

**West Suffolk Council
Food Safety Service Plan
2019/20**

Preface

The Food Standard Agency (FSA) Framework Agreement sets out what the FSA expects from local authorities in their delivery of official controls on food law including within service plans.

The Food Law Code of Practice states that each Competent Authority must have an up-to-date, documented Food Service Plan which is readily available to food business operators and consumers. The Plan must be subject to regular review and clearly state the period of time during which the Plan has effect.

The Plan must cover all areas of food law that the Competent Authority has a duty to enforce and set out how the authority intends to deliver Official Controls within its area. The Plan must include imported food responsibilities and the control arrangements in place. The Plan must include reference to the authority's approach to enforcement including its Alternative Enforcement Strategy for dealing with those premises rated as low risk under the Food Establishment Intervention Rating Scheme set.

This document has been developed with due regard to all available regulations, conditions, codes of practice, statutory guidance and practical experience of legislation. Should anything in future publications, legislative/regulatory changes or case law impact upon the content of this service plan document, then it will be taken into account and the document may be updated at a later stage and with due consideration to the resource implications for the Regulating Food Authority.

On 1 April 2019 West Suffolk Council was created, replacing the previous Forest Heath District Council and St Edmundsbury Borough Council. All data prior to 1 April 2019 is combined from both previous authorities who were working together as a shared service since 2011.

This Food Safety Service Plan is meant to be read in conjunction with the Planning and Regulatory Services Business Plan for 2019/20, an extract of which is presented at Appendix 1.

For further information please refer to:

www.food.gov.uk

www.westsuffolk.gov.uk

If you require this information in another format or language, please phone 01284 757400 or email food&safety@westsuffolk.gov.uk to discuss your need.

1.0 VISION, PURPOSE, AIMS AND OBJECTIVES

1.1 Service Vision and Purpose

To protect public health and safety and the environment, by carrying out programmed and reactive interventions, investigations and research to detect, eliminate and/or control hazards by applying fair, transparent and proportionate enforcement.

1.2 Range of functions and activities

The Food Safety function is delivered by the Commercial Environmental Health (CEH) team, located within the Environmental Health Service in the Planning and Regulatory Services Directorate.

The range of food safety functions undertaken by the CEH team are varied and include the following:

- Programmed interventions/inspections and revisits in food premises for which the West Suffolk councils are the enforcing authority;
- Investigation of complaints concerning food, the full range of food establishments, and food handling practices;
- Providing food safety advice and support to new and existing food business operators, including help by promoting the Food Standards Agency's "Safer Food, Better Business" food safety management system;
- Food sampling in accordance with the programme prepared by the Public Health England and the Eastern Region Food Sampling Group;
- Investigation of suspected and confirmed food poisoning cases and outbreaks, and other notified infectious disease cases;
- Action in respect of Food Alerts issued by Food Standards Agency;
- Acting as "Originating Authority" to food manufacturers and producers within West Suffolk and issuing Health Certificates for those who export foodstuffs;
- Ensuring the removal of unfit food from the food chain by seizure, detention or voluntary surrender;
- Consultees for food safety guidance and policies, planning applications, etc.;
- Food Safety Promotional and Educational Campaigns;
- Health Development in areas related to the functions above, for example participation in the Eat Out Eat Well award scheme;
- Checks on inland imported food control at retail, catering and other establishments;
- Registration of all food establishments, including Approvals where appropriate.

1.3 Customers

Our customers are varied; however they mainly include the following:

- All members of the public residing in or visiting West Suffolk;

- Food establishments for which we are the responsible enforcing food authority;
- Public Health England;
- Food Standards Agency;
- Local Authorities;
- Trading Standards;
- Port Health;
- Internal Services.

1.4 Aims and Objectives

Within the broader work covered by the Planning and Regulatory Services Business Plan 2019-20, West Suffolk Council has responsibilities as a Food Authority.

Our aims are:

- To work with businesses and consumers to promote and secure high standards of food safety and minimise risks to the health of residents and visitors, by ensuring that all food processes, premises and food handlers within West Suffolk maintain good levels of hygiene;
- To seek to continually improve health, safety and welfare standards and to reduce health inequalities of all individuals working in and visiting places of work within the district;
- To protect public health and safety by carrying out targeted inspections (interventions), enquiries, investigations and research to detect, eliminate and/or control hazards by applying fair, proportionate and transparent enforcement;
- To help businesses through smarter ways of regulation to reduce the burden so that they can make a beneficial contribution to the local economy.

