

**Appendix 1**  
**Official Food Controls Service Plan**  
**Aylesbury Vale District Council 2019/20**

**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 consisting of the Leader of the Council, a Deputy Leader and seven Cabinet Members each with a specific portfolio area. The food service is within the portfolio of the Cabinet Member for Waste and Licensing.

In 2016/17 and the early part of 2017/18 Aylesbury Vale District Council was significantly restructured in line with the 'Commercial AVDC' programme refocusing services around a more commercial, sustainable and flexible organisational model. Environmental Health functions which include food safety, are being delivered within Regulatory Services as part of the Customer Fulfilment directorate.

Regulatory Services is split into four teams: Environment, Enforcement (South), Enforcement (North) and Housing. Environmental Health functions including food safety, health and safety, statutory nuisance, pollution Control, public health (infectious diseases control) and private sector housing are delivered within both Enforcement teams (North and South) based on geographical area. The Principal Enforcement Officer is the lead officer for food controls and reports directly to an Enforcement Team Manager. There are four Enforcement Officers with the qualifications to carry out official food controls and four Enforcement Officers with a primary focus on environmental health functions (one of these posts is career graded).

Our career graded Enforcement Officer has successfully completed her MSc in Environmental Health and is now in the process of completing her Chartered Institute of Environmental Health (CIEH) learning portfolio to become a qualified Environmental Health Practitioner. The service also employs a 2nd Principal Enforcement Officer who is the lead technical expert for Private Sector Housing matters and who also sits within the Enforcement team but does not undertake any food enforcement activity. The Environment Team contains a Pollution Control Officer who acts as the technical expert for contaminated land, air quality and private drinking water supplies.

The work alongside food service delivery includes all proactive and reactive work for health and safety, public health, statutory nuisance, licensing and planning consultation, pollution control and housing standards. The food controls work is undertaken by Enforcement Officers is dependent on their level of qualification, experience and competency as required by the Food Law Code of Practice. The food service is driven by a combination of reactive and proactive demand.

During 2018/19 a number of qualified contractors were employed temporarily to assist with the delivery of food controls by undertaking low risk inspections. All contractors must evidence the qualifications, experience and competency to carry out this work as required by the Food Law Code of Practice. The Principal Enforcement Officer monitors and audits contractors' work to ensure a high standard of consistency and quality of service is maintained for our residents and businesses.

### 2.3 External contacts and provision

AVDC has liaison arrangements with public bodies and local authorities in Buckinghamshire. AVDC is a member of the Buckinghamshire Food Liaison Group. The Group has agreed terms of reference with regard to the shared common interests of the provision of official food controls in Buckinghamshire. The group consists of Environmental Health representatives from South Bucks and Chiltern District Councils, Wycombe District Council and Milton Keynes Council. Also in attendance are Trading Standards representatives from Buckinghamshire and Surrey County Council and Milton Keynes Council and representatives from the Food Standards Agency (FSA) and Public Health England. The group covers current enforcement issues, sampling results and programmes, legislation updates and implementation and initiatives to improve food service delivery.

AVDC is also a member of the Thames Valley Environmental Health Liaison Group. The group is chaired by Public Health England and consists of Environmental Health representatives from South Bucks and Chiltern District Councils, Wycombe District Council and a representative from NHS Buckinghamshire. The group covers contemporary infectious disease issues, legislation updates and implementation, initiatives to improve outbreak control and service delivery.

The Environmental Health team also liaises with the South East (Thames Valley) unit of Public Health England (PHE) and the Consultant in Communicable Disease Control. 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 service is delivered by the Enforcement Teams (North and South). The Officers deliver food controls alongside all other commercial and residential aspects of environmental health work.

The food service is driven by a combination of reactive and proactive demand.

- Reactive demand- This is based on intelligence from members of the public, internal departments and external organisations. This includes investigation of food and food premises complaints, investigation of notifications of infectious disease, responding to food incidents and alerts, requests for re-rating by food businesses under the national Food Hygiene Rating Scheme, participation in PHE led national sampling programmes, acting on food safety issues and trends as raised by the Food Standards Agency.
- Proactive demand - This is based on inspections required by law and education for food businesses. This includes 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. 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.

The Environmental Health service is delivered from the Council offices at The Gateway in Aylesbury during office hours. 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 when an incident occurs.

