

**Official Food Controls Service Plan**  
**Aylesbury Vale District Council 2015/16**

**1. Service Aims & Objectives**

1.1 Aims and Objectives

The food controls service plan sets out Aylesbury Vale District Council's intentions for taking forward corporate and service level objectives in relation to food hygiene and safety in the Vale.

**2. Background**

2.1 Profile of the Local Authority

Aylesbury Vale covers 350 square miles and makes up more than half of the County of Buckinghamshire in the centre of Southern England. It is located approximately 40 miles north-west of London and 65 miles south-east of Birmingham. Good transport links are provided via three major road routes – the M1, M25 and M40.

Aylesbury Vale has a population of approximately 184,500 of which approximately 78,000 reside in Aylesbury itself. Of the local population approximately 14% come from ethnic minority groups. Aylesbury Vale's population is based in the three major settlements of Aylesbury, Buckingham and Wendover and many mid to small rural parishes of which over half have less than 500 residents. As such the Vale has a mixed economic profile with large areas of predominantly agricultural activity as well as small hubs of commercial and industrial activity. Parts of Aylesbury Vale have been designated for their landscape quality, either as forming part of the Chilterns Area of Outstanding Natural Beauty, Areas of Attractive Landscape or Local Landscape Areas. Aylesbury is the administrative centre for both the District Council and the County Council.

2.2 Organisational Structure

Aylesbury Vale District Council has a governance structure which consists of the Leader of the Council and 6 Cabinet Members each with a specific portfolio area of responsibility broadly based on service delivery areas. The official food controls service reports to the Cabinet Member for Environment and Waste. The Environmental Health and Licensing service consists of three teams:

- Environmental health (split into two geographical area based sub teams)
- Licensing
- Environmental Health Customer Services

The Environmental Health and Licensing service underwent a major restructure during 2014, and the organisation of the service changed from 1 April 2015. It is not anticipated that the changes to the structure of the service will have an impact on food service delivery.

The provision of official food controls rests with the Environmental Health Team. Within the team there are two Environmental Health Managers. One leads primarily on residential matters and the other on commercial. The Environmental Health Manager (EHM) who leads on commercial activities is the Lead Officer for food controls and reports to the Environmental Health and Licensing Manager. She reports to a Director. All EHOs are fully generic and undertake food activities (dependant on competence etc.), irrespective of whom their line manager is.

There are currently 4 District Environmental Health Officers (EHOs) covering all aspects of Environmental Health Work across the Vale, including the provision of official food controls. The EHOs are supported by 4 Environmental Health Technical Officers (EHTOs) who cover all aspects of Environmental Health work excluding food safety inspection and audit because they are not suitably qualified as required by the Food Law Code of Practice. Two of our EHTOs are currently undertaking the qualifications to become EHOs. The level of food activity that they undertake is dependant on qualification and experience. There are also two Senior Technical Officers who are specialists in pollution and housing matters. It is not expected that they will undertake food control activity.

In the last four years, due to restructure and the deletion of posts, it has been necessary to outsource some food controls to a suitably qualified contractor to ensure that food service targets can be met. This will again be necessary during the period 2015-16 and budget has been allocated to resource this. Where contractors are used to carry out food controls competencies are assessed prior to food controls being allocated. In addition work carried out is appropriately monitored and audited by the EHM to ensure that food controls are implemented effectively and a high standard of consistency for businesses is maintained as far as is possible.

Corporately we are reviewing our services and the way that they are delivered. Known changes include the development of a Customer Delivery Service where many administrative functions will be undertaken by a central team rather than individual departments. We may also further investigate charging for food business advice as many other local authorities are already doing. This is an ongoing development for the Council.

### 2.3 External contacts and provision

AVDC is a member of the Bucks Food Liaison Group which consists of the other Buckinghamshire local authorities; South Bucks District Council, Chiltern Borough Council, Wycombe District Council and Milton Keynes Council as well as Bucks and Surrey County Council's Trading Standards, Milton Keynes Council Trading Standards, a representative from the Food Standards Agency and a representative from Public Health England, Colindale. The Bucks Food Liaison Group has agreed terms of reference with regard to the shared common interests of the provision of official food controls in Buckinghamshire.

As is required the Environmental Health team also work with the South East (Thames Valley) unit of Public Health England (PHE) and the Consultant in Communicable Disease Control. AVDC is a member of the Buckinghamshire Environmental Health Liaison Group which is chaired by Public Health England and consists of the other Buckinghamshire local authorities (as above, except Milton Keynes Council who attend a different regional group) and a representative from NHS Buckinghamshire.

Specialist services such as microbiological and chemical analysis of food and water samples are outsourced to UKAS accredited laboratories as required.

#### 2.4 Scope of the Food Service

The food controls service is delivered by the EHMs and 4 EHOs alongside other aspects of proactive and reactive Environmental Health work which include health and safety, public health, statutory nuisance, licensing and planning consultation, pollution control and housing standards.

