

Spelthorne Borough Council

Food Safety Service Plan

2022 – 2024

FOREWORD

This plan sets out how the Council will deliver its 2022-2024 Food Safety Service Plan.

In its development, consideration has been given to the profound impacts the Coronavirus pandemic has had on the public and business activities over the last 24 months. Consideration has also been given to the continuing impacts they will likely experience as businesses and organisations seek to recover and return to business as usual.

Spelthorne's Environmental Health Service has acutely felt the impacts of the pandemic with significant resources diverted from March 2020 to support and take on a critical role in the Council's response. Environmental Health Officers are trained and experienced in public health controls including infection control, contact tracing and the investigation of outbreaks. In addition, with a background in working with businesses to ensure compliance with legislation officers were tasked with enforcing the Coronavirus business restriction regulations. The Commercial Team within Environmental Health were directly involved in Covid related work until the end of February 2022. The team continue to provide assistance to businesses with their arrangements for risk assessment and are available to assist Surrey County Council's Public Health Team and UK Health Security Agency as requested.

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

This Plan also takes into account the requirements of the Covid-19 Local Authority Recovery Plan which sets out the FSA's guidance and advice to local authorities for the period from 1 July 2021 to 2023/24. All local authorities are expected to have regard to the guidance and advice in the Recovery Plan.

This Service Plan explains how the team 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. All activities and procedures take account of the Food Law Code of Practice and its supporting document the Food Law Practice Guidance (England). In addition, 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 every two years and an annual update will be included in the Environmental Health Service's annual Service Plan.

TABLE OF CONTENTS

1. Service Aims and Objectives	4
2. Background	7
3. Service Delivery.....	11
4. Resources	16
5. Quality Assessment	18
6. Review	19

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 2022/24:

Objective	
1	To satisfy the requirements of the framework for service delivery as set out in the FSA's Recovery Plan.
2	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.
3	To promote the FSA national Food Hygiene Rating Scheme (FHRS), including publicising on the Council's Facebook and Twitter accounts those business receiving a 5 rating.
4	To achieve a 92% ratio of food businesses with a food hygiene ratio of 3 to 5 compared to those scoring 0 to 2.
5	To actively work with our lower rated businesses to improve their standards and achieve a maximum 4% of food business with a food hygiene rating of 0 and 1. Where necessary we will take appropriate enforcement action in line with our Enforcement Policy.
6	To respond to a minimum of 95% of food safety service requests within ten days.
7	To ensure all authorised officers are competent as per the requirements of the revised Competency Assessment Framework as set down in the Food Law Code of Practice for all officers undertaking official food controls.
8	To actively promote the "Eat Out Eat Well" award.
9	To participate in national and local sampling projects as appropriate.
10	To highlight issues with food allergens and hypersensitivity - during routine inspections, businesses will be signposted to the free material available from the FSA and we will participate in any campaigns run by the FSA, as appropriate.

1.3 Link to the FSA's Covid-19 Local Authority Recovery Plan

The Recovery Plan sets out the Food Standards Agency's (FSA) guidance and advice to local authorities for the period from 1 July 2021 to 2023/24.

The guidance and advice aim to ensure that during the period of recovery from the impact of COVID-19, local authority resources are targeted where they add greatest value in providing safeguards for public health and consumer protection in relation to food. It also aims to safeguard the credibility of the Food Hygiene Rating Scheme (FHRS).

1.3.1 The Recovery Plan provides a framework for re-starting the delivery system in line with the Food Law Codes of Practice for new food establishments and for high-risk and/or non-compliant establishments while providing flexibility for lower risk establishments. This should be implemented alongside delivery of:

- official controls where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance that support trade and enable export
- reactive work including enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints
- sampling, and
- ongoing proactive surveillance.

1.3.2 Local authorities should, where they can, move at a faster pace in realigning with the intervention frequencies and other provisions set out in the Food Law Codes of Practice.

