

Document Control Information



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Public Protection Partnership

**FOOD SAFETY, FOOD STANDARDS AND ANIMAL FEED, SAFETY AND STANDARDS PLAN
2018 - 2019**

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It is a requirement that Local Authorities produce a Service Plan each year, the format of which is contained within the Framework Agreement on Official Feed and Food Control by Local Authorities.

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PART 1 FOOD HYGIENE

SECTION 1: BACKGROUND TO SERVICE

Service Purpose

Food Hygiene Service Aims and Objectives

To ensure that the risks of illness and injury through poor food safety and hygiene are minimised, and to increase consumer and business awareness of food safety, hygiene and healthy eating. This is achieved by monitoring businesses through risk-based inspections and sampling and by taking appropriate and timely action in response to food related issues, and through liaison and awareness campaigns with food businesses and consumers to provide best advice in relation to good practice and legal compliance.

Scope of the Commercial Team Service

The staff within the team deal with all food safety related matters including programmed inspections, reactive inspections, food complaints, food hazard warnings and food related illness. Other food safety issues are dealt with by other agencies e.g. Food Standard Agency. There are also a number of approved premises which are manufacturers eg cheese makers, premises which manufacture meat products and fish products. The team also enforces Health & Safety in all Local Authority enforced premises and Smokefree Legislation. The team are also taking an active role in the public health agenda. To date we have launched the Eat out eat well award which rewards food businesses who have healthy options on their menu and who promote healthy eating.

Shared Services

On 9th January 2012 Wokingham and West Berkshire signed a joint service agreement for the environmental health and licensing services. On 9th January 2017 Public Protection Partnership was formed, this is a shared service provided by Bracknell Forest Council, West Berkshire Council and Wokingham Borough Council. As such this service plan will cover the work of the 3 Council areas.

Food Hygiene Quality objectives

- To ensure as far as practicable that food produced and sold within the Boroughs is safe and fit to eat.
- To advise businesses on their legal responsibilities and educate all of our customers on food issues.

Public Protection Partnership

VISION

To protect and support residents and legitimate business through the successful use of information and intelligence, delivering safe and healthy neighbourhoods.

MISSION

The purpose of the service is to: -

- Give people information so they can make informed decisions and understand their rights and responsibilities.
- Create an atmosphere where legitimate and compliant businesses can thrive and not have their interests undermined by those who choose not to comply.
- Preserve the health, wellbeing and safety of the communities we serve.

STRATEGIC PRIORITIES of PUBLIC PROTECTION PARTNERSHIP

- Community Protection
- Protecting and Improving Health
- Protection of the Environment
- Supporting Prosperity and Economic Growth
- Effective and Improving Service Delivery

Strategic priorities of Commercial Team

- **Health and Safety in the work place**
- **Food safety at business premises and in the home**

Areas not deemed as the Strategic Priorities will be carried out but will not be given priority

The Control Strategy details the activities

SA PRIORITY: SA12	Food Safety at businesses premises and in the home	CORE PRIORITY: CP1, CP2. CP4	CC IMPACT: CC1, CC4
Prevention	Undertake a planned prevention programme of visits / alternative interventions of the risk rated food premises across our area to ensure food placed on the market is safe, members of the public are being protected and non-compliant businesses are not gaining an economic advantage		
	All new food premises are inspected to ensure compliance in business practices, that food placed on the market is safe and to assist with the development of the business; ensuring non-compliant businesses are not gaining an economic advantage		
	Promotion of the Food Hygiene Rating Scheme to enable the public to make informed choices relating to food hygiene of the business premises they use.		
	Through the use of Infectious Disease questionnaires, leaflets on food poisoning and developing the PPP website ensure that individuals with confirmed food related infectious diseases are given educative preventative information		
	Participate in national prevention campaigns led by FSA and PHE and develop PPP website		
	Engagement with the Primary Authority scheme to provide direction to other LA regulators and to ensure our PA partners are operating legally		
Intelligence	Sampling campaigns and PHE FW&E reports and emerging risks reports by PHE FW&E		
	Continue to horizon scan for emerging risks within the Food Industry; using FSA intelligence (Food Fraud), intelligence reports to FSA, new guidance and legislation and Food Alerts		
	Infectious Disease notifications from PHE and emerging risks detected by PHE		
	Using existing links with Berks and Oxon Food Liaison Groups, the National Food Focus Group, the FSA, PHE and PHE FW&E and develop links with other organisations to ensure intelligence is fed back into the PPP		
	scanning social media and media for emerging risks and from following leads gained during preventative intervention work		

	Analysing service requests from the public, employees and employers to develop a better understanding of potential issues to better target resources
Enforcement	Participation in the National and Local sampling programme to identify unsafe food and ensure it is removed from the market and to contribute to national statistics and local intelligence and ensure non-compliant businesses are not gaining economic advantage
	Use the Infectious Disease notifications from PHE to follow up implicated food premises to ensure unsafe food is not placed on the market and take the appropriate action with regard to the cause of the incident
	Ensure that there are appropriate resources to carry out planned prevention work and sampling and the appropriate intervention can be taken where necessary to ensure non-compliant businesses are not gaining economic advantage
	Development of officers in investigation, evidence gathering, decision making and production of case files and Court proceedings to optimise success rates
	Undertake enhanced interventions with the poorest performing food premises (the Zero and One FHRS score premises)
	Ensuring competency of Authorised Officer in line with FSA COP requirements to ensure any enforcement action taken is legal and uncontested and that the action taken by Authorised Officers is correct and does not cause unlawful economic implications to the businesses or put the public at risk

The Role of the Commercial Team with regard to the Strategic Priorities – Food and Public Health;	
Community Protection	The main role of the team is to ensure that food businesses and premises for which we are the enforcing authority for health and safety are compliant with the legislation; the purpose of this legislation is to protect people.
Protecting and Improving Health	Our role within Infectious Disease Control meets this requirement; and our public health role including Eat Out Eat Well and the Good Food Challenge, and enforcement of smokefree legislation.
Protection of the Environment	Enforcing within food premises in connection with waste disposal; both commercial rubbish, food waste and drainage.

Supporting Prosperity and Economic Growth	We enforce the legislation consistently in all premises ensuring that businesses are not economically advantaged by non compliance. We work with new businesses to ensure that are aware of what they need to do, and what they do not need to do, to comply. We work with the most non compliant food businesses in an educative role to ensure they improve their hygiene rating and therefore increase their customer base.
Effective and Improving Service Delivery	Working on Quality Management Systems to ensure the service is consistent and streamlines; feedback from businesses; ethos of continuous improvement.

Public Health

As of 1st April 2013, local authorities across the country took on direct responsibility for public health from the NHS. This means that the Council leads the transformation and integration of local health and social care services to improve health and wellbeing for the people of Bracknell, West Berkshire and Wokingham. This provides new opportunities, allowing us to focus on improving the health and well-being of our population through all our activities.

The transition meant the movement of a small team of public health professionals into the authority who will champion healthy working through the local authority and GP commissioners to integrate health and social care -preventing ill health, protecting against threats to public health and tackling inequalities in health.

In 2017 18 we worked to deliver the Good Food Challenge in schools across West Berkshire funded by West Berkshire Public Health Team. This funding has been stopped in 2018 19.

Service Structure

Commercial Team Staffing (April 2018)

Category of staff	Acceptable Food Related Qualification	Number of Officers in post April 2016	Number of Officers in post April 2017	Number of Officers in post April 2018	Full Time Equivalent for carrying out food enforcement (70%)	Full Time Equivalent carrying out H&S Enforcement (30%)
Commercial Team Manager	BSc in Environmental Health MSc in Environmental Health Diploma in Environmental Health	0.81 Plus BFBC equivalent 0.2 FTE = 1FTE total	0.81	0.81	0.6 Strategic Management	0.21 Strategic Management
Principal Environmental Health Officer	BSc in Environmental Health MSc in Environmental Health	1 Plus BFBC	1	1	0.8 operational management	0.2 operational management

	Diploma in Environmental Health	equivalent 1 FTE = 2 FTE total					
Senior/Environmental Health Officers	BSc in Environmental Health MSc in Environmental Health Diploma in Environmental Health	7 (equates to 5.99 FTE Plus 4 FTE BFBC = 9.99 FTE total	7 (equates to 5.8 FTE Plus 3 FTE BFBC = 8.8 FTE total (1FTE maternity leave back June 2017)	10 equates to 9.2 FTE total	6.2	3	
Senior Food Safety Officer	EHRB Higher Certificate NEBOSH certificate/Diploma	1	1	1	0.80	0.20	
Technical Officer	Holds Higher Certificate in food inspections; Currently working towards registration with CIEH	1	1	0.81	0.81; Carries out non official intervention work only	0	
Total		15.09 FTE	12.61 FTE	12.82 FTE	9.21	3.61	

Staff Development Plan and FSA Code of Practice competency assessment

- All staff are subject to a formal appraisal each year with interim monthly review meetings.
- Part of this appraisal process is the development of a training needs analysis for staff.
- Food officers must complete a competency matrix (FSA COP) which provides evidence of their competency in 19 areas.
- The Lead Officer is required to evidence these 19 areas and a further 13.
- A matrix of the training needs of the team is compiled.
- 20 Hrs of 'Continuing Professional Development' (CPD) training is provided for all staff operating under the Code of Practice.
- Each officer is responsible for keeping a record of training undertaken and maintaining their own CPD records.

Service Budgets/Resources

Totals for 2018 19

Revenue: £11,242 (incl H&S regulatory function)
Fee income: £12,000 (main source Primary Authority work)
Capital: Nil

Staffing Allocation for food – 8 FTE's operational food safety enforcement (equates to 13,024 officer hours) (1FTE = 220 days)

Food Safety Activity	No of Hours (approx.)
Inspections	3891
Service Requests	2050
Re visits	300
Samples	532
ID's and Outbreaks	315
Promotional work	50
Project work (on line sales, mobiles, brokers)	111
Food Hygiene Rating Scheme – running scheme	756
Zero and One Rated Project	300
Outdoor events	68
Eat out eat well award	-
QMS review and update	600
Audits and action plan implementation	100
Investigations and Formal Action*	220
Training (CPD and mandatory internal)	600
Primary Authority	300
Meetings (team and Dept.)	1000
Total	11,193

The staffing allocation for food safety is 13,024 officer hours; plus, for the projects above, 0.2 management time (325hrs) (PEHO) = 13,350hrs.

* This is an estimate based on the experiences of previous years, investigations, prosecutions and serious food poisoning outbreaks can vary considerably in complexity and therefore officer hours.

There is also a reduction in Management capacity through PPP in the Commercial Team; and due to PPP a need for increased Management as there

are more officers which equates to more management time. In addition there is a need to ensure that all systems and procedures are set up consistently which will take management time. In 2018 19 we have realigned the role of Senior officers to carry out internal monitoring.