The service is driven by a combination of demand (reactive), inspection (proactive), education and intelligence.

- Demand – e.g. investigation of food and food premises complaints, investigation of notifications of infectious disease, responding to food incidents and alerts, request for re-rating by food businesses under the national Food Hygiene Rating Scheme
- Inspection – e.g. programmed food inspections and interventions as required by the Food Law Code of Practice, maintenance of an annual sampling programme as agreed by Bucks Food Liaison Group
- Education – the provision of advice and support to new and existing food businesses in the Vale, the promotion of food safety to residents and visitors to the Vale and via the national Food Hygiene Rating Scheme
- Intelligence – responding to food incidents and alerts, participation in PHE led national sampling programmes, acting on food safety issues and trends as raised by the Food Standards Agency.

## 2.5 Demands on the Food Service

Food premises profile in Aylesbury Vale by risk category:

Business Type	Premises Risk Category							Total
	A	B	C	D	E	U (unrated)	Outside of programme	
Primary Producers	0	0	2	7	16	4		29
Manufacturers/Packers	0	6	10	4	10	1		31
Importers/Exporters	0	0	0	1	5	1		7
Distributors/Transporters	0	0	1	4	18	3		26
Retailers	1	5	20	46	158	12	39	281
Restaurants/caterers	2	35	243	436	434	185	5	1340
Total no. of food premises	3	46	276	498	641	206	44	<b>1714</b>

Premises which are classed as “outside” are premises which we have determined our outside of our annual intervention programme. They are registered with us, but do not receive routine programmed interventions.

Within the premises profile there are 14 approved establishments. This is an increase of 2 from 2014/15. The new approved premises are egg packing centres. Approved establishments are food premises that prepare and handle foods of animal origin for sale or supply to other businesses. These premises must meet additional legislative food safety requirements and will generally require greater officer resource than other food premises.

There are several annual events that take place in Aylesbury Vale that require additional resource. These include the Moto GP and British Grand Prix at Silverstone, Bucks County Show and ad hoc markets, licensed large scale (i.e. music events) and community events.

The Environmental Health Service is delivered from the Council Office at The Gateway, Gatehouse Road, and Aylesbury during Council opening hours of 08.45 – 17.15 Monday – Thursday and 08.45 – 17.00 Fridays. There is no out of hours service provided by Environmental Health however it is recognised that Officers may sometimes need to work outside of these hours where food premises open solely in the evening or where an incident occurs.

## 2.6 Regulation Policy

The Council has adopted the Government's 'Enforcement Concordat' on the principles of good enforcement. The Environmental Health & Licensing department operates to an Enforcement Policy Statement and Divisional Enforcement Policy (QPMS-04) which aims to ensure a clear and consistent approach to enforcement within the department, including in the delivery of the food service. The Policy was reviewed in May 2014, and has regard to the requirements of the Regulators' Code.

The Enforcement Policy adopts a tiered approach to enforcement and the action that will be taken by the Council to secure compliance with legislative requirements. The Policy applies the principles of proportionality in applying the law and securing compliance, consistency of approach, targeting of enforcement action and transparency about how we will operate and what the duty holder may expect. The enforcement policy is operated with regard to the Council's Equal Opportunities Policy.

## 3. Service Delivery

### 3.1 Interventions at Food Establishments

Interventions undertaken at food establishments result from a mixture of proactive programmed interventions (inspections or other interventions scheduled to be undertaken during 2015/16 generated from the Food Standards Agency Code of Practice, Annex 5 risk rating process) including food sampling and reactive interventions. Reactive interventions may result from a complaint from an employee or member of the public, from unsatisfactory food sampling results or from

intelligence received from another food authority or the Food Standards Agency e.g. in relation to a Food Alert.

Number of interventions due by risk category 2015/16 as of 1<sup>st</sup> April 2015

	Total	A	B	Non-comp C	Comp C	Non-comp D	Comp D	E
Programmed food interventions 2014/15 (inclu outstanding interventions 2013/14)	694	3	45	16	141	2	291	195
New unrated premises interventions (exclu low-risk categories)	67							
<b>Total</b>	<b>761</b>	<b>3</b>	<b>45</b>	<b>16</b>	<b>141</b>	<b>2</b>	<b>291</b>	<b>195</b>

In addition to the numbers specified above the authority receives between 15 and 20 new food business registrations a month throughout the year. These numbers also have to be factored into the inspection allocation for these periods.

There is a backlog of 67 new unrated premises awaiting inspection. It is important to note that within this number there will be a proportion of businesses which have registered with us, but have not yet commenced trading and therefore we are unable to inspect. It is better to visit a premises once it has begun trading so the officer can see the practices which are actually being carried out on site.