There are two phases to the Recovery Plan:

1.3.3 Phase 1 - 1 July to 30 September 2021

In Phase 1, local authorities are expected to deliver the following:

- official controls where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance that are undertaken to support trade and enable export
- reactive work including enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints
- sampling in accordance with the local authority sampling programme or as required in the context of assessing food business compliance, and any follow-up necessary in relation to the FSA Surveillance Sampling Programme
- ongoing proactive surveillance to obtain an accurate picture of the local business landscape and to: identify open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities, or Food Business Operator (FBO)
- for 'new businesses', consideration of registration information and intelligence with appropriate onsite interventions carried out where there are concerns around public health/consumer protection
- for 'new businesses' where consideration of registration information and intelligence indicates low risk, initial visits should be prioritised and undertaken in accordance with the Codes of Practice and Practice Guidance taking account of the flexibilities provided
- planning for resumption of planned intervention programmes for high-risk category and non-compliant establishments in Phase 2.

1.3.4 Phase 2 – 1 October 2021 to 2023/24

In Phase 2, local authorities are expected to deliver (a) to (g) as detailed in paragraph 1.3.3 (Phase 1), plus the following:

- implementing planned intervention programmes for high-risk category and non-compliant establishments in accordance with the timeline outlined in the Plan
- implementing an intelligence/information based approach for lower risk category establishments
- responding to FHRs requested re-visits in line with the timelines specified in the FHRs Brand Standard for England or the statutory guidance in Wales and Northern Ireland.

1.3.5 Spelthorne is currently on track to meet all the requirements of the Recovery Plan and indeed working at a faster pace to realign and work through the backlog of inspections caused by the pandemic.

1.4 Links to corporate objectives and plans

The Council's Corporate Plan 2021 – 2023 has five key priorities and seven values for Spelthorne:

1.4.1 Priorities

- Community
- Affordable housing
- Recovery
- Environment
- Service Delivery

1.4.2 Values

- Pride in our Council, communities and Borough
- Responsive and flexible
- Open and accountable
- Value for money
- Integrity
- Dependable
- Empowering communities

1.4.2 The Food Safety Service Plan is key in protecting our Community and providing a safe Environment and makes a significant contribution to the Communities' economic recovery out of the impacts of Coronavirus.

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. We are working with business to help them to recover from the impact of the pandemic.

1.4.3 This Service Plan incorporates these values.

2. BACKGROUND

2.1 Profile

2.1.1 Spelthorne is 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.

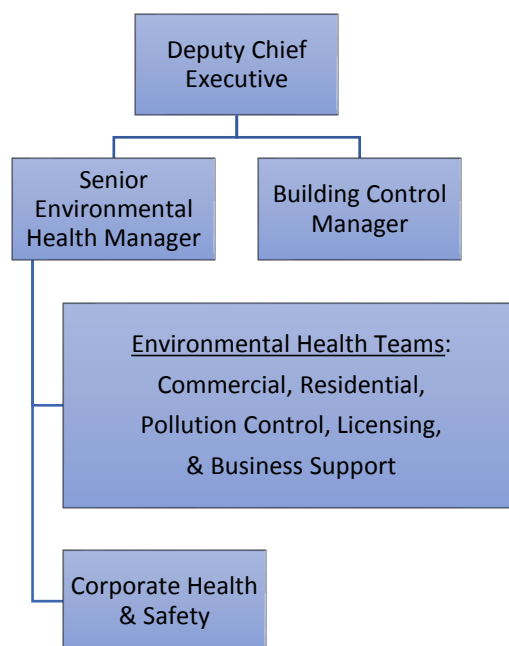
2.1.2 Spelthorne's population is approximately 95,600, based on figures from the 2011 census. The main centres of population are the towns of Staines-upon-Thames, Ashford, Sunbury-on-Thames, Shepperton and Stanwell.

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 the European Union (Withdrawal) Act 2018 as amended by the European Union (Withdrawal Agreement) Act 2020 relating to retained EU regulations
- 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 food safety advice to managers and proprietors of food businesses
 - the implementation of the Commercial Team's Health Promotion initiatives, such as the "Eat Out, Eat Well" Award Scheme which is promoted during inspections and via the Spelthorne website
 - 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 including labelling, calorie display and animal feedstuff legislation is the responsibility of Surrey County Council Trading Standards Department and is outside the scope of the service.
- 2.3.4 Spelthorne is signed up to a Memorandum of Understanding in relation to food and feed imported through London Heathrow Airport. This MoU is managed by the FSA and is due for review in November 2023. The purpose of the MoU is to set out in writing the arrangements that have been agreed to establish Hillingdon as the single designated local authority responsible for carrying out all appropriate safety checks at Heathrow Airport on imported food at Internal Temporary Storage Facilities. External Temporary Storage Facilities remain our responsibility.