These aims are supported by a number of objectives:

1. Carry out an annual planned programme of food hygiene inspections in accordance with Food Standards Agency framework guidance, codes of practice and relevant statutory requirements;
2. Investigate food and food premises complaints and take appropriate action in accordance with our service standards, procedures and national guidance;
3. Inform businesses of their legal obligations under relevant legislation;
4. Carry out routine microbiological sampling in accordance with national guidance and participate in local, regional and nationally coordinated surveys;

5. Investigate and monitor reports of infections and notifiable diseases in partnership with Public Health England;
6. Respond to food alerts issued by the Food Standards Agency in accordance with local and national guidance;
7. Act as originating authority for certain food businesses and investigate or respond to any enquiries made by other authorities or agencies;
8. Provide advice, assistance, training and development opportunities to both businesses and consumers. Help businesses improve their standards by promoting best practice, self-regulation and enhancing the competence skills of employees;
9. Promote food safety and, where appropriate, participate in local and national campaigns;
10. Provide appropriate training and development opportunities for staff to ensure an appropriate level of competence;
11. Work in partnership with other agencies to help secure and promote good food hygiene;
12. Ensure the work of the Service accords with West Suffolk Council policies.

1.5 Links to the Strategic Framework

West Suffolk Council's Strategic Framework sets out what the council aims to achieve with our partners, local businesses, communities and residents. This means focusing our efforts and resources in the areas that are the biggest priorities for West Suffolk.

Our strategic vision is:

Supporting and investing in our west Suffolk communities and businesses to encourage and manage ambitious growth in prosperity and quality of life for all.

Our strategic priorities are:

- Growth in West Suffolk's economy for the benefit of all our residents and UK plc.
- Resilient families and communities that are healthy and active.
- Increased and improved provision of appropriate housing in West Suffolk in both our towns and rural areas.

We review our Strategic Framework regularly in order to ensure that it remains relevant and is kept up to date. Progress towards delivery of our Strategic Framework is set out in the West Suffolk annual report.

More information on the Strategic Plan can be found on our website:
www.westsuffolk.gov.uk/Council/Policies_Strategies_and_Plans/strategicframework.cfm

1.6 Enforcement Policy

The West Suffolk Council Enforcement Policy came into effect on 1 April 2019, providing a framework for all of our regulatory services, including the food safety service.

The refreshed policy includes changes brought about by the Regulators' Code which establishes how non-economic regulators should interact with those they are regulating. The Code requires regulators to:

- Carry out their activities in a transparent way that helps those they regulate to comply and grow;
- Design simple and straightforward ways to engage with and hear the views of those they regulate;
- Base their regulatory activities on risk and share information about compliance and risk; and
- Ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities.

Officers, including those with responsibility for the enforcement of food and health and safety laws, have regard to the Enforcement Policy when making enforcement decisions.

2.0 **SERVICE DELIVERY**

2.1 Demands on the Food Safety Service

There are approximately 1,880 food establishments registered/approved under food safety legislation in West Suffolk. A profile of registered/approved food establishments classified in accordance with the Food Standards Agency's main use code is given in Table 1.

Table 1 - Profiles of registered/approved food establishments in West Suffolk. Source: M3 Database 15/05/2019 (2018 figures)

FSA Category	Number of establishments
Primary producers	35 (39)
Manufacturers/Packers	49 (65)
Importers/Exporters	4 (4)
Distributors/Transporters	64 (60)
Retailers	360 (374)
Restaurants and Caterers	1292 (1334)
TOTAL	1804 (1880)

West Suffolk Council have approved establishments that produce meat, fish, dairy and egg products. The number of West Suffolk food establishments approved/conditionally approved under EU Regulation 853/2004 is:

15 (2018 = 14)

Source: M3 database 15/05/2019

West Suffolk attracts many tourists and visitors due to the range of things to do, from outdoor family fun and historical events to live music. Events and activities such as the Bury St Edmunds Christmas Fayre, Newmarket Races, and Forest Live see the Team working with event organisers and others during the planning and delivery of their events to ensure that the food stored, prepared and served is safe to eat and complies with food safety laws.

The CEH team perform out-of-hours inspections where this is necessary, for example some large outdoor events and Sunday/Farmers' markets. Some food businesses that are open for business at night, at weekends or in the early hours of the morning, are identified for occasional inspection at these times.

There are a large number of food businesses associated with and/or operated by the ethnic minorities within West Suffolk - including Chinese/Cantonese, South Asian, Turkish, Greek, Thai, Portuguese and Polish. The majority of food businesses run by these groups are takeaways, restaurants and retail shops. The CEH team makes use of translated information made freely available by the FSA, for example advisory leaflets. Additional translation services may be used where there is a legal requirement to do so, where it is necessary to help ensure that Food Business Operators understand where action needs to be taken to protect against serious risk to public health, or to assist in efficient and effective service delivery. These additional translation services are rarely needed as part of our routine work.

Correspondence with food business operators or customers known to have a poor understanding of English may be provided in appropriate languages/alphabets advising the recipient of the legal importance of the letter and the need to obtain a full translation.