Key Service Partners and Partnerships

- Berkshire Environmental Health Managers: Berkshire local authorities, to coordinate sub-group activities, and promote good practice.
- Public Health England: advice and information, including liaison with the Consultant in Communicable Disease Control
- Food Standards Agency: target setting, audit and advisory role for LAs
- Berkshire and Oxon Food and Safety Liaison Group: consistency of approach and the exchange of good practice
- Berkshire Infectious Disease Control Liaison Group
- Berkshire Sampling Group

Securing Action by Relevant Duty Holders

All of our inspection activity and enforcement action is carried out in accordance with the PPP Enforcement Policy; and associated procedural guidelines in the Quality Management System.

Government Approach – Regulatory Delivery part of the Department for Business, Energy and Industrial Strategy

Regulators' Code 2014 Better Regulation Delivery Office

This applies to all the work mentioned in the plan – details can be found at <https://www.gov.uk/government/publications/regulators-code>

Performance indicators of Commercial Team - Food Hygiene

These will be reported on quarterly in 2018 19

1) Measure of Broadly Compliant and Fully Compliant –

Broadly Compliant - describes the % of the food premises that have 'some non-compliances' for food hygiene and for structure (and cleaning) and are 'satisfactory' in terms of our Confidence in Management. They are not compliant premises and still have food hygiene contraventions on inspection. They have an officer score of 10 10 10 for those areas on inspection. This indicator has been used by LAs for many years to track food inspection

compliance however its meaning is not fully understood and may not be interpreted incorrectly.

Broadly Compliant

To ensure that premises meet satisfactory compliance for the manufacture, preparation and sale of food.

TARGET = 90%

Fully Compliant - describes the % of the food premises that have no non compliances at their food inspection ie no statutory requirements under food safety law (there may be recommendations). This indicator has not been previously used and so there will be no comparison data either locally or nationally

Fully Compliant

To ensure that premises meet full compliance for the manufacture, preparation and sale of food.

TARGET = 20%

2) Statutory Requirements at Inspection

This indicator is similar to fully compliant – it attempts to show the percentage of food inspections carried out where the officer has to take a statutory intervention as the premises are operating in a way that does not comply with relevant legislation. Again, this indicator has not been previously used and so there will be no comparison data either locally or nationally. It will however show what % of premises are required to make improvements following our inspection visits and therefore shows the impact of the inspection regime.

Statutory Requirements at Inspection

To demonstrate the activity of the team in ensuring compliance with legislation

TARGET = it is not appropriate to set a target to work towards his year as this will be a comparison over the next years

3) Zero / One Score FHRS indicator

Ensure that food premises rated zero and one in the Food Hygiene Rating Scheme at the start of the inspection year achieve a rating of Broadly Compliant or above (3 score and above) by their next full inspection visit (subject to pending enforcement action). The scope of the project will include premises that are zero and one at the start of the inspection year in April; and their next inspection date falls within the inspection year or a requested rescore falls within the inspection year (as this is the date by which another score can be given)

Zero / One Score
 To ensure that poorly performing premises are brought to 'Broadly Compliant'
TARGET = 75%

4) New Premises inspection within 28 days

New food premises will receive their initial inspection within 28 days of trading commencement where the business has notified us of opening by Registering as a food business. This is so that new businesses are given the assistance they need at an early date to make them aware of their responsibilities and to ensure food premises across the Boroughs prepare and serve food that is safe to eat. It also promotes ensures a level playing field for all food businesses and promotes economic growth

Inspect new food businesses within 28 days of notified date of trading commencement **TARGET = 75%**

SECTION 2 FOOD HYGIENE SERVICE DELIVERY

Type of Premises (FSA Categorisation)	No. of Premises Bracknell Forest	No. of Premises West Berkshire	No. of Premises Wokingham
Producers	4	8	8
Manufacturers/ Packers	3	29	11
Importers/exporters	3	4	2
Retailers	100	207	157
Restaurants / Caterers	549	698	544
Distributors	6	22	5
Care Establishments / childminders	291	176	188
Educative Establishments	71	106	71
Total No. of Food Premises	1027	1250	986

Food Inspections – Key Drivers

- Minimum frequency of inspection set out in the Food Standards Agency Code of Practice which is determined by the officers' risk rating of the premises at inspection.
- The Code of Practice also permits alternative enforcement strategies to replace the physical inspection of low risk premises. We undertake a system in which low risk food premises (E rated) are sent a self-assessment questionnaire to check whether risks have increased and how they are managing those risks. Inspection visits are made where there are non-returns of questionnaires or where the questionnaire returned shows an increased risk.
- Due to staffing levels we took the decision to reduce the inspection time at D premises. We carry out a partial inspection visit, which consists of a revisit and an examination of the highest risk activity as well as establishing that there have been no other changes. It is within the COP that this is permitted.

Food Inspection Programme

2017 18

In terms of programmed food inspections carried out we achieved;

- 100% in Wokingham
- 100% in West Berkshire
- 100% in Bracknell

The actual number of food inspections carried out over the past three years are as follows;

	Actual number of Food Inspections carried out			Actual number of Alternative Interventions on E premises carried out in Food Premises		
	Bracknell Forest	West Berkshire	Wokingham	Bracknell Forest	West Berkshire	Wokingham
2015/16	236	443	360	130	135	95
2016/17	438	592	437	95	89	89
2017/18	277	446	383	67	71	71

New Food Businesses

We carry out inspections of new food businesses.

	2016 17 Number of Food Business opening	2016 17 Number of food businesses which closed	2017 18 Number of Food Business opening	2017 18 Number of food businesses which closed
Bracknell	38	10	173	210*
West Berks	140	187	167	160
Wokingham	118	132	106	95

- * Following the transfer to a new database cleansing has been ongoing

One of the Performance Indicators of the team is to inspect new food businesses within 28 days of the notified date of opening; the target set is 75%.

The benefits of carrying out inspections of new premises within 28 days are

- The business benefits from an early intervention and can move forward with the expertise in food safety to ensure success in that area which promotes economic development.
- The consumer is protected and can make informed choices of where to eat using the Food Hygiene Rating Scheme
- Unrated premises are given a priority and this ensures that inspections are carried out and therefore the database is kept up to date. In addition it ensures the Broadly Compliant figure and Fully Compliant figures are kept high as an unrated premises is deemed non compliant by definition

The businesses closing are not necessarily those that are due for an inspection in the year.

	% new businesses inspected within 28 days of opening		
	2015 16	2016 17	2017 18
West Berks and Wokingham	92.5%	93%	91.5%

100% of new premises do receive an inspection in the year.

We will report on Bracknell unrated in the coming year, issues with the database set up are close to being resolved.

Food Inspections now due 2018 19

The food safety programme of inspections for this year are set out below:

2018 19 inspections due							
Risk Category	A (2 visits required)	B	C	D	E	Unrated (predicted est)	Totals
Bracknell	1 (2)	29	85	165	163	130	574
West Berkshire	6 (12)	31	147	245	206	160	801
Wokingham	2 (4)	20	114	177	140	110	565
TOTAL	18	80	346	587	511	400	1940

The resources to carry out the 2018 19 inspections are calculated from the table below:

Risk Rating	No. of Premises Due 2018 19	Estimated time per inspection ¹	Estimate of time needed to deliver all inspections (hours)
A	18	5hrs	90
B	80	4hrs	320
C	346	3hrs	1038
D (partial insp visit)	587	1.5hrs ²	880.5

E (Alternative enforcement strategy)	511 51	1 hr 1hr ³	511 51
New Premises ⁴	400	2.5hrs	1000
Totals			3890.5 hrs

¹ Includes time for travel, pre-inspection preparation, inspection, and preparation of report.

² Categories D will have a partial inspection visit this reduces the time spent by the officer on previous years. This is permitted within the Food Law Code of Practice

³ Categories E will be inspected using an alternative enforcement strategy. If we assume 10% (approx. 51) will not respond or will respond unsatisfactorily and will therefore require an inspection then there is a resource implication of 51 hours which has been included above.

⁴ New premises are those who will register with us in 2018 19 and will require an inspection.

Should a premises operate outside working hours we will inspect them when they are operating.

For mobile traders we will inspect the mobile van when they are operating.

Food Hygiene Rating Scheme (FHRS)

The scheme, along with officer's enforcement visits to premises, encourages food business operators to work to improve their food hygiene practices and so improve their rating. The food business are given a window sticker and encouraged to display these at the entrance to their premises. Display is not yet mandatory but the FSA are looking at bringing in legislation to make it so. The changes to the number of premises at each level as a comparison between the start of April 2017 and April 2018 is demonstrated below.

As can be seen there is an increase in higher ratings and corresponding decrease in lower ratings. This may be attributed to a strong inspection regime where premises who are due for an inspection are inspected and where the lower rating premises are part of the zero and one score project.

Score Rating	Number premises at start April 2017 (Percentage)			Number premises April 2018 (Percentage)		
	Bracknell	West Berkshire	Wokingham	Bracknell	West Berkshire	Wokingham
	360 (61%)	798 (70%)	598 (66%)	404 (70.5%)	762 (72%)	620 (78%)
	145 (25%)	179 (16%)	124 (14%)	112 (19.5%)	177 (17%)	119 (15%)
	53 (9%)	78 (7%)	42 (5%)	42 (7%)	72 (6%)	36 (4%)
	15 (2%)	21 (1.8%)	10 (1%)	8 (1%)	26 (2%)	15 (2%)
	17 (2%)	17 (1.7%)	16 (2.6%)	7 (1%)	13 (1%)	5 (0.6%)
	1 (0.2%)	0 (0%)	0 (0%)	0 (0%)	1 (0.1%)	0 (0%)

The percentage of premises in each rating will constantly be changing as each premises rating is automatically updated onto the site 28 days after the inspection date. The delay of 28 days has been set as the officer has 14 days to inform the business of their rating (and to prepare the report) and then there is a 21 day appeal period. Exempt premises and unrated are excluded from the % calculation.

Zero / One Score Project

Officer work with these premises throughout the year using educative visits when appropriate where specific food hygiene topics are discussed and made relevant to the business. The officer then carries out a full risk rating inspection when the business is ready (i.e. when the premises has demonstrated that any changes they have made are sustainable and they have operated to that level for a number of months) or by the next inspection due date.

The project is a continuous one as during the year premises will fall to zero and one and these will be included in the next year project group.

It was decided to add this as a Performance Indicator for the team last year which would focus on ensuring that premises with zero and one score raise their standards by their next Inspection / audit intervention to broadly compliant (see next section below for definition). The target is 75%. Premises whose next inspection date does not fall within the year will not be included in the figure unless the premises applies for a rescore.