In the 2012/13 period a new procedure for dealing with low risk new premises registering with the authority was introduced to try and target the limited resource available towards premises more likely to be involved in higher-risk food activities. As a result in 2015/16 in line with this procedure, childminders that do not prepare or handle open high-risk foods, small-scale domestic cake-makers (some of the cake makers indicate making less than 5 cakes per month, or supplying mainly friends and family) and halls and sports clubs for community use/hire will not receive an

inspection from the authority unless information or intelligence is received that justifies the need to do so. Should a complaint be received regarding one of these premises then this is likely to trigger an inspection or intervention. As a result of the departmental restructure the way that inspections are allocated to officers, has changed. This revised allocation procedure should ensure that the new premises are inspected with more priority.

New unrated premises currently awaiting inspection (as of 1<sup>st</sup> April 2015)

Total no. of unrated food premises awaiting inspection	221
Child-minders awaiting inspection	79
Low-risk premises awaiting inspection (church halls etc.)	33
Low-risk domestic premises cake-makers awaiting inspection	42
Total no. of remaining unrated premises awaiting inspection (excluding categories above)	<b>67</b>

The authority aims to reduce the time taken to inspect a new unrated premises in 2015/16 by employing the services of a qualified contractor to assist with these inspections. There has been budget allocated for this period to resource this.

In order to target resource where the risk to health is the greatest, premises are inspected in accordance with a risk prioritisation scheme specified within the Food Hygiene Intervention Policy and Alternative Enforcement Strategy (AES) (QPMS-59) which was introduced in the 2012/13 period. The aim of this is to allow the Council to target a limited resource where the risk to public health is likely to be the greatest. In 2015/16 programmed interventions are to be carried out in accordance with date due and in the following priority order;

- 'A' rated,
- 'B' rated,
- non-compliant 'C' rated
- new unrated businesses awaiting inspection
- compliant 'C' rated
- non-compliant 'D' rated
- complaint 'D' rated



- 'E' rated

A business that receives a score of more than 10 for any of the three risk rating areas; food hygiene and safety, structure and confidence in management, at the time of risk rating is considered to be a 'non-compliant' premises. A business that receives a score of 10 or less in each of the three risk rating areas is considered to be a 'compliant' premises. This is in line with the FSA definition of 'broadly compliant' with regard to food law requirements and with Annex 5 of the Food Law Code of Practice.

Compliant 'D' rated and 'E' rated premises will be subject to an Alternative Enforcement Strategy (AES) which will involve a mixture of inspection/audit and other interventions including the use of self-assessment questionnaires.

There is a backlog of 67 new premises (excluding low risk categories) in Aylesbury Vale who have registered with the Council but not received an intervention. It is the Council's view that these premises should take priority for intervention in 2015/16 in line with the risk prioritisation scheme (as outlined above). This is because without any knowledge of the processes and activities going on within these businesses we cannot make risk judgements about them. Although there is a requirement for businesses to register with us 28 days before they commence trading we find that businesses will either register far in advance or not register prior to commencement of trading. Officers will often pick up information about new businesses via other intelligence sources. These new premises will be prioritised over our compliant 'C' rated premises which are those premises that we know from our previous interventions are 'broadly compliant' with food law requirements and are less likely to pose a significant compliance or health risk.

### 3.2 Childminders

In January 2014, changes were made at a national level concerning the registration of childminders as food businesses with environmental health departments. There is now an agreement between the Food Standards Agency and Ofsted that information will be supplied to environmental health departments by Early Years Departments

regarding childminders who register with them as an early years provider. Due to this change there is no longer a need for childminders to directly register with district councils. For Aylesbury Vale information should be supplied to us by Buckinghamshire County Council.

All childminders that the Council is made aware of receive a questionnaire at the time of notification which allows us to collect information about the number of children they look after and the type of food they prepare and provide to children in their care. In accordance with the Food Hygiene Intervention Policy and Alternative Enforcement Strategy (AES) (QPEMS-59) childminders that only provide low-risk snacks such as fruit, biscuits and cereal are not identified as requiring inspection by the authority and are instead risk rated on the basis of the information they provide. Those that prepare and provide higher risk foods are identified as requiring inspection and added to the list of new unrated premises awaiting inspection.

### 3.3 Outstanding Inspections from 2014/15

There are 71 overdue interventions from 2014-15 which are from the following categories:

Rating	Outstanding
A	0
B	0
C	9
D	49
E	13
Total	71

Of these 87% of the outstanding interventions were from the lowest risk categories and many of these would have been subject to a questionnaire instead of an inspection visit. These businesses would have been sent a questionnaire but it may not have been returned despite EHTOs attempting to make contact with the business. It is likely that a number of these businesses may have ceased trading and not informed us. EHTOs will target these premises during 2015/16 in order to establish their status and remove them from the database if appropriate.

