

Document Control Information



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Public Protection Partnership
FOOD SAFETY, FOOD STANDARDS and FEED SERVICE PLAN 2021 – 2022

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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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SECTION 1: PURPOSE OF THE PLAN AND SUMMARY INFORMATION ON 2020 21

Purpose of the Food and Feed Plan

The annual Food and Feed law enforcement plan combines Food Hygiene (enforced by Environmental Health, and Food Standards and Feed (enforced by Trading Standards). It is designed to deliver on the Public Protection Partnership (PPP) 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, and in accordance with the framework agreement on official feed and food law control service planning as set out by the Food Standards Agency (FSA). Specifically it sets out how these authorities regulate and protect the food chain from 'farm to fork' in respect of Food hygiene from production to end consumer, feed quality, food and feed hygiene at primary production, food standards and labelling requirements.

The plan seeks to deliver a focussed approach through the successful use of information and intelligence and should be viewed in that context as PPP's ambitions to deliver its services using principles adopted from the national intelligence model going forward.

It is the responsibility of feed and food business operators to ensure compliance with relevant standards. It is the role of the PPP to ensure that those businesses accountable for not meeting such standards are handled in a consistent and proportionate manner in order to meet the standard. Maintaining this approach provides consumers protections and allows consumers to make informed choices. The successes of the PPP are managed using key performance indicators that align with requirements set out within the framework agreement on official feed and food controls.

The programme is structured to ensure it aligns with the overarching priorities set out by the inter authority agreement, and subsequently the PPP strategic assessment.

2020 - 2021 Inspection Year

This plan looks at the work carried out in the previous inspection year (April 2020 to March 2021); and sets out the plan of work for the April 2021 to March 2022 inspection year.

The Food Hygiene and Standards Inspection programme that we work to, as detailed in the Food Standard Agency Code of Practice, was first disrupted in February 2020 as the Covid 19 pandemic began.

As a result of the coronavirus Covid 19, pandemic, services have experienced unprecedented and significant impacts felt across all sectors of society and the PPP service is not immune to these impacts. As a consequence, the service has had to reshape its delivery of services based on the needs (and restrictions) imposed on the community; the economy; the regulatory framework, and the food and feed businesses that have 'survived' this period as a result of the outbreak. Added to this remains the issue of Brexit and the transitional arrangements in terms of

administering the statutory obligations the food authority will need to do, will need be met.

A hold was put on carrying out physical inspections due to the safety of officers and the risk of officers becoming vectors for the Coronavirus, and to protect vulnerable groups in the premises we inspect. Indeed many premises were closed due for all or part of the pandemic, due to legislative closures, and to decisions made by the operators to close.

As such this service plan will differ from that of previous years.

In terms of our programmed food inspection work in 2020 – 2021 we were led by the FSA in their directives to us as a LA enforcing body, and for 2021 22 in their formally documented recovery plan.

During the 2020 21 inspection year the PPP were heavily involved in the Covid Response.

2021-22 Inspection Year

In terms of the inspection year we are currently in (2021 22) the Food Hygiene team continue to be heavily involved with the control of Covid 19; in addition to working reactively to assist, when the Step Changes permitted, premises to reopen. Food Standards are moving into the recovery timetable of inspection work.

The Covid work carried out by the PPP is detailed in this plan. A summary of activities follows;

- Covid Compliance checks on premises;
- Education of businesses on the changes to legislation at each step via virtual seminars, and through Covid Compliance Visits.
- We have lead on Local Contract Tracing in West Berks (7 days a week service) and operationally for Bracknell and Wokingham at weekends.
- We have carried out Isolation calls to check welfare for Bracknell and for West Berkshire
- We have operated a CV19 notification e mail 7 days a week to coordinate and action positive cases from high risk settings, as part of this we have acted as Subject Matter Experts for many sectors in terms of outbreaks
- We have carried out outbreak investigations and been involved with Incident Management Teams (IMT) and LA response meetings;
- We have assisted Events in ensuring that they are Covid Secure – and we have monitored to ensure that the Covid Risk Assessments

were being adhered to

- We have dealt with the reactive complaints and enquiries,
- we have carried out a number of interventions for Covid in high risk settings such as RCH, specialist units catering for those with Learning Difficulties, Early Years Settings,
- we have taken enforcement action for non-compliance, we have carried out Covid Patrol
- We have managed a team of Covid Marshalls.
- We have lead in the examination of intel from PHE to ascertain premises implicated through co-incidence reports, and we have followed up with those businesses to ensure they were Covid compliant
- We have inspected and followed up complaints in Quarantine Hotels and Bridging Hotels

Much of this work has been carried out by Authorised Food Hygiene and Health and Safety Enforcement Officers based in the Compliance and Programme team. These officers are ideally placed as their role is infection disease control and enforcement of health and safety. Trading Standards have also been involved, especially with enforcement of premises in relation to permitted opening. The Licensing Officers have also played a role in Covid Compliance Checks at licenced premises.

At all times during the pandemic reports have been brought to the Joint Management Board and Joint Public Protection Committee of PPP to update on the work of the team and of PPP.

As such much of this plan will relate to the recovery work required to get the Food Inspection plan on track. As we are still in the pandemic at the time of drafting the plan it is subject to change.

SECTION 2: BACKGROUND TO SERVICE

Profile & Organisational Structure

On 6th January 2017 Bracknell Forest Borough Council (BFBC), West Berkshire District Council (WBDC) and Wokingham Borough Council (WBC) entered into a joint service, inter authority agreement (IAA) for Trading Standards, Environmental Health and Licensing. This function is provided by the Public Protection Partnership (PPP). PPP governance arrangements have led to PPP being directed by a separate committee of elected members

representing of each authority who are advised by a joint management board (JMB) made up of heads of service representing each authority. Wokingham Borough Council has given notice that it will be withdrawing from this agreement by April 2022.