## **2.5 Demands on the Food Service**

The total number of food premises within the Vale is 1690. This is a small decrease from 2018/2019 (when the total number was 1798, this is partially due to the work undertaken in checking and removing closed businesses from our database). The table overleaf shows the food premises profile in Aylesbury Vale by business type and risk category:

Food premises profile by business type and risk category

Business Type	Premises Risk Category					Unrated	Outside Programme	Total
	A	B	C	D	E			
<b>Primary Producers</b>	0	0	1	5	20	2	3	31
<b>Manufacturers/Packers</b>	0	2	7	8	15	5	0	37
<b>Importers/Exporters</b>	0	0	0	0	4	0	2	6
<b>Distributors/Transporters</b>	0	0	1	1	22	1	6	31
<b>Retailers</b>	0	3	13	59	155	8	68	306
<b>Restaurants/Caterers</b>	3	28	240	416	363	34	195	1279
<b>Total no. of food premises</b>	<b>3</b>	<b>33</b>	<b>262</b>	<b>489</b>	<b>579</b>	<b>50</b>	<b>274</b>	<b>1690</b>

The classification of premises risk is in accordance with the Food Law Code of Practice. Risk rating is based on the nature of the operation and standards of hygiene. Category A businesses are highest risk and category E are lowest risk. Unrated premises are those that have not currently been classified. Premises outside the programme are premises that are registered with us, but do not receive routine programmed interventions.

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. Within the premises profile there are 15 approved establishments and 2 further premises currently in the process of being approved. This is an increase of 1 over the previous year 2018/19.

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

## **2.6 Regulation Policy**

The Council has adopted the Government's 'Enforcement Concordat' on the principles of good enforcement. The Enforcement Teams operate in line with our Enforcement Policy which aims to ensure a clear and consistent approach to enforcement, including in the delivery of the food service. The Policy was last 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 adopts 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 2018/19 generated from the Food Law Code of Practice 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 2019/20 as of 1<sup>st</sup> April 2019

	<b>Total</b>	<b>A</b>	<b>B</b>	<b>C</b> Non-comp	<b>C</b> Comp	<b>D</b> Non-comp	<b>D</b> Comp	<b>E</b>
<b>Programmed interventions</b>  (including outstanding interventions 2018/19)	<b>717</b>	3	36	5	157	0	253	263
<b>New unrated interventions</b>  (excluding low-risk categories)	<b>37</b>							
<b>Total</b>	<b>754</b>							

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) (The aim is to allow the Council to target a limited resource where the risk to public health is likely to be the greatest. In 2019/20 programmed interventions are to be carried out in accordance with date due and in the following priority order;

- A rated
- B rated
- C rated- non-compliant
- New unrated businesses awaiting inspection
- C rated- compliant
- D rated- non-compliant
- D rated- compliant
- E rated

The definition for non-compliant and compliant business is in line with the Food Law Code of Practice. It is based on the risk score given by the Officer at the time of

inspection. It includes three risk rating areas; food hygiene and safety, structure and cleaning and confidence in management. Compliant D rated and E rated premises are lower risk premises and 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.

New unrated premises currently awaiting inspection as of 1<sup>st</sup> April 2019:

<b>Total no. of new unrated food premises awaiting inspection</b>	<b>37</b>
Child-minders awaiting intervention	8
Low-risk premises awaiting intervention (church halls etc.)	0
Low-risk domestic premises cake-makers	0
<b>Total no. of remaining unrated premises awaiting intervention (excluding low risk categories above)</b>	<b>29</b>

There has been an improvement in the total number of new unrated premises awaiting intervention (i.e. premises that have registered with the Council but not yet received an intervention) from 56 at the start of 2018/19 to 37 at the start of 2019/20. There inevitably will always be a small proportion of businesses who have registered with us, but we are unable to inspect them because they have not commenced trading. It is better to visit these premises once trading has commenced so the officer can see the practices which are actually being carried out on site.

New premises will continue to be prioritised this year 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 too far in advance or not register prior to commencement of trading. Officers will often pick up information about new businesses via other intelligence sources.

The service uses an online food business registration form which was introduced in 2016/17. The online form reduces the administration time and allows quicker categorisation of lower risk businesses. The form requires the business to provide information about the food they prepare and supply before they can submit it to us. This information allows officers to determine if the premises is low risk or outside the programme. This includes small-scale domestic cake-makers and community halls available for hire. Premises outside the programme 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 intervention.

The FSA are currently in the process of piloting a central registration system which will mean that businesses register at a central location rather than with each individual location where the premises will be located. Should this be rolled out nationally during 2019/20 we will also implement as directed.