Several food businesses cater specifically for people who are vulnerable for example as a result of age or disability. This is taken into account by appropriate risk scoring criteria used in the risk rating of such premises to determine intervention and inspection frequencies.

2.2 Approved food businesses and Single Council

The number of approved food establishments in West Suffolk on 1 April 2018 was 14. These approved food business are approved by the relevant food authority in which they are located, with each being given an identification code to apply to their products indicating their food authority. For Forest Heath District Council the identification code was FM***, for St Edmundsbury Borough Council it was SM***. The CEH team were advised by the FSA that a single food authority may not have two identification codes and that an entirely new code could be applied or one of the existing codes could be applied across the new food authority.

It was determined that the financial impact of such a change of coding could be significant to some businesses, with one stating that changing to a new code would cost them approximately £50 000. An impact assessment was undertaken which identified a potential disproportionate financial burden to businesses across the two authorities.

The number of approved food businesses in each West Suffolk authority were:
St Edmundsbury BC: 7
Forest Heath DC: 7

These food businesses represent a production throughput of:

FH total = 8t/wk

SE total = 1255t/wk

It was determined that the appropriate action would be to retain the SM*** code and to issue new codes to the businesses based in Forest Heath District Council. This decision was made very early in the West Suffolk Single Council process and was communicated to all approved food businesses in July 2018 to give them a long lead-in period to manage the change and minimise any potential financial impact.

The initial letter was followed-up by telephone calls, site visits and further correspondence by the CEH team to provide support and advice to the affected businesses. A 3-month period of indulgence after the 1 April West Suffolk Council creation was also agreed, and notified to the FSA, to enable affected businesses to use-up any remaining packaging to minimise any financial loss.

In March 2019 the FSA confirmed that they were entirely happy with our approach to the above in seeking to minimise the impact on our approved food businesses of the change to a single food authority.

2.3 Interventions at Food Establishments

The CEH team aims to ensure that food in the West Suffolk area is fit for human consumption, and that outbreaks of food poisoning and other infectious diseases are controlled. To achieve this, inspections and interventions at food establishments are carried out using a risk-based approach, in accordance with the Food Law Code of Practice. Specialist computer software is used to record all food business establishments. These records are kept up to date and are used to administer the programme of risk-based inspections and other interventions.

The Food Law Code of Practice requires that all new food establishments should receive an initial inspection. This should normally take place within 28 days of registration or from when the Authority becomes aware that the establishment is in operation. This reflects the importance of ensuring new food establishments are complying with food law.

Food establishments are risk-rated using criteria set out in the Food Law Code of Practice. Establishments receive a risk rating according to:

- the nature of their business, for example the risk associated with the type of food handled, processing methods, number and vulnerability of customers; and
- the standard of food safety achieved, i.e. compliance with food safety law.

Establishments may be rated as higher risk either because of the high-risk nature of the food and processing methods at their business, because of the

low standards of food safety, or a combination of both. Establishments receive a risk rating ranging from A (highest risk) to E (lowest risk). Unrated establishments include new businesses that are waiting for an inspection to be carried out. Some establishments are outside the risk-based intervention and inspection programme, such as primary producers.

Profiles of the food establishments by risk are shown below, in Table 2.

Table 2 - Profiles of food establishments according to risk. Source: M3 database 15/5/2019 (2018)

Risk Category and number of food establishments in each category					
A	B	C	D	E	Unrated*
6 (8)	32 (41)	210 (234)	681 (647)	645 (690)	230 (260)

*The "Unrated" category consists of either new premises awaiting inspection, outside the inspection programme, or premises requiring database recoding for example as a non-food premises.

The minimum intervention frequency as required by the Food Law Code of Practice, and the estimated time per intervention for each risk category, are set out below in table 3.

It should be noted that all estimated times in the following sections are based on our previous experience.

The range of available interventions for food establishments includes inspections, monitoring, surveillance, verification, audit, sampling, education, advice, coaching, information and intelligence gathering. The regulatory burden is minimised by selecting the most appropriate intervention for the risk category of the establishment. Alternative enforcement strategies include the use of questionnaires for lower risk category E food business establishments.

Table 3 – Food Law Code of Practice minimum intervention frequency and locally estimated time per intervention for each risk category.

Category	Minimum intervention frequency	Estimated time per intervention (hours)
A	6 months	6
B	12 months	6
C	18 months	5
D	24 months	3
E	Alternative enforcement every 3 years	2
Unrated / Uncategorized	-	2

The numbers of food interventions due (including outstanding) for 2019/20 by risk category are shown below, in Table 4.