This project has been extremely successful in raising the hygiene standards in the premises included with the lowest score rating as 95% of the premises which remained open, benefited from the interventions i.e. showed marked improvements in food hygiene.

	Score at April 2017	Score following project March 2018	
Bracknell Forest	Zero score – one One score – 9	Ceased trading One premises ceased trading 3 now 3 score 4 now 4 score 1 now 5 score	100%
Wokingham	Zero score - none		

	1 score – 14 premises	3 premises ceased trading 2 premises remained 1 score 1 premises 2 score 3 premises 3 score 4 premises 4 score 1 premises 5 score	73% The premises that remained a one score are subject to enforcement action at premises
West Berks	Zero score – none 1 score – 6 premises	1 premises ceased trading 1 premises 1 score 3 premises 4 score 1 premises 5 score	80%
			Overall 83% of the premises in scope for the project achieved a rating of 3 or more which is broadly compliant

With the nature of the turnover of food businesses and the fact that any business can have internal factors which can have a huge bearing on its rating e.g. a new manager, new processes, financial troubles leading to cutting corners etc, which if not managed can mean the premises

becomes a higher risk and therefore a lower score. Therefore, unfortunately there will always be a percentage of premises as zeros and ones, although these will not normally be the same premises.

Food Compliance Data Results

The 'Broadly compliant' figure is used by the FSA as a performance indicator for LA food enforcement service it is also used in house. It is the percentage of our food premises which are broadly compliant with food legislation at inspection visits. It is determined by the risk rating the officer gives after inspection which is in line with the FSA code of Practice.

The term actually describes the % of the food premises that have 'some non compliances' for food hygiene and for structure (and cleaning) and are 'satisfactory' in terms of our Confidence in Management. They are not compliant premises and still have food hygiene contraventions on inspection. A score of 10 or less in hygiene practices, structural matters, and confidence in management equates to broadly compliant. These premises are not fully compliant with the legislation.

In 2018 19 we have added a performance indicator of fully compliant.

The performance indicator target set is 90%.

	March 2015	March 2016	March 2017	March 2018
Bracknell Broadly Compliant	92%	90.47%	94%	96%
West Berkshire Broadly Compliant	93%	93%	96%	95%
Wokingham Broadly Compliant	96%	96%	96%	96%

*This figure includes premises which are newly opened and not yet inspected; in the FSA definition of 'broadly compliant' they say that such a premises is to be counted as a non-compliant premises.

In 2016/17, 89.8% of establishments in England were 'broadly compliant' or better compared with the national average of 89.0% for the UK.

Outdoor events

In addition to the normal programmed inspections we also visit many outdoor events to advise and enforce on Food Safety issues.

These events include the Henley Regatta, the Henley Festival, The Rewind Festival, Marvelous Festival, the Newbury Showground, Newbury Racecourse events and Lapland UK.

In 2018 19 there are a number of new events which will take time to advise and inspect – International Polo Event in Bracknell, Englefield Estate Concerts, and possibly a Classical concert before Rewind.

We estimate that enforcement activity at these events equates to 31 person days which is 230 hours. The reason we attend is due to the high number of visitors and the amount of publicity that accompanies these events and so any food poisoning outbreak would be disastrous. The breakdown for the time spent is approximately 30:70 food : H&S; therefore in this service plan 68 **hours** is noted.

Revisits

Year	No. of Revisits		
	Bracknell	West Berkshire	Wokingham
2015/ 16	13	36	48
2016/ 17	16	57	63
2017/ 18	8	37	27

A revisit is a follow up visit to an inspection to ensure that remedial work identified as necessary has been carried out. It is to be carried out where the premises are not broadly compliant. To be more efficient we use a self certification system for premises where the breach is less severe.

Revisits should be carried out on all non broadly compliant premises – this is about 5% of our premises. It is estimated that approximately 100 will be carried out in 2018 19; the time implication will be 300 **hours**.

There are also Rescore visits. These are at the request of the premises when they feel they have done sufficient work in order for their Food Hygiene Rating Score to be increased. We have to carry these out where the business have evidenced that they have carried out improvements. They cannot be done within 3 months of the initial inspection (in order to ensure that the business can sustain the improvements) and must be carried out within 3 months.

Enforcement Action

There are a number of enforcement options available to officers ranging from verbal advice through to prosecution. Enforcement actions taken over the previous three years are detailed below.

	15/16			16/17			17/ 18		
	Bracknell	West Berks	Wokingham	Bracknell	West Berks	Wokingham	Bracknell	West Berks	Wokingham
No. of Hygiene improvement notices served	2	15	4	0	3	0	4	7	1
No. of Hygiene emergency prohibition notices served	0	0	0	0	0	0	1	0	0
No. of prosecutions	0	0	0	0	1	0	0	0	0
No of simple cautions	0	0	0	0	0	0	0	0	0
Detention notices	0	0	0	0	0	0	0	0	0
Voluntary Closures	1	1	3	0	4	0	1	3	0

The resource implication of formal action can be significant. An estimation of 50 hours can be put per premises where there is no simple caution or prosecution taken. This figure will rise should a simple caution or prosecution be taken and the work on the service plan would be revised. There is a provisional time of 200 hours in this service plan.

In 2017 18 the formal closure (Hygiene Emergency Prohibition Notice) was carried out on a food premises that had a mouse infestation, it was closed for nearly 2 weeks. The Food Business Operator has subsequently closed the premises and left the Country.

The Voluntary closures were for rat infestations and poor practices.

Food Service Requests

We receive food related service requests and complaints some of which relate to foods produced outside our area. All are investigated and we take action as appropriate. Set out below are the numbers of service requests received.

Service requests can range from complaints about the cleanliness of a premises to consumers finding a foreign body in the food they are eating. We also get general enquiries from businesses and consumers and queries about food hygiene training. Average of 1.5 hours each – 2,050 hours.

In 2018 19 we will be evaluating how the Commercial Team and the Response Team will work together on service requests.

Period	Food Safety		
	Bracknell	West Berkshire	Wokingham
2015 /16	787	337	304
2016 17	671	441	455
2017 18	500	463	402

Control and Investigation of Outbreaks and Food Related Infectious Disease

We respond to notifications of food related illness which are emailed to us daily from the Health Protection Unit of Public Health England. Outbreaks and cases of disease are investigated and where necessary the Consultant in Communicable Disease Control is involved. The purpose is to control the spread of disease and to isolate the source so that we can take the appropriate action. There is a Joint Infectious Disease Incident Plan for Berkshire that was produced in conjunction with the Health Protection Unit and the other 5 local authorities which can be activated on a 24 hour basis. We work with Public Health England to investigate cases of infectious disease.

One officer from each area monitors trends and possible connections between cases.

Infectious Disease Notifications

Period	Notifications		
	Bracknell	West Berkshire	Wokingham
2015/16	272	186	229
2016/17	207	214	237
2017 18	181	255	282

The resource implication is dependent on the type of food poisoning.

On average the resource is 265 **hours**.

Diagnosis	No of cases 2015 /16			No of cases 2016 /17			No of cases 2017 18		
	Bracknell	West Berks	Wok	Bracknell	West Berks	Wok	Bracknell	West Berks	Wok
E. coli	*	1	4	6	1	5	0	8	5
Clostridium difficile	*	1	0	0	0	0	0	0	0
Legionellosis	*	0	0	1	1	0	0	1	2
Unable to diagnose	*	4	12	0	6	0	6	1	0
Cryptosporidium	*	20	6	6	22	13	8	4	3
Dysentery (Shigella)	*	1	2	0	2	4	2	3	3
Salmonellas	*	19	26	11	11	31	22	20	16
Giardia lamblia	*	28	21	4	18	28	3	10	7
Campylobacter	*	182	156	77	147	152	138	207	244
Typhoid Fever	*	0	0	0	0	0	0	0	1
Hepatitis 'A' and 'E'	*	2	1	0	5	4	2	1	0
Listeria monocytogenes	*	1	1	0	0	0	2	0	1
Leptospirosis	*	0	0	0	1	0	0	0	0
Not specified (database issues)	*	0	0	100	0	0	0	0	0

* No data available

Our figures reflect the national trend in that Campylobacter is the most common form of food poisoning.

To protect the public we respond immediately to all cases of E.Coli, Legionellosis, Salmonellas, Typhoid Fever and Hepatitis A.

Following the Single cases protocol (an agreement between Environmental Health Teams in Local Authorities of the Thames Valley and Thames Valley Public Health England Centre guiding the roles and responsibilities in follow up of single cases of gastrointestinal disease) we work with PHE to investigate where their intelligence leads to a local food source.

The Single Case Protocol has been revised this year to take effect from 1 April 2017 and there is a small shift of work to Las from PHE. As this relates to single cases only there is a view that the workload shouldn't increase however this will be monitored by PPP.

We have reviewed our procedures for 2018 19 to ensure effective use of Authorised Officer time. We will now not send out questionnaires to campylobacter. This is reducing our time from estimated 600 hours to **265** hours (for Single case and outbreak).

It is estimated that this will reduce the number of IDs Authorised Food Officers actively deal with by questionnaire to the patient to 10% (all will still be processed through Partnership Support Team). The resource is estimated at 3 hours each 215 hours.

We also receive calls from members of the public who experience symptoms of food poisoning and often implicate a food premises. We investigate these and always advise that the people visit their GP and submit a sample so that a diagnosis can be made.

Many cases of vomiting and diarrhoea which are reported to us are diagnosed during the investigation as norovirus. This virus can commonly be spread by contact with those who are ill and via surfaces including food and so we take a role in preventing the spread and in investigating the source.

It is not uncommon for outbreaks to involve 100s of people ill and such an outbreak can take a lot of officer time, it is estimated that 50 hours will be spent on these outbreaks.

Food Sampling

Sampling of foodstuffs and cloths and swabbing of surfaces and equipment are carried out as national and local projects. In addition samples are taken in response to problems observed during routine inspections and as a result of service requests from the public.

Period	Food Hygiene		
	Bracknell	West Berks	Wok
2015/16	12	39	40
2016/17	6	74 (17 of these from approved premises)	140 (78 of these from approved premises)
2017/18	16 (2 premise)	11 (from one premises)	15 (3 premises)

This is an area where, due to prioritisation of the food inspection program and reactive work, the resources for sampling has fallen dramatically over the year and this shows in the figures.

The time implication for sampling should be approximately 2 days per month per authority – 532 hrs.

Food Safety Incidents

Food Hazard Warnings are received via the FSA in box and are actioned in accordance with the Code of Practice. We also have a procedure in place to notify the Food Standards Agency should we become aware of any serious localised incident or a wider food safety problem.