In addition to the 754 programmed interventions and new unrated interventions (excluding low risk) detailed above the authority receives between 15 and 20 new food business registrations a month throughout the year. These numbers will also be factored into the inspection allocation for these periods. In 2019/20 the authority will continue to employ the services of a qualified contractor to assist with the low risk programmed inspections and to reduce the time taken to inspect new unrated premises. There has been budget allocated for this period to resource this.

### 3.2 Outstanding Inspections from 2018/19

Number of overdue interventions by risk category 2018/19 as of 1<sup>st</sup> April 2019:

<b>Rating</b>	<b>Outstanding</b>
A	0
B	0
C	0
D	17
E	28

<b>Total</b>	<b>45</b>
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There are 45 overdue interventions from 2018/19. All of the outstanding interventions are from the lowest risk categories. The majority of these businesses will have been sent a questionnaire but failed to return it despite officers attempting to make contact with the business. It is likely that a number of these businesses may have ceased trading and not informed us. We will continue to target these premises during 2019/20 in order to establish their status and remove them from the database or reclassify them where appropriate.

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

Premises currently due an AES intervention as of 1<sup>st</sup> April 2019<sup>1</sup>:

	Total	D	E
Premises due for AES intervention 2019/20	240	11	229

The policy relating to the inspection of food premises is detailed in the Food Hygiene Inspection Procedure. This document sets out what food businesses can expect from Officer interventions and expands in a practical way the Council's Divisional Enforcement Policy. In recognition that most businesses want to comply with the law, officers 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 some of the

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<sup>1</sup> These numbers are an estimate only because each premise is reviewed to determine whether AES is appropriate (for example if there's an FSA alert about a particular food issue or complaint which means an inspection is necessary)

premises below will be classed as having a non-inspectable risk. In addition, some food business registrations we receive are not technically required to be registered as a food business as set out in recital 9 of Regulation (EC) No 852/2004 because what they do does not have the necessary ‘continuity’ or ‘degree of organisation’ required. For example a daily small-scale provision on weekday afternoons by community / charity volunteers such as provision of tea and biscuits in church halls. Another example would be a small food bank operating for just an hour or two per day on an infrequent basis by volunteers collecting tinned and packaged foodstuffs not requiring temperature control donated by for distribution to local needy people.

This approach will continue in 2019/20. This does not exempt these businesses from meeting food law requirements, but means that they will either not need to be registered or if they do require registration as a food business they are sufficiently low risk enough to not require a programmed intervention. Further example scenarios include:

- 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 (feed is animal food)
- 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/guardians

AVDC seeks 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. Our policy when inspecting lower risk category D and E premises that require an inspection is that these types of premises now receive a ‘targeted’ partial inspection which focuses on a specific food hygiene element. This results in the inspection time for some lower risk businesses being cut by around 50%. Where appropriate, E rated premises and Compliant D rated premises that don’t require an inspection can be sent a self assessment questionnaire.

### **3.4 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. In 2018/19 we undertook 35 revisits which took approximately 53 hours including administrative time. This does not include travel time.

### **3.5 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 issued 505 Health Certificates which generated £16,167. In 2019/20 we will continue to review the process of issuing health certificates to ensure we are offering customers the best service. In addition, it is understood that depending on how the UK leaves the EU (Brexit) then there maybe additional demands on this service. We will monitor advice from central government and implement as required. The current advice indicates the authority will retain flexibility to determine whether each consignment would need to be physically checked, based on existing records or the outcomes of previous official controls. In addition the government has introduced an additional qualification to improve the supply of Certification Support Officers (CSO) who can be engaged by Official Veterinarians (OV) to support the process. We do not therefore anticipate that any additional demand generated for Health Certificates would be unmanageable.

### 3.6 National Food Hygiene Rating Scheme (FTRS)

The authority is part of the Food Standards Agency's national Food Hygiene Rating Scheme (FTRS). 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 a continued 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 2018/19 period the number of requests for revisit received by the authority was 28. This is a large increase over the previous year when we had 13 requests. Under the FTRS Local Authorities are able to make a charge to businesses requesting these re-rating visits to allow their costs to be recovered. In 2019/20 we will look into making the necessary arrangements to enable charges to be made following these requests. Obviously it makes sense that, in the lead up to the new Unitary authority, that any approach is consistent with the other District councils and may not be implemented until after vesting day when services will begin to harmonise.

