

Spelthorne Borough Council

Food Safety Service Plan

2019 - 2020

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Foreword

This Service Plan has been produced in response to the Food Standard Agency's Framework Agreement on Food Law Enforcement which sets out how the plan should be structured and what the plan should contain.

The Plan explains how we will protect and promote food safety throughout the Borough by a combination of measures which include the enforcement of food safety law, sampling, advice and education and liaising with other organisations. The mix of enforcement includes aspects that are demand driven, inspection driven, education driven and intelligence driven. Our activities and procedures take account of the Food Law Code of Practice and its supporting document the Food Law Practice Guidance (England). In addition our officers take account of the Food Hygiene Rating Scheme – Brand Standard.

The Plan is approved by Elected Members to ensure transparency and accountability and is published on the Council website.

The Plan is reviewed annually.

1. Service Aims and Objectives

1.1 Aims

- 1.1.1 The aim of the food safety service is to protect health by assuring the production, preparation, storage, distribution and supply of food by businesses within Spelthorne is safe.
- 1.1.2 We aim to provide a comprehensive food safety service to consumers and the operators of food businesses and achieve a good balance between providing advice, information, training and where necessary enforcement.

1.2 The following objectives have been identified for 2019/20:

	Objective
1.	To achieve at least 95% of higher risk food hygiene inspections/interventions in accordance with the frequencies set out in the Food Law Code of Practice.
2.	To promote the Food Standards Agency (FSA) national Food Hygiene Rating Scheme (FHRS), including publicising on the Council's Facebook and Twitter accounts those business receiving a 5 rating.
3.	To achieve a 92% ratio of food businesses with a food hygiene ratio of 3 – 5 compared to those scoring 0 – 2.
4.	To achieve a maximum 4% of food business with a food hygiene rating of 0 – 1. We will actively work with these businesses to improve their standards but where necessary we will take appropriate enforcement action.
5.	To inspect at least 20% of our lowest risk (category E) rated businesses.
6.	To review the Competency Assessment Framework as set down in the Code of Practice for all officers undertaking official food controls.
7.	To respond to a minimum of 95% of food safety service requests within six days.
8.	To establish a new food hygiene training programme in response to changes to the old system.
9.	To implement any outstanding recommendations arising from the Surrey inter-authority Food Hygiene Rating Scheme Audit.
10.	To actively promote the "Eat Out Eat Well" award.
11.	To participate in national and local sampling projects as appropriate.

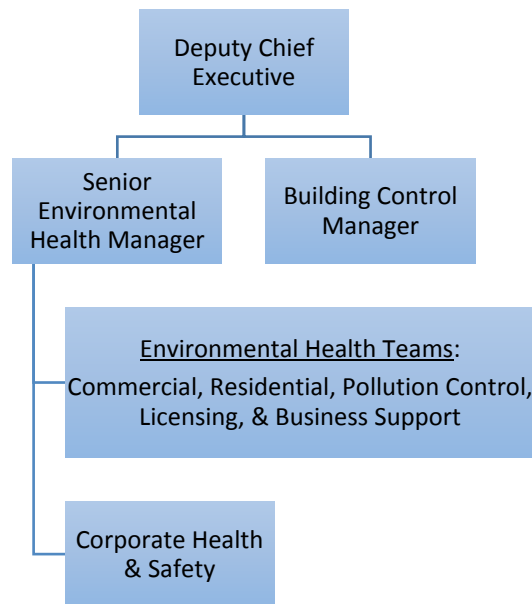
1.3 Links to corporate objectives and plans

The Council's Corporate Plan 2016 – 2019 has four key priorities for Spelthorne:

- Housing
- Economic Development
- Clean and Safe Environment

- Financial Sustainability
- 1.3.1 The Food Safety Service Plan is key in achieving a “Clean and Safe Environment” and contributes to ensuring sustainable “Economic Development”. An effective food safety team contributes to these priorities by protecting the health of its residents and visitors through the provision of safe food, the prevention and detection of food borne illness and food poisoning and by ensuring that good businesses are not disadvantaged by non-compliant traders.
 - 1.3.2 This Plan also incorporates the five values of the Council; these are Accountability, Self-Reliance, Community, Opportunity and Tradition.
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2. **Background**
 - 2.1 **Profile**
 - 2.1.1 Spelthorne is located in the far North corner of Surrey. Boroughs adjacent to us are Runnymede and Elmbridge to the south in Surrey, Windsor and Maidenhead and Slough to the west in Berkshire, and Hillingdon, Hounslow and Richmond upon Thames to the north and east in Greater London.
 - 2.1.2 Spelthorne’s population is approximately 95,600, based on figures from the 2011 census. The main centres of population are the towns of Staines-upon-Thames, Ashford, Sunbury-on-Thames, Shepperton and Stanwell.
 - 2.2 **Organisational Structure**
 - 2.2.1 The organisational structure of the Council comprises of the 39 elected members and a Chief Executive who is supported by two deputies. The food safety service forms part of the Environmental Health Department. The food team is headed by the Principal Environmental Health Officer (Commercial) who reports to the Senior Environmental Health Manager (SEHM). The SEHM reports directly to the Deputy Chief Executive.
 - 2.2.2 The food safety service is provided by the Commercial Team who also provide a health and safety enforcement service including smoke-free legislation; and process, monitor and enforce various licensing/registration regimes, such as all animal licensing and beauty treatments in relevant premises.

2.2.3 The structure is as follows:



2.3 Scope of the Food Service

2.3.1 The Council provides a comprehensive service to food consumers and food businesses in Spelthorne. We have the main responsibility for enforcing the provisions of the Food Safety Act 1990, the Food Safety and Hygiene (England) Regulations 2013 and associated European Community regulations made under the European Communities Act 1972 in all food premises located within the Borough.

2.3.2 As a designated Food Authority we are responsible for a full range of duties including:

- food hygiene inspections;
- participation in the national Food Hygiene Rating Scheme to enable consumers to make informed choices about the places where they eat out or shop for food;
- the investigation of complaints and service requests relating to food safety matters;
- responding to food safety incidents;
- the provision of advice to businesses and the public on food safety matters;
- sampling of foodstuffs for microbiological and where necessary chemical examination; and analysis of food handling environments through surface swabs;
- controls of imported and exported foods;
- the investigation of notifications and outbreaks of food poisoning and gastrointestinal infection to control and prevent further cases from source of disease, identify source and prevent spread from primary case;

- provision of food hygiene training courses for food handlers, and food safety advice to managers and proprietors of food businesses;
- the implementation of the Commercial Team's Health Promotion initiatives, e.g. "Eat Out, Eat Well" Award Scheme which is promoted during inspections and via the Spelthorne website; and,
- the maintenance the database of food premises in the Borough and ensuring that the information is accurate and up to date.

2.3.3 Enforcement of food standards and animal feedstuff legislation is the responsibility of Surrey County Council Trading Standards Department and is outside the scope of the service.

2.4 Demands of the Food Service

2.4.1 The majority of food premises in our area are predominantly small to medium sized catering or retail businesses.

2.4.2 The premises profile is outlined below. Please note that this is a snapshot in time and changes regularly as new businesses open and others close.

Type of Premises	1 April 2017	4 Dec 2018
Primary Producers	0	0
Manufacturers & Packers	2	2
Importers/exporters	1	1
Distributors/Transporters	13	16
Retailers	186	182
Restaurants/Caterers	595	625
Total	797	826

2.4.3 In addition there are:

- Two markets – one in Kempton Park every Thursday and one on Staines High Street on Wednesdays, Fridays and Saturdays. There is a farmer's market once a month in Staines-upon-Thames.
- One approved premises, which is an inflight caterer and one large cereal producer.
- There are also a number of events held within the borough during the year including Staines-upon-Thames Day, Zimfest, Shepperton Big Tree Night and Shepperton Village Fair.

2.4.4 It is unclear what impacts there will be on the service when the UK leaves the European Union, particularly considering our proximity to Heathrow Airport and the presence of storage facilities within the borough. Currently we have some arrangements in place with our colleagues on the imported food team at Hillingdon, however it is still unknown what additional checks may be required on imported foods

and there are potential resourcing issues in relation to this. We are in contact with our colleagues in Hillingdon.

