



**South Staffordshire Council**

# **Food Safety Service Plan**

## 2023-2024



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# Summary

The Food Service Plan expresses the Council's commitment to the development of the food service and the requirements set out by the Food Standards Agency (FSA) who monitor and audit local authorities' activities on food law enforcement. The Service Plan helps to ensure that the national priorities and standards are addressed and delivered locally.

The FSA 'Framework Agreement on Official Feed and Food Controls by Local Authorities', provides service planning guidance and the format for this document. This is to enable the FSA to assess our delivery of the Service Plan and to enable comparison with (and benchmarking against) other local authorities.

The FSA, in the Framework Agreement, requires that the Food Service Plan be suitably approved to ensure transparency and accountability. South Staffordshire Council's Food Service Plan has previously been approved by the Licensing and Regulatory Committee.

## **FSA review of the delivery of official food controls post Covid-19 Pandemic**

Prior to the pandemic, the FSA was already looking to review and modernise the food hygiene delivery model in the UK, taking account of the potential implications of Brexit on food safety regulation.

In 2021, the FSA introduced a Covid19 Recovery Plan setting out the FSA's guidance and advice to local authorities on the delivery of official food controls and activities running into 2023/24. This Service has followed the guidance issued.

In the meantime, the review of the future model for food hygiene controls is ongoing and local authorities were consulted on a new model proposed for post 2024 onwards.

# Aims, Objectives, Policies and Procedures

## 1. Corporate Vision and Aims

The Council Plan for 2020-2024 sets out the Council's vision and priorities:

1. Prosperous Communities and
2. Vibrant Communities

It aims to highlight how the authority plans to support businesses and the communities within South Staffordshire by driving economic prosperity and enhancing health and wellbeing in the district.

## 2. Service Aims and Objectives

To ensure that food and drink intended for sale for human consumption, which is supplied, manufactured, produced, stored, distributed, handled or consumed within South Staffordshire complies with the law, is free from contamination and is without risk to the health of consumers (people who work, live or visit South Staffordshire).

We aim to do this through the Service Plan by ensuring:

1. Under prosperous communities, to encourage businesses to be successful and attractive to their customers, but also compliant. New and existing businesses will be supported at all times.
2. Under vibrant communities, businesses will be encouraged to be successful by producing, preparing, and selling food and drink which is as safe for their customers.

### 2.1 Objectives

- To develop a programme of intervention work in line with the FSA's food law requirements.
- To undertake effective and appropriate food safety interventions of food premises by suitably trained and qualified officers, to ensure food law compliance and to minimise risks to health.
- To ensure food businesses are appropriately registered or approved.
- To take proactive steps to identify new or changing businesses as part of the requirement to maintain an accurate database of food businesses in South Staffordshire.
- To respond to all notifications of food poisoning incidence or outbreaks in line with agreed standards with UKHSA and Public Health and take necessary and appropriate action.
- To investigate and respond to complaints relating to food and drink, and regarding food premises, and inform complainants of the outcome.



# Aims, Objectives, Policies and Procedures

## 2.1 Objectives (Continued)

- To undertake proactive food sampling as part of national or regional studies, or carry out reactive sampling as required locally, to demonstrate the importance of good food hygiene or to check compliance with food safety systems in place.
- To appropriately respond to enquiries and requests from food businesses, both existing and new. To appropriately respond to FSA national food alerts and incidents.
- To effectively communicate food safety matters to both businesses and consumers within South Staffordshire
- To take appropriate enforcement action proportional to the risks involved and in accordance with the Council's Enforcement Policy with due regard being given to the Primary Authority Scheme and guidance from relevant external bodies.
- To collaborate and work in partnership with the Central England Food Coordinating Group, the Staffordshire, Shropshire and Telford and Wrekin Food Group and associated partner organisations.
- To respond to the Food Standards Agency on any information or returns requested.
- To work collaboratively with UKHSA on infectious diseases and sampling.

## 2.2 Council Enforcement Policy

The policy directs us towards a staged approach to enforcement, opting for an informal advisory approach with most issues. Our business customers rely on the service to maintain a level regulatory playing field so that non-compliant businesses do not gain a competitive advantage. We are expected to be consistent and fair, providing advice and guidance when it is needed, using enforcement tools when necessary and appropriate.

## 2.3 Focussed Enforcement

- Embedding the Corporate Enforcement Policy into the team's work.
- Ensuring that resources are targeted to the highest risk areas in terms of the public, health and safety, and the environment.
- Enforcement will be focused on the most important areas and unnecessary burden reduced on businesses.
- Supporting Business and the local economy, by ensuring a level playing field through appropriate and proportional regulatory interventions and providing a degree of trusted technical advice in the fields of food safety.

The overall aim is to ensure that there is fair regulation for all, achieving a safe, clean, and green district for residents, businesses, and visitors.

