



Service:	Person responsible for the assessment:	Date EqIA completed:
Environmental Health & Licencing	Jasmin Thomas	18.9.23

PART A - Identification

1	Title or name of proposal	Food Service Plan 2023-2024
2	The commencement date of the proposal and approval e.g., CLT, Cabinet, Committee, Council	April 2023 25 th October 2023 - Licensing & Regulatory Committee
3	What are the aims, objectives, and purpose of the proposal?	<p>South Staffordshire Council has a statutory responsibility to produce an annual food service plan which sets out the aims and objectives for the year, in relation to food safety and hygiene which are the functions undertaken by the District Council. The plan reviews the performance over the previous financial year, considers the likely demands on the service in the year ahead, and considers the resources available to do this.</p> <p>The food Service Plan provides information to:</p> <ul style="list-style-type: none">- safeguard the people who live, work or travel through the district by ensuring that all food and drink produced, imported, prepared or sold within the district is safe and wholesome to eat.- To enforce food safety legislation in accordance with the Environmental Health Enforcement Policy in a way which is necessary and proportionate; consistent; transparent and targeted.- To prevent and control the spread of poisoning and food borne diseases.- To carry out inspections of food premises, to monitor compliance with relevant food safety legislation and operate the National Food Hygiene Rating Scheme.- To respond to food alerts issued by the FSA, in respect of food hazards and incidents.- To investigate notifications and outbreaks of food poisoning and food borne disease in accordance with the council' procedures and the

		<p>United Kingdom Health Security Agency (UKHSA) “Major Outbreak Plan”, and to take such measures as are necessary to prevent the spread of disease.</p> <p>It has been produced to ensure that local businesses, members of the public, council officers and Members understand the approach to regulatory enforcement adopted by the Council. The service plan will help to ensure that the actions of the Council are fair, consistent, open and effective.</p> <p>The Food Service Plan and report is submitted to the Licensing & Regulatory Committee for approval.</p>
4	Status of the proposal	<p>New proposal/ <input type="checkbox"/></p> <p>Existing proposal <input type="checkbox"/> Annual Proposal <input type="checkbox"/> Date Last Reviewed:</p>
5	Are there any other functions, policies or services which might be linked with this one for the purposes of this exercise?	<p>There is a central government requirement for local authorities to comply with relevant legislation, codes of practice, guidance on enforcement priorities and a framework document to produce an annual service plan for food law enforcement. This plan is supplementary to the Commercial Service Plan.</p> <p>The plan provides more specific detail on the Food Service’s aims and objectives for the forthcoming year in complying with the current Food Law Code of Practice and Food Standards Agency Framework Agreement with Local Authorities, which embodies the requirements of the legislation.</p> <p>In addition, the food plan also considers the views and requirements of the Food Standards Agency (FSA) who provide advice and guidance for food interventions required by local authorities.</p>
6	Who is it intended to affect or benefit (the target population):	<ul style="list-style-type: none"> - Food producers, caterers and retailers in the district - Residents and visitors to South Staffordshire Council who may visit local food premises, or anyone who consumes food in the district - Elected members - Authorised officers engaged in food interventions and enforcement activity