Primary Authority

The **Regulatory Enforcement & Sanctions Act 2008** introduced the **Primary Authority Principle**, placing a particular responsibility upon local authorities to provide information, advice and support to local businesses that operate in more than one local authority area.

The Act seeks to secure national co-operation and consistency of regulatory enforcement by setting up a 'Primary Authority'; which came into effect April 2009. There is provision for local authorities to charge for this service and consideration needs to be given to how this requirement can be managed.

West Berkshire and Wokingham Shared Service has a Primary Authority arrangement with Prezzo and HiPP, Bracknell with Waitrose.

This has a large time implication, although we charge for our time at a cost recovery rate, the level of officer involved with the work cannot be backfilled and so there has been a reduction in quality monitoring.

The time implication is estimated at **300 hours**.

Promotional and Educational Work

The Strategic Priority has highlighted a need to look at food poisoning in the home. As this is the remit of the FSA and PHE any input we have will have minimal effect in comparison to the input by these national bodies. However, we will participate in any national projects.

In addition we send a Food Poisoning information sheet to all patients reported with food poisoning that are LAs responsibility under the PHE Single case protocol.

No more than **50 hours** will be spent on general promotional work during 2018 19.

The main promotional activity is running of the Food Hygiene Rating Scheme. Each month the resource will be approximately 21 hours (file monitoring dealing with review requests and work on the website) giving a total of 756 **hours**. The benefits of this scheme in encouraging increased compliance will outweigh the time implications in its running and the monitoring is in line with our QMS procedures based on FSA COP.

PUBLIC HEALTH ROLE OF THE COMMERCIAL TEAM

Healthy Eating

The prevalence of obesity among adults has increased sharply during the 1990s and early 2000s. By 2050 obesity is predicted to affect 60% of adult men, 50% of adult women and 25% of children (Foresight 2007).

Obesity is associated with a range of health problems including type 2 diabetes, cardiovascular disease and cancer. The resulting NHS costs attributable to overweight and obesity are projected to reach £9.7 billion by 2050, with wider costs to society estimated to reach £49.9 billion per year (Foresight 2007). These factors combine to make the prevention of obesity a major public health challenge.

Knowing the principles of eating healthily is important but if the range of food available does not reflect these principles it is not possible to make a choice. Additionally if individuals are not aware of what constitutes healthy eating they cannot be expected to incorporate it into their everyday diet.

As we have an involvement with all food businesses in the Borough the Commercial team are very well placed to assist in the introduction of healthier options in catering premises.

The eat out eat well award is a free award scheme for caterers which is already well established in Surrey County Council and is being run through West Berkshire and Wokingham Environmental Health.

We launched the Eat out eat well scheme in May 2012 however take up amongst food businesses is slow and we are not resourced as a team to spend much time in its promotion.

In addition this has not been determined as a service priority, and so has a limited resource allocation.



The aim of this award is to increase awareness and knowledge of healthier food options amongst both consumers and food business operators and to highlight businesses that make it easier for their customers to have a healthier diet.

It rewards businesses that use healthy ingredients and incorporate better preparation practices to provide healthier food across the menu and who promote healthy eating, and those who make it easier for consumers to find healthier food choices when eating out or taking away. In addition businesses can go one step further by clearly identifying items on their menu and/or within the food display area that meet the standards in the conditions for achieving the award.

The award is open to all types of establishments that cater for the general public, including takeaways, cafes, sandwich shops, and restaurants.

It is not intended to apply to premises that cater for individuals with specific dietary requirements. These include care homes for older people, state schools and nurseries where there are already guidelines or measures in place to improve the healthiness of food available. However, the award is open to establishments such as private schools where there is no requirement to adhere to national guidelines.

The award has three levels – Bronze, Silver, and Gold, and is symbolised by an apple logo in the shape of a heart.

The level of award is based on a scoring system that takes into account the type of food on offer, cooking methods, and how caterers promote it to their customers. To obtain a Gold Award, key members of staff will need to undertake some form of accredited or recognised training in nutrition.

Good Food Challenge

We received funding from the Public Health Team in West Berkshire to run a series of healthy eating workshops with year 3 pupils in primary schools. This funding has not been renewed in 2018 19.

Food Hygiene Training for the Public

Due to low take up of this service over recent years due to increasing reliance on line training, leading to an income loss in the region of £9k we no longer provide this service.

Quality Management Systems

At present the accreditation to the quality management system ISO 9001 held by Wokingham lapsed pending accreditation of the joint service. The QMS system is still however used by the team to ensure consistency in work and this year we will be ensuring that all Bracknell procedures are merged.

Part of our QMS system includes the procedures for monitoring the quality of the work carried out.

COM M P003	Internal Monitoring Food	This included quality checks on inspections and SRs
COM M P008	Accuracy of Food Hygiene Inspection Recording	This ensures accurate data entry and subsequent correct FHRS display

SECTION 3: BERKSHIRE COMPARISON AND RISK ASSESSMENT ON FOOD SERVICE

Number of professional Food Hygiene and Food Standards FTE (Full time equivalent) posts reported in LAEMS (Local Authority Enforcement Monitoring System) 2016/17

LA	FTE	No Food Premises	Ratio premises per FTE
Bracknell Forest	2	1012	
Reading	5	1463	1:293
Slough	4.62	889	1:192
West Berkshire	3.6	1,143	
Windsor and Maidenhead	5.5	1,371	1:249
Wokingham	3.9	976	
West Berks and Wok shared service			1:283

In 2016 17 the figure of 2 FTE for food in Bracknell appears low bearing in mind the FTE in the team at the time.

Wokingham and West Berkshire have staffing levels on the lower side in Berkshire for the number of food premises.

Looking at the number of premises which are classed as Broadly Compliant provides insight, as does the % of interventions achieved:

Authority Name	Total % of Interventions achieved - 2016 17	Total % of Broadly Compliant establishments (including unrated) 2016 17
Bracknell Forest	95.78	94.07
Reading	61.64	90.77
Slough	89.58	83.13
West Berkshire	100	96.41
Windsor and Maidenhead	59.87	92.56
Wokingham	100	96.41

It should be noted that Broadly Compliant figures, where not all interventions are achieved, are inaccurate as they do not take account of any changed in rating of those premises not inspected.

PPP figures for 2017 18 were 9.4 FTE (this includes management TM and PO level) for 3131 food premises ratio 1: 333 which was the lowest staffing ratio in Berkshire

PPP figures for 2018 19 are predicted as 9.21 FTE (this includes management TM and PO level) for 3131 food premises ratio 1: 339 which will be the lowest staffing ratio in Berkshire

However, when the work carried out is analysed PPP are actually the highest achievers.

In 2018 19 Bracknell, Wokingham and West Berkshire have achieved 100% of inspections due and Broadly Compliant figures of 96% Bracknell; 95% West Berkshire and 96% Wokingham. Some reasons for this are that food inspections are given the highest priority in the team and other work is stopped we monitor the inspection work across the year to ensure that there will not be a shortfall. In addition we do not have the numbers of Primary Authorities that other LAs have and therefore work is not diverted from the food inspection work. In 2017 18 Officers were also encouraged to take an allocation of food inspections as overtime as 2 officers left (although we have recruited to those vacancies there was still down time between new recruits and time taken in inductions).

Risk of a Reduced Food Enforcement Service / Reduced Targets For Food Inspections

Description	Service Level Comment	Consequences if no or reduced service.
Food safety service requests	Responding to all service requests and complaints from business and individuals about food, food premises, food hygiene etc.	<ul style="list-style-type: none"> • A statutory function (Regulation (EC) 882/2004); FSA COP • Poor hygiene in premises could be missed. • Food hazards could be overlooked. • We use investigations to prevent similar occurrences • Direct impact on food hygiene and food quality and therefore, public health and consumer protection. • Increasing service request numbers and infectious disease notifications. • Increasing pest population in the Council areas. • Missed opportunities to take formal enforcement action against premises. • Increased complaints of inequality from businesses within the community towards us as the enforcing authority. • Poor public perception of service and increase in complaints about the service and ombudsman complaints. • FSA monitor to ensure service carried out to standard in COP; sanction can remove service and charge Council for running of service. • Reduction in staffing can lead to reduction in monitoring activity with officers leading to a failure to comply with FSA COP Competency and Authorisation of officers.
Routine inspections of food premises.	<p>Undertake routine, planned inspections of premises based on current risk assessment criteria set by Food Standards Agency COP</p> <p>Undertake initial assessment of all new food businesses regardless of risk. Provide consumers with information</p>	<ul style="list-style-type: none"> • A statutory function (Regulation (EC) 882/2004); FSA COP • Poor hygiene standards in individual premises and standards for district generally would drop. • As food hazards are not detected there will be a direct impact on personal and public health and consumer protection. • Reduction in inspections can affect the accuracy of the Food Hygiene Rating Scheme which will undermine the system and will give the consumer incorrect information on the standards of the premises. • Also removes the ability of the consumer in making an informed choice of where to eat • Can mislead the consumer as the information on FHRS will not be maintained up to date ie a 5

relating to hygiene standards. Inspections within 28 days of opening or due date

score may no longer be 5.

- In addition the fact that all inspection data is published along with the last inspection date premises not receiving an inspection will be in the public domain.
- There will be an impact on the Broadly Compliant figure (percentage of premises which meet satisfactory compliance for the manufacture, preparation and sale of food) which is used by the FSA and is a Performance Indicator.
- There will be an effect on the performance indicator to Inspect new food businesses within 28 days of notified date of trading commencement which helps to encourage new businesses.
- Increasing service request numbers and infectious disease notifications.
- Increasing pest population in the Council areas.
- Missed opportunities to take formal enforcement action against premises.
- Increased complaints of inequality from businesses within the community against the council as an enforcing authority.
- Poor public perception of service and increase in complaints about the service and ombudsman complaints.
- FSA monitor to ensure service carries out the food inspection to the service level set down in the FSA Code of practice which details frequency of inspection and that work is carried out to the standard in COP; sanction can remove service and charge Council for running of service.
- Reduction in staffing can lead to reduction in monitoring activity with officers leading to a failure to comply with FSA COP Competency and Authorisation of officers.
- Not inspecting the lower risk premises can also lead to an inaccurate database, it is in the COP that the LA database remains accurate.
- In addition low risk premises can change hands and management and can become high risk and without an inspection regime this would be missed leading to public safety issues.