2.4 Demands on the Food Service

2.4.1 The majority of food premises in Spelthorne 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 that changes regularly as new businesses open and others close.

Type of Premises	on 1 April 2022	on 31 March 2021
Primary Producers	1	1
Manufacturers & Packers	8	7
Importers/exporters	2	2
Distributors/Transporters	20	18
Retailers	170	164
Restaurants/Caterers	639	616
Total	840	808

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.
- Two approved premises (an inflight caterer and a biltong manufacturer). There is also one large cereal producer.
- Routinely there are several events held within the borough during the year, including Staines-upon-Thames Day, Shepperton Big Tree Night, Sunbury Amateur Regatta and Shepperton Village Fair. The pandemic has resulted in the cancellation of many of these events over the last 24 months but there is an expectation of a return to normal for Summer 2022 and 2023.

2.4.4 Brexit Impacts on the Food Service

2.4.4.1 Imports

The government introduced a new staged approach to imports that came into effect from 1 January 2021: -

- **October 2021 (originally April 2021):**
 - Pre-notification requirements for Products of Animal Origin (POAO), certain animal by-products (ABP), and High-Risk Food Not of Animal Origin (HRFNAO)
 - Export Health Certificate requirements for POAO and certain ABP will come into force on the same date.
- **January 2022 (originally July 2021):**
 - Extending the option for business to use deferred declarations for up to 6 months after the goods have been imported until Jan 2022
 - Safety and Security Declarations
 - Physical checks for POAO, certain ABP, and HRFNAO will not be required until 1 January 2022. At that point they will take place at Border Control Posts.
- **March 2022 (originally July 2021):**
 - From March 2022, checks at Border Control Posts will take place on live animals and low risk plants and plant products.

▪ **1 July 2022 - phase 3 Border Operating Model (this has been further delayed)**

As of 1 July 2022, it was expected that a health certificate would be required for import into the UK for much of the veterinary and phytosanitary cargo. Without a certificate, no entry. This would apply to:

- all regulated animal by-products
- all regulated plants and plant products
- meat and all meat products
- all other foodstuffs not of animal origin with a high risk profile

The UK planned to inspect the veterinary and phytosanitary cargo at the external border as from 1 July 2022. This will take place at Border Control Posts (BCP).

This phase has been further delayed.

The team works closely with colleagues at the Imported Food Office in Heathrow Airport and a Memorandum of Understanding is in place with regards to storage sheds within the borough. Any consignments that illegally bypass the Border Control Post are referred to the inland authority where the consignment is stored. A similar arrangement is in place for third country imports prior to EU Exit and Spelthorne has received such referrals infrequently. It is yet to be seen if there will be an increase in the referrals of illegally imported consignments to the team because of EU exit.

2.4.4.2 Exports

The EU requires that some UK food and drink exports are certified by a UK certifying authority before being exported. In Great Britain, the Animal and Plant Health Agency (APHA) is responsible for issuing export health certificates (EHC) for certain products of animal origin (POAO) to specific countries.

Local authorities can provide export certification for certain products not covered by official EHCs issued by APHA. This can relate to products that are:

- not of animal origin
- processed meat products
- manufactured food and drinks

The type of certification that needs to be provided is specific to the product being exported and the requirements of the destination country.

To date the team has not received any requests from businesses to certify any products for export from the UK however requests for certifications for products not of animal origin have been received for countries not within the EU.

2.4.5 **Access to the Service**

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 4.30pm 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 9 am to 5 pm on Monday to Thursday and 9 am to 4.30 pm on Friday.
- A duty officer is available from 9.30 am to 5 pm Monday to Thursday, and from 9.30 am to 4.30 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

It is our policy to carry out programmed food hygiene interventions in accordance with the minimum inspection frequencies defined in the Food Law Code of Practice, and priority will be given to inspections of higher risk premises and approved premises.

3.1.1 Impacts of Coronavirus on Interventions (2020-2022)

Throughout 2020-2022, many of the team's resources have been diverted to providing advice, guidance, and enforcing the Coronavirus Regulations and related business restrictions, as well as investigating and controlling outbreaks of coronavirus and other infectious diseases in workplaces and throughout Spelthorne.