### 3.4 Alternative Enforcement Strategy (for low-risk food businesses)

Premises currently due an AES intervention (as of 1 April 2015)

	Total	Compliant D rated	E rated
Low-risk premises overdue intervention from 2014/15	14	8	6
Premises due for AES intervention 2015/16	309	148	161
Total no. of premises that may be subject to AES in 2015/16	<b>309</b>	148	161

Currently our AES questionnaires are sent out by post. Our corporate website is being relaunched during 2015, and we are investigating what services can be completed by customers using online transactions. As part of this process we will investigate if it is possible for businesses to complete questionnaires online. It has not been possible to do this prior to the launch of the new website and therefore this was not progressed during the 2014/15 period (as proposed in the previous Food Service Plan).

The policy relating to the inspection of food premises is detailed in the Food Hygiene Inspection Procedure (QPMS-55). This document sets out what food businesses can expect from EHO's and expands in a practical way the Council's Divisional Enforcement Policy. In recognition that most businesses want to comply with the law, EHO's help food businesses and others meet their legal obligations without

unnecessary expense, whilst taking firm action against those who fail to comply with the law, including prosecution where appropriate.

This Service Plan is focused towards directing our resources towards the highest risk and most non-compliant businesses. European food law states that all food businesses should receive an intervention, however AVDC along with all other Bucks Food Liaison Group members formally agreed in June 2015 that the following premises would be classed as having a 'non-inspectable risk'. This does not exempt these businesses from meeting food law requirements, but they will not be subject to programmed interventions.

- Retailers where the sale of low-risk food is ancillary and/or seasonal, e.g. clothes and card shops
- Service sector businesses only serving drinks and biscuits, e.g. hairdressers and car sales showrooms
- Religious groups only serving drinks and biscuits after events
- One-off events such as charity fundraisers and fetes
- Food brokers that do not actually handle food, i.e. offices
- Grain haulage businesses as Trading Standards will cover them if serving feed businesses
- Community halls offered for hire by others (individual businesses operating regularly from these will be expected to register and be subject to official controls)
- Child-minders that only provide milk, other drinks and low-risk snacks or serve food provided by the parents

AVDC seek to ensure that resources are targeted and applied where they are most required and can be most effective. There are a number of food businesses that consistently perform compliantly and/or have a number of external audits each year. During 2015/16 we want to explore the possibility of extending the scope of our Alternative Enforcement Strategy to include more of our complaint food businesses, however this would mean that we were acting outside of the FSAs Code of Practice. The FSA and Department of Business, Innovation and Skills have been reviewing the option of earned autonomy for businesses and the outcomes of this will inform our own work in this area.

### 3.5 Revisits

The Food Hygiene Inspection Procedure details the action to be taken when non-compliance following inspection is found and identifies when to carry out a revisit. During 2014/15 we undertook 39 revisits which took approximately 85 officer hours, including administrative time.

### 3.6 Health Certificates

The division provides health certificates to several manufacturers within the Vale to assist with the export of products of fish or plant origin to countries outside of the European Union. Health certificates are provided for companies that have received an inspection or audit of the premises and this service is charged for. Last year the division generated £19,800, an increase of nearly £2000 from the previous year, from health certification. During 2015/16 we will be reviewing the process we use for issuing the certificates.

### 3.7 National Food Hygiene Rating Scheme (FHRS)

The authority is part of the Food Standards Agency's national Food Hygiene Rating Scheme (FHRS). The scheme is intended to give consumers information to assist them in making choices about where they buy their food from. AVDC promotes the scheme through various channels including social media, and articles in Council publications.

We have seen an interest in the ratings we award to businesses from the local media and have been contacted by members of the public for advice about premises following rating. Under the food hygiene rating scheme businesses that have taken steps to address the issues of non-compliance raised at the time of their initial inspection can request a revisit to the premises for the purpose of re-rating. In the 2014/15 period the number of requests for revisit received by the authority was 4.

### 3.8 Food Complaints

In the 2014/15 period the authority received 104 food related complaints. The complaints can be broken in to two distinct areas; complaints regarding food itself (22 complaints) and complaints about premises (82 complaints). The resource involved in investigating these complaints by the EHOs was approximately 167 hours. This does not take into account time spent on telephone contact and data entry by the Customer Services Team. It is anticipated that the number of food complaints received in the period 2015/16 is likely to be similar.

### 3.9 Home Authority Principle and Primary Authority Scheme

The Council does not act as either a Home Authority or a Primary Authority partner for any food businesses within the Vale. The Home Authority Principle and Primary Authority Scheme are adhered to by Officers when undertaking interventions in multi-outlet businesses. Officers will contact the Primary Authority where an agreement exists, on policy or enforcement issues relating to food hygiene for national food businesses.

There are several large manufacturers within the Vale with whom a Primary Authority agreement could be possible. This is an area in which the Council is interested and would consider further if an approach was made.

The scope of the Primary Authority scheme is currently under review nationally and is likely to be increased to cover more small and medium sized businesses. This provides a greater opportunity for AVDC to explore and develop Primary Authority partnerships with business.

