

Spelthorne Borough Council

Food Safety Service Plan

2024 – 2026

FOREWORD

This plan sets out how the Council will deliver its 2024-2026 Food Safety Service.

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 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.

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Summary

Local Authorities are required by the Food Standards Agency (FSA) to produce service plans for their food safety services. The service plan must outline the aims and objectives for the two years ahead and evaluate the achievements of the past two years.

In 2022/24 the team continued to focus their resources on the highest risk food businesses and work through the backlog. The following table summarised some of the work undertaken:

	2021-2022	2022-2023	2023-2024*
Food Inspections	336	299	330
Complaints Investigated	92	72	77
Queries from businesses	82	117	91
Infectious Disease cases	109	137	129

*full year data not yet available, accurate as of 22 January 2024

The team has also continued to participate in the national Food Hygiene Rating Scheme (FHRS); 97% of eligible businesses have ratings of three or above, well in excess of our target of 92%. Those businesses who are below this standard will continue to be targeted for improvement with revisits and where appropriate taking further legal action against them; 0.8% of businesses have a rating of 0 or 1 (represents 5 food businesses).

The main objectives for the Food Safety Service Plan 2024/2026 are outlined on page 4 of the plan and include a target of inspecting at least 95% of higher risk food businesses, the promotion of the FHRS with 92% of all food businesses achieving a food hygiene ratio of 3 or above, and to respond to a minimum of 95% of service requests within six days.

Overall, the higher priority objectives of both services were met. However, by virtue of the variation outlined in pages 18 of the service plan, and in consideration of the anticipated new duties for special treatments we need to carry out a review to determine whether the Commercial team are sufficiently resourced to provide the statutory duties required by the food safety legislation and the health and safety legislation.

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 2024/26:

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 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 to 5 compared to those scoring 0 to 2.
4.	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.
5.	To respond to a minimum of 95% of food safety service requests within ten days.
6.	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.
7.	To participate in national and local sampling projects as appropriate.
8.	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.

1.4 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
- Addressing housing need

- Resilience
- Environment
- Services

1.4.2 Values

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

1.4.3 The Food Safety Service Plan is key in protecting our Community and providing a safe Environment.

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.

1.4.4 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 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 103,000 based on figures from the 2021 census. The main centres of population are the towns of Staines-upon-Thames, Ashford, Sunbury-on-Thames, Shepperton and Stanwell.

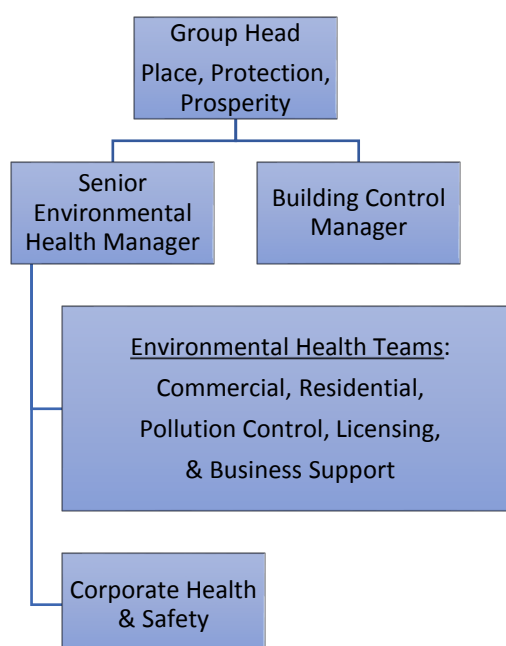
2.2 Organisational Structure

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 to the Group Head for Place, Protection and Prosperity.

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 as required
- 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 was due for review in November 2023, however we are still waiting for this review to take place.

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 17 January 2024
Primary Producers	1	1
Manufacturers & Packers	8	6
Importers/exporters	2	7
Distributors/Transporters	20	24
Retailers	170	209
Restaurants/Caterers	639	596
Total	840	843

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.
- One approved premises (an inflight caterer). 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, a number of Christmas Markets and Shepperton Village Fair.