This had a significant impact on the team’s ability to undertake food hygiene interventions, and while intervention activities have been prioritising in accordance with the advice provided by the FSA, a significant backlog of premises waiting routine intervention had accumulated. Work on this backlog commenced in 2021/2022 and continues into 2022-2023.

3.1.3 Food Premises Interventions Programmed for 2022-2024

The profile of premises by risk rating and the anticipated number of interventions to be undertaken during the years 2022-2024, are outlined in the table below. This is a snapshot of the system as of 12 April 2022. The profile can change quickly because of an intervention meaning that a premises can move either up or down. The number of “A” rated businesses can vary significantly during the year.

Risk Category	Number of Premises inspections due	Inspection Frequency
A	1	6 months
B	25	12 months
C	111	18 months
D	262	24 months
E	164	Alternative Strategy
Total	563	

The above table does not include inspections carried over from the 2021-2022 programme and details of these are included in Section 6.

3.1.4 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.

3.1.5 In addition to this list, there will be unrated premises which are awaiting inspection (such as new businesses) and revisits to premises in line with our Food Hygiene Intervention Policy and Food Hygiene Enforcement Procedure.

3.1.6 In 2021/2022 the team received 94 new business registrations. These were prioritised upon receipt with higher risk business receiving inspections within 28 days of opening.

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 six 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 Received
2021 / 2022	92
2020 / 2021	72
2019 / 2020	110
2018 / 2019	82

The subject of these complaints often includes 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 most food businesses seek to comply with the law and will provide such advice and assistance as may be necessary.

3.4.2 This includes:

- Guiding businesses to 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 2021/2022 we dealt with 82 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.

3.4.4 The team has been working with businesses throughout the whole of the pandemic to help them to operate safely, and comply with the Covid-19 restrictions, and meet the requirements of guidance issued by Central Government. We have helped food businesses re-open following the various lifting of lockdowns. In association with the Licensing Team, we have routinely

issued mailshots to licensed premises and food premises as well as mailshots specifically targeted in content to other businesses such as sports clubs, gyms, and close contact services.

- 3.4.5 The team has noticed an increase on business reliance on online platforms such as Just Eat, Deliveroo and Uber Eats to reach a larger customer base. This has resulted in increased contact from these organisations checking on registration and hygiene rating status. Businesses are also demanding faster re-inspections and the publications of ratings due to the pressure from these platforms. Generally food businesses cannot trade from these platforms if they have a hygiene rating of two or less.

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/UKHSA 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 UKHSA laboratory in Porton Down, Salisbury as it currently holds UKAS accreditation for the microbiological examination of food samples.

- 3.5.5 In 2021/2022 we submitted 9 samples taken from two different businesses following allegations of illness.

3.6 Control and Investigation of Outbreaks & Food Related Infectious Diseases

- 3.6.1 We work closely with our colleagues in UK Health Security Agency (UKHSA). 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 regularly attend the Surrey Health Protection Group meetings to keep informed of local and national issues, the Spelthorne representative also provides an update to the Group on our work. We also regularly attend training events run by this group.

3.6.3 Certain infectious disease must by law be reported to us. Notifications received are shown in the table below.

Year	Notifications
2021 / 2022	109
2020 / 2021	86
2019 / 2020	144
2018 / 2019	141

3.6.4 We have a responsibility to investigate notifications 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. The response times required of us varies from 24 hours to three days and often these notifications will be treated as a priority.

3.6.5 There were no major food poisoning outbreaks reported in the Borough during 2021/2022.

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 compositional 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 is identified locally.

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.
- UK Health Security Agency
- Surrey County Council Trading Standards
- Surrey County Council Public Health Team

- Surrey Healthy Eating Award Steering Group.