### 3.10 Advice to businesses

Officers routinely provide advice and guidance to businesses during programmed interventions. However there are also a number of contacts received each year from businesses requesting advice regarding their existing business or from those looking to set up a new food business in the Vale.

In 2014/15, 48 requests for general food business advice were received by the authority. Of these 13 related to information requests regarding the setting up of a

new food business. The resource involved in providing this advice to businesses by the department was approximately 40 hours. Officers now have some general advice which they can email out to a new business. It is acknowledged that this area of work is not fully recorded on our system as we are sometimes contacted for advice before a business has found a premises in the Vale in which to be established. In addition if a premises asks for advice this may be recorded against the premises record rather than as a service request and hence the time taken is a lot less than the previous year. This does not take into account time spent on telephone contact and data entry by the Customer Services Team. Although improvements were made to how data regarding new food business advice contacts is recorded during the 2012/13 period, there is still evidence that it is not fully recorded.

We are currently working closer with colleagues in our Economic Development Team and in the South East Midlands Local Enterprise Partnership (SEMLEP) region. SEMLEP are working on a project called "Better Business for All" which is about developing and understanding the benefits of the relationships regulators have with businesses. This is an area which is in development for the department.

On occasions we may also make direct contact with a particular sector of food businesses to advise them regarding new legislation or guidance that may affect their businesses. This contact is generally made either in writing or via email and has not been considered in the resource allocation above. We are aware that there are ongoing issues concerning the service of rare burgers and this is an area where officers are keeping up to date in order that we are able to supply the appropriate guidance once it is issued by the Food Standards Agency.

### 3.11 Food Sampling Programme

Food sampling is undertaken in line with the Food Sampling Policy and Procedure. The objectives of the food sampling programme are to protect the consumer from contaminated foods that may pose a risk to health. The Council participates in both proactive and reactive sampling activity. Proactive sampling involves participation in national sampling programmes coordinated by Public Health England , Bucks Food

Liaison Group and the Food Standards Agency. The information obtained through the national sampling programmes helps to identify food hazards and provides a knowledge base for food authorities. Reactive sampling is also undertaken in food businesses in the Vale where it is necessary to validate food processes, activities and procedures and to investigate contamination and food poisoning incidents.

The 2015/16 proactive sampling plan is based on the Public Health England (PHE) UK Co-Ordinated Microbiological Sampling Programme 2015/16. In addition the authority will be undertaking sampling on locally agreed areas informed by the Bucks Food Liaison Group and local intelligence and information. The PHE study plans relate to salads from takeaway premises and self service bars. There is likely to be a reactive study later in the year which will pick up an area of concern which has been identified through the year. It is anticipated that the Council will participate in the first study, and potentially others depending on whether we have premises which are included in the scope of the surveys.

An imported foods programme was introduced in 2013/14 and this will be built upon in 2015/16. In addition a number of reactive samples will be taken during the course of the year to both validate food processes and procedures and investigate where there may be concerns regarding contamination.

In 2014/15 a total of 20 proactive and reactive samples were taken from food businesses in the Vale. In addition we took part in a survey which involved swabbing wooden platter boards and slates to monitor the effectiveness of cleaning. The resource involved in taking these samples and the associated administration by the EHOs was approximately 4 hours. This does not take into account time spent on data entry by the Customer Services Team, or time taken to organise and plan the sampling programme. . The four Environmental Health Technical Officers working with the Environmental Health division are authorised to take informal food samples and will be involved in proactive sampling for the national sampling programme. Two of the EHTOs have also been given a greater responsibility in organising the sampling process and hence it is anticipated a greater number of samples will be taken. In the event that a formal food sample needs to be taken where legal action



may result an Environmental Health Officer would undertake this sampling. Officers received update training on food sampling during 2014/15.

Samples requiring microbiological analysis are submitted for analysis to the Food and Water Laboratory at Public Health England in Colindale, London. Food sampling analysis credits are provided by the PHE and used and shared by the food authorities in Buckinghamshire. Aylesbury Vale DC liaises with the other food authorities in Buckinghamshire via the Bucks food Group to coordinate sampling across the County.

There maybe occasions when samples need to be sent to the Public Analyst. Examination maybe for chemical contamination or composition analysis. Our appointed Public Analyst is Worcester Scientific Services.

### 3.12 Control and Investigation of Outbreaks and Food Related Infectious Disease

Food poisoning notifications and outbreak controls are carried out in accordance with the Control of Infectious Disease Procedure (QPMS-11).