Table 4 - Number of food interventions due, including outstanding 2019/20. Source: M3 database 15/05/2019 (2018)

Risk Category	Number Due 2019/20	Estimated Time to complete (Hours)
A	6 (6-monthly inspection) (8 (6-monthly inspection))	72 (96)
B	32 (42)	192 (252)
C	124 (151)	620 (755)
D	310 (290)	930 (870)
E	91 (375)	182 (750)
Uncategorised	14 (22)	28 (44)
TOTAL	577 (888)	2024 (2767)

The total number food hygiene interventions carried out by the CEH team during 2018/19 are shown below, in Table 5.

Table 5 - Number of food interventions completed during 2018/19. Source: M3 database 15/05/2019 (2018)

Risk Category	Completed during 2018/19
A	12 (11)
B	37 (43)
C	155 (172)
D	339 (371)
E	211 (190)
Other	6 (7)
TOTAL	760 (790)
AES Questionnaire	133 (68)

The food interventions at lower-risk premises that were not completed in 2018/19 will be carried forward into 2019/20 and are shown below, in Table 6.

Table 6 - Number of food interventions being carried forward into 2019/20 Nb. Figures included in Table 4 above. Source: M3 database 15/05/2019 (2018)

Risk Category	Outstanding	Estimated Time to complete (Hours)
A	0 (0)	Included in Table 4
B	0 (0)	
C	1 (0)	
D	2 (67)	
E	7 (187)	
Uncategorised	1 (12)	
TOTAL	11 (266)	

Missed lower-risk inspections, arising as a result of access issues such as infrequent and erratic trading, will continue to be picked up during 2019/20.

Additional staff resource was utilised during 2018/19 to clear the backlog of outstanding lower-risk inspections. This was carried out in close liaison with the Food Standards Agency's Regulatory Delivery Assurance Team as part of their standard review of local authority intervention activity.

Interventions are undertaken following documented procedures. The date of a primary inspection may be brought forward, for example in response to a complaint, a new food registration, a material change in the business, receipt of information from the FSA, an outbreak, or being a seasonal business that may be closed at the time of the next date due. Other reactive interventions are carried out at other times, for example in response to customer complaints, alleged cases of food poisoning, food hazard warnings, sampling, revisits and requests for advice.

Most food businesses that supply food direct to the public receive a rating under the Food Hygiene Rating Scheme (FHRS). These ratings range from **0** (urgent improvement necessary) to **5** (very good). Businesses that receive a rating of 0, 1 or 2 have a poor level of compliance with food safety and hygiene law.

Businesses that are broadly compliant with food safety and hygiene law will receive at least a rating of **3** (satisfactory). On 31 March 2019, **97.8%** of FHRS-rated West Suffolk food businesses were rated **3-5**. Businesses that have a good level of compliance with food safety law will receive the top rating of **5**. On 31 March 2019, **85.7%** of FHRS-rated West Suffolk food businesses were rated **5**.

Interventions will be undertaken more frequently for poorly compliant businesses due to the increased food safety risk identified. These interventions aim to achieve better and sustained compliance rates at poorly compliant food businesses. Revisits of poorly compliant businesses will always be carried out to secure the necessary improvements to protect public health. However, it should be noted that these revisits do not lead to an automatic review of their FHRS rating and some businesses choose not to apply for a re-rating visit. Such businesses can be seen to have a low FHRS rating for a long period of time, however the CEH team will have carried out the necessary intervention visits to ensure any critical improvements have been made.

Changes to the Food Law Code of Practice in 2017 enabled local authorities to offer fast-tracked visits at the request of the business for FHRS re-ratings on a chargeable basis. On 1 August 2018 West Suffolk Council introduced a charge for FHRS re-rating inspections. The charge was set at £110 per re-rating visit, consistent with other Suffolk authorities, and applies to all requests for a FHRS re-rating.

It was anticipated that there would be a slight increase in the number of re-rating requests following the introduction of the charge. In West Suffolk the number of re-rating inspection requests increased to 40 during 2018-19, from

37 during 2017-18. Uptake will continue to be monitored with future pricing reviewed periodically based on experience and regional benchmarking.

At this time, no announcement has been made about when mandatory display of FHRS ratings will be introduced, however this could significantly increase the number of businesses who may opt for a fast-tracked visit. This would impact on the staff resources currently available within the Team and will be reviewed accordingly.

The CEH team received 40 requests for a re-rating inspection during 2018/19. Of these, 27 were re-rated as 5 – Very Good, 8 were re-rated as 4 – Good, 2 were re-rated as 3 – Satisfactory, 1 was re-rated as 2 – Improvement Necessary and 1 remained unchanged as a 4 – Good. Unfortunately, one business that requested a re-rating inspection saw their rating dropped from a 1 to a zero due to issues found during the inspection, however they have subsequently made significant improvements and are now rated as 4 – Good.

The CEH team work with businesses to actively promote improved FHRS ratings following interventions at those businesses, by providing communications advice and through the use of media and social media.