Communicable Disease Control	Investigation of food borne infections including food poisoning and suspected food poisonings as per SLA with PHE This also includes water borne e.g. Legionnaires	<ul style="list-style-type: none"> • A statutory function (Regulation (EC) 882/2004); It is in legislation that we assist the CCDC (Consultant in Communicable Disease Control) at Public Health England in disease management and investigation. • Offences not detected or prevented. • On going issues not detected leading to public health risk; this can lead to multiple fatalities in the cases of legionnaires, E Coli 0157 for example. • Missed opportunities to take formal enforcement action against premises. • Poor public perception of service and increase in complaints about the service and ombudsman complaints. • FSA monitor to ensure service carries out their duties to the service level set down in the FSA Code of practice; sanction can remove service and charge Council for running of service.
Sampling	Samples taken as part of active investigations, surveillance and verification of food safety management systems.	<ul style="list-style-type: none"> • Part of a statutory function. • Sale of food harmful to human health. • Offences not detected or prevented. • Longer term detrimental effect on public health. • Routine sampling can inform about the hygiene of the premises. • Formal sampling can be used as evidence in formal action. • Unsatisfactory sample results can be a useful tool to demonstrate to the business the consequences of poor practices and hygiene and can have an educative role in changing attitudes. • The introduction of the FSA COP Competency Framework (April 2016) means that in order to take a 'sample' and record it as such for the purposes of the formal return the officer must be an authorised officer ie meet the baseline qualification and be registered with CIEH.

Any changes to the way in which we carry out food inspections may be covered under the FSA review 'Regulating our Future'.

For these reasons we still see it as a priority to carry out 100% of the inspections due in the year. However, this year we have had to look at ways to reduce inspection time due to reduced staffing levels and more premises with PPP. Therefore, as has been detailed, all D visits will be by partial inspection.

SECTION 4: FOOD SAFETY MONITORING

As part of the evaluation of the effectiveness and efficiency of the service provided is required to be undertaken.

We identified the following that we are using to monitor food safety trends for 2017 18 (please note these have been extended for 2018 19):

- % of inspections of food premises that were carried out
- % of premises found to be broadly compliant with food hygiene law
- % of premises in each category of Food Hygiene Rating Scheme
- % of new premises inspected within 28 days of registration
- Customer satisfaction with the service (reported centrally)

The purpose of these indicators is to demonstrate that we are continuously improving as a service and that the work that we are doing is having a positive impact.

% of inspections of food premises due that were carried out

Year	% Inspections Carried Out		
	Bracknell	West Berkshire	Wokingham
2015/16		100%	100%
2016/17	95.78%	100%	100%
2017/18	100%	100%	100%

We have managed to achieve 100% of our targeted food inspections which is an excellent achievement for the team and reflects the hard work put in by officers and management of absences and prioritisation of work.

% of premises found to be broadly compliant

Year	% broadly compliant*		
	Bracknell	West Berkshire	Wokingham
March 2014		89%	96%
March 2015		93%	96%
March 2016		93%	96%
March 2017	94%	96%	96%
March 2018	96%	95%	96%

*This figure included premises which are newly opened and not yet inspected; in the FSA definition of ‘broadly compliant’ they say that such a premises is to be counted as a non-compliant premises.

It is probable that this percentage will not be increase by much more due to the turnover of businesses; we will however endeavour to work with businesses to ensure they achieve broad compliance with food legislation and that they maintain this standard. In addition the zero/one score project will target those that are not broadly compliant to raise the standard.

% of premises in each category of the Food Hygiene rating Scheme with comparison to April 2017

Score Rating	No premises at start April 2017 (Percentage)			No premises at April 2018 (Percentage)		
	Bracknell	West berk	Wokingham	Bracknell	West berk	Wokingham
	61%	70%	66%	70.5%	72%	78%
	25%	16%	14%	19.5%	17%	15%

	9%	7%	5%	7%	6%	4%
	2%	1.8%	1%	1%	2%	2%
	2%	1.7%	2.6%	1%	1%	0.6%
	0.2%	0%	0%	0%	0.1%	0%

The standard of premises in all areas has improved. This is down to a strict inspection regime and prioritisation of food inspection programme and skilled Inspectors.

Percentage of new premises inspected within 28 days of registration

One of the team Performance Indicators is to inspect new food businesses within 28 days of the notified date of opening; the target set by West Berkshire Council is 75%. 2014 15 was the first year we have had this performance indicator, in 2018 19 Bracknell will be included

	West Berkshire	Wokingham	Bracknell
2014 15	86%	86%	
2015 16	94%	90%	
2016 17	92%	95%	
2017 18	89%	94%	

The difficulty with this indicator is ensuring that the Food Business Operators gives us the exact date of opening. Dates on food registration forms do not always match the actual date. In addition food premises in private houses need an appointment and food is not always prepared every day.

The percentage has reduced slightly reflecting staffing levels.

Table 1 Performance in 2017 18 against the work plan

No.	Key Target	Start Target Date (beginning of)	Responsible Officer (s)	Budget implication (if any)	Commentary	Year end outcome
1	Successful merge of the 3 LAs Commercial Teams	April 2017	RG	Officer time	Ensure processes and procedures are combined	This is still in progress due to prioritisation of customer facing work. Also due to the complexities of 3 databases and 3 IT systems and issues with access
2	Programmed Food Hygiene Inspections (including outdoor events)	Throughout the year	All (RG to lead)	Officer time	As programmed and using alternative enforcement strategies	Achieved 100%

3	Ensure that FHRs is maintained accurately	Throughout the year	PEHO / (All to assist)	Officer time;	Maintain FHRs database by uploading inspection details every 2 weeks and maintaining quality checks on data entry	FHRs has been uploaded but due to reduction in management the level of monitoring has dropped
4	Monitor to ensure that all premises are risk rated consistently	Throughout the year	PEHO	Officer time	File monitoring to ensure the FHRs ratings are fair and consistent	due to reduction in management the level of monitoring has dropped
5	Zero and low one rated project	Throughout the year	PEHO	Officer time	To provide assistance to the poorest performing premises to increase compliance (to achieve 75% premises at Broadly Compliant or greater by year end)	Overall 83% of the premises in scope for the project achieved a rating broadly compliant or more
6	Infectious Diseases	Throughout the year	SFSO / EHO	Officer time	Consider all notifications of Infectious Disease and action accordingly	Completed
7	Food related Service Requests	Throughout the year	All	Officer time	As allocated to officers	Completed
8	Partnership working across Berkshire	Throughout the year	RG	Officer time	Attend regional working groups Carry out work in group work plan	Completed
9	Participate in local regional and national sampling programmes	Throughout the year	PEHO	Officer time	Deliver on sampling plan	Very reduced sampling activity this year due to

						prioritisation and staffing levels
10	Eat out eat well award	Throughout the year	RG	Officer time;	promote the Eat out eat well award for healthier options in catering premises, concentrate on a specific sector	No activity this year due to prioritisation and staffing levels
11	Imported Food Control	Throughout the year	All	Officer time	To include checks as part of routine inspections and document findings	Completed
12	Ensure through the appraisal system that staff are trained and competent	Throughout the year	All (RG)	Officer time; training costs	Comply with WBC Appraisal policy Arrange and attend training	Completed
13	Implement the FSA COP competency requirement for officers	April 2016	All (RG)	Officer time; training costs	Ensure QMS reflects the requirement. Officers to fill in self assessment TM / PEHO to review and implement a training plan	Completed
14	Food mobiles & FHRS	Throughout the year	EHO	Officer time;	To ensure that the food mobiles we have on our database and uploaded to FHRS meet the requirements of the Brand Standard(carry forward form 2016 17)	Part completed due to prioritisation and staffing levels
15	Food Brokers	Throughout the year	EHO	Officer time;	To identify the food brokers and ensure they meet the requirements brought in by the new FSA guidance (carry forward form 2016 17)	Not carried out due to prioritisation and staffing levels
16	On line Food Premises	2 nd Q	S / EHO	Officer time;	To identify the premises	Not carried out due to

					with on line foods and ensure they meet the requirements brought in by the new FSA guidance	prioritisation and staffing levels
18	Good Food Challenge	Throughout the year	RG	Officer time; funded by West Berks PH team	Promote healthy eating in year 3 primary schools in West Berks	This is still running as is school year

Table 2: Reviews and Inspections Expected for 2018 19

Reviews and inspections we expect in 2018 19 (and inspecting body)	Desired Outcome	Comment (how the service is planning for the inspection and where joint responses are required with other services)	Responsible Officer
QMS	Combine PPP	Work towards readiness for accreditation	RG
In House audit plan	Sat	Determine audits to take place; one per quarter	RG

SECTION 5: OUR SERVICE PRIORITIES, OBJECTIVES & TARGETS 2017 18

A key component of the FSA’s strategic commitment to playing its part in achieving “food we can trust” is an effective, robust and proportionate system of ensuring that food businesses comply with the regulations put in place to protect consumers’ interests.

In January 2016 the FSA Board agreed that the FSA should engage with key stakeholders to begin the process of designing a new approach to supporting regulatory compliance. This is still ongoing and we are awaiting more consultation papers.

The FSA state that they are not approaching this fundamental rethink by starting with the status quo and seeking incremental change. They are starting with the best system they can aspire to, and then planning how we collectively take steps to achieve it. It will demand ongoing change within the FSA as well as in business and local authorities.

More detail is contained within appendix 3 and 4.

SECTION 6: PLANS FOR MEETING STATUTORY/ REGULATORY REQUIREMENTS

Work Plan for 2018 19

Targets must specific, measurable, include a responsible officer.

No.	Key Target	Start Date (beginning of)	Target	Responsible Officer (s)	Budget implication (if any)	Commentary
1	Successful merge of the 3 LAs Commercial Teams	Ongoing from April 2017		RG	Officer time	Ensure processes and procedures are combined
2	Programmed Food Hygiene Inspections (including outdoor events)	Throughout the year		All (RG to lead)	Officer time	As programmed and using alternative enforcement strategies
3	Ensure that FHRS is maintained accurately	Throughout the year		PEHO / (All to assist)	Officer time;	Maintain FHRS database by uploading inspection details every 2 weeks and maintaining quality checks on data entry
4	Monitor to ensure that all premises are risk rated	Throughout the year		PEHO	Officer time	File monitoring to ensure the FHRS ratings are fair and consistent

	consistently				
5	Zero and low one rated project	Throughout the year	PEHO	Officer time	To provide assistance to the poorest performing premises to increase compliance
6	Infectious Diseases	Throughout the year	SFSO / EHO	Officer time	Consider all notifications of Infectious Disease and action accordingly
7	Food related Service Requests	Throughout the year	All	Officer time	We will explore the integration of Commercial SRs into the Response Team within the competency requirements laid down by the Food Law Code of Practice
8	Partnership working across Berkshire	Throughout the year	RG	Officer time	Attend regional working groups Carry out work in group work plan
9	Participate in local regional and national sampling programmes	Throughout the year	PEHO	Officer time	Deliver on sampling plan
10	Eat out eat well award	Throughout the year	RG	Officer time;	This will continue to run but with a low priority as it has not been identified as a Strategic Priorities
11	Ensure through the appraisal system that staff are trained and competent	Throughout the year	All (RG)	Officer time; training costs	Comply with WBC Appraisal policy Arrange and attend training
12	Continue to implement the FSA COP competency requirement for officers	April 2016	All (RG)	Officer time; training costs	Ensure QMS reflects the requirement. Officers to update self assessment TM / PEHO to review and implement a training plan
13	Food mobiles & FHRS	Throughout the year	EHO	Officer time;	Complete this project To ensure that the food mobiles we have on our database and uploaded to FHRS meet the requirements of the Brand Standard(carry forward form 2016 17)
14	Good Food Challenge	Throughout	RG	Officer time;	Complete by July 2018 – no Public Health

		the year		funded by West Berks PH team	Funding to carry this out next year
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Work with Trading Standards