2.4.5 The service can be accessed by: -

- Calling in person to the Spelthorne Borough Council, Knowle Green, Staines upon-Thames, TW18 1XB. The Offices are open from 9am to 5pm Mondays to Thursdays and 9am to 4.45pm on Fridays. The office is closed in the evenings and at weekends.
- Telephoning the support staff (01784 446291). The Business Support Team is available from 8.30 am to 5.30 pm on Monday to Thursday and 8.30 am to 5 pm on Friday.
- A duty officer is available from 9.30 am to 5.30 pm Monday to Thursday, and from 9.30 am to 5 pm on Fridays.
- By telephoning officers through their direct line telephone numbers.
- By emailing the Commercial Team at eh.commercial@spelthorne.gov.uk.
- Emailing officers directly via their individual email addresses.
- Food safety emergencies can be dealt with by telephoning our 24-hour out-of-hour's emergency service where the on-call officer will contact a senior officer from Environmental Health.
- Information and advice can be accessed via the Council's website at www.spelthorne.gov.uk.
- Submitting information through the Food Standards Agency website portal.
- The food hygiene ratings of eligible businesses can be found at <http://ratings.food.gov.uk/> and via a link on the Spelthorne website.

2.5 Enforcement Policy

- 2.5.1 Enforcement will be carried out in a fair, equitable and consistent manner in accordance with the Regulator's Code and the Environmental Health Enforcement Policy.
- 2.5.2 The policy was last updated in October 2014 and is currently under review. Copies of the Environmental Health Enforcement Policy are available on request and the policy is also available on the Council's website.

3. Service Delivery

3.1 Food Premises Interventions

- 3.1.1 It is the our policy to carry out programmed food hygiene interventions in accordance with the minimum inspection frequencies defined in the

Food Law Code of Practice. Priority will be given to inspections of higher risk premises and approved premises.

- 3.1.2 The current profile of premises by risk rating and the anticipated number of interventions to be undertaken during the year 2018/2019 are outlined in the table below. This is a snapshot of the system at one point in time and the profile can change quickly, for example following an intervention a premises can move either up or down. In particular the number of “A” rated businesses can vary significantly during the year.

Risk Category	Number of Premises	Inspection Frequency
A	1	6 months
B	20	12 months
C	71	18 months
D	137	24 months
E	230	Alternative Strategy
Total	459	

- 3.1.3 The risk categories are derived from the scoring system laid down in the Food Law Code of Practice and are based on the type of food handled, the size of the business, the level of compliance with hygiene and structural requirements and the extent of management control.
- 3.1.4 In addition to this list, there will be unrated premises which are awaiting inspection and revisits to premises in line with our Food Hygiene Intervention Policy and Food Hygiene Enforcement Procedure.

3.2 Food Complaints

- 3.2.1 We will investigate food complaints or complaints relating to the hygiene of food premises in accordance with centrally issued guidance and our own Food Complaints Procedure. The depth and scope of investigation required will depend on the nature of the complaint.
- 3.2.2 All food complaints involving an imminent risk to health will be responded to as quickly as possible and all others within 6 working days. Where appropriate, complainants will be advised of the outcome.
- 3.2.3 The following tables outlines the number of complaints received:

Year	Complaints
2017/2018	97
2016/2017	100
2015/2016	90

From 1 April 2018 to 12 December 2018 we have received 92 food complaints.

The subject of these complaints often include allegations of illness, poor hygiene practices, concerns about cleaning and general repair, pest infestations and foreign body allegations.

3.3 Home Authority Principle and Primary Authority Scheme

- 3.3.1 We support both the Home Authority Principle and the Primary Authority Scheme. We do not currently have any formal primary authority agreements in place.
- 3.3.2 The Primary Authority scheme permits any business to register with one local authority as a source of advice on environmental health issues. Officers are required to contact the Primary Authority before taking any enforcement action against that company. The Primary Authority can then block the proposed action if it believes that it is inconsistent with advice or guidance previously given to the organisation concerned.
- 3.3.3 All authorised officers are registered with the online database and are familiar with the requirements of the scheme.

3.4 Advice to Business

- 3.4.1 We recognise that the majority of food businesses seek to comply with the law and will provide such advice and assistance as may be necessary.
- 3.4.2 This includes:
- Running food hygiene training courses/seminars as required.
 - Provision of business information sheets, including leaflets detailing local providers of food hygiene courses, practical advice on hazard analysis and controlling food safety hazards, temperature control and guides to compliance with specific food safety legislation.
 - On the spot advice during routine visits and inspections.
 - Advice in written inspection reports.
 - Provision of free telephone advice.
 - Provision of information on the Council's social media accounts.
- 3.4.3 In 2017/2018 we dealt with 84 specific requests from businesses and individuals for information requiring advice. These requests are often from new businesses setting up, businesses about to refurbish their premises or those wishing to expand upon their current activities. This is an increase of 6% from last year.