PART B - Evidence, Research and Stakeholder Engagement

7	<p>List relevant examples of data (qualitative and quantitative) or any consultation information available that will enable the impact assessment to be undertaken</p>	<ul style="list-style-type: none"> - Level of compliance within different business sectors including food hygiene ratings achieved. - information held on the commercial Uniform database system which details all inspections / interventions. The system identifies all known local premises on the basis of risk, and thereby enables a comprehensive risk-based inspection programme to be identified for the subsequent financial year. This provides details of the type of businesses in the district and those receiving an intervention each year, and the level of compliance for each business and types of businesses. This data is essential for the purposes of the food Service Plan. - Evidence comes from feedback from officers and interaction with businesses. - Enforcement action undertaken and outcomes of statutory notices and prosecutions. - Business satisfaction surveys undertaken pre – Covid. - Work has previously been undertaken with specific external contractors to provide training on food safety management systems (Safer Food Better Business) and improving food hygiene standards in Asian & Chinese catering premises. This has provided information about the specific needs of businesses from the BME community.
8	<p>Evidence from the data from Question 7 of any feedback or complaints against the service/policy/procedure on grounds of potential or perceived discrimination</p> <ul style="list-style-type: none"> • <i>Who was consulted on this proposal?</i> • <i>How has the proposal been explained to those who would be directly or indirectly affected by it?</i> • <i>What outcome(s) are meant to be achieved from this proposal?</i> • <i>What factor(s) could contribute to the outcome(s)?</i> • <i>What factor(s) could detract from the outcome(s)?</i> 	<p>No negative feedback has been received.</p> <p>1. However, at this moment it is not known precisely how many food premises are managed by persons from particular ethnic groups etc although it is suspected that certain types of food business (e.g. takeaways) are run by and tend to members of the BME communities.</p> <p>Further information could be gained on this during the inspection process, when the ethnicity of food premises owners could be gathered. This could be</p>

		<p>cross referenced against compliance and customer satisfaction levels to help ensure these groups are not disadvantaged.</p> <p>2. Some business owners and staff may experience issues with literacy and therefore experience a lack of understanding of what legally is required of them / and or whether they understand any correspondence sent to them.</p> <p>This normally comes to light if the compliance standards are poor and further interactions take place with the businesses.</p> <p>3. A great proportion of information, advice and guidance is available online but this can make access to such information restrictive if the business owners or staff are not IT literate or have ready access to such information.</p> <p>Where such issues are identified, the business is provided with physical / paper information.</p> <p>4. Need to reinstate business customer satisfaction surveys on how businesses perceive interaction with the service and where further improvements can be made.</p> <p>5. Are members of the public satisfied with the compliance standards of businesses in the district – potential for regular surveys.</p>	
9	Does your proposal link with other proposals to have a cumulative negative affect on particular equality groups?	Yes/ No	If yes, give details
		No	

PART C – Assessment and Differential Impacts

Within this table, state whether the policy or function will have a positive or negative impact across the protected characteristics and provide any comments, reason, and evidence to support this.

What is the effect of the change on each characteristic – tick one				Reason		Action* Required
	Positive impact	Negative impact*	Neutral	Explanation of impact analysis	Is this likely to be unlawful?	Yes / No
Age Young People (up to 18) 18-50, 50 – 6565+	✓			Businesses serving food predominantly to vulnerable groups (including those under the age of 5 or over the age of 65) are inspected more frequently (typically annually) than other catering premises.	No	No
Disability Visual impairment Hearing impairment Physical impairment Learning impairment Mental Health Other impairments	✓			The Service Plan applies equally to all residents of South Staffordshire irrespective of disability. Food businesses serving predominantly immuno-compromised persons (such as some care homes and hospital kitchens) are inspected at a more frequent interval. Some allergies can be persistent and life threatening; our inspections of food businesses include an assessment of allergen management and communication, with appropriate enforcement where necessary is shared with Trading Standards..	No	No

Gender reassignment Transitioned Transitioning Non-Binary			✓	There is no evidence that this will impact on any specific person based on this characteristic.	No	No
Marriage & Civil Partnership Marriage Civil Partnership			✓	There is no evidence that this will impact on any specific person based on this characteristic.	No	No
Pregnancy and Maternity Pregnancy Maternity (Period after birth) Adoption			✓	There is no evidence that this will impact on any specific person based on this characteristic.	No	No
Race Ethnicity, National Origin Asylum Seeker/Refugees Gypsies & Travellers Migrants, Other	✓			<p>There is no evidence that this will impact on any specific person or business based on this characteristic. Any incidental impact on those within this group is very likely to be positive – for example – promotion of the Food Standard Agency’s guidance for Chinese and Indian cuisines where appropriate.</p> <p>Levels of awareness of the requirements of legislation can be lower in some minority groups. As a result, people from some minority groups may face a disproportionate level of enforcement action. Language and literacy may also exacerbate this problem, but information leaflets and translation services are available.</p>	No	No