The Trading Standards Department of Suffolk County Council has responsibility for food standards matters. Liaison arrangements are in place through the Suffolk Food Liaison Group to develop joint work plans and to help ensure that matters of joint interest, such as food labelling, imported food, BSE controls, animal by-products, avian influenza and genetically modified foods are discussed. Joint visits with Trading Standards Officers are made where appropriate. Copies of all food registrations received are forwarded to Suffolk County Council’s Trading Standards Department.

2.4 Food hygiene practices/hygiene of premises complaints

Officers investigate food complaints in accordance with documented procedures and, where necessary, liaise with Primary, Originating and Home authorities during the course of investigations. In determining an appropriate course of action, the team take into consideration any reports received from the Primary, Home or Originating authorities, and the food business identified as the cause of the complaint, and will have regard to the West Suffolk Council Enforcement Policy.

Table 7 - Food Hygiene Complaints 2018/19. Source: M3 database 15/05/2019 (2018)

Complaint Type	Number	Estimated Time per Task	Estimated Time to complete (Hours)
Unsatisfactory Practices	55 (53)	6	330 (318)
Unsatisfactory Premises	32 (24)	6	192 (144)
Food Complaint (Biological)	0 (1)	6	0 (6)
Food Complaint (Foreign	18 (14)	6	108 (84)

Body)			
Food Complaint (Labelling)	1 (2)	5	5 (10)
Food Complaint (Other)	92 (60)	5	460 (300)
Food Complaint (Chemical)	1 (1)	4	4 (4)
Food Complaint (Undercooked)	4 (5)	6	24 (30)
Total	203 (160)		1123 (896)

2.5 Food Sampling Policy

Microbiological food sampling makes an important contribution in protecting the general public and discharging the Councils responsibility in food law enforcement. Microbiological food sampling is used as part of a planned approach to gather information about the microbiological quality, and possible presence of harmful microorganisms, in particular foods which are produced and/or sold locally. Based on this information appropriate action can be taken to protect the consumers.

West Suffolk Council is committed to providing the resources necessary to carry out a sampling programme. The CEH team are responsible for undertaking the food sampling functions. The council has a food sampling programme for microbiological purposes. The food sampling is prioritised to concentrate upon one or more of the following criteria:

- foods which are produced within West Suffolk;
- the risk ratings of the premises; and
- any local, regional or national coordinated sampling surveys or programmes.

The majority of food samples, including hygiene swabs, are taken informally for the purpose of monitoring, surveillance and intelligence gathering. Formal samples will be taken where enforcement action is anticipated and these samples will be taken in full compliance with the legislation, relevant Code of Practice and with consideration of the West Suffolk Council Enforcement Policy.

Official laboratories as designated by the FSA will be used for samples obtained during the sampling programme. The designated laboratory is the Public Health England Laboratory at Collindale, London. Other samples will be sent to the Council's nominated Public Analyst, Public Analyst Scientific Services Limited.

Samples are recorded using the Northgate PS M3 database. The FSA's UK Food Surveillance system (UKFSS), whilst still functional for some local authorities, will be decommissioned by the FSA due to performance issues, an alternative is likely to be introduced in the next few years.

Samples may be taken during manufacturing/production processes for the purposes of ensuring food safety and establishing the effectiveness of the critical controls in the process. The food business will be notified of the result

of any such sample analysis or examination.

West Suffolk Council does not currently act formally as a Home Authority or Primary Authority for any food business. Where sampling identifies a problem with food manufactured outside the districts, the relevant Primary, Home or Originating authority will be notified and a copy of the certificate of analysis or examination will be forwarded to them.

Food sampling will not normally be undertaken as a constituent part of food safety inspections. It may take place if, during the inspection, the authorised officer identified a particular problem that needs further investigation.

Samples of food received as a food complaint may require microbiological examination, chemical analysis or expert identification.

Where a particular premises or food produced in West Suffolk is implicated in a case, or cases, of foodborne disease, food samples may be taken and submitted for examination, for the purpose of identifying any likely source of infection and controlling any risk to public health. These samples are likely to be formally taken and examined.

Food samples may also be taken and submitted as part of a special investigation, for example in response to a food hazard warning or other intelligence received about potential food safety and quality issues.

**Table 8 - Food Samples 2018/19 against anticipated in 2019/20.
Source: M3 database 15/05/2019 (2018)**

	Number of Samples	Estimated Time Per Sample (Hrs)	Total Time (Hrs)
Actual 2018/19 (2017/18)	75 (132)	2.5	187.5 (330)
Anticipated 2019/20	150	2.5	375

2.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

The CEH team will assess and respond accordingly to reports of communicable diseases, including food-associated illness. The investigation of outbreaks of food poisoning is conducted in liaison with the Consultant in Communicable Disease Control (CCDC), having regard to the Norfolk, Suffolk and Cambridgeshire Joint Communicable Disease Incident/Outbreak Management Plan. Information relating to certain infections will be collected as a matter of urgency and passed to the Anglia Health Protection Team, Public Health England, in accordance with the East of England Standard Approach to Investigating Gastro-Intestinal Disease Cases.