15	Food Brokers	From 2016	April	EHO	Officer time;	Work with Trading Standards to identify the food brokers and ensure they meet the requirements brought in by the new FSA guidance (carry forward from 2016 17)
16	On line Food Premises	From 2016	April	S / EHO	Officer time;	Work with Trading Standards to identify the premises with on line foods and ensure they meet the requirements brought in by the new FSA guidance
17	Allergens	On going		All AO	Officer Time	We will continue to work with Trading Standards to ensure all premises are compliant with Allergen legislation
18	FHRS Misleading Sticker Display	April 2018		All AO	Officer time	Officers to report a reduction in FHRS score to TS who can then target their visits to ensure that the higher sticker is not left in place
19	Food Hygiene Low Risk Inspection questionnaires	July 2018		RG	Officer time	Where TS are inspecting a premises that requires a food hygiene questionnaire return the TS officer will ensure the questionnaire is filled in at the visit
20	Unrated insp	April 2018		All AO	Officer time	We will try, within the constraints of the 28 day, to combine food hygiene inspector and food standards inspector visits
21	TS low risk	July 2018		RG	Officer time	We will look at a project to see impact of Food Hygiene Inspectors carrying out Food Standards inspection where appropriate in low risk premises

Work With Housing

22	Residential Accommodation	July	ongoing	All AO	Officer time	We will continue to report intelligence back
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		2018			on residential accommodation discovered when we are in commercial premises.
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APPENDICES

Appendix 1: Financial Information

There are no revenue implications.

Appendix 2: Risk register

This is covered in the Commercial Risk Register which is reviewed monthly Author: Rosalynd Gater Commercial TM; and in the Service Risk Register author Sean Murphy.

Appendix 3: National Picture for Food Safety and the work of the team

National Picture for Food Safety and the work of the team	
LBRO has now been rebranded as the Better Regulation Delivery Office (BRDO). Better Regulation Delivery Office became part of Regulatory Delivery in March 2016. – See https://www.gov.uk/government/publications/priority-regulatory-outcomes-for-england for more information.	
The work of the team supports the Priority Regulatory Outcomes in the following ways;	
Priority 1: Support economic growth, especially in small businesses, by ensuring a fair, responsible and competitive trading environment	
Priority Regulatory Outcomes	Work of the Commercial Team
The burden of regulation remains a significant concern for UK businesses and needs to be addressed at both national and local level. The regulatory system as a whole, and local regulators individually, should tailor their approaches to support businesses into compliance in a way that meets their needs	Food premises are inspected according to risk; the full range of inspection interventions are utilised including partial inspections and self assessment for the low risk premises. Educative approach used with zero and one rated premises to give them the information and encouragement to improve.
Businesses want proportionate and consistent enforcement, which is targeted at non-compliant businesses, ensuring a fairer playing field for the businesses that do invest in compliance.	Formal enforcement is taken where other techniques have failed and where it can be seen that the business will not respond to non formal methods. Thus it is targeted at premises who wilfully disregard the legislation. All businesses are given a report following the inspection which clearly states the area where they are not meeting the requirements and gives recommendations on how to improve. All food businesses are subject to inspection and all are inspected

	when due.
Priority 3: Improve quality of life and wellbeing by ensuring clean and safe neighbourhoods	
37% of residents surveyed across England think that rubbish or litter lying around is a very big or fairly big problem in their local area	Food waste and the outside bin area forms a part of all food inspections and we respond to service requests on food waste and related problems.
Priority 4: Help people to live healthier lives by preventing ill health and harm and promoting public health	
Preventing ill health requires an ambitious strategy and innovative techniques to help people take responsibility for their own health. Reducing health inequalities requires a focus on the health behaviours of smoking, alcohol consumption, obesity and unhealthy nutrition. Regulatory services have an important and unique contribution to make to preventing ill health and harm and reducing health inequalities.	The team plays a lead role in infectious disease control and in control of food borne illnesses by routine inspections of food premises and by investigating food borne illness. The team launched the Eat Out Eat Well award to promote healthier options in food premises. This award is free and available to all caterers (with the exception of those where there is a more specific nutritional requirement).
In England today, over a fifth of the adult population smokes – 8.8 million people. Smoking is one of the most significant factors underlying health inequalities and life expectancy and as such, a key focus of improving public health.	At all food inspections the team ensures that the premises are complying with smokefree legislation which prohibits smoking in enclosed and partially enclosed premises.
In 2008-2009, there were 24.8 million working days lost overall in England, 20.6 million of these were due to work related ill health and 4.1 million due to workplace injury. GPs are more likely to see people suffering from work related stress, musculoskeletal disorders, skin or respiratory disease than any other work-related reason.	This is a key role for the team as we enforce health and safety legislation in addition to food hygiene legislation. The PPP Health and Safety Enforcement Service Plan contains more detail.
Priority 5: Ensure a safe, healthy and sustainable food chain for the benefits of consumers and the rural economy	
Currently, about half of the food consumed in the UK is imported. The Government believes that more needs to be done to support the farming industry and encourage sustainable food production	This is the main role of the team – and the Service aims and objectives of the team support this; to ensure that risks of illness and injury through poor food safety and hygiene are minimised, and to increase consumer and business

<p>here in the UK. To support the farming industry, it is important to ensure a safe, healthy and sustainable food chain that benefits consumers and the rural economy. Enforcement of food safety law ensures that food purchases are produced, transported and sold in line with requirements and ultimately, that food is safe to eat. Delivery of food safety and consumer protection across the food chain is shared by a number of agencies and delivery partners, including local authorities, the Food Standards Agency, DEFRA and Animal Health.</p>	<p>awareness of food safety, hygiene, healthy eating and sustainable procurement practices. This is achieved by monitoring businesses through risk-based inspections and sampling and by taking appropriate and timely action in response to food related issues, and through liaison and awareness campaigns with food businesses and consumers to provide best advice in relation to good practice and legal compliance.</p>
<p>Poor diet is recognised as one of the main causes of ill-health and premature death. It has been estimated that approximately one third of deaths from heart disease and a quarter of deaths from cancer can be attributed to poor diet. The public health implications of poor diets are becoming more significant.</p>	<p>The Eat out eat well award and work in the public health field supports this.</p>
<p>The consumption of unsafe or unfit food can give rise to food borne disease. During 2008-9, approximately 80,000 food premises were rated as non-compliant with food safety legislation at a level that exposes consumers to risk.</p>	<p>To prevent the consumption of unsafe or unfit food is one of the main role of the team.</p>
<p>Food borne disease is a major cause of illness in the UK and imposes a significant burden on individuals, healthcare services and the economy. It is estimated that each year in the UK around 1 million people suffer a food related illness, which leads to 20,000 people receiving hospital treatment and 500 deaths each year from food borne disease.</p> <p>The cost to the economy of food borne disease is estimated to be in the order of £1.5 billion per annum, due to loss of production, health care costs and damage to business. This does not include the costs of major incidents and food scares.</p>	<p>To control food borne disease is one of the main roles of the team.</p>

This clearly shows the importance which the Government has set on the work of the team and the priorities which the local authority should be

investing in.

The Government has, for a number of years, pursued a programme of wide-ranging regulatory reform based, initially, on the recommendations of the 'Hampton' report (2005) whose remit was to reduce unnecessary burdens on businesses. The Government's aim is to work towards a vision of a regulatory system that is based around risk and proportionality.

The Regulatory Enforcement & Sanctions Act 2008 is an important step forward in delivering this vision, and will significantly impact on all local authority regulatory services, and in particular Health and Safety and Food Safety Enforcement.

The Act introduced the **Primary Authority Principle**, placing a particular responsibility upon local authorities to provide information, advice and support to local businesses that operate in more than one local authority area.

Appendix 4: The Future for Food Safety

FSA Regulating our Future

In early 2016 the FSA took the decision to revisit the review into the food regulatory service delivery model, this review is still ongoing.

A key component of the FSA's strategic commitment to playing its part in achieving "food we can trust" is an effective, robust and proportionate system of ensuring that food businesses comply with the regulations put in place to protect consumers' interests.

In January 2016 the Board discussed this, reaffirmed its commitment to the protection of consumers' interests as the central driver of any new system, and agreed that the FSA should engage with key stakeholders to begin the process of designing a new approach to supporting regulatory compliance.

The FSA's 2015-20 strategy focuses on the role that the FSA plays in delivering "food we can trust" and recognises the critical importance of working in partnership with others to protect consumers' interests in relation to food.

The FSA state that they are not approaching this fundamental rethink by starting with the status quo and seeking incremental change. They are starting with the best system they can aspire to, and then planning how we collectively take steps to achieve it. It will demand ongoing change within the FSA as well as in business and local authorities.

Within this overall, high level vision, which will take several years to fully design and deliver, there are some priorities and more immediate requirements. The design of delivery options needs to identify new ways of deriving assurance, and better enforcement of official controls. The FSA say it must propel them and businesses towards better use of new technology, and be compatible with consumer empowerment through increased transparency.

Where there are immediate incremental improvements that can be made to consumer protection, they will make them as part of their business as usual activities, but the objective of this programme is to define and then deliver a new regulatory blueprint for a food industry unrecognisable from the one that existed when the current system was designed.

There are a number of Principles which the FSA adopt and these will remain the basis for the model following review;

Businesses are responsible for producing food that is safe and what it says it is, and should be able to demonstrate that they do so. Consumers have a right to information to help them make informed choices about the food they buy – businesses have a responsibility to be transparent and honest in their provision of that information

This is a fundamental principle of food law. We need to help businesses understand what is required of them, and make sure they're doing what they need to, so consumers can be confident about the food they eat. Businesses need to recognise this responsibility, and demonstrate to us and consumers that they meet it.

Business transparency across a wide range of consumer interests in relation to food is essential in building and maintaining confidence in the industry. Consumers should be able to make informed choices based on the things that matter to them – and businesses need to enable that.