The PPP serves a rising population of almost ½ million residents, comprising of around 120,000 (BFBC), 160,000 (WBDC) and 165,000 (WBC). Whilst the three authorities share many similarities such as the types of businesses, their more modern industrial and historic towns and villages, political governance, and health demography, each area is also unique. For example, major retail, shopping and leisure facilities within the Lexicon can be found within BFBC, higher density student living linked to Reading university and the highly attended Henley Regatta features within WBC. Within West Berkshire, rural landscapes, farming and horse racing are common place.

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 Compliance and Programme Team

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, and were at the forefront of the Covid response across the 3 Council areas.

The officers carrying out Food Hygiene and Covid work are also the Authorised Officers for Health and Safety Enforcement. The work carried out on Health and safety Enforcement falls outside of this service plan but for 2020 / 21 was essentially reactive work, accident investigation and the Covid compliance work.

The EH Housing Function sits in Compliance and Programme.

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.

Trading Standards Aims and Objectives

Trading Standards within PPP has responsibility for the following areas of the feed and food chain;

- Ensuring the accuracy of food labels and descriptions that are applied to feed and food products
- Ensuring claims made in the course of the marketing of food are accurate and legal
- Ensuring feed and food standards are enforced appropriately
- Ensuring Food Alerts relating to feed and food standards are acted upon in a proportionate and consistent manner.
- Ensuring standards are met at primary production (farms and growers)
- Ensuring feed hygiene and compositional required standards are met throughout the supply chain and on farm
- 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 feed or food
- Ensuring complaints from consumers relating to feed or food issues are assessed and assigned to an officer for action and/or are recorded for intelligence purposes
- Supporting local, regional and national programmes delivered by other relevant partners
- Registration / Approval of Feed Businesses

If appropriate, other relevant inspections or regulatory checks and assessments will be carried out at the time of the feed and food hygiene and food standards inspection. For example, product safety, licensing matters, weights & measures regulation and farm animal welfare.

There are also wider cross cutting issues for PPP, such as immigration issues, modern day slavery and fraud. Such interventions are dependent on the premises type, risk assessment and resource levels available. PPP aims to target interventions at the most critical points within the most high risk areas based on the PPP strategic assessment.

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.

Public Protection Partnership 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

The Control Strategy is normally utilised to details the activities, and their priority.

2020 21 / 2021 22 Priority Setting

Due to Covid the priority of the team is dependent on the Covid Situation. Priorities are tracked using Business Continuity Plans, Recovery Plans and Operations Risk Registers which are frequently updated and shared with Gold Command, the Joint Management Board and the Joint Public Protection Committee.

Key Objectives

For Food Hygiene Authorised Officers the primary role in 2020 21, continuing in 2021 22, is to assist in the control of Covid 19. In addition, to ensure that reactive work is responded to and high risk premises are inspected.

For Food Standards Authorised Officers, 2021 22 sees a move back to their primary work as part of the recovery plan; this is

- To ensure the PPP carry out planned inspections within higher risk feed and food businesses. This includes the provision of legal and practical advice at the time of the visit to improve compliance rates.

- To apply alternative interventions and approved strategies where lower risk premises are concerned, that are in line with relevant approved CoPs. E.g. Earned recognition, alternative enforcement strategy.
- Assess unrated and new premises to bring them into the risk based audit programme.
- By analyzing intelligence and information entering the service, identify where current quality standards are not being met.
- To respond to customer complaints and requests for our service as well as requests for advice from businesses.
- In line with national priorities to ensure, primary producers and feed business operators achieve compliance with the relevant feed and food hygiene requirements.
- To provide information to consumers to allow them to make informed choices

Profile of the Food Premises across PPP

Type of Premises (FSA Categorisation)	No. of Premises Bracknell Forest 1/4/21	No. of Premises West Berkshire 1/4/21	No. of Premises Wokingham 1/4/21
Producers	3	20	11
Manufacturers/ Packers	2	29	14
Importers/exporters	3	8	6
Retailers	144	254	164
Restaurants / Caterers	532	852	741
Distributors	4	29	7
Care Establishments / childminders	192	171	162
Educative Establishments	68	101	73
Total No. of Food Premises	948	1464	1178
April 2019 for comparison	853	1264	986

Number of New Food Premises Registering in PPP

	Bracknell	West Berks	Wokingham	Total
2018 19	88	157	126	371
2019 20	84	190	152	426
2020 21	161	236	205	602

Service Structure

Our primary resources are our staff. There are some 120 staff operating across PPP. The resources at the PPP disposal are diverse and range from support officers with administrative, intelligence and analytical database skills, trading standards officers, sampling officers, specialists in feed and food hygiene at primary production officers, animal health officers, food safety officers, environmental health officers, solicitors, and a technically qualified leadership and management team.

The officers carrying out Food and Feed control across Hygiene and Standards are highly skilled and must carry out assessments of Competency at regular intervals. The delivery programme ensures services are carried out by officers with the correct levels of qualification, skills and expertise, as set out in the Code of Practice and Practice guidance on official controls.

‘Commercial Team’ Staffing (April 2021) (Food and Health and Safety Authorised Officers)

The PPP structure has gone through a number of changes in the last 2 years and therefore comparison data on previous staffing is unavailable.

This table shows the FTE as of 1 April 2021. The plan for 2021 22 was to reduce the Covid programmed inspection work as the Covid numbers declined, and was dependent on the changing landscape of the Government Step changes. It was envisioned that the team would switch to the Recovery model from 1 July 2