2.4.4 Brexit Impacts on the Food Service

2.4.4.1 Imports

The final Border Target Operating Model was released in August 2023 following many delays. This sets out the following timeframes for import controls:

31 January 2024 - The introduction of health certification on imports of medium risk animal products, plants, plant products and high risk food and feed of non-animal origin from the EU.

30 April 2024 - The introduction of documentary and risk-based identity and physical checks on medium risk animal products, plants, plant products and high risk food and feed of non-animal origin from the EU. Existing inspections of high risk plants/plant products from the EU will move from destination to Border Control Posts. The simplification of imports from non-EU countries. This will include, the removal of health certification and routine checks on low risk animal products, plants, plant products from non-EU countries as well as reduction in physical and identity check levels on medium-risk animal products from non-EU countries.

The team work closely with colleagues at the Imported Food Office in Heathrow Airport and a Memorandum of Understanding is in place with regards 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 these changes.

2.4.4.2 Exports

The EU require 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. We receive on average 2 – 3 such requests per year.

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 August 2023.

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.

3.1.3 Programmed Food Premises Interventions

The profile of premises by risk rating and the anticipated number of interventions to be undertaken during the years 2024-2025, are outlined in the table below. This is a snapshot of the system as of 22 January 2024. 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	0	6 months
B	8	12 months
C	89	18 months
D	99	24 months
E	48	Alternative Strategy
Total	244	

The above table does not include inspections carried over from the 2023-2024 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 **New Business Registrations**

All new registrations were reviewed by the PEHO within 10 days of receipt and were then prioritised upon receipt with higher risk business receiving inspections within 28 days of opening.

Year	Number of new registrations
2022/2023*	90
2021/2022	94
2020/2021	109
2019/2020	121

*not whole year data, registrations received as of 17 January 2024

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
2023 / 2024*	77
2022 / 2023	72
2021 / 2022	92
2020 / 2021	72
2019 / 2020	110
2018 / 2019	82

* not whole year data, complaints received as of 17 January 2024

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 We dealt with the following requests from businesses and individuals for information requiring advice.

Year	Requests for help / advice
2023 / 2024*	91
2022 / 2023	117

Year	Requests for help / advice
2021 / 2022	82
2020 / 2021	82
2019 / 2020	71
2018 / 2019	90

*not full year's data, requests received as of 22 January 2024

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 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 Submission of Food Samples

Year	Number of Samples
2023 / 2024*	9
2022 / 2023	15

Year	Number of Samples
2021 / 2022	9

* not whole year data, correct as of 22 January 2024

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
2023 / 2024*	129
2022 / 2023	137
2021 / 2022	109
2020 / 2021	86
2019 / 2020	144
2018 / 2019	141

* not whole year data, notifications received as of 17 January 2024

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 UKHSA 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.

3.7 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.

3.7.4 The team were involved with an assessment by the Foods Standards Agency following an unsatisfactory results for acrylamide in crisps.

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 – Spelthorne will be the Chair of this group for 2024.
- Surrey Health Protection Group
- Surrey Environmental Health Managers' Group
- Liaison arrangements with Corporate Health and Safety, Building Control, Planning, Licensing, Legal etc.
- UK Health Security Agency
- Surrey County Council Trading Standards
- Surrey County Council Public Health Team
- Immigration Enforcement
- Marine Management Organisation

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.

3.9.4 We introduced a cost recovery fee for requested re-inspections under the Food Hygiene Rating Scheme in April 2019. Between the 1 April 2022 and the 31 March 2023, we received 20 requests for a re-inspection and between 1 April 2023 and the 22 January 2024 we have received 5 requests. 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 Business have a right of appeal under the FHRS. An appeal must be made within 21 days of receiving notification of their rating. The appeal is considered by the Lead Officer for food, unless she was actively involved in the determination of the initial rating and in this instances another competent food officer will undertake the appeal, where necessary this may be an officer from another Local Authority. The rating is not published until after the appeal has been considered and this should be within 21 days of submitting the appeal.

During 2022/23 one appeal was received (the appeal was dismissed and the rating remained the same) and as of 22 January 2024 no appeal had been received.