3.9 Food Safety Promotion

- 3.9.1 We participate in the national Food Hygiene Rating Scheme. Most 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 publicise businesses with the top rating of 5 on the Council's Facebook and Twitter accounts. This was paused during the pandemic but will re-start in 2022-2024.
- 3.9.4 We introduced a cost recovery fee for requested re-inspections under the Food Hygiene Rating Scheme in April 2019. Between the 01 April 2021 and the 31 March 2022, we received 17 requests for a re-inspection. All of these were revisited within the three-month timescale. It was noted that many food businesses have identified an urgency with these revisits as they are unable to trade on the online food platforms, and as a result we aim to do these visits as quickly as possible, circumstances depending.
- 3.9.5 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.
- 3.9.6 We did not run any Level 2 Foundation Certificate in Food Safety during 2021/2022. We do not intend to run any courses during 2022/2024. We will however, direct businesses requiring this training to Elmbridge Borough Council as they provide an online training service.

4. RESOURCES

4.1 Financial Allocation

- 4.1.1 The cost of providing the food safety service in 2022/2023, including staff and budgetary expenses is expected to be approximately £167,200 and the budget will be similar for 2023/24.

4.2 Staff Allocation

- 4.2.1 The 2021/2022 staffing allocation was 2.9 full time equivalents. This included administrative supports (0.65), and management support (0.15) to provide overview of service plans, officer performance, service development and budget controls.
- 4.2.2 The allocation of staff remains at 2.9 full-time equivalent.

- 4.2.3 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.
- 4.2.4 The team currently have a contractor working on average 30 hours per week. This officer is working on food hygiene inspections only and is working to clear the backlog of routine inspections. The cost of this contractor is covered by Covid-19 funding and is expected to be available until the end of July 2022.

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 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 enough 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-to-one meetings as set out in the Council's Continuous Performance Management programme, 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 - Using 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. The PEHO undertake a monitoring visit each quarter. In addition to these visits the PEHO will randomly check one report/written warning monthly. 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.

From April 2022 until 31 March 2022, 18 customer care questionnaires were returned.

- 17 (94.5%) agreed that their business was treated fairly and one (5.5%) disagreed.
- 17 felt that the contact was helpful while one neither agreed nor disagreed.
- All respondents agreed that the information they received was clear and easy to understand.
- 17 respondents agreed that the member of staff was polite and courteous while 1 respondent did not agree or disagree.

Overall the feedback was positive and the following comments were received:

- *(Officer) was very approachable. He told us and guided us to improve the areas needed too. Very happy. Thank you.*
- *Happy with everything*

- *Service was fast. The inspection officer very helpful.*
- *Everything was pretty good.*
- *Very helpful and very professional*

5.3 External Monitoring

- 5.3.1 The service is subject to audit from the Food Standards Agency. The last audit was carried out in October 2014.
- 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. The FSA will follow up any anomalies within the return or may seek further clarification.
- 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.
- 5.3.4 The team participate in the FHRS consistency exercises run by the FSA. With these exercises the FSA provide a scenario for all Local Authorities in England, Wales and Northern Ireland to work through and score under the Food Hygiene Rating Scheme. The score is reported back to the FSA with justification. The results are collated and circulated to all Local Authorities. The scenarios are also discussed and peer reviewed at the Surrey Food Liaison Group.

6. REVIEW

This section should be read in conjunction with (a) section 3.1.1 of this report which details the impacts of coronavirus on delivering the food safety service interventions, and with (b) 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 higher priority objectives of the Council's food service were met.
- 6.1.2 The service aims to complete 95% of its programmed high risk inspections before 31 March 2021. This year, due to the impacts of Covid-19 on the Environmental Health service we have been working to clear out backlog of food hygiene inspection and the meeting the requirements of the FSA's Recovery Plan.

Risk Category	2021-2022		
	No. of programmed inspections due including backlog from previous years	No. of inspections completed*	Inspections overdue on 1 April 2022
A	1	1	0
B	17	26	0
C	121	76	17
D	197	179	37
E	147	54	120
Sub-total	483	336	174

*these numbers includes new businesses that were not included in the list of programmed inspection. Also the risk rating is given as a result of the inspection, therefore the premises may be a C when the officer arrives but a B as a result of this inspection.

*the number of inspections completed does not also include the numbers of businesses that have ceased trading.

6.1.3 During 2021-2022, 336 inspections were completed. The table above provides the detail of these broken down by risk category. All higher risk business inspection were completed. In addition to the inspections other interventions were also undertaken: one formal caution was issued, six Hygiene Improvement notices were served, twelve detention notices were served on illegal imported consignments of food and 306 written warnings sent out.