3.5 Food Sampling

- 3.5.1 Food sampling provides useful information about the microbiological constitutes an important element of the intelligence driven side of the food safety enforcement mix.

3.5.2 We will ensure that food is inspected and sampled in accordance with our sampling procedure, relevant legislation, statutory Food Safety Code of Practice and centrally issued guidance to ensure that food meets the food safety requirements.

3.5.3 Our approach to sampling is:

- We will continue to support and participate in FSA/PHE national sampling programmes as appropriate and where resources allow.
- Where appropriate, samples will be taken during routine inspection and if necessary as part of legal proceedings.
- Food complaint samples will be submitted on an ad-hoc basis as appropriate.
- We will re-sample should any sample result be unsatisfactory or potentially hazardous.

3.5.4 Food samples will be submitted for analysis to the PHE laboratory in Porton Down, Salisbury as it currently hold UKAS accreditation for the microbiological examination of food samples.

3.5.5 So far in 2018 we participated in two national surveys and submitted 24 samples.

3.6 Control and Investigation of Outbreaks & Food Related Infectious Disease

3.6.1 We work closely with our colleagues in Public Health England (PHE). In the event of an outbreak of food poisoning we follow the procedures set down in the Surrey Outbreak Control Plan.

3.6.2 We are regularly attend the Surrey Health Protection Group meetings to keep informed of local and national issues. We also regularly attend training events run by this group.

3.6.3 Certain infectious disease must by law be reported to us.

Year	Notifications
2017/2018	135
2016/2017	64
2015/2016	112

We have received 106 notifications between 1 April 2018 and 12 December 2018.

3.6.4 We have a responsibility to investigate notifications in an attempt to identify the source, to prevent cases from the source or from a primary case. In certain cases we may need to require exclusion from work or nursery/schools. Our officers refer to the Single Case Plan when

handling all notifications. This document has been drawn up in conjunction with PHE and is maintained and updated by them.

- 3.6.5 There were no major food poisonings outbreaks reported in the Borough during 2017/2018, however we received a request from Public Health England to make contact with our public swimming pools following a large outbreak of *Cryptosporidium* at an open farm in Sussex. It is expected that any major outbreak would place a significant strain on resources.
- 3.6.6 The team were also involved in the exclusion of two children under the age of five from their nursery and school. The protocol agreed with Public Health England requires children under five who are suffering from or have tested positive for specified *E. coli* infections must be excluded from any childcare setting until they have submitted two clear faecal samples.

3.7 Food Safety Incidents

- 3.7.1 Food alerts are issued by the FSA and notify the public and food authorities to serious problems involving food that does not meet food safety standards or food that does not meet compositionally standards. They come to a special inbox that is monitored daily.
- 3.7.2 The content of all food alerts received will be assessed by the Principal Environmental Health Officer (Commercial) or an Environmental Health Officer on the Commercial team and appropriate action taken as specified in the alert.
- 3.7.3 We will promptly notify the FSA and all other relevant agencies if any potentially serious incident are identified locally.
- 3.7.4 Following a routine sample of cheese imported from Poland we notified the FSA of an incident which was then followed up with their counterparts in Poland. The cheese was subsequently removed from sale.

3.8 Liaison with Other Agencies

- 3.8.1 We actively participate in liaison arrangements with a number of other local authorities, agencies and professional organisations in order to facilitate consistent enforcement, to share good practice and to reduce duplicity of effort.
- 3.8.2 This includes:
- Surrey Food Liaison Group
 - Surrey Health Protection Group
 - Surrey Environmental Health Managers' Group

- Liaison arrangements with Building Control, Planning, Licensing, Legal etc.
- Public Health England
- Surrey County Council Trading Standards
- Surrey Healthy Eating Award Steering Group.