### 3.7 Food Complaints

In the 2018/19 period the authority received 143 food related complaints. The resource involved in investigating these complaints by the EHOs was approximately 80 hours. This does not take into account time spent on telephone contact and data entry by the Customer Services Team. The complaints can be broken into two distinct areas; complaints regarding food itself (90 complaints), complaints about premises (53 complaints). It is anticipated that the number of food complaints and request for service received in the period 2019/20 is likely to be similar.

### 3.8 Primary Authority Scheme

The Council does not act as a Primary Authority partner for any food businesses within the Vale. The Primary Authority Scheme is 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.

### 3.9 Regulating Our Future

The FSA and Department of Business, Innovation and Skills have been reviewing the option of earned autonomy for businesses. This has led to the development of the FSA's Regulating our Future (ROF) agenda. ROF encompasses a significant rethink of how food controls are delivered across the UK and it has a clear principal at its heart which is a recognition that food businesses with an excellent compliance history will be able to use audit data to evidence compliance with food law. We will continue to ensure we are aware of these national developments and work with colleagues in the rest of Buckinghamshire to ensure we are able to adapt to meet the future changes in a consistent way.

### 3.10 Salesforce

The department moved from Uniform database system to a new system known as Salesforce in November 2017. Initial issues with the software (such as generating the 2017/18 annual food safety data return (known as Local Authority Enforcement Monitoring System (LAEMS)) to the Food Standards Agency (FSA)) have now been resolved and the 2018/19 annual food safety data return was generated and submitted on time. Now that Officers are more experienced with the programme we are beginning to realise the advantages of moving to the new software such as the ease of generating and drilling into reports (e.g. inspections outstanding, Requests for service by Officer and others).

### 3.11 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 January 2019 we launched our new ‘New Food Business Advice Service’. This is a paid for service for prospective new food businesses to consult with Food Safety Officer on their food business plans. For a fixed fee of £200 the customer receives 2 hours contact from a food officer. As an example this could involve a visit from an officer to view a premises and discuss kitchen layout, or it could be a review of a food safety management system and telephone feedback/consultation. The service is designed to be flexible to accommodate the many different needs a new food business may have.

To date we have received and processed 2 New Food Business Advice requests. We will continue to promote this service and intend to review its success after 1 year.

In addition, the AVDC website provides links to further guidance and information which food businesses are directed and we are continuing to improve our online offer to new food businesses. All new registrations automatically receive an information pack which gives practical advice on what steps to take in order to get a maximum 5 star food hygiene rating. We have also made sure that this advice pack includes information about the Council’s commercial waste bin collection service and how businesses can apply for this service.

### 3.12 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 2019/20 proactive sampling plan is based on the Public Health England (PHE) UK Co-Ordinated Microbiological Sampling Programme 2019/20. It is anticipated that the Council will participate in the studies where we have premises which are included in the scope of the surveys. 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 2018/19 a total of 12 proactive and reactive samples were taken from food businesses in the Vale. The four Enforcement Officers (Environmental Health) 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. In 2019/20 we anticipate undertaking more sampling both as part of the PHE National Studies and in addition to assist with our food safety interventions. In the event that a formal food sample needs to be taken where legal action may result, a food competent Enforcement Officer would undertake this sampling.

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. AVDC liaises with the other food authorities in Buckinghamshire via the Buckinghamshire Food Group to coordinate sampling across the County. There maybe occasions when samples need to be sent to the Public Analyst for chemical contamination or composition analysis. Our appointed Public Analyst is Worcester Scientific Services.

### 3.13 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 (QPEMS-11). In 2018/19 the number of notifications of infectious disease received by the Council was 197. Not all of these were necessarily food related, and it is extremely rare to be able to associate them

with a premises/food source. PHE directly investigate a number of infectious diseases with the patient and only notify the Council where they 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 majority of notifications are administered by the Customer Relationship team and Enforcement 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 Enforcement Officer. In the event of an outbreak resources have to be pulled from other work streams to enable investigation of the outbreak as necessary. 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.

### 3.14 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 2018/19 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 Food Standards Agency.

### 3.15 Liaison with Other Organisations

The Authority has liaison arrangements with various outside bodies and neighbouring local authorities including the Buckinghamshire Food Liaison Group and Thames Valley Environmental Health Liaison Group. In 2018/19 the resource involved in attending and contributing to Liaison Groups was approximately 50 Principal Enforcement Officer hours. It is anticipated that the resource implications for the period 2019/20 will be similar.