In 2014/15 the number of notifications of infectious disease received by the Council was 135. Not all of these were necessarily food related, and it is extremely rare to be able to associate them with a premises. PHE directly investigate a number of infectious diseases with the patient and only notify the Council where there find links with a premises or are given information which is of concern. The Council directly investigates Campylobacter and Salmonella in vulnerable people or where it is known the patient is a food handler. Many of our investigations are undertaken via a postal questionnaire. It is considered likely that a similar number of notifications will be received by the authority this year. The resource involved in processing and investigating these notifications by the department was approximately 65 hours. This does not take into account time spent on data entry and the production of standard letters and questionnaires by the Customer Services Team. The majority of notifications are administered by the Customer Services Team and the Environmental Health Technical Officers who categorise the disease case by risk group and send out and administer questionnaires as necessary. In some cases it is

necessary to carry out visits to infected persons to provide advice or assistance with the collection of faecal sampling at the request of PHE. The information collected is provided to PHE as requested to inform and assist with trend analysis.

In the event of an outbreak of infectious disease the investigation process follows that detailed within the PHE Thames Valley Health Protection Team Outbreak Plan and would be led by an Environmental Health Officer. In the event of an outbreak resources have to be pulled from other work streams to enable investigation of the outbreak as necessary. A number of non-food related outbreaks associated with swimming pools occurred in 2013/14 and resources were redirected as part of these investigations. The investigation of one of these continued in 2014/15. This resource cannot be allocated on a day-to-day basis because of the unpredictability of occurrence and can place high demands on other areas of service provision at the time of the outbreak.

### 3.13 Food Safety Incidents

Food Safety incidents are dealt with in line with the Food Incident Policy and Procedure and in line with the requirements of the Food Law Code of Practice. In 2014/15 a small number of food safety incidents required action from the authority. The authority is regularly informed of incidents and product recalls which have taken place such as due to undeclared allergens. These are read and action taken if directed by the FSA.

### 3.14 Liaison with Other Organisations

The Authority has liaison arrangements with various outside bodies and neighbouring local authorities. The Buckinghamshire Food Liaison Group meets every two months to discuss current enforcement issues and ensure consistency in approach and joint working. The Food Liaison Group has agreed shared food terms of reference across Buckinghamshire. A representative from the FSA and from PHE also attends and contributes to the Food Liaison Group as well as a representative from Buckinghamshire County Council Trading Standards department and Milton Keynes Council Trading Standards department. The Food Lead Officers for each

organisation often liaise outside of meetings if necessary. In 2014/15 the resource involved in attending and contributing to Food Liaison Group was approximately 66 EHM hours. It is anticipated that the resource implications for the period 2015/16 will be similar. The format of meetings changed slightly in 2014/15 to enable the environmental health representatives to focus on future priorities and to enable more detailed discussion regarding Food Hygiene matters. The revised format will continue in 2015/16.

Aylesbury Vale District Council is also a member of the Thames Valley Health Protection Agency Environmental Health Liaison Group (EHLG) which meets twice annually to review infectious disease and food safety issues. In 2014/15 the resource involved in attending and contributing to EHLG was approximately 45 EHM hours. It is anticipated that the resource implications for the period 2014/15 will be similar.

### 3.15 Food Safety Promotional Work and other Non-official Controls Interventions

There is limited resource available for the provision of food safety promotional work in the 2015/16 period. The Council utilised the media toolkits produced by the Food Standards Agency concerning promoting FHRs around Christmas and Valentines' Day. The local newspaper has also run several articles on FHRs and this has raised awareness of the scheme. It is anticipated in 2015/16 that we will continue to use the FSA media tool kits which enable us to use both traditional press releases and social media. Articles will also be included in the Council newspaper 'Vale Times' which is distributed to every house in the Vale. It is anticipated that around 20 hours will be spent on food safety promotional work.

On the 1<sup>st</sup> April 2013 responsibility for public health transferred from the NHS to local government. Public Health England has been established to coordinate the strategic delivery of local public health interventions based on community need. It is likely that the new public health agenda will shape local delivery of food controls to some extent as there is the opportunity to expand on our current intervention with food businesses to deliver this agenda e.g. through the provision of healthy menu advice. In addition Buckinghamshire and Surrey County Council Trading Standards has a

healthy eating award scheme for catering premises called “Eat Out , Eat Well” and EHOs are promoting the scheme during inspections to businesses which meet the criteria.

In December 2014 the Food Information Regulations came into force. These are primarily enforced by Trading Standards, however environmental health has been given some enforcement powers concerning the requirements which now apply to catering establishments. All officers attended training on the new requirements and compliance is checked during routine inspections. In addition officers have provided advice to retail premises and some manufacturers to help them comply with the new requirements. This is an example of an area where we could potentially charge for this advice in the future.

### 3.16 FSA Audit

A full FSA Audit was undertaken in October 2012, and a revisit to confirm progress occurred in October 2013. It was deemed that satisfactory progress was made on the original action plan, however there were a small number of items which were outstanding. One of these related to an electronic document management system. This was purchased and implemented in December 2013. It is anticipated that the FSA will revisit during 2015/16 to look at the progress made on the final outstanding items.