				<p>The enforcement policy seeks to ensure that enforcement activities are consistent, proportionate, transparent, and targeted in accordance with the Enforcement Concordat.</p> <p>All letters go out in English unless we are aware that the recipient does not speak English or does not have access to a friend / relative who can translate for them. Use of interpreting service during formal interviews as required under PACE.</p> <p>Specific training on improving compliance and food hygiene training instigated for Asian & Chinese businesses in the past.</p> <p>During our routine inspections, we will look for evidence of modern slavery and share this information with partner agencies such as the police, border force and fire service. In these situations, unsafe working conditions or inadequate accommodation will be remedied using these our enforcement powers and the partner agencies</p>		
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				enforcement powers as appropriate.		
Religion or Belief Buddhists, Christians, Hindus, Jews, Muslims, Sikhs, Others Belief e.g., Humanists Non-Belief			✓	Officers need to have a wide knowledge of diverse cultures domestically and commercially within the district. This includes knowledge and respect of different religions and faiths that we come into contact with on a day-to-day basis. E.g. knowledge types of foods consumed by different groups and practices.	No	No
Sex Female, Male, Non-Binary			✓	There is no evidence that this will impact on any specific person based on this characteristic.	No	No
Sexual Orientation Lesbian, Gay, Bi-Sexual			✓	There is no evidence that this will impact on any specific person based on this characteristic.	No	No
Other lone parents, carers, unemployed Social economic groups, low-income groups, literacy issues	✓			Included in the inspection programme are food banks and other premises serving low-income groups or those otherwise under financial pressure in the current economic climate to ensure that food is safe and what it says it is. Officers will explain the requirements of food law in easy-to-understand ways, correspondence will be sent in plain English, the law is not specified in any correspondence to	No	No

				<p>ensure letters and emails are not perceived to be difficult to read.</p> <p>Food hygiene ratings are designed to be displayed in an easily understandable format.</p>		
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PART D – Outcomes, Action, and Public Reporting

What Justifiable Action Does the Evidence, Engagement and Consultation Suggest You Take?

	Description	Yes / No
A	No Major Change Required When no potential for discrimination or adverse impact is identified and all opportunities to promote equality have been taken.	No
B	Adjustments needed to remove barriers or to better promote equality Are you satisfied that the proposed adjustments would remove the barriers identified?	No
C	Continue despite possible adverse impact For important relevant proposals, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.	No
D	Stop and rethink your proposal Actual or potential unlawful discrimination is identified; the proposal will need reviewing immediately.	

PART E – Monitor Evaluate and Review

Action and Monitoring Plan - where the assessment in Part C & D indicates a potential negative impact, how will this be reduced or mitigated to reduce impact moving forwards?

Conclusions Reached About Potential Impact		
Possible Impact	Group(s) Affected	Evidence
Impact Identified	Action	Responsibility
Timescale	Expected Outcomes	Review Date

PART F – To be completed by Equality Service Group

Date Reviewed	Name of Representatives involved in Review (min of 3). If less than 3 please explain what exceptional circumstances apply
General Comments	
Recommendations	
Publish Results <input type="checkbox"/> Carry out further impact assessment, if yes state the review date and ensure this is diarised for action <input type="checkbox"/>	Specific Recommendations to Consider:
Confirm that the recommendations have been actioned or explain why if any cannot be actioned.	

Remove the red prompt questions and this text and then send the form to your Corporate Director/Assistant Director to review and sign,

Part G – Corporate Director/Assistant Director Approval

- I am satisfied with the results of this EqIA.
- I have seen the Council's Equality Schemes or Equality Action Plan and am satisfied with the contribution it can make.

Approved

Corporate Director/Assistant Director Signature:

Date:

Once signed the author of the EqIA should attach it to the report.

Please send a copy to Thomas Reynolds, Performance & Customer Insight Manager requesting that the EqIA is published on our internal equality site.

Where the EqIA relates to a member report the EqIA should be sent to Member Support at the same time as issuing your report to ensure it is on the CMIS system prior to the Cabinet/Committee/Council meeting.

If the EqIA relates to an Individual Decision, please ensure that the EqIA is attached to the report.