Table 1 outlines the number of inspections taken over the last four years.

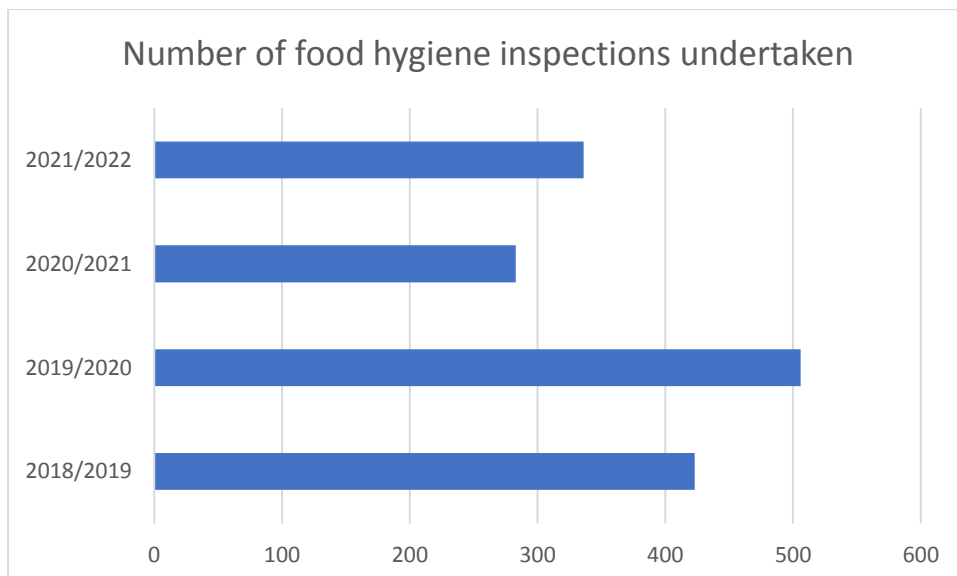
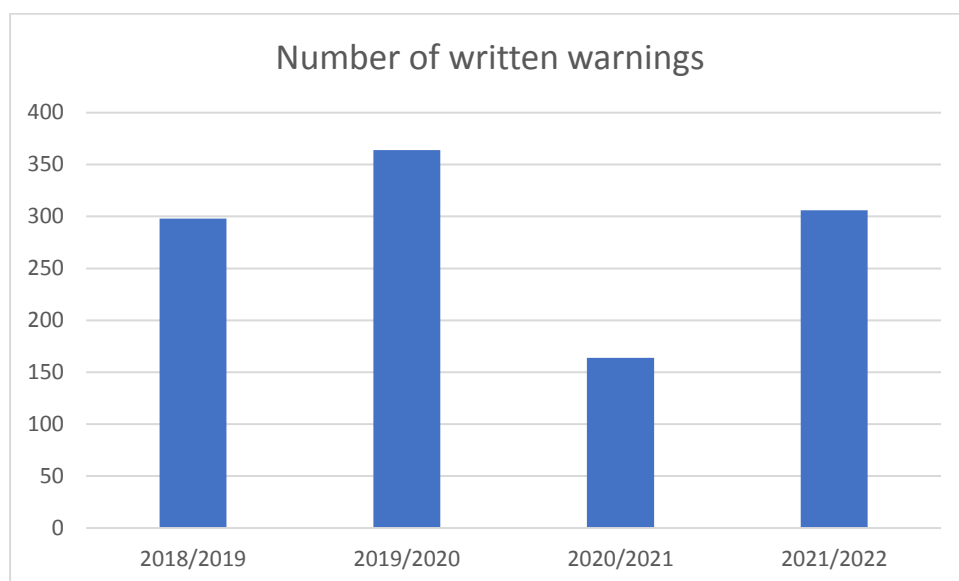


Table 2 shows the number of written warnings issued following interventions



The figures for 2020/2021 and 2021/2022 in both Table 1 and Table 2 are impacted by the diversion of resource to the Covid-19 pandemic response.

6.1.4 We have continued to successfully participate in the national Food Hygiene Rating Scheme.

FHRS	No. of Premises	%
5	454	68%
4	145	22%
3	44	6.6%
2	17	2.5%
1	4	0.6%
0	2	0.3%

6.1.5 On the 12 April 2022, 96.6% of our eligible businesses have ratings of three or above. This exceeds the target set of 92%. We had two zero-rated premises and four one rated premises: representing 0.9% of our eligible businesses.