### **3.16 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 2019/20 period. The Council utilises the media toolkits produced by the Food Standards Agency promoting FHRs around Christmas and Valentines' Day, weekend Bank Holidays and allergen awareness using the Council's social media accounts. The local newspaper has run several articles on FHRs and this has raised awareness of the scheme. It is anticipated in 2019/20 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 10 hours will be spent on food safety promotional work. Articles are also placed on the AVDC intranet to raise awareness with staff regarding FHRs and other activities related to food that the team undertakes.

The Food Information Regulations came into force in 2014. These are primarily enforced by Trading Standards, however, environmental health has been given some enforcement powers concerning the allergen requirements in catering establishments. Officers check compliance and provide advice and guidance during routine inspections.

## **4. Resources**

### **4.1 Financial Allocation**

The overall level of expenditure allocated for the provision of the food service in the 2019/20 period is as indicated below:

Staff Costs (and internal recharges – Marketing, Finance etc.)	£138,000
All recharges	£71,000
Equipment/printing	£2000
Specialist advice (including payments for contractor inspections)	£14,000
<b>TOTAL</b>	<b>£225,000</b>

The estimated level of food service demand during the 2019/20 period:

Food service demand 2019/20	Resource required (hours)			
	EO	EO(F)	PEO	CRE
201 inspections (programmed A to non-compliant D plus outstanding C premises from 2017/18)	0	402	64	40
180 new inspections (premises registering during the 2019/20 period) plus 37 from 2018/19	0	434	69	43
180-200 compliant D and E rated premises inspections (not suitable for AES)	0	180	20	27
316-336 compliant D (low risk foods) and E rated premises AES interventions (suitable for AES)	128	128	0	84
Revisits to non-compliant premises	0	53	0	0
FHRS administration and revisits to re-rate	0	56	28	0
Infectious disease investigation	250	80	0	0
Food complaint investigation	0	460	0	0
Sampling activity	25	40	5	0
Attendance/input at Bucks Food Group, EHLG and other food related forums	0	0	140	0
Food incidents and alerts	0	20	0	0
Provision of food business advice	0	180	0	50
Management and administration of food service	0	20	700	400
Formal enforcement activity and legal cases	70	300	70	0

Training and CPD	20	60	35	0
Support of EHTOs undertaking EHO qualification (food element)	0	60	30	0
Work on implementation of public health agenda	0	15	0	0
Food/Health Promotion activities	0	20	20	0
<b>TOTAL</b>	<b>493</b>	<b>2508</b>	<b>1181</b>	<b>644</b>
<b>Grand Total</b>	<b>4182 hours = 2.61 FTE</b> <b>4826 hours (including CRE)</b> <b>= 3.02 FTE</b>			

PEO = Principal Enforcement Officer EO = Enforcement Officer EO (F) = Food Competent CRE = Customer Relationship Team

An 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 2018/19 and known demands within the 2019/20 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 2.9. This consists of 4 food qualified Enforcement Officers and one Principal Enforcement Officer (PEHO) as well as administrative Customer Relationship staff. Each of the Officers spends approximately 50% of their time on food service work. The PEHO also spends approximately 50% of their time on work associated with the delivery of food controls. There is administrative support provided to these officers by the Customer Relationship team and the Systems Administration Team which is equivalent to 0.37 of a FTE post. The non-food

qualified Enforcement Officers provide support to the Officers in some areas of food service work and this is reflected in the table.

The FTE staff allocation for the provision of the 2018/19 food service was 2.9. In the 2019/20 period this staff allocation has remained the same. There is a £14,000 specialist advice budget within the 2019/20 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 0.26 FTE post.

#### 4.3 Staff Development Plan

The Food Standard Agency's Code of Practice was revised in April 2015. The section concerning the Qualifications and Experience was updated and local authorities were given 12 months to implement the revised requirements.

The Food Law Code of Practice requires authorised food officers to complete a minimum of 20 hours per year of Continuing Professional Development (CPD) training. These hours are split into:

- 10 hours- core food matters directly related to the delivery of official controls
- 10 hours- other professional matters including training needs identified by Team Managers and Principal Enforcement Officer during competency assessments/appraisals

As part of the Buckinghamshire Food Group, Aylesbury Vale District Council supports and engages with the other districts and partners to assist in running a low cost food training courses 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 Enforcement Team 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. Officers take part in Food Standards Agency consistency exercises and food service consistency is regularly discussed at monthly team meetings. This will continue in 2019/20.