3.9 Food Safety Promotion

- 3.9.1 We participate in the national Food Hygiene Rating Scheme. The vast majority of our food business are included in the scheme and it is well received by both food business and consumers. The aim of the scheme is to help consumers to make informed choices about where they purchase food from.
- 3.9.2 We adhere to the guidance contained within the FSA's document – "The Food Hygiene Rating Scheme: Guidance for local authorities on implementation and operation – the Brand Standard".
- 3.9.3 We further publicise businesses with the top rating of 5 on the Council's Facebook and Twitter accounts. From 1 April 2019 we will also share the names of those businesses receiving the lower ratings of 0 (urgent improvement required) and 1 (major improvement required) once their appeal period has passed.
- 3.9.4 From April 2019 we are introducing a cost recovery fee for requested re-inspections under the Food Hygiene Rating Scheme.
- 3.9.4 We work in partnership with the Trading Standards team at Surrey County Council to promote the Eat Out Eat Well scheme. The scheme is promoted during routine inspections to potentially eligible businesses and on the Council's website.
- 3.9.5 It is our intention to establish a new means of providing food hygiene training in 2019/2020. We plan to look at smarter and most effective means of delivery training to ensure that we meet the needs of our service users. We have not run a course since 2016. The course was generally run at a loss if it was not to capacity, however due to the positive impact on attendees the course was considered worthwhile and a good use of officer time.

4. Resources

4.1 Financial Allocation

- 4.1.1 The cost of providing the food safety service (including staff and budgetary expenses in 2018/2019 is £128,000. It is expected that the budget for 2019/2020 will be similar.

4.2 Staff Allocation

- 4.2.1 The 2018/2019 staffing allocation is currently 2.9 full time equivalents; this includes administrative supports (0.65) and management support (0.15) such as reviewing service plans, officer performance, service development and budget controls.
- 4.2.2 In addition approximately 0.1 FTE of authorised officer time is spent on duties such as checking notices, detailed investigations, small outbreaks and preparation for prosecutions etc.

4.3 Staff Development Plan

- 4.3.1 We recognise the need for all officers engaged in food safety work to be trained, not only to the minimum level required by law, but also to a level commensurate with the work they carry out. We also recognise the need to develop the personal skills needed in order to work effectively in the field and for EHOs' to meet the requirements of the Chartered Institute of Environmental Health Continuing Professional Development (CPD) scheme.
- 4.3.2 The Food Standards Agency Framework Agreement on Local Authority Food Law Enforcement requires Local Authorities to appoint a sufficient number of authorised officers to carry out food enforcement work and that they shall have suitable qualifications, training and experience consistent with their authorisation and duties in accordance with the relevant Food Safety Code of Practice.
- 4.3.3 The Food Safety Code of Practice requires the Local Authority to ensure that every officer receives structured on-going training, which is managed, assessed and recorded. The minimum on-going/update training for each officer should be at least 20 hours per year, of which at least 10 hours must be food based.
- 4.3.4 Each member of staff receives one annual appraisal and one to one meetings every six to eight weeks at which time development needs are identified and a plan agreed to address these.
- 4.3.5 Training and development is provided by a range of methods including:-
 - i. Post Entry Training - Nominations for formal training courses/qualifications are considered annually and in appropriate cases members of staff are sponsored on formal academic and practical courses.
 - ii. Short Course Training - Where appropriate, short courses, seminars and workshops can provide valuable updates for staff. We support attendance at such events through the Council's short courses training budget.

- iii. In-house Training - We encourage in-house training as this helps to develop individual's presentation skills as well as cascade information to other members of staff.
- iv. Cascade Training - Staff are encouraged/required to cascade information skills and knowledge they possess or have gained through attendance at Seminars and short courses to other members of staff at in-house training sessions.
- v. Peer Review - Through the use of peer review, during joint visits, and in monitoring work performance we encourage exchange of expertise and skills between staff.
- vi. Surrey Food Study Group & Team Meetings - These provide useful forums for exchange of information and experience amongst team members and colleagues, and assist in achieving a uniformity of approach to food safety issues.
- vii. Consistency Exercises – these are held routinely following our monthly team meetings and involve either an exercise provided by the FSA or a recent case presented by one of the team.

5. Quality Assessment

5.1 Internal Monitoring

- 5.1.1 We have a monitoring programme in place. Each quarter one authorised food officer is identified as monitoring officer and is responsible for assessing the work of two other officers in line with our procedure. The monitoring officer selects the activity. Activities can include accompanied inspections/visits, sampling, service request reviews/visits, review of post inspection work (letters/aide memoires), imported food, enforcement follow-up etc. These checks are documented. Contractors are also included in this schedule. The implementation of the schedule is a standing item on the agenda for the monthly Commercial Team meetings.
- 5.1.2 The PEHO also carries out one to ones with each member of the food team on a regular basis.
- 5.1.3 In addition to these checks, all food businesses who are moved out of Categories A & B into lower risk categories must be counter-signed by an authorised officer. In the first instance these files should be passed to the Principal Environmental Health Officer, however in her absence another authorised food officer will be acceptable.