## 3. Policies and Procedures

The Council's activities and procedures for its food safety service takes account of:

- i. It's statutory duties.
- ii. The Food Law Code of Practice (England).
- iii. The Council's Enforcement Policy.
- iv. And it's current Food Safety Service Plan.

Officers undertaking these Food Safety Services will:

- i. Contribute to the priorities identified by the Food Standards Agency and referred to in this Service Plan.
- ii. Follow procedures documented by its Assistant Team Manager, in accordance with the standard contained in the FSA's Framework Agreement on Local Authority Food Law Enforcement.
- iii. Have regard to circulars and other guidance, issued by the Food Standards Agency and the Local Government Regulations Group (LGR).
- iv. Have regard to local intelligence and data.

## 1. Profile of South Staffordshire district

South Staffordshire covers an area of 101,000 acres with a population of approximately 111,900 throughout its area. There is no single residential or commercial centre within the district although principal settlements include Penkridge, Brewood, Great Wyrley, Cheslyn Hay, Codsall, Bilbrook, Perton, Wombourne and Kinver.

South Staffordshire overall is a rural area with many attractions for visitors. This is reflected in the fact that many of its food businesses are caterers or retailers and some significant food producers and manufacturers.

## 2. Organisational Structure

The Council has adopted the Leader and Cabinet approach to local governance as the most appropriate model for South Staffordshire, and report to the Regulatory and Licensing Committee.

The Environmental Health and Licensing Team Manager reports to the Assistant Director of Community Services on food safety matters and the officers have delegated powers to determine applications for registration, consents, and formal approvals under EC Regulations for approved premises.

Appendix 1 details how this Team fits into the Council's management/officer structure.

## 3. Scope of the Food Safety Service

The Team provides the following services:

- Maintaining an up-to-date register of all food premises in South Staffordshire.
- Programme of food hygiene inspections and interventions in registered and approved premises. Operating the National Food Hygiene Rating Scheme in accordance with the Brand Standard.
- Investigation of infectious diseases incident and outbreaks related to food, water and environmental. Undertaking microbiological food sampling within the programme.
- Providing allergen information and advice to businesses, undertaking checks during inspections and work in collaboration with Trading Standards.
- Providing food safety advisory services.
- Responding to and investigating food complaints and hygiene complaints related to premises. Receive and act on Food Alerts / withdrawals and recalls issued by the FSA.
- Assess food and water provisions at events held throughout the district on a risk-based basis.
- Take appropriate action where failings with food law are identified, including to seize, detain and arrange disposal, as necessary, of unfit food.
- In addition, officers are also involved in wider services including health and safety enforcement work, premises licensing, public health licensing and animal welfare licensing.

## 3.1 Food Law Enforcement

Food law enforcement is shared between central and local government bodies. Within local authorities this is between Environmental Health and Trading Standards. The FSA are responsible for certain types of premises, including approved abattoirs and meat cutting establishments for food hygiene.

The FSA is also an independent government department and responsible for directing food law activities, enforcement support, advice and audit of enforcement activity with respect to local authority food safety and food standards controls.

The Team is responsible for food law enforcement within the district. This means taking account of both statutory enforcement responsibilities imposed by food safety and public health legislation and an

educative approach to food safety through the provision of advice to local businesses and through health promotion.

## 3.2 Food Hygiene and Food Safety Interventions

- The purpose of 'interventions' is to ensure that food establishments comply with current legislation and statutory guidance and for us to provide relevant food safety advice. We use a wide range of interventions to monitor and increase business compliance as guided by the Food Law Code of Practice.
- Interventions are activities which monitor, support, and increase food safety compliance within food establishments and to ensure food is safe for consumption. They include but are not restricted to the following 'official controls':
  - **Inspections and Audits (Full/Partial inspections and audits)**
  - **Monitoring**
  - **Surveillance**
  - **Verification**
  - **Sampling and analyses where examination is carried out by an Official Laboratory.**
- Other interventions which do not constitute 'official controls' can be undertaken as considered appropriate. These may be in addition to the 'official control' or at an interval between 'official controls' and include:
  - **Education, advice, and coaching**
  - **Information and intelligence gathering**
  - **Sampling where examination is not carried out by an Official Laboratory.**
- We are required to document, maintain, and implement a food hygiene interventions programme that includes all food establishments.
- The programme ensures that businesses within the district are inspected based on their inspection rating at frequencies laid down in the Code's Food Hygiene Scoring System. The frequency of the inspection will vary depending on the type of food business, the nature of the food, the degree of handling and the size of the business. Businesses potentially posing a higher risk will be inspected more frequently than those with a lower risk. We will also pay particular attention to food businesses that present particular risks to food safety based on method of processing and scale.



