communications and sustainable productive partnerships.

**Table 3. Intervention planning table 2023-24**

<b>Sector, premises type or specific cross sector activity</b>	<b>Evidence that identified the concern and set its priority</b>	<b>Planned intervention type</b>	<b>Rationale for intervention</b>	<b>Planned activity or resource</b>
<b>Proactive interventions</b>				
Electrical safety in hospitality settings	National priority	Inspection	LAC 67/2 Annex A	Compliance assessments during food hygiene inspections and education
Visitor attractions with animal contact	National priority and local intelligence	Inspection	LAC 67/2 Annex A Local intelligence	Advise and inspect as appropriate following SAG involvement.
Inflatable amusement devices	National priority and local intelligence	Education and inspection	LAC 67/2 Annex A Local intelligence	Education and compliance assessments during inspections
Gas Safety in commercial catering premises	National priority and local intelligence	Inspection	LAC 67/2 Annex A Local intelligence	Compliance assessment during food hygiene inspections and education
<b>Proactive intervention</b>				
Health and safety project on workplace transport and pedestrians	Local Intelligence and accident statistics review	Education and inspection	Local priority	Compliance assessment during advice visits and inspections
<b>Reactive interventions</b>				
Support community events through the Safety Advisory Group	Reactive referral work National priority – crowd control	Promotion of best practice	Increased safety at public events	Coordinate and attend WS SAG meetings, review event management plans and risk assessments, attend events where necessary

<b>Partnership working</b>				
Participate in the Suffolk Health and Safety Liaison Group	Section 18 compliance and partnership working	Various	Joined up approach to safety initiatives within Suffolk	Represent WSC at the group, participate in any suitable joint projects
<b>Investigation of complaints</b>				
To respond to requests for service	Reactive referrals	Various	Advice, visits	
<b>Investigation of accidents</b>				
To review all accident notifications and investigate when meet the selection criteria	Reactive referrals	Various	Control immediate hazards, reduce the likelihood of recurrence	Accident investigation

## Summary of priorities for 2023-2024

- Health and Safety Project with CEH team and intern.
- To ensure implementation of National priorities and Local priorities.
- To ensure accident investigations are prioritised.
- To continue to monitor the resource provided to health and safety. enforcement to ensure it is adequate to meet the demands of the service.
- To ensure any changes in legislation, for example to beauty industry are implemented and staff trained as appropriate.

## Conclusion

This Service Plan has been agreed with the director of HR, Governance and Regulatory, following consultation with Cabinet Portfolio Holder. It will be formally adopted and approved by Cabinet in due course.

## Appendix A: West Suffolk Council Business Plan 2022-23 for Environmental Health

Service manager: Andy Newman

<b>Action, objective or work package</b>	<b>Link to strategic</b>	<b>Funding</b> (service budget, grant funding and so on)	<b>Timing</b>	<b>Monitoring mechanism</b> (for example Service level indicators, KPIs - balanced scorecard, PDRs)	<b>Lead Officer and Portfolio Holder(s)</b>	<b>Other services or partners involved, including business partner support</b>
<p>Continue work to ensure that all food establishments comply with food safety requirements to increase the proportion of 3-5* rated businesses.</p> <p>Food team to follow Food Standards Agency 22-25 Covid recovery plan</p>	<p>Families and communities that are healthy and active</p> <p>Promote West Suffolk as a place to do business</p>	<p>Within existing revenue budget</p>	<p>2023-24</p>	<p>Service and Directorate KPIs</p> <p>Performance Development Review process</p>	<p>Commercial EH Team Leader</p> <p>Portfolio Holder</p>	<p>Legal team</p> <p>Finance (re-rates)</p> <p>Communications (enforcement)</p> <p>Food Standards Agency</p> <p>Systems and Support teams</p> <p>Customer services</p>
<p>To review the food safety and health and safety service plans to ensure they are compliant with statutory guidance and supports corporate objectives for consultation adoption and publication</p>	<p>Families and communities that are healthy and active</p> <p>Promote West Suffolk as a place to do business</p>	<p>Within existing revenue budget</p>	<p>2023-24</p>	<p>Performance Development Review process</p> <p>KPIs</p>	<p>Commercial EH Team Leader</p> <p>Portfolio Holder</p>	<p>Legal team</p> <p>Finance (fees)</p> <p>Democratic services</p> <p>Communications</p>

Action, objective or work package	Link to strategic	Funding	Timing	Monitoring mechanism	Lead Officer and Portfolio Holder(s)	Other services or partners involved, including business partner support
<p>Improve working practices and ensure effective delivery of CEH team functions.</p> <p>Development of process maps linked to skills matrix for each function:</p> <p>Priority:</p> <ul style="list-style-type: none"> <li>• Animal licensing</li> <li>• Skin piercing</li> <li>• Food business registration</li> <li>• Complaints and enquiries</li> </ul> <p>If capacity:</p> <ul style="list-style-type: none"> <li>• Inspections (Food, H/S, Revisits, FHRS)</li> <li>• Accident notifications and investigations</li> <li>• Notices and Prosecutions</li> <li>• ID notifications</li> <li>• Approved food business registration</li> <li>• Cooling tower registration and register</li> </ul> <p>Food sampling</p>	<p>Being more commercial</p> <p>Increased opportunities for economic growth</p> <p>Families and communities that are healthy and active</p> <p>Ways of working – collaboration and integration</p>	<p>Within existing revenue budget</p>	<p>2023-24</p>	<p>Reporting via project plan once established.</p> <p>KPI</p> <p>Annual fees</p> <p>Performance Development Review process</p>	<p>Food Safety and Licensing Manager</p> <p>Portfolio Holder</p>	<p>Legal team</p> <p>Customer services</p> <p>Trade</p> <p>Communications team</p> <p>Food Standards Agency</p> <p>Health and Safety Executive</p> <p>UK Health Security Agency</p> <p>Department of Environment, Food and Rural Affairs</p> <p>Systems and Support teams</p> <p>Finance</p>