5.2 Customer Care

- 5.2.1 Customer care questionnaires are sent out to at least 95% of food businesses that have received an inspection to assess the levels of satisfaction with the service.

The following comments were received:

- I. Thank you*
- II. Health officer excellent in profession. There is a lot to learn from her.*
- III. Great visit with excellent feedback*
- IV. Noted all comments and will strive to put things right.*
- V. A pleasant experience.*

5.3 External Monitoring

- 5.3.1 Our service is subject to audit from the Food Standards Agency. Our last audit was carried out in October 2014 and all the issues raised at that time have been addressed to the satisfaction of the FSA.
- 5.3.2 An annual return is submitted to the FSA. This is a requirement of all Local Authorities and it outlines in detail the work of our service.
- 5.3.3 Our implementation of the FHRS was audited in December 2015 as part of an inter-authority audit organised by the Surrey Food Liaison Group and funded by the FSA. There are some outstanding recommendations from this audit to be completed and these will be completed in 2018/2019.

6. Review

This section should be read in conjunction with the Environmental Health's Performance review.

6.1 Review against the Service Plan

- 6.1.1 The service has continued to provide a professional and quality service. Overall the main food objectives of the Council's food service were met. The service aims to complete 95% of its programmed high risk inspections before 31 March 2019, however it is unlikely that this target may not be met. Priority will be given to the highest risk inspections of which we have one category A inspection, 10 category B inspections and 27 category C inspections. Some complaints, accidents, animal licensing work and legal cases may also be prioritised.
- 6.1.2 We undertook 425 food hygiene interventions in 2017/18. We served 39 Hygiene Improvement notices, 1 Emergency Hygiene Prohibition notice and sent 239 written warnings.
- 6.1.3 So far from April 2018 to December 2018 we have completed one category A inspection, 14 category B inspections, 67 category C inspections, 90 category D inspections and 34 category E inspections. A total of 206 inspections.

- 6.1.4 In April 2018 we successfully prosecuted a food business for selling food passed its use by dates on two separate occasions. This business had received a number of warnings prior to this action.
- 6.1.5 We have continued to successfully participate in the national Food Hygiene Rating Scheme. As of 4 December 2018, 93% of our eligible businesses have ratings of three or above.
- 6.1.6 As of 4 December 2018 we did not have any zero rated premises and 31 one rated premises, this is approximately 4.9% of our eligible businesses. Businesses which fail to meet the required standards are subject to re-inspections, invited to attend formal interviews in the Council Offices and where appropriate further legal action is taken.
- 6.1.7 We have continued to provide a large volume of free information and assistance to local businesses.

6.2 Identification of any Variation

- 6.2.1 Due to staffing issues there has been difficulties in meeting some of the objectives set out in the 2018/2019 plan. Since August 2017 we have had a vacant post (0.5 from August 2017 to March 2018 and a full-time post from February 2018 to date). We have employed contractors to help with inspection based work but this has meant prioritising inspections and targeting our high risk premises. As a result, completion of some objectives from the 2018/2019 that have been delayed, namely the review of our food safety training programme, the completion of our operational food safety procedures and the full implementation of the recommendations made following the FHRS Inter-authority Audit.
- 6.2.2 The recruitment of a competent officer as defined by the Food Law Code of Practice has proved difficult. The fulltime post has been advertised three times since February 2018 and we have failed to fill it each time.
- 6.2.3 An office move and ICT difficulties have also impacted the team's capacity to meet all its objectives.
- 6.2.4 The team has also been involved in a number of complex accident investigations and were very heavily involved in the new animal licensing new inspection regime as a result of the change legislation introduced in October 2018. The changes to this legislation will continue to have an impact on the team for some time to come.

6.3 Areas of Improvement

6.3.1 The following improvements are planned for 2018/2019:

- Continue to update and implement any policies and procedures required to ensure the service complies with the FSA Framework Agreement.
- Attract and retain qualified and competent food officers.
- Ensure that the service is inclusive and is provided to hard to reach groups.
- Continue to promote the FHRS across the Borough and seek to increase the number of eligible businesses achieving a rating of three and above.
- Ensure that technology is used efficiently to record information necessary to deal with customer queries, provide FSA returns and provide information to customers in an electronic format.