The CEH team response to a report of communicable disease, including food-associated illness, is undertaken following documented procedures.

Table 9 - Gastrointestinal disease cases notifications 2018/19 against anticipated in 2019/20. Source: M3 database 15/05/2019 (2018)

	Number of Reported Cases (Individuals)	Time Per Case (average)	Total Time (Hrs)
Actual 2018/19 (2017/18)	65 (93)	2	130 (186)
Anticipated 2019/20	100	2	200

Joint civil contingency and emergency stand-by arrangements exist to respond to suspected or confirmed outbreaks of infectious disease or food poisoning with either the potential to cause serious harm or death to any person, or debilitating illness or disease to significant numbers of people, or illness or disease to particularly vulnerable populations.

2.7 Food Safety Incidents

Arrangements are in place to receive FSA Food Alerts for Action and take specified action on behalf of consumers.

During 2018/19, 163 food alerts were notified by the FSA, compared to 78 in 2017/18. Very few of these required formal action, i.e. dedicated visits to local food establishments. All food alerts are logged and recorded on our specialist database.

Table 10 - Food Alerts Requiring Action 2018/19 against anticipated in 2019/20. Source: M3 database 15/05/2019 (2018)

	Number of Alerts requiring local action	Time Per Case (average)	Total Time (Hrs)
Actual 2018/2019 (2017/18)	0 (0)	4	0 (0)
Anticipated 2019/2020	2	4	8

2.8 Export Health Certificates

A number of West Suffolk food businesses export products outside the EU, a process that requires each consignment to be accompanied by an Export Health Certificate.

The UK's exit from the EU, BREXIT, was due to reach its conclusion on 29 March 2019. However, upon exiting the EU all consignments being exported to the EU would also be subject to the requirement for export health certification.

A list of all approved West Suffolk food businesses who had confirmed to the

FSA that they currently export Products of Animal Origin (POAO) to the EU and would continue to do so after BREXIT was obtained. With the considerable uncertainty regarding the BREXIT process and possible exit dates it was difficult to provide clear advice to these businesses, however they were provided with current advice and guidance as it was produced by the FSA and Animal Plant Health Agency (APHA). West Suffolk Council also took steps to become listed as a supplier of Export Health Certificates where only a certificate of attestation was required by the destination country.

It is expected that there will again be an increased level of communication between the CEH team and relevant businesses as the revised BREXIT date in October approaches.

There was an increase in the number of EHC's issued during 2018/19. The end of 2018/19 saw a further sharp increase in the number of EHC's issued by the CEH team for existing businesses. The CEH team spoke to the businesses involved to ascertain the reason for the increase, hypothesising that it may have been due to the BREXIT uncertainty. However, the businesses confirmed that it has been due to customer demand only and that this increased level is likely to be maintained.

Changes to the EHC requirements for exports into the EU could see a further significant increase in the number of EHC's being requested during 2019/20.

Table 11 – Export Health Certificates issued during 2018/19 against anticipated in 2019/20. Source: M3 database 15/05/2019 (2018)

	Number of Export Health Certificates issued	Fee charged per certificate	Income generated
Actual 2018/2019 (2017/18)	696 (476)	£39 (£39)	£27144 (£18564)
Anticipated 2019/2020	1000	£39	£39000

2.9 Primary Authority and Home Authority Schemes

The Regulatory Enforcement and Sanctions Act 2008 introduced into law the principle of the Primary Authority (PA). All local authorities are required, by law, when considering enforcement action against a business with multiple outlets, to follow advice agreed between the business and its PA. The purpose of these requirements is to achieve greater consistency in enforcement action in large, multi-outlet businesses.

The CEH team supports the PA and Home Authority (HA) schemes. Where PA partnerships are registered with the Regulatory Delivery (formerly the BRDO), an officer will contact the PA to ensure that proposed actions are not contrary to appropriate advice that the PA has previously issued.

The CEH team will support requests from appropriate business for West Suffolk

Council to become the PA for that business. Costs incurred by the authority in the setting up and management of the PA arrangement can be recovered from the business.

2.10 Advice to Business

The CEH team actively support businesses to help them grow and become a success. The Team provides advice to businesses, for example:

- the promotion of information guidance notes to assist businesses comply with the law and good food hygiene practices;
- directing enquiries to relevant sources of competent and reliable advice, for example the FSA website;
- distribution of FSA and other guidance to businesses relating to specific and topical issues;
- provision of advice to businesses during and following inspections;
- mailshots;
- through the West Suffolk Environmental Health Facebook page; and
- responding to requests for advice from businesses and members of the public.