## **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' and 'Food Service Monitoring, Audit and Review Procedure'. The food service is subject to a rolling programme of review by the Internal Audit Team. Consistency within the FHRs is also an item on the Buckinghamshire 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 2018/19. 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.

The number of interventions completed in 2018/19 by risk category:

<b>2018/19</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>Unrated</b>	<b>Total</b>
Interventions completed	5	43	202	216	167	37	670
Interventions outstanding	0	0	0	17	28	52	97

% interventions achieved	100%	100%	100%	92.1%	83.2%	n/a number varies monthly	92.9% (Excl. unrated)
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The total number of interventions remained similar to 2017/18. All of the highest risk premises (A rated and B rated premises) were inspected along with all the C rated premises.

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

The number of broadly compliant businesses by risk category:

2017/18	A	B	C	D	E	Total
Total number of premises	3	36	278	532	614	1463
Number broadly compliant	0	20	266	531	614	1431
% Broadly compliant	0%	55.56%	95.68%	99.81%	100%	97.81%

The figures relating to compliance of food businesses has remained very consistent over the previous periods (2013/14 96.47%, 2014/15 96.93%, 2015/16 97.08%, 2016/17 97.5%, 2017/18 98%). As almost 100% of D and E rated premises are broadly compliant, this provides justification for the targeting of resources towards A-C rated and newly registered premises. It is important to note that A or B rated premises are not necessarily non-compliant businesses but may be high-risk because of the type of food activities carried out.

The areas of improvement identified in the previous Food Service Plan are discussed within this document. The areas have been completed or are identified as ongoing in the 2019/20 improvement areas below. In the period 2019/20 delivery

against this service plan will be reviewed and the Principal Enforcement Officer will update the Cabinet Member for Waste and Licensing.

#### 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 Unitary

It was announced on 1 November 2018 that from 1 April 2020 the 5 separate councils that exist within Buckinghamshire (4 districts and 1 county) will cease to exist and a new Buckinghamshire Council will be created. During 2019/20 the councils will begin the preparations for the creation of the new authority. It is anticipated that as each of the councils currently operate their Environmental Health services in slightly different ways, initially it will be business as usual post 1 April 2020. It is during the current year that we will need to ensure that the new authority is able to operate in a safe and legal manner from its creation and this will be a focus for the Principal Enforcement Officer and Team Managers.

## 6.4 Areas of Improvement

Prior the formation of the new unitary Buckinghamshire Council the primary focus for 2019/20 will be to ensure that our database is accurate and that we begin work to align systems and procedures with the other Buckinghamshire Authorities. This will help to enable a smooth transition to a Unitary Authority. However, the service plan has identified the following areas for improvement in delivery of the food service over the 2019/20 period:

- Continue to review the premises database with a focus on category E rated premises to ensure that where appropriate, these premises are correctly classified as outside the programme. This will improve the database accuracy and ensure resources are targeted to those requiring intervention and based on risk to public health.
- Enforcement Officers will be encouraged to undertake more targeted partial inspections for some category C premises and for the majority of D rated premises such as pubs and restaurants with broadly compliant hygiene scores or higher. We believe that there are many advantages of an inspection compared with sending a questionnaire; businesses also tell us they prefer an inspection as an opportunity to speak to a food safety officer. A partial inspection will also help reduce the inspection time meaning we can focus more time and resource on those businesses that are non-compliant.
- Enforcement Officers are to continue to target 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.
- Continue to promote our 'New Food Business Advice Service'
- Continue to keep abreast of current issues, (particularly Regulating our Future and Brexit) and cascade information to businesses as required.
- Investigate and implement a system to charge for FHRs re inspections to ensure that these costs can be recovered where possible.
- Ensure that we participate in the PHE sampling programmes for 2019/20 and that sampling is undertaken where appropriate to enhance our food safety

interventions (i.e. to assist with educating food business operators and to assist in the evaluation of food hygiene procedures)

Whilst it is not an area specifically highlighted for improvement, we will work with other existing Buckinghamshire authorities with respect to the formation of the new Buckinghamshire Council which by its nature will bring improvements to the food service in future years. Our primary objective will be to ensure we can operate a safe and legal service from 1 April 2020.

*Produced by Neil Green, Principal Enforcement Officer (Environmental Health)*