FSA and regulatory partners' decisions should be tailored, proportionate and based on a clear picture of UK food businesses

There is enormous variation in food businesses, in their size, the type of food they produce, the processes they use and their attitude to food safety and authenticity. They will need different levels of support, and different levels of scrutiny. One size will not fit all so we will be considering how to segment businesses – and to do that, we will need good quality, up to date information about them.

The regulator should take into account all available sources of information

There is a wealth of information concerning food businesses that we could be using to build our picture of business behaviour. This can include data industry collects about itself from its own audits and checks, and information from other sources, such as consumers and other regulators. Once we're confident we can rely on these, we should focus our efforts on filling the gaps rather than repeating the work of others. Large businesses with experience of using a range of food data sources have a leadership role to play, in sharing safety and authenticity related insights they gain.

Businesses doing the right thing for consumers should be recognised; action will be taken against those that do not

Many businesses want to produce food that is safe and what it says it is, and do so. They know that consumer confidence in the whole industry is crucial, so are as keen as we are to drive out those who put that confidence at risk. Businesses who put consumers at risk, either deliberately or negligently, need to know that there will be consequences, while businesses who demonstrate to us that they are transparent and prioritise food safety and authenticity will benefit from reduced regulatory scrutiny.

We are open to using a range of tools to encourage business behaviour change, including reputational recognition and sanctions.

Businesses should meet the costs of regulation, which should be no more than they need to be UK food is some of the safest in the world, and UK businesses benefit from consumers (in home and domestic markets) trusting the food they produce. The industry tells us they value a strong, independent regulator. We believe that the regulatory regime should be as cost-effective as possible, for example by working with others and using a range of sources of information. Industry should meet that cost, with those requiring the greatest regulatory intervention/attention contributing the most.

As can be seen there will be far reaching changes to the food service but as yet we do not know what those will be and how it will affect the Public Protection Partnership.

ACRONYMS

AES	Alternative Enforcement Strategy
BIS	Department for Business, Innovation and Skills
COM TM	Commercial Team Manager
EHRB	Environmental Health Registration Board
EOEW	Eat out eat well rating scheme
FSA	Food Standards Agency
FSMS	Food Safety Management System
FHRS	Food Hygiene Rating Scheme
HoCS	Head of Corporate Services
IDs	Infectious Diseases
LAA	Local Area Agreement
LAEMS	Local Authority Enforcement Monitoring System
NEBOSH	The National Examination Board in Occupational Safety and Health
PEHO / PO	Principal Environmental Health Officer
PPP	Public Protection Partnership
RH/RG	Rosalynd Gater (Hale) (Commercial Team Manager)
S/EHO	Senior / Environmental Health Officer
SEHA	Senior Environmental Health Assistant
SFBB	Safer Food, Better Business
SFSO	Senior Food Safety Officer
SM	Sean Murphy PPP Manager
SMEs	Small and Medium Sized Enterprises

PART 2

TRADING STANDARDS SERVICE

FOOD STANDARDS AND ANIMAL FEED, SAFETY AND STANDARDS DELIVERY PLAN

2018 - 2019

1.0 Aims and Objectives

1.1 Aims and Objectives

The annual Food Law Enforcement Plan is designed to deliver on the Public Protection Partnership aims and priorities in respect of promoting and protecting health and supporting reputable businesses. This plan covers the local authority areas of Bracknell Forest, West Berkshire and Wokingham. Specifically it sets out how these authorities regulate and protect the food chain from 'farm to fork' in respect of food and feed quality, standards and labelling. This includes protection from contamination.

The annual Food Law Enforcement Plan seeks to deliver a focussed approach through the successful use of information and intelligence.

It is the responsibility of food and feed business operators to ensure they comply with relevant standards and legislative requirements. It is the role of the Public Protection Partnership to ensure that food produced and sold in Bracknell, West Berkshire and Wokingham meets legal standards and is labelled and marketed in such a manner as to allow consumers to make informed choices. This compliments the educational approach taken to allow consumer information to be used.

The regulation of animal feed operators is needed to protect the health of animals and ultimately the food chain.

Failures in regulation, nationally and internationally, has led to injuries to health, damage to markets and loss of consumer confidence e.g. BSE, Foot and Mouth and various food standards and safety alerts including contaminated alcohol and meat products.

The programme is structured to ensure that national and local priorities are incorporated within it.

Key Objectives

- To ensure that we inspect our High and Medium Risk food businesses on a risk based frequency. This includes the provision of legal and practical advice at the time of the visit to improve compliance rates.
- Assess unrated and new premises to bring them into the risk based audit programme.

- To identify where current quality standards are not being met or areas of consumer risk exists e.g. undeclared allergens through the use of targeted sampling and intelligence led focused audits.
- To respond to customer complaints and requests for our service as well as requests for advice from businesses.
- In line with national priorities to visit relevant primary producers and feed business operators to ensure compliance with the Food and Feed hygiene requirements.
- To provide information to consumers to allow them to make informed choices

1.2 Local Priorities

The relevant Public Protection Partnership priorities are:

- 1) Community Protection including tackling the issues that cause the greatest harm to individuals.
- 2) Protecting and Improving Health including allowing residents to make informed choices and delivering initiatives designed to improve and enhance health.
- 3) Supporting Prosperity and Economic Growth including the provision of advice to businesses and protecting them from unfair trading.

2.0 Background

2.1 Organisational Structure

On 9th January 2017 Bracknell Forest, West Berkshire and Wokingham councils entered into a joint service agreement for Trading Standards, Environmental Health and Licensing. This function is provided by the Public Protection Partnership. The food and feed enforcement functions in their entirety fall under the remit of the Public Protection Manager.

Prior to January 2017 the Food Standards and Feed functions were undertaken by two separate services: Bracknell Trading Standards undertook this function within the Bracknell Forest area and West Berkshire & Wokingham Trading Standards undertook the function within the areas of West Berkshire & Wokingham councils.

2.2 Scope of the Feed and Food Service

The Trading Standards Service has responsibility for the following areas of food chain and animal feed enforcement and education:

- Ensuring the accuracy of food labels and descriptions that are applied to food
- Ensuring claims made in the course of the marketing of food are accurate and legal
- Ensuring food standards are maintained
- Enforcement of Food Alerts relating to food standards or chemical contamination are responded to as appropriate
- Ensuring that legally required food hygiene standards are met at primary production (farms and growers) premises
- Ensuring that legally required feed hygiene and compositional required standards are met throughout the supply chain and on farm
- Ensuring that animal feed is appropriately labelled and marketed
- Ensuring businesses are appropriately advised in line with the advice policy
- Ensuring that consumers have the required knowledge base to make informed choices when purchasing food or feed
- Ensuring complaints from consumers relating to food or feed issues are assessed and assigned to an officer for action or are recorded for intelligence purposes
- Deliver part of the regional feed programme on behalf of a number of South East feed enforcement authorities

If appropriate, other relevant inspections (eg product safety, weights & measures, pricing, animal health) will be carried out at the time of the food or feed standards inspection. This is dependent on the premise type, risk assessment and resource level. With limited resource we aim to target our interventions at the most critical points.

2.3 Demands on the Feed and Food Service

The Service offers confidential and impartial advice for businesses of Bracknell, West Berkshire and Wokingham to ensure compliance with law. Dealing with complex and technical enquiries along with inspecting and monitoring activities are essential parts of the workload.

In line with the Hampton principles the Food Standards Agency has allowed local authorities to adopt a more flexible and varied approach in developing a suitable strategy to maintain compliance. As a result the team will continue to visit a number of high and medium risk food premises but look to alternative enforcement strategies to keep under review low and non inspectable risk food premises. Audits and sampling will continue to be targeted at nationally or locally recognised areas of concern.

Currently the Partnership has approximately 3566 food businesses on its databases showing as liable for food standards work. Of those premises 48 are classified as high risk, approximately 480 medium risk, approximately 1286 low risk and approximately 500 as being outside of the scope of the programme. The remainder is made up of unrated premises. This presents the biggest challenge for the service as these need to be brought back into the audit programme. This figure changes on a yearly basis.

In terms of feed premises there are 598 primary producers (including livestock farms) and 103 inland feed premises.

The risk rating for each premise is assessed at each visit and by reference to events such as levels of compliance, local risk and the category of individual businesses. In addition the Service will have regard to the principles of the Hampton Review, ensuring that no inspection is conducted without a reason and local risk factoring is applied.

The Food and Feed Service provided is specific to the needs and nature of the area. As a consequence time is spent on Primary and Home Authority responsibilities, this includes allocating time to our major food producers.

We will also advise and seek compliance on highly specific labeling criteria. This will include the traceability of foods and feeding stuffs and the declaration of foods which contain allergens.

2.4 Service Contact Details

Email:

tsadvice@westberks.gov.uk

Telephone:

01635 519930 (Out of hours 01635 42161)

Located at:

Council Offices, Market Street, Newbury, Berkshire. RG14 5LD

Civic Offices, Shute End, Wokingham, Berkshire RG40 1WW.

Council Offices, Time Square, Market Street, Bracknell RG12 1JD

Opening hours are 9am-5pm Monday to Thursday and 9am to 4.30pm Friday.

2.5 Regulation Policy

The Enforcement policy for the Public Protection Partnership (PPP):

- 1) The Regulators Code forms the guidelines that PPP uses for the basis for general enforcement work,
- 2) The Code for Crown Prosecutors is used as the basis for decisions to prosecute in all criminal matters;

In the context of this policy PPP consists of those matters enforced by the Trading Standards, Environmental Health and Licensing Services

For the Code for Crown Prosecutors see:

http://www.cps.gov.uk/publications/docs/code_2013_accessible_english.pdf

Regulators Code:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf

3.0 Service Delivery

3.1 Interventions at Food and Feeding stuffs establishments

Each local authority is required by the Food Standards Agency's Codes of Practice to document, maintain and implement an interventions programme for those premises for which they have enforcement responsibility.

There is a risk based approach in relation to food and feed advice and enforcement. Resources dedicated to food and feed related activities are balanced against the demands of other regulatory activities. This risk based approach allows more intensive regulation to be directed at those businesses presenting the greatest risk.

Official controls include – inspection, audit, surveillance, verification, sampling and monitoring and other interventions which can effectively support businesses to achieve compliance with legislative requirements include – education, advice, information and intelligence gathering. The different interventions allow the authority to choose the most appropriate action to be take to increase levels of compliance.

The proposed 2018/19 intervention programme of work is detailed below:

Category	Minimum intervention rating	Intervention Type	Number of premises due	Target
HIGH	At least every 12 months	Inspection, partial inspection, audit or sampling	42	100%
MEDIUM	At least every 24 months	Inspection, partial inspection, audit or sampling	204	100%
LOW	At least every 60 months	Alternative Intervention Strategy, inspection, partial inspection, audit or sampling	613	In response to complaints, request by the business or as part of identified projects
UNRATED	Not known until risking	Inspection /desktop for premise outside the scope of programme	814	Action plan to be introduced to address outstanding unrated list

During this financial year we will continue working on categorizing and risk assessing our feed and food hygiene premise at primary

production in line with the Codes of Practice.