Table 12 - Requests for Advice 2018/19 against anticipated in 2019/20. Source: M3 database 15/05/2019 (2018)

	Number	Time Per Case (average)	Total Time (Hrs)
Actual 2017/2018 (2016/17)	218 (212)	4.5	981 (954)
Anticipated 2018/2019	250	4.5	1125

Many of these enquiries and advice requests take time for the officers to research and compile the advice, often very specialised, with some requiring visits to the premises.

The CEH team takes all opportunities to engage with businesses, for example when a food registration form is received, etc. to provide advice by telephone or by visits to the premises. The advice visits enable businesses to commence their operations in a safe manner and in compliance with regulations, with appropriate signposting to other departments for further guidance relating to licensing, planning, building control, available grant funding, etc. This proactive support enables the business to receive the higher FHRS food ratings at their initial food hygiene inspection, essential for a new business to present to customers.

The CEH team contributes updates to the West Suffolk Council website pages and social media content. These offer a range of information on setting up a new business, Safer Food Better Business, commonly used forms to download, how to lodge complaints or make an enquiry, general food safety information and a link to the FSA's website for further information.

The CEH team recognises the importance of social media as a highly effective means of communicating and engaging with the public. The CEH team maintains the West Suffolk Environmental Health Facebook page, posting articles relating to all Environmental Health Service teams. The Facebook page is used to provide general food safety information and guidance, to actively promote the Eat Out Eat Well and Take Out Eat Well awards and to publicise press articles that relate to our positive support of local businesses.

2.11 New Anglia Better Business for All

Supported by Regulator Delivery (RD) within the Department for Business Energy and Industrial Strategy (BEIS), we are working with other regulatory services and the New Anglia Local Enterprise Partnership (LEP), covering Norfolk and Suffolk, to develop better ways of working to improve the effective and efficient delivery of regulatory services. The core aims of the Better Business for All initiative are to:

- Raise the profile of the regulatory services provided by local authorities;
- Improve the co-ordination of information flows between the various regulators;
- Develop a greater understanding of what businesses need from local regulators;
- Improve stakeholder access to regulatory information and guidance.

2.12 Liaison with other Organisations

The CEH team has extensive liaison in place with a wide range of other organisations. For food safety matters these include:

- Food Standards Agency;
- Suffolk Food Liaison Group;
- Eastern Region Co-Ordinated Food Sampling Group;
- CCDC and the Anglia Health Protection Team, Anglia and Essex Public Health England Centre;
- DEFRA;
- Immigration Compliance and Enforcement Team - East of England (Home Office);
- West Suffolk Council's Planning and Building Control teams (to review relevant applications);
- Trading Standards/Environmental Health Departments nationally as required;
- Care Quality Commission;
- Suffolk Adult Safeguarding Board; and
- Suffolk Regulatory Services and New Anglia Local Enterprise Partnership Working Group.

2.13 Food Safety Promotion

The CEH team promotes food safety using materials made available by the FSA or produced in-house that are intended for businesses or the public. Examples include:

- helping business operators meet regulations on food hygiene through promoting and supporting the FSA's Safer Food Better Business packs;
- the use of FSA materials during Food Safety Week;
- the development of guidance for market stalls trading in West Suffolk;
- the writing of articles for distribution to businesses by external organisations.

We support the annual Crucial Crew event promoting food safety messages to year 10 school children. In July 2018, 1135 children attended the Crucial Crew event in Bury St. Edmunds. The CEH team will continue to participate at Crucial Crew events in West Suffolk as they provide an important opportunity to give basic food hygiene advice to a large number of children who then share the advice with friends and family.

The CEH team also actively supports the Bury St Edmunds Christmas Fayre and other events, with the whole team carrying out high-profile interventions at relevant stalls each year.

2.14 Healthy eating – Eat Out Eat Well

The CEH team actively promote the Suffolk Eat Out Eat Well (EOEW) and Take Out Eat Well (TOEW) award schemes, encouraging businesses to develop and promote healthier options in their menus and premises. We achieve this by promoting the scheme during routine inspections and other visits, providing information and advice to interested groups and businesses, and by the publication and promotion of EOEW and TOEW award successes through their social media and corporate media outlets.

The Suffolk Take Out Eat Well award was launched on 20 September 2018 at Suffolk County Council's offices in Ipswich with three West Suffolk businesses receiving awards.

As at 5 April 2019, there were 54 EOEW and 3 TOEW awards held by West Suffolk businesses. The total number of awards held at 5 April 2019 in Suffolk was 132 (2018 = 130).