## 4. Resources

### 4.1 Financial Allocation

The overall level of expenditure allocated for the provision of the food service in the 2015/16 period is as indicated below:

Staff Costs (and internal recharges – Marketing, Finance etc.)	£179,000
IT Costs recharge	£13,500
Legal Costs recharge	£7,200

Equipment/printing	£4,000
Specialist advice (including payments for contractor inspections)	£10,000
TOTAL	£214,200

The estimated level of food service demand during the 2015/16 period is as indicated below:

Food service demand 2015/16	Anticipated resource requirement (hours)
216 inspections (programmed A rated to non-compliant D rated premises plus outstanding C rated premises from 2014/15)	432 EHO hours
135 -180 new inspections (premises registering during the 2015/16 period) plus 67 new inspections carried over from 2014/15	472 EHO hours
80-100 compliant D and E rated premises inspections (not suitable for AES)	140 EHO hours
400 compliant D and E rated premises AES interventions (suitable for AES)	150 EHTO hours 150 EHO hours 100 CSA hours
Revisits to non-compliant premises	240 EHO hours
FHRS administration and revisits to re-rate premises	15 EHM hours 35 EHO hours
Infectious disease investigation	200 EHTO hours 80 EHO hours
Food complaint investigation	270 EHO hours
Sampling activity	10 EHM hours 80 EHO hours 50 EHTO hours
Address remaining outstanding FSA audit items (ldox	20 EHM hours

DMS, review of some procedures)	25CSA hours
Attendance/input at Bucks Food Group, EHLG and other food related forums	140 EHM hours
Food incidents and alerts	100 EHO hours
Provision of food business advice	180 EHO hours 50 CSA hours
Management and administration of food service	700 EHM hours 20 EHO hours 400 CSA hours
Formal enforcement activity and legal cases	300 EHO hours 70 EHM hours
Training and CPD	35 EHM hours 60 EHO hours 20 EHTO hours
Support of EHTOs undertaking EHO qualification (food element)	30 EHM hours 60 EHO hours
Work on implementation of public health agenda	15 EH hours
Arla Foods Ltd – on going support and familiarisation with new processes, practices and procedures	20 EHM hours 40 EHO hours
Food/Health Promotion activities	20 EHM hours 20 EHTO hours
Total	1040 EHM hours 2599 EHO hours 440EHTO hours 575 CSA hours
Grand Total	4654 hours (approx. 2.90 FTE)

A FTE post amounts to approximately 1600 working hours per annum. The above figures are an approximation based on the information available regarding the

provision of the food service in the period 2012/13 and known demands within the 2015/16 period. Due to acknowledged gaps within the database it is likely that these figures do not take into account additional factors such as the increased demand of reactive work in other areas during the summer months, staff sickness and considerable travel time to and from food premises. They also do not take into account the unpredictable demands that can be placed on the food service by incidents such as a large food poisoning outbreak, a complex prosecution case, a serious workplace accident investigation or a major pollution incident.

#### 4.2 Staffing Allocation

The number of full-time equivalent (FTE) staff allocated to the provision of the food service is currently 2.95. This consists of 4 Environmental Health Officers and one Environmental Health Manager (EHM) as well as administrative Customer Services support. There is additional support available as the other EHM and the EHLM are both food competent. Each of the EHOs spend approximately 50% of their time on food service work. The EHM also spends approximately 50% of her time on work associated with the delivery of food controls. There is administrative support provided to these officers by the Customer Services team and the Database Administrator which is equivalent to 0.45 of a FTE post. The EHTOs provide support to the EHOs in some areas of food service work and this is reflected in the table above.

The FTE staff allocation for the provision of the 2012/13 food service was 2.95. In the 2015/16 period this staff allocation remains the same. There is a £10,000 'specialist advice' budget within the 2015/16 expenditure allocation food service budget to allow the department to buy in contractor inspections to assist with meeting intervention targets as necessary. This amount is equivalent to a 0.22 FTE post.

#### 4.3 Staff Development Plan

Environmental Health staff involved in the delivery of Official Controls will complete a minimum of 10 hours per year of Continuing Professional Development (CPD) training. Aylesbury Vale District Council supports and engages with the CIEH Buckinghamshire Branch who run a number of low cost training courses (including food training) throughout the year. Environmental Health Officers will attend both

external and internal cascade training courses during the course of the year, some of which are organised by the Food Standards Agency. Where Officers attend courses that are of use to the rest of the Environmental Health staff this information is delivered via cascade training and course resources made available to others. Officers are required to keep records of the CPD training that they complete.

The Food Standard Agency's Code of Practice was revised in April 2015. The section concerning the Qualifications and Experience has been revised and local authorities have been given 12 months to implement the revised requirements. The FSA will be providing training to lead food officers regarding the training and the Practice Guidance which supports the Code of Practice will also be revised. Officers will receive training concerning the changes.