- 3.9.6 Businesses also have the “right of reply”. This enables businesses to explain to their customers any actions they have taken to improve hygiene standards at their premises since their inspection or to say if there were unusual circumstances at the time of the inspection that might have affected the rating. This comments are published beside their rating.

During 2022/23 and so far this year we have no received any requests for this.

4. RESOURCES

4.1 Financial Allocation

- 4.1.1 The cost of providing the food safety service in 2024/2025, including staff and budgetary expenses is expected to be approximately £182,511 and the budget will be similar for 2026/27.

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 It should be noted that frequently this resource is diverted to other areas of work including health and safety enforcement, public health functions and animal licensing work.
- 4.2.5 The team were supported by a full-time contractor until February 2023 when the funding expired. This contractor solely undertook food hygiene inspection.
- 4.2.6 The FSA has committed to providing guidance for Local Authority on how to assess the resource required to adequately operate this service. It is likely that our current allocation is an under-estimate of what is required and will be reviewed when the FSA guidance is published.

4.3 Assessment of staff resources required to ensure the delivery of Spelthorne’s food safety service

4.3.1 The FSA has a statutory function to monitor the performance of local authorities and ensure that it meets the minimum standards set out in the Feed Law Code of Practice and Food Law Code of Practice.

FSA performance monitoring has found that there may be inadequate resourcing by many local authorities to ensure that food and feed official controls are effectively delivered.

4.3.2 While the FSA are identifying measures that they can implement that can help address the findings under their control, they are writing to local authorities in respect of these concerns.

4.3.3 By August 2024, the Senior Environmental Health Manager will carry out a review of the staff resources required to ensure the ongoing effective delivery of Spelthorne's food safety service.

4.4 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 (Commercial) undertakes 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 External Monitoring

- 5.2.1 The service is subject to audit from the Food Standards Agency. The last audit was carried out in October 2014. This was an in-depth three day audit of the food service.
- 5.2.2 A statutory return is submitted to the FSA twice a year in April and in October. 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.
- 5.2.3 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. This audit focussed on our implementation of the national Food Hygiene Rating Scheme.

- 5.2.4 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.
- 5.2.5 An annual return is also made to HMRC. This is a statutory return and provides HMRC with requested details from our database.

6. 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 the end of each financial year.
- 6.1.3 Programmed Inspections Due & Completed

Risk Category	Inspections due 2022 /2023 including backlog	Inspections completed in 2022-2023	Inspections due 2023/24 including backlog	Inspections completed in 2023-2024* including backlog	Inspections due before 31/03/2024
A	1	1	0	0	0
B	25	29	28	9	12
C	92	90	82	49	33
D	121	102	226	109	120
E	254	77	198	38	165
Sub-total	493	299	534	205	330

*completed as of 23 January 2024, therefore not a full year's data

These numbers include new businesses that were not included in the list of programmed inspections, we receive an average 100 of these per year. 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 Comparison with national situation

The FSA Annual Local Authority Performance Review, states that "six months after the end of the recovery plan, local authorities are still a long way off meeting the required frequencies of interventions in the lower risk establishments.

The following tables sets out the percentage of inspections carried out for each risk category between 1 April 2023 and 30 September 2023:

Category	Nationally	Spelthorne
A	87%	100%
B	82%	58%
C	68%	82%
D	42%	46%
E	18%	14%

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

FHRS	No. of Premises	%
5	480	72
4	127	19
3	40	6
2	15	2.2
1	5	0.8
0	0	0.0

On the 22 January 2024, 97% of our eligible businesses have ratings of three or above. This exceeds the target set of 92%.

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.

- 6.1.5 During 2022-2023, in addition to programmed inspections other interventions were also undertaken: one Food Hygiene Improvement notice was served, one detention notices was served on illegal imported consignments of food and 214 written warnings sent out.
- 6.1.6 So far in 2023/2024 we have served one hygiene emergency prohibition notice following a mouse infestation, agreed one voluntary closure following a rat infestation, served four hygiene improvement notices, issued one simple caution and served two detention notices for illegal of imported consignments.
- 6.1.7 We continue to receive a high number of new food business registrations. Many of these businesses are based from home and gaining access to carry out the inspection can be time-consuming.