## 3.2 Food Hygiene and Food Safety Interventions (continued)

- Take account of certain types of food businesses which may require 'approval' status to operate.
- The purpose of the intervention is to establish what the scope of the business is, gather and record information, identify good practices and poor food safety breaches. In the latter case, work with the business to make improvements with compliance, communicate this to the business and evaluate a risk rating score.
- Businesses will be inspected, as far as is reasonably practicable, within the period determined by the inspection rating.
- We will always take preference to inspect higher risk businesses over the inspection of lower risk businesses. Lower risk premises with an intervention rating of category E for hygiene may be dealt with by an 'Alternative Enforcement Strategy' (AES). This allows for the removal of very low risk food businesses from the inspection programme. However, businesses classified in this way must still receive a food hygiene intervention at least once every three years.
- This year a number of category E premises will receive an intervention based on their activity or if the subject of any complaints.
- If a low-risk business requests an inspection visit, this will be undertaken to assist the business. For example, where the businesses wish to obtain greater compliance with food law or requires a food hygiene rating for business purposes.

## 3.3 Food Premises

Food premises are classified according to a risk rating system to determine which category they fall within.

The risk rating will determine when a premise is due for intervention and at the following minimum frequency:

- A. High risk** - visit at least every 6 months.
- B. High risk** - visit at least every 12 months.
- C. Medium risk** - visit at least every 18 months.
- D. Low risk** - visit at least every 24 months.
- E. Lowest risk** - subjected to Alternative Strategies every three years because of the relative low risk associated with these businesses, unless deemed to require a visit.

## 3.4 Focussed Action for Food Safety

We will continue with our work on 'focussed action' to ensure poor rated businesses improve their compliance rates. Following an inspection, businesses receiving either Zero, One or Two Rating under the National Food Hygiene Rating Scheme are deemed 'poor or borderline' with respect to food safety requirements and fall below the Food Standard's Agency's 'satisfactory' (Broadly Compliant) compliance status.

Focused action may still involve serving notices or taking further formal action, but the methods employed may vary including informal one to one meetings, tailored revisits, self-certification etc., with the onus on the business to demonstrate how they will or have improved within a short period of time to ensure levels are to at least a 'Broadly Compliant' status.

Should the business require further assistance, the Officers will be able to provide additional but specific paid for one-to-one business support advice.

## 3.5 New businesses and Food Registration

- Food business operators must register their establishments with their appropriate Food Authority unless they are subject to 'Approval'. We maintain a record of all registered and approved premises.
- Certain food operations require 'Approval' under Regulation 853/2004. In South Staffordshire these include some manufacturers and egg packaging plants. Premises and food operations will need to be inspected prior to issuing approvals and systems regularly monitored thereafter.
- Unrated businesses: - new businesses will be flagged for an initial inspection and will then be risk rated. Until that happens the business remains unrated. To support businesses, the team will be available to provide appropriate advice and information.
- Details of new food businesses as supplied to South Staffordshire Council are copied to Trading Standards each calendar month.
- Where we become aware that ownership of a food business has changed or a new business has commenced, we will include the business in the following periods intervention programme based on its potential risk. Businesses posing lower risks e.g., cake businesses will receive a visit at a later stage but will be offered advice to begin with.

## 3.6 Self-Certification Forms/Revisits

On occasions, the operator of a food business will need to make improvements to comply with food safety law. In some cases, a revisit may be undertaken after a date is specified for compliance; and /or a self-certification form will be requested to be completed to indicate what steps have been taken by the business to comply. A revisit may or may not be undertaken thereafter based on the information received and assessment of confidence in management of the business. This will always be communicated to the business operator.

## 3.7 National Food Hygiene Rating Scheme

Where the business falls within the scope of the Food Standards Agency's 'National Food Hygiene Rating Scheme' (FHRS), it will be awarded the appropriate hygiene rating and the information publicised on the FSA's national website - [www.food.gov.uk/ratings](http://www.food.gov.uk/ratings). The hygiene ratings are given in accordance with the FSA's 'Brand Standard' for the scheme.

When food businesses are inspected, they are assessed and given a Hygiene Rating based on three criteria:  
- standards of hygiene, structure and documented food safety management systems.

The ratings range from 5 (Very Good) to Zero (Urgent Improvement Necessary):

**0 = urgent improvement necessary;**

**1 = major improvement necessary**

**2 = improvement necessary**

**3 = generally satisfactory**

**4 = good**

**5 = very good**



Some 'lower risk' premises will fall within the scope scheme and for equitable reasons some of these businesses will be included in the inspection programme to allow scoring to take place.

A South Staffordshire Council Policy Document on the rating scheme details the Appeals Procedure; the Right to Reply Procedure and Request for Re-Inspection for a Re-Rating. A fee is chargeable for a business requesting a 'Re-Rating' inspection.

Details are also contained in an Information Sheet accompanying the inspection correspondence.