## **5. Quality Assessment**

### **5.1 Quality Assessment and Internal Monitoring**

During the 2012/13 period new procedures for monitoring the accuracy, quality and consistency of the delivery of the food service were introduced. Details of the monitoring arrangements in place are set out within the departmental procedures 'Food Database Management Procedure (QPEMS-58) and 'Food Service Monitoring, Audit and Review Procedure' (QPEMS-62). The food service is subject to a rolling programme of review by the Internal Audit Team. Consistency within the FHRS is also a rolling item on the Food Group meeting agenda.

## **6. Review**

### **6.1 Review against the Service Plan**

The table below details the number of interventions that formed part of the programme in 2014/15. A category A premises should receive an inspection 6 months after the previous intervention, where as a category C is inspected at 18 month intervals. A number of factors influence when an inspection is due including the number of people the business supplies food to and how compliant the business is with legislative requirements.



2014/15	A	B	C	D	E	Total
Interventions carried out	7	58	225	152	73	515
Due interventions outstanding	0	0	9	49	13	71
% due interventions achieved	100%	100%	96%	67.76%	82.19%	86.21%

The Food Standards Agency provide categorisation of when a business is deemed to be “broadly compliant” with the law based on their risk scores at inspection.

2014/15	A	B	C	D	E	Total
Total number of premises	3	46	276	498	641	1464
Number broadly compliant	1	29	254	494	641	1419
% Broadly compliant	33.33%	63.04%	92.03%	99.20%	100%	96.93%

The 2014/15 figures show a very small decrease of 0.6% in the total number of interventions achieved in comparison to the 2013/14 figures. All of our highest risk premises (A rated and B rated premises) were inspected. The number of A rated premises requiring an intervention fell by 50% compared to the previous year. There was an increase of 43% in the number of B rated premises which required an intervention compared to the previous year. There was also a slight increase in the number of D rated premises receiving an intervention. It is also important to note

that during 2014/15 the department underwent consultation with respect to a major reorganisation and officers had to undertake training activities in areas which are outside of the area of food safety. The uncertainty and training demands did have a small impact on officers' capacity to carry out food interventions.

The figures relating to compliance of food businesses remained the same as the previous periods (2012/13 96.69%, 2013/14 96.47%, 2014/15 96.93%). As 99.6% of D and E rated premises are broadly compliant, this provides justification for the targeting of resources towards A-C rated premises. It is important to note that an A rated premises is not necessarily a non-compliant business but may be high-risk because of the type of food activities it carries out.

In the period 2015/16 delivery against this service plan will be reviewed and the Environmental Health and Licensing Manager will update the Cabinet Member for Environment and Waste.

## 6.2 Identification of any Variation from the Service Plan

As part of the review process any variance from the service plan will be identified and detailed within the report. Reasons for the variance will be given and any necessary improvement plans for the following 6 month period identified.

## 6.3 Areas of Improvement

This service plan has identified the following areas for improvement in delivery of the food service over the 2015/16 period:

- The Code of Practice allows local authorities to undertake a range of interventions other than full inspections, these include partial inspections and audits. Although these were looked at when initially included in the Code the decision not to routinely use these intervention techniques will be re-evaluated.
- The Code of Practice's section regarding Qualifications and Experience has been reviewed in April 2015. The requirements of the section will be implemented during the period 2015/16 (pending guidance and training from the FSA)
- A number of our egg packing businesses are category E rated premises. The current questionnaires which we use for our lower risk premises focus upon

catering activities and a bespoke questionnaire for this type of business will be created to reduce the need to visit this low-risk business type unnecessarily.

- A review of the potential for implementing online questionnaires for the Alternative Enforcement Strategy (AES) will be carried out. This is dependant on the launch of the new Council website and software development for online forms from other Council depts.
- Following the restructure the way that inspections/interventions are distributed to the officers will require review. Any changes made will be monitored to assess impact.
- The food contractor currently focuses upon compliant C rated premises and D and E rated premises. The allocation of inspections given to the contractor may be increased to include some low risk newly registered premises, thus reducing the time between registration and a premises' first food hygiene inspection.
- The EHTOs are to focus upon targeting the D and E Rated premises who did not return questionnaires last year. If necessary inspections will be carried out. This work will improve the accuracy of our database.
- We will continue to work with SEMLEP regarding the "Better Business for All" initiative in order to assist businesses and improve the relationship between regulators and the businesses themselves (especially those which are generally compliant).
- We will keep abreast of current issues, (particularly concerning new guidance on the service of rare burgers) and cascade information to businesses as required.
- We will review the health certificate processes to ensure that we are offering the best service to our business customers. This may involve a move to secure online certification.
- We will explore the option of increasing the scope of our Alternative Enforcement Strategy to businesses which are consistently compliant, however this would mean operating outside of the FSA's Food Law Code of practice.
- *Produced by Jacqui Bromilow, Environmental Health Manager*