6.1.8 Throughout 2022-2024, 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. We shall continue to do so in 2024 – 2026.

6.2 Identification of any Variation

6.2.1 Animal Licensing Work

The PEHO (Commercial) is the only competent officer within the organisation to undertake animal licensing inspections as required under the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018. All animal licensing work including renewals, new applications, interim revisits, complaint investigations and statutory returns now sit with the PEHO solely.

Since the introduction of the Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 the intention has been to transfer the responsibilities for animal licensing from the Commercial Team to the Licensing Team. It was anticipated that two officers from the Licensing Team would undertake the required training course in 2022/23, however only one Licensing Officer (LO) was able to do. The PEHO supported and mentored the officer throughout 2022/2023 to complete the qualification. Unfortunately, the LO left Spelthorne Borough Council in November 2023 just as the qualification has been satisfactory completed. Due to the staffing issuing within the Licensing Team, there are currently no officers studying for the required qualification. The training required is intensive and generally takes about one year to completed.

The lack of resilience in this area has had a direct impact on the PEHO's workload with time diverted from normal activities to undertake the work.

6.2.2 In 2023 the team served a Hygiene Emergency Prohibition Notice on a food business following the discovery by officers of an extensive mouse infestation throughout the premises. The infestation presented an imminent risk to public health and swift action was taken to address this risk. 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 business was time intensive and involved interview under caution, a court hearing, site visits and sampling.

6.2.3 The team also agreed a voluntary closure of part of another food business with an active rat infestation.

6.2.4 The team is involved in a number of complex cases including:

- A fatal accident investigation with an inquest listed for April 2024.
- The preparation for and attendance at two exhumations.
- The investigation of the infection controls including water sampling at a swimming pool following the notification of a serious illness.

- Assisted UKHSA in the investigation of two separate cases of Legionella.
- Liaised with the UKHSA on the surveillance and prevention of invasive mosquitoes.
- Worked with the Marine Management Organisation following an operation they ran with Hampshire Police which resulted in the identification of a food business within Spelthorne illegal harvesting shellfish.
- Responded to two national consultations - the introduction of a new licensing system for non-surgical cosmetic treatments and significant amendments to the Food Law Code of Practice.

6.2.5 The team has experienced difficulties with Spelthorne's IT systems including difficulties sending emails to certain neighbouring local authorities, slow internet speed at Knowle Green, difficulties using the kit provided in meeting rooms within Knowle Green, difficulties using SharePoint while logged in at the office and connectivity issues both while working from home and in Knowle Green.

The in-house migration from the use of T-drive to SharePoint was problematic and resulted in an additional and unexpected drain on resource. The implementation of SharePoint is ongoing with the expectation that additional time will be diverted to this new way of working. Collectively these issues have negatively impacted productivity.

6.2.6 The Eat Out Eat Well programme is not operational but is currently under review. Responsibility for the scheme has moved from the Trading Standards Team at Surrey County Council to the Public Health Team within Surrey CC. This team are currently running a pilot with a small number of businesses within Runnymede and Surrey Heath. We are waiting the outcome of this pilot.

6.3 Areas of Improvement

6.3.1 The following are planned for 2024-2026:

- Continue to update and implement any policies and procedures required to ensure the service complies with the FSA Framework Agreement. Our inhouse procedures require review and updating. This is time-intensive work that we have been unable to complete due to other higher priority pressures within the team.
- Ensure that the service is inclusive and is provided to hard-to-reach groups. Our webpages requires updating to help with this.
- 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. The team are currently

engaged in a project which involves the utilisation of Surface Pro tablets during site visits.

- We are also anticipating the introduction of a new licensing system for non-surgical cosmetic procedures in 2025/26. The current regulatory framework includes a registration system for certain procedures such as tattooing and cosmetic piercing and falls within the remit of the Commercial Team; and it places few restrictions on who can perform non-surgical cosmetic procedures. Under the proposed scheme, which will be operated by local authorities in England, practitioners will need to be licensed to perform specific non-surgical cosmetic procedures and the premises from which they operate will also need to be licensed. The new licencing system is likely to have a significant impact on workloads.