We aim to carry out interventions to those premises in line with the Food Standards Agency profiling.

As part of regional feed work we will be carrying out 26 Inland Feed inspections and 6 Primary Production inspections.

Where appropriate Animal Health Inspectors will carry out some of the Food and Feed Hygiene inspections alongside their routine Animal Health visits.

3.2 Feed and Food Complaints

Food and feed complaints are investigated by the service in line with departmental procedures.

In responding to complaints we aim to ensure that:

- the composition of food meets legal requirements
- action is taken as necessary under Food Safety Act and/ or relevant legislation
- food is accurately labelled and advertised
- feed is wholesome and correctly described
- action under Animal Feed (England) Regulations and / or other relevant regulations is taken appropriately
- the risk of recurrence is reduced

3.3 Primary Authority Scheme

The concept of Primary Authority was formalised under the Regulatory Enforcement and Sanctions Act 2008. Under this legally recognised scheme (overseen by the Regulatory Delivery), any business operating across more than one Local Authority can form a legally recognised partnership, effectively creating a focus for consistent advice. It is the gateway to simpler, more successful

local regulation, and previous changes to the scheme has meant a significant expansion to the range of businesses that can participate, to now include so-called 'Co-ordinated Partnerships', such as franchise operations, trade associations and other business groups.

We offer Primary Authority partnerships to businesses wishing to take advantage of the scheme.

Currently we are in a primary authority relationship with two food companies, Prezzo Ltd and HiPP UK Ltd, these businesses currently do not require large amounts of officer time in relation to food standards.

3.4 Advice to Business

The Public Protection Partnership offers advice and guidance to food and feed businesses based in Bracknell, West Berkshire and Wokingham either if requested or as part of interventions and inspections.

We have implemented this principle by providing advice and information on the legality of product ranges, packaging, composition, labelling and advertising. This service is delivered pro-actively during the inspection of premises and reactively in response to requests from businesses and referrals from other agencies.

Resources to deliver business advice are drawn from across the competent officers identified in the service.

The Public Protection Joint Committee has agreed that we will continue to support the Home Authority Principle but that this work will become chargeable at the same rate as Primary Authority work. Small businesses will receive up to half an hour of free advice.

3.5 Food and Feed Sampling

The Partnership recognises the important contribution targeted sampling makes to the protection of the food chain including the health of farm animals. Analysis is undertaken for compositional quality and safety purposes as well as for determining compliance with labelling regulations.

The Service produces its own annual sampling programme to establish the effectiveness of the management of food and feed standards in local businesses. The programme reflects local, regional and national trends. The plan is sufficiently flexible to take account of any areas which require attention as they arise i.e. food incident warnings, consumer complaints.

We anticipate this will translate to approximately 100 food and feed samples being taken in the next financial year.

The Partnership partakes in regional and national sampling programmes and other national initiatives as appropriate. Regional sampling this year will include food supplements for unauthorised ingredients and non-permitted health claims, identifying local on line sellers and bringing them into compliance, and targeting takeaway premises looking at a range of issues such as use of colours, GM Oil, meat and fish speciation and allergen control.

Local sampling will include samples taken from local importers and manufacturers as well as extending the sampling programme into areas where last year's sampling results indicated there was a problem.

3.6 Feed/Food Safety Incidents

Food and Feed Alerts are issued by the Food Standards Agency (FSA) to all Food Authorities in the country when a national food or feed safety issue has arisen with a specific product.

Alerts are responded to as directed by the warning notification received from the FSA and in accordance with the Code of Practice. All warnings are received by email and any subsequent action taken is recorded and retained on file.

3.7 Liaison with Other Organisations

We work closely with a number of organisations and to avoid duplication of effort we have clear guidelines on who is responsible for what.

Partners include:

- Sixteen other Trading Standards authorities in the South East Region that together make up Trading Standards South East Limited (TSSEL). Activities include liaising on all key Trading Standards issues, co-ordinated inspection, sampling and advice projects and sharing of information and in particular the national feed programme delivered on behalf of the FSA.
- Environmental Health Teams across the Thames Valley.

- Bracknell, West Berkshire and Wokingham Public Health Teams - for preventative healthy eating initiatives and tackling obesity.
- Food Standards Agency
- Members of Bracknell, West Berkshire and Wokingham Councils are consulted prior to the plan being approved
- The Public Protection Manager is a member of the National Feed Governance Group on behalf of National Trading Standards

3.8 Feed and Food Safety and Standards promotional work and other non-official Controls and interventions

The promotion of food standards and feed safety will be achieved through local initiatives and publicity and by supporting national initiatives. The Partnership will aim to :

- contribute to the wider public health agenda through the promotion of healthier eating options.
- raise awareness of food issues to local food businesses and residents
- undertake 20 educational talks
- give advice to local business at the time of routine visits about upcoming changes to legislation.
- ensure that the effectiveness of promotional activities are evaluated via feedback from businesses and the public
- make use of the many guidance leaflets for business on feed and food topics that are available to download from www.businesscompanion.info and from the FSA

4.0 Resources

4.1 Financial and Staffing Allocation

Our primary resources are our staff. There is the equivalent of 3.0 FTE trading standards posts involved with food standards and feed enforcement. In total there are 16 officer posts of which this 3 FTE is drawn from, whose work involves some aspect of food and /or feed enforcement as part of their day to day duties, consisting of:

- 1 x Team Manager
- 6 x Trading Standards Officers
- 7 x Trading Standards Enforcement Officers / Fair Trading Officers

The net total cost of the service for 2018/19 is estimated to be £97K

Staffing Costs (approx. including on costs)	£86K
Travel	£6K
Sampling & Analysis	£25K
FSA Income	-£20K

This work often is conducted alongside other work including weights and measures and animal health and welfare.

The Trading Standards Team Manager is responsible for the allocation and delegation of budgets allocated to the feed and food enforcement functions.

The service also makes use of monies offered by the Food Standards Agency for carrying out specified feed work.

4.2 Staff Development Plan

Each of the staff involved with the delivery of this plan (with the exception of the educational aspect) are food and / or feed competent and have undergone an assessment of their competency via the competency framework laid down in the statutory Code of Practice.

Individual training needs are identified via the appraisal and 1:1 process and is linked to operational and resource.

In line with the Code of Practice authorised officers must undertake 20 hours training per year with at least 10 hours in the core subject to maintain competency in food law and 10 hours for feed officers.

5.0 Quality Assessment

5.1 Quality assessment and internal monitoring

- Ensuring sample analysis is carried out only by laboratories that are accredited and appointed for the purpose of the various statutes.
- Following inspections and complaint / service request completion the department has a system of sending “Satisfaction Survey” questionnaires. These are sent to every food premises visited by officers and to a proportion of service requests. Feedback received is then recorded, the results for 2017/18 was –
 - Customer satisfaction – tbc
 - Business satisfaction – tbc
 - Business & customer satisfaction (combined) – tbc
- Internal monitoring is conducted every quarter to assess performance against the plan.

6.0 Review

6.1 Review of Delivery Plan

- The objectives are regularly reviewed by the Lead Officer for Food and Feed and the Trading Standards Manager to ascertain whether objectives are being achieved and any variations highlighted.
- The Feed and Food Delivery Plan is set against the Public Protection Partnership priorities as well as local and national reporting frameworks. These include:
 - Interventions to High and Medium Risk food premises against target
 - Response to food and feed complaints

- Number of samples against target
- Interventions to feed premise against target set by the National Feed Programme
- Prosecutions and other legal actions

We will review the plan, at the end of the financial year, as part of the service planning process, lead by the Trading Standards Manager, to ensure it continues to meet the needs of our customers.

6.2 Identification of any variation from the Delivery Plan

- Variations from the plan will be reviewed at regular tasking meetings with management
- Variances will be documented.
- If changes are made they would be subject to final agreement by the Public Protection Manager under delegated authority.

6.3 Areas of Improvement

- Areas for improvement are incorporated into the following year's objectives, or dealt with as soon as possible if there are no additional financial implications.
- Identified areas:
 - Ensuring that intelligence reports from the FSA and other sources eg. Public Analyst , direct our audit programme
 - Continue to improve quality of data held on the database – including ensuring that feed premise coding is in line with the Code of Practice, and matching of EH and TS food premises
 - Prioritising potential High and Medium risk along with new unrated premises
 - Development of Alternative Enforcement Strategies for Low risk premise interventions
 - Develop further a documented process / procedure for the internal monitoring of food and feed work in line with the Code of Practice.
 - To examine the basis of our response particularly in relation to follow up action regarding Food and Feed Alerts received from the FSA.

7. Our Performance Out-turn for 2017-18

In producing our Food and Feed Law Plan we reflect on the previous year's activities. This process provides the opportunity to identify what went well and what went less well, and identify trends or key areas for focus moving forward. The food and feed law enforcement activity undertaken during 2017/18 is summarised as follows:

- Inspected 486 food businesses and undertook approximately 88 other related visits
- Dealt with 183 complaints, including advice requested by business
- Formal Cautions accepted by 2 food operators
- Issued 119 written notifications and/or warnings where businesses were found not to comply with legal requirements
- Undertook approximately 150 food samples and screening tests for composition
- Carried out 37 visits to primary production premises and 9 inland feed visits

Areas of concern identified as a result of audits, sampling or other interventions included:

- Un-declared allergens in catering establishments
- Food found on sale past its marked Use By date and thus deemed unsafe
- Undeclared meat and fish species / substitution
- Imported food labelling and standards
- Misleading food descriptions
- Failure to mention the use of GM containing products

APPENDIX: Relevant Officers

Officer	Role Food	Role Feed
Sean Murphy	Head of Service	Head of Service
John Nash	Trading Standards Manager / Competent Officer	Trading Standards Manager
Tammie Hambridge	Lead Officer / Competent Officer	Lead Officer / Competent Officer
Lisa Brown	Trading Standards Officer / Competent	
Vicky Lister	Trading Standards Officer / Competent	
Toby Green	Trading Standards Officer / Competent	
Heather Parson	Trading Standards Officer / Competent	
Robert Charlton	Trading Standards Officer / Competent	
Glenda Cameron-Lloyd	Enforcement Officer / Competent	
Heather Flemming	Regulatory Services Officer / Competent	
Elizabeth Brewster	Fair Trading Officer / Competent	
Jacqui Turner	Fair Trading Officer / Competent	
Joel Theobald		Fair Trading Officer / Competent
David Hillier		Enforcement Officer / Competent
Joanne Withey		Enforcement Officer / Competent