At the Bury Food and Drink Festival on August bank holiday, 2018 the CEH team again used the main stage to promote the EOEW scheme with four businesses receiving awards from Cllr Susan Glossop, Planning and Growth Deputy Portfolio Holder. The award presentations received wide and positive publicity in the press and on social media, with a Facebook 'reach' of over 8300.

3.0 **RESOURCES**

3.1 Financial Allocation

Details of budgetary provision are included as annual corporate budgets, published annually on our website.

The Council maintains their own legal services to provide support to service areas. There is also financial provision made to enable the use of external legal services, where appropriate.

3.2 Staffing Allocation

The CEH team consists of (Full Time Equivalent FTE):

Commercial Environmental Health Team Leader	1.0 FTE;
Environmental Health Officers	3.17 FTE;
Technical Officer	0.5 FTE.

The current staff allocation is considered sufficient to meet the statutory responsibilities within the service plan, however additional resource may be required to meet the discretionary needs of this plan. Unplanned work may require reprioritisation within the plan in the event of its occurrence.

The Commercial Environmental Health Team Leader is the Lead Officer for food hygiene and food safety matters, in accordance with the Food Safety Act Food Law Code of Practice.

In addition to the food safety work undertaken by the CEH team, the officers also carry out many other statutory and discretionary duties, including accident investigations, health and safety regulation and enforcement, managing the West Suffolk Safety Advisory Group, active participation in other groups such as the Mid-Anglia Environment Safety and Health Group, skin piercing registration and regulation, smoke free regulation and enforcement.

These additional duties, and those within this Food Safety Service Plan, are carried out by a professional team of Environmental Health Officers who have the qualifications, knowledge, skills and experience to undertake such a wide variety of activities.

The Technical Officer post, created in September 2016, is a developmental one. The current Technical Officer started a Post-Graduate course at Birmingham University in September 2017 and has successfully passed all assignments to date. This 2-year course will subsequently enable them to carry out the full range of food safety interventions and enforcement and is due to be successfully completed in June/July 2019. The officer will then be required to complete a practical experience and training portfolio to be assessed. It is anticipated that the portfolio will take between 6 and 12 months to complete.

3.3 Staff Development Plan

The Council has a staff performance review scheme. As part of the scheme, officers formally discuss and agree individual performance targets and training/personal development plans with their line manager every 12 months. Progress with the plan is reviewed periodically so any issues can be raised and addressed.

Relevant training areas are identified to ensure the requirements for authorised officers in accordance with the Food Law Code of Practice are met. The FSA's Authorised Officer Competency Assessment form is used to help identify training and development needs.

The CEH team ensures that all enforcement officers are appropriately qualified and receive regular training to maintain and improve their level of competency. All officers are expected to have access to the equivalent of at least 20 hours update training, which is monitored through the team's internal Service Plan. A mixture of both internal and external training is provided for officers to achieve this aim. Following the decision by the Food Standards Agency to cease the provision of free training opportunities for EHO's, Suffolk authorities are working collaboratively to ensure that adequate training opportunities are available for all officers in the future.

4.0 **QUALITY ASSESSMENT**

4.1 Quality Assessment

The CEH team has a range of documented procedures which are subject to monitoring and review. In 2015/16 a countywide common procedure template, aligned to the 2015 Food Law Code of Practice, was designed. The documented procedures have all been reviewed by the team to reflect changes in the 2017 Food Law Code of Practice and the FHRS brand standard.

4.2 Inter Authority Audits and Peer Review

The principle of inter authority audits (IAA) is fully supported. The CEH team has previously undertaken inter-authority inspection and quality monitoring, with some benchmarking against our similar neighbouring authorities of Babergh and Mid Suffolk District Councils. Peer review also takes place amongst Suffolk authorities through the Suffolk Food liaison Group and amongst the team, for example discussions during team meetings and joint visits.

4.3 Internal Monitoring Arrangements

The CEH team is implementing the following arrangements to assist in assessing and improving the quality of the work carried out:

- checking samples of post-inspection reports, letters and notices;
- undertaking a number of shadow-inspections or follow-up visits;
- file reviews during team meetings;
- performance reviews during team meetings based on the Food Safety Service Plan and the Environmental Health Service Plan; and
- one-to-one meetings.

The contents of statutory notices will be discussed and agreed with the CEH Team Leader or other colleagues before service, where appropriate.

4.4 Benchmarking

The Food Standards Agency (FSA) publishes on their website the food safety enforcement activity carried out by all local authorities in the UK. This information is collated from the Local Authority Enforcement Monitoring System (LAEMS) statistical returns provided by local authorities and provides a useful tool for benchmarking performance with other local authorities. The

FSA also reports this performance data to Government and Europe.

Monitoring performance against the standards set out in the West Suffolk Council Food Safety Service Plan will be via management meetings and the corporate Balanced Scorecard

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