We will continue working to reduce the percentage of business having a rating of 0 or 1. Businesses that continue to fail to meet the required standards are subject to re-inspections, are invited to attend formal interview, and where appropriate further legal action is taken. We are meeting the target of below 4% for our one and zero rated premises.

6.1.6 Six ratings given under the Food Hygiene Rating Scheme were appealed in 2021-2022. Where appeals are received, they are considered by a senior officer, usually the Lead Food Officer, who was not involved in the inspection. Of these six, one appeal was withdrawn, four were dismissed and one was

upheld with the rating changed from one (major improvement necessary) to two (improvement necessary).

It is believed that this increase in appeals is due to businesses wishing to delay the publishing of their rating particularly those receiving ratings of two and below. Most of the online platforms such as Uber Eats, Just Eat and Deliveroo will not accept businesses within a rating of two or lower. Once an appeal is received, publication of the rating is paused until the appeal has been considered. This must be done within 21 days. Appeals are very time consuming for the considering officer. There is no charge to businesses for submitting an appeal.

Officers have noted a decrease in standards in certain businesses particularly those who may have previously rated three and above. Businesses have reported difficulties recruiting and retaining chefs and other food handlers. This is likely to be as a consequence of Covid-19 and EU Exit. The lack of available food handlers is putting considerable strain on businesses resulting in non-compliance with minimum standards. Some businesses have also reported difficulties and delays sourcing new equipment and replacement parts for existing kit.

- 6.1.7 There was an increase in the number of businesses registering from a private domestic dwelling handling high risk foods. Historically the vast majority of home caterers handled lower risk foods such as cupcakes/cakes and operated on smaller scales. Since the pandemic we have seen an increase in businesses wishing to sell higher risk foods such as Sunday roasts, sushi, home-made biltong, home-made baby foods, curries etc. The resulting visits are more complex and time consuming with officers reporting frequent issues with arranging access. Food officers do not have the same powers of entry into domestic dwellings as they do into commercial ones and at least 24 hours' notice should be given.
- 6.1.8 Throughout 2021-2022, we have continued to provide a free information and assistance to local businesses to help them operate safely for purposes of food safety and hygiene, and COVID-19 safety measures.

6.2 Identification of any Variation

- 6.2.1 The Covid-19 pandemic has impacted the delivery of the 2021-2022 Food Safety Service plan. We continued to undertake restriction work and contract tracing up until the end of February 2022.
- 6.2.2 The PEHO (Commercial) shared animal licensing work with a one of the Licensing Officers (LO). The PEHO and this LO were the only officers with the required qualifications and competency under the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018. The LO left Spelthorne Borough Council in September 2021. This has had a direct impact on the PEHO's workload with time diverted from her normal activities to undertake the additional work. Prior to the LO's departure the animal licensing work including routine renewals, new applications and complaint work was divided between the LO and the PEHO. All animal licensing visits and complaint investigations now sit with the PEHO solely. It is anticipated that

two officers from the Licensing Team will undertake the required training course in 2022/23 and the PEHO will support with their training and mentoring.

- 6.2.3 In 2021/2022 we issued one formal caution to a business following the sale of undercooked chicken. A formal caution was issued to this business instead of a prosecution due to the circumstances involved and the improvement made by the business. The investigation into this complaint was time intensive and involved interviews under caution, site visits and sampling.
- 6.2.5 The team is also involved in another complex accident investigation which diverts officer time away from food safety work.
- 6.2.6 The team has also seen an increase in illegal food imports referred to us from the Imported Food Team at Heathrow with twelve detention notices served in 2021/2022 compared to seven in 2020/2021. In addition the team dealt with an inland imported food referral from the FSA concerning an import of 21,000 kg of honey.

6.3 Areas of Improvement

6.3.1 The following are planned for 2022-2024:

- Ensure that the backlog of inspections and interventions arising from 2020-2021 and 2021-2022 are completed.
- Continue to update and implement any policies and procedures required to ensure the service complies with the FSA Framework Agreement.
- 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 the service is inclusive and is provided to hard-to-reach groups
- Retain qualified and competent food officers.
- 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.