Data is uploaded to the FSA's website on a regular basis. 5 rated businesses immediately go live and the remaining businesses every 35 days to allow for the appeal procedure.

## 3.8 Food and Food Premises Complaints

Complaints are assessed and the most appropriate course of action taken. Priority is given to cases which pose a risk to public health to ensure all reasonable precautions are taken to prevent any recurrence. On occasions the investigation may involve further formal action. It is recognised that not all complaints require the same scope and scale of investigation and officers are guided by Food Safety Policies and Procedures.

Investigations will frequently involve contact with local food businesses, manufacturing companies and local authorities in other areas.

## 3.9 Requests for Service

The team have many customers, including the people who live and work in South Staffordshire, visitors, tourists, and businesses. Great customer service delivery is an important part of the Council's overall priority and as a result we aim to ensure service requests are dealt with effectively.

95% of service requests will be acknowledged within three working days and 80% resolved within 35 working days.

## 3.10 Food Safety Incidents

The FSA issue 'Food Alerts' and 'Food Incidents' to alert the consumer and local businesses to problems or potential problems in particular food products, and to ensure they are removed from the food chain.

The team, will as appropriate, liaise with Trading Standards, over the handling of food alerts that have implications for both authorities.

## 3.11 Food sampling

Food samples are taken either in response to complaints or as part of the Council's proactive surveillance procedures and interventions for ensuring that food produced and/or sold in South Staffordshire is safe to eat. The Council also participates in a regional sampling programme, coordinated by the Central England Food Coordinating Group. The national sampling programme comes from UK Health Security Agency (UKHSA). Both provide intelligence that can help identify the focus of food safety visits.

The service recognises that microbiological sampling and food testing of foods handled/produced in the district is a key area in relation to food safety and an official control defined by the FSA.

All food, environmental swabs and water samples are examined at a London laboratory for microbiological testing.

Faecal specimens are processed at the Enteric Laboratory at Birmingham Heartlands Hospital.

The services of a Public Analyst for appropriate analysis and examination of foodstuffs are through a local laboratory service.

Any unsatisfactory sample results are followed up with further sampling and investigation.

## 3.12 Infectious Disease Control

The service carries out the statutory responsibilities with regards to infectious diseases. This includes but is not solely in relation to food borne illness so whilst the service will investigate outbreaks of Salmonella and E. coli for example, it will also follow up incidents of Legionella and Hepatitis.

The duties include working with UKHSA to identify sources of disease, reducing the risk of transmission, gathering data, liaising with people suffering from infectious diseases and when necessary, taking formal legal action to prevent the spread of disease.

Investigation and control of major outbreaks is undertaken in conjunction with the Consultants in Communicable Disease Control (CCDCs) at UKHSA. The CCDC, employed by UKHSA West Midlands North is the Proper Officer appointed by South Staffordshire Council for the purposes of the amended Public

Health (Control of Disease) Act 1984 and the Public Health (Infectious Diseases) Regulations 1988 the latter amended by the Health and Social Care Act 2008.

The health protection powers are contained within the Public Health (Control of Disease) Act 1984 (as amended) together with the Health Protection (Local Authority Powers) Regulations 2010 and the Health Protection (Part 2A Orders) Regulations 2010.

## 3.13 Health Promotion and Education

The Council will promote food safety by the best possible means and currently use social media to promote food safety initiative and messages, including the 4 and 5 food hygiene ratings of businesses.

## 3.14 Home/Originating Authority Principle and Primary Authority Scheme

In line with Code of Practice, the team will have regard to the Home / Originating Authority Principle.

- Councils with the Head Office of a food company in their area act as a point of contact for the business and for different local authorities who deal with local outlets or products from the same company. We are an Originating Authority for five food manufacturers in the district. However, we have no formal agreements currently in place to act as a home authority for any food business.
- The Department for Business, Energy and Industrial Strategy (BEIS) co-ordinates the Primary Authorities scheme. Where agreements have been reached between business and local authorities to act as Primary Authorities, officers will before taking any formal action, consult with the Primary Authority in accordance with agreed procedures laid down.

## 3.15 Working with other organisations

We are a member of the Staffordshire, Telford, and Shropshire Food Liaison Group, which aims to:

- Act as a forum to provide consistency of enforcement.
- Act as a facilitator for benchmarking activities.
- Provide 'standardisation' exercises to facilitate consistency.
- Forum for sharing best practice.
- Focal point for information from outside agencies such as the FSA, CENTSA (Central England Trading Standards Authorities), UKHSA and Laboratories.

In 2015, the Central England Food Coordinating Group was set up as a strategic policy group for the wider region, covering the West Midlands, Worcester and Hereford, and South Midland Authorities as well as the Shropshire, Staffordshire local food liaison group.

Other links exist with:

- Externally, with Trading Standards at County Council to ensure improved working relationship for food standards work.
- Commissioners for school catering, OFSTED, Fire Service, Police, Social Services, Care Quality Commission etc.



# The Work Programme and Service Delivery

## 1. Demands of the Service

### Profile of food premises - April 2023

As of April 2023, there were 916 local food businesses registered with South Staffordshire Council, a slight increase from the previous year. Majority are retail and catering businesses, with a sizable number of food manufacturers located in the district.

Risk Category	A	B	C	D	E	Unrated (New / Awaiting intervention)	Total
Total Number of Premises	2	17	121	311	447	18	916
Premises due for interventions up to March 2024	2	17	80	191	346	18 (plus)	308 (exc Es)

### Types of businesses - April 2023

Food Premises by Main Use - April 2023		Numbers
	Category of Establishment	
F01	Primary	4
F02	Manufacturer and Packer	32
F03	Importer	0
F05	Distributors and Transporters	4
F06A	Retailer – Supermarket /Hypermarket	18
F06B	Retailer – Small Retailers	111
F06C	Retailer – Others	31
F07A	Restaurants and Caterers	141
F07B	Hotel / Guest House	14
F07C	Pub / Club	143
F07D	Takeaway	57
F07E	Caring Premises	120
F07F	School / College	56
F07G	Mobile Food Unit	48
F07H	Others	136
Slaughter		1
TOTAL		916

## Types of businesses - April 2023 (continued)

- 32 are classed as manufacturers and packers
- Fourteen manufacturers, primary producers and distributors produce / distribute products regionally and nationally.
- Nine are breweries/wineries.
- Seven are approved for products of animal origin.
- Three are approved egg packing/egg product centres.
- A significant proportion of the food premises are catering businesses forming a major part of the local economy.
- Over the last year approximately 110 businesses have either changed ownership or were new businesses.
- At the start of the 2023 -24 financial year there were 17 new or changed businesses awaiting inspection. This is a relatively small number. These are included in the inspection programme for the new financial year.
- The categories of premises figures fluctuate annually as businesses start or cease trading. It is estimated that approximately 100 new businesses will open each year.

## 2. Outdoor Events:

Several outdoor events take place in the district such as at Weston Park, Himley Hall, Chillington Hall as well as local events and other temporary events attracting a considerable number of businesses and members of the public. These, together with a varying number of car boot sales, in the region of 20 a year and one large market operating regularly in the district, attract many mobile food traders, which will receive interventions outside the Team's food safety inspection programme.

Events in the district are monitored, and based on risk, the organisers of some events will be requested to provide information regarding the food and water provision. A proportion will be included in further intervention work.

# The Work Programme and Service Delivery

## 3. Sampling

Sampling will be undertaken as part of any regional and national sampling programmes, but also as a result of officers identifying premises, practices or food production processes requiring microbiological testing and verifications.

The programme so far for this year will involve:

Surveys	Month
National Survey	
<b>STUDY 77: Ready to Eat Salad and Salad Components.</b>  Purpose: To check on the microbiological quality and safety of salads and salad components due to increased cases of food poisoning and the epidemiological link salad products.	<b>April to March 2024</b>
<b>STUDY 78: Hygiene in Catering Premises.</b>  Purpose: Following the Covid pandemic and Brexit, study to assess whether hygiene standards have dropped or remained steady.	<b>April to October 2023</b>
Cross Regional surveys	
<b>Legionella Study.</b>  Purpose: To assess risk of legionella in water systems post Covid and ensure legionella risks have been assessed by employers / operators.	<b>To December 2023</b>

## 4. Factors that may have major impact on service delivery

The team may need to react to unforeseen events that may occur throughout the period of the plan such as infection control outbreaks, emergency closures, food hazard warnings, increase in service requests and other areas of work covered by the team, which impact upon the resource available for programmed work. Ongoing changes in food safety priorities will also need to be responded to.

Where such factors arise, these could have an adverse impact on the routine food hygiene inspection programme.

# The Work Programme and Service Delivery

## 5. Service Priorities

In line with service requirements namely,

- 100% of the high- risk food businesses (Category A & B) required to be inspected by the due date.
- 100% of Not Broadly Compliant businesses, where appropriate, to receive focussed intervention or formal action as soon as possible after the initial intervention and continued over a time span of 3 months.
- All 'Not Broadly Compliant' businesses to progress to 'Broadly Compliant' within 3 months of the initial inspection where appropriate, however, preferably much sooner.
- One of the key performance targets under the safe and sustainable districts is for 90% of registered food businesses to be 'Broadly Compliant'.



# The Work Programme and Service Delivery

## 6. The Work Plan for 2023–2024

	Activity	FSA Requirement	South Staffordshire Requirement
1	Food Registration processes	Proactive surveillance to obtain an accurate picture of the local business landscape and to identify: - open/closed/recently re-opened/new businesses. - change of operation, activities or FBO.	Process in place to manage new business registrations.
2	New Businesses	New food business establishments where consideration of registration information/intelligence indicates high or low risk.	New businesses introduced into each inspection quarter. Higher risk prioritised first for inspection.
3	Management of food incidents and hazards - including outbreaks of foodborne illness	As stipulated by food law requirements.	Process in place.
4	Investigation and management of complaints	As stipulated by food law requirements.	Process in place.
5	Enforcement action in case of non-compliance	LA enforcement policy and food law requirements.	Follow Councils enforcement policy and requirements of food law.
6	FHRS requested re-visits	Within 3 months of request.	Process in place.
7	Sampling	In line with LA sampling programme, and assessing food business compliance.	Follow national and regional programme or as intelligence identifies.
8	Category A premises	No later than 28 days after the due intervention date.	Cat As to be inspected by the due date.
9	Category B premises	No later than 28 days after the due intervention date.	Cat Bs to be inspected by the due date
10	Category C premises	No later than 28 days after the due intervention date.	By end of quarter period.
11	Category D premises	No later than 28 days after the due intervention date.	By end of quarter period.
12	Category E premises	Post Covid to undertake carry out intervention of a proportion of Cat Es.	Small number identified for inspection based on intelligence and risks posed.
13	Sector specific official controls Support trade and enable export	Official controls that must be undertaken to support trade and enable export.	As required.
14	Allergen related work		Provide relevant allergen advice to businesses and undertake checks during intervention visits.
15	Advice to businesses		Provide appropriate and relevant advice and information to new and existing businesses on a reactive or proactive basis.

## 1. Officers

The number of full time equivalent (FTE) officers deployed in the provision of the food safety function for the service is 2.5 FTE as at April 2023. In total six officers support the food law enforcement function, as detailed in the table below:

Officer Post	FTE
EHO – Assistant Team Manager Food Lead	0.4
Food Safety Officers X 3	1.5
Technical Food Safety Officer	0.4
EH & L Team Manager	0.1
Administration support staff	0.1
<b>Total</b>	<b>2.5</b>

The Food Safety Officers are qualified to either the level of Higher Certificate in Food Premises Inspection or Higher Certificate in Food Control. The qualifications and competency of Environmental Health Officers and three Food Safety Officers enable them to undertake inspection of all categories of food business.

Staffing Allocation: The resources required to undertake the services described above are detailed in the table below:

Function	2023-2024 (Full time equivalent posts)
Food Premises Inspections / Interventions	60%
Complaints about Food and Food Businesses	7%
Home Authority Principle	2.5%
Advisory services/ business support	15%
Food Sampling	2%
Control and Investigation of Food Poisoning	3%
Food Alerts	0.5 %
Liaison with other Organisations	2.5%
Food Safety Promotions and Education	1.5%
Administration	3%
Staff Development	3%
<b>Total Resources Required</b>	<b>100%</b>



## 2. Officer Development

- Officers authorised to undertake inspections must be suitably qualified and demonstrate their competency to undertake inspections and audits of food safety systems.
- Annual personal development reviews identify officer development needs. Any additional training will reassess the officer authorisation categories in future.
- As well as this, all Officers involved in the provision of the food safety service are required to complete and keep up to date their Competency Framework. This is used to support their development.
- The Food Law Code of Practice also requires authorised food officers to receive at least 10 hours relevant food training per year.
- To fulfil training needs, officers will attend online courses and seminars arranged by the Chartered Institute of Environmental Health, UKHSA, and external organisations.

## 3. Financial Allocation

Sufficient financial allocation for delivery is available as per budget pages approved and scrutinised by the Lead Cabinet Member.



# Quality Assessment and Performance Management

1. Procedures are in place to scrutinise all the work carried out by the team. Documented procedures have been produced. We monitor officer consistency through participation in national consistency exercises (as produced by the FSA) and local initiatives set by the Food Liaison Group.
2. The service further monitors performance against targets via internal Key Performance Indicator as detailed below:

## Quarterly

% of Broad Compliance businesses for food hygiene (accumulative score).

Additionally, the inspection programme is regularly monitored and on a quarterly basis the intervention progress is accessed. All category A and B risk premises must be inspected by the inspection due date.

3. The quality of service provided by the team will be assessed by:
  - Monitoring performance against targets detailed in South Staffordshire Council's Service Plan for food premises inspections and responses to requests for service.
  - Monitoring actual working practice against procedures for:
    - Inspections of food businesses.
    - Investigation of complaints and food poisoning notifications.
    - Enforcement.
4. Performance monitoring will be undertaken by generating reports from the Uniform database on:
  - Inspections undertaken, for comparison against annual programme.
  - Complaints and other requests for service, to monitor progress.
5. Working practices will be monitored routinely by the Assistant Team Manager/Team Manager:
  - Monitoring all formal enforcement action and all proposals for formal enforcement action. A selection of reports on approved premises inspections.
  - All zero, one and two rated premises; and higher risk premises reports and files. Contentious outgoing correspondence.
  - Annual peer review of inspections (shadowing). Regular team meetings.
  - Individual performance review.
  - Regular on-going review of training needs and learning. Regular FHRS consistency training exercises with the FSA.
6. Complaints regarding services provided will be investigated under the Council's formal complaints procedure.

## 1. Review of Performance

### 1.1 Activities

The Table below shows the activities which are reported to the FSA annually and form part of their monitoring of this statutory function:

Activity	2018-19	2021-22	2022-23
All Interventions	338	249	408
Sampling Visits	33 Premises visited (58 samples)	1 premises (6 samples)	11 Premises visited (58 samples)
Advice & Education	5	All new businesses provided with advice.	All new businesses provided with advice.
Service of Improvement Notices	4	1	0
Emergency Prohibition Notices	-	-	1
Service requests- Complaints about food and hygiene of premises	68	88	167
All Food related service requests	256	Approx. 200	Approx. 270
Infectious disease notifications	152	114	171
Total premises as of April	898	893	916
Prosecutions	1 Formal caution 1 prosecution concluded September 2018. 1 Prosecution ongoing concluded July 2019.	1 instigated	1 prosecution summons served during year.
Percentage of Broadly Compliant premises	96.7%	95%	96%

## 1.2 Broadly Compliant

The percentage of premises Broadly Compliance at the end of the financial year March 2023 was 96% which was a very positive.

Premises with a food hygiene rating of 3 or more are broadly compliant. It should be noted that premises that are yet to receive a rating (i.e., new unrated premises) are automatically counted as non broadly compliant by default.

The high compliance rate means that businesses overall have maintained good standards over the pandemic period. Regular contact with food businesses during Covid is likely to have had a positive influence on businesses to continue with good practices.

## 1.3 Food Hygiene Ratings for Food Premises

This demonstrates the high level of food hygiene compliance amongst the businesses in South Staffordshire.

Rating	2018-19	2021-22	2022-23
Zero	1	1	1
1	8	6	9
2	9	3	5
3	40	15	26
4	118	108	108
5	474	547	572
Total number of premises in the scheme	650	680	721

Under the scheme, businesses with a rating of 4 or below can request a Re-Rating Inspection. If they fulfil the criteria for re-inspection this will be accommodated, and the business re-inspected and given the appropriate new rating.

## 1.4 Interventions Achieved

- Interventions for all Category A and B premises were achieved including the backlog from 2020, where some high-risk premises such as care homes were not able to be inspected.
- All Category C premises inspected.
- No less than Broadly Compliant Ds left for interventions.
- Majority of new unrated premises inspected.
- Sampling programme restarted post Covid.
- Prosecution completed of a repeatedly poor premises and in Court in April and June 2023.

Any businesses subject to a complaint or linked to any food or water borne infectious disease were inspected, particularly if not in the original programme of inspections.

## 1.5 Formal Action

A food business was formally closed and a Hygiene Emergency Prohibition Notice served due to a major rodent infestation.

Further formal action considered.

## 1.6 Sampling

Sampling undertaken at 11 premises with 58 samples taken, these included at Camp Bestival 2022.

## 1.7 Allergens

Legislation from 13 December 2014 required food businesses including caterers and takeaways to provide allergy information for its customers.

The duty is placed on both Trading Standards and Environmental Health. However, as these types of premises are more routinely visited by officers from Environmental Health, it has been agreed within the Food Technical Group, that Food Safety Officers from District and Borough Councils would monitor how businesses implemented the requirements and would provide further advice as required. Any issues of concern or complaints relating to the business would be referred to Trading Standards as the main duty for enforcing these regulations rests with Trading Standards at the County Council.

From 1st October 2021, further allergen labelling requirements were introduced for prepacked for direct sale (PPDS), also known as Natasha's Law. Pre-Prepacked for direct sale is food that is packaged at the same place it is offered or sold to consumers and is in this packaging before it is ordered or selected. It can include food that consumers select themselves (e.g., from a display unit), as well as products kept behind a counter and some food sold at mobile or temporary outlets.

In South Staffordshire, allergen information is routinely checked at all catering businesses and in addition, it is now also a significant part of the intervention work to check how businesses manage allergen cross contamination issues.

## 1.7 Events

There were over 40 large or larger scale events in the district during the year, in addition to many smaller community events. The larger events tended to attract hundreds of customers, to tens of thousands of members of the public. These were prioritised by the team to undertake Event Management Planning checks and in terms of food, organisers were required to provide details of their food contractors and water supply provisions. Organisers are advised to only take on registered and inspected food businesses and those which were either 4 or 5 Rated businesses. Details were requested and desk top checks and some onsite visits were undertaken to determine the food hygiene and safety that was in place.

## 1.8 Asylum provisions

Catering provisions from external providers were looked at premises hosting asylum seekers. Some of the providers were new and liaison took place with the home local authorities.

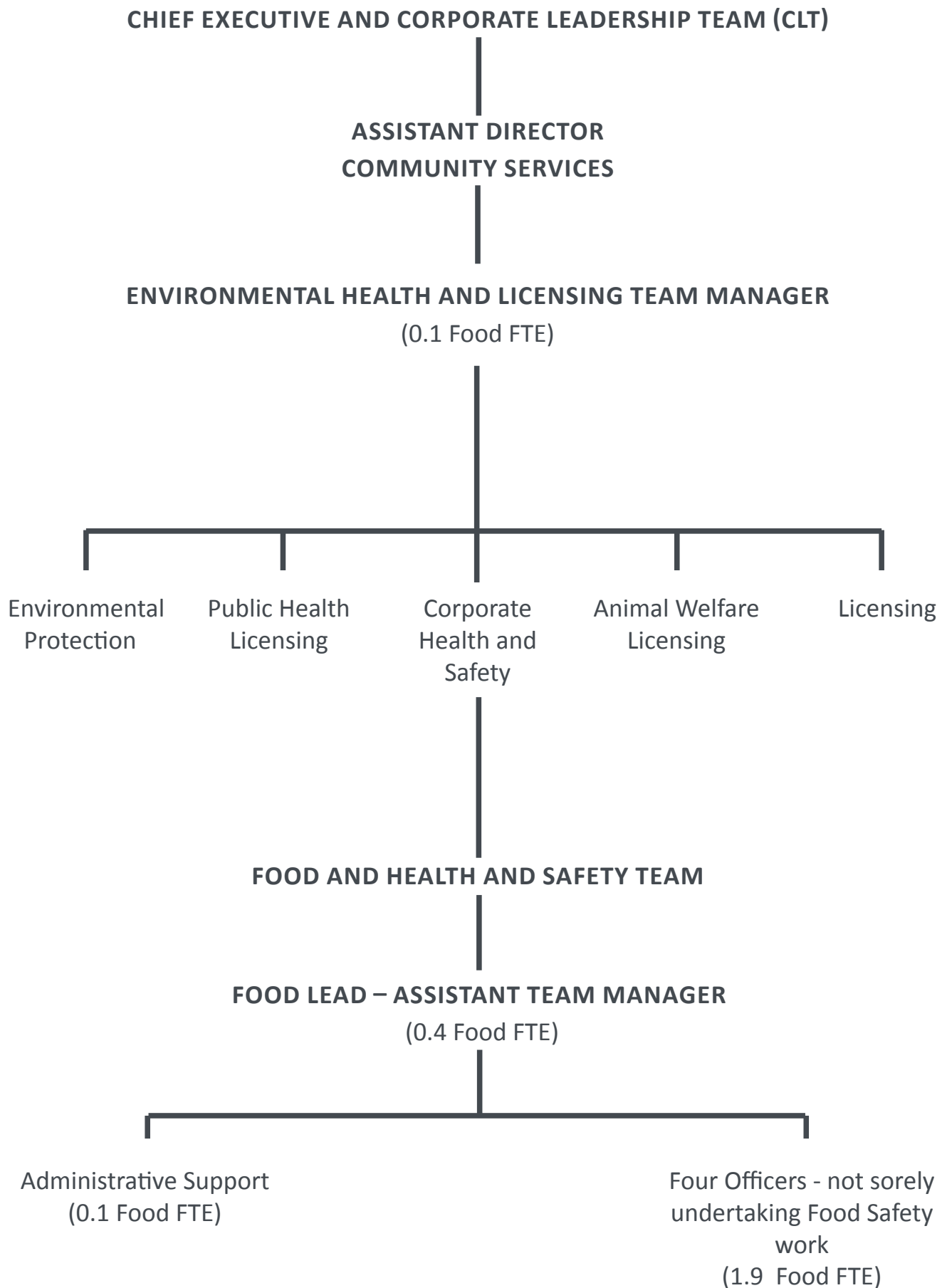


## 1.9 The Central England Food Coordinating Group (CEFCG)

A strategic food group covering three Food Technical Groups from Staffordshire, Shropshire (North Food Group), West Midlands, Worcestershire, Hereford (Central Food Group) and Warwickshire, Coventry, Rugby etc. (South Food Group).

The Lead Chief EHO is the South Staffordshire Council's Environmental Health and Licensing Service Manager who attends the wider regional Central England Environmental Health Management Board (CEEHMB).









**South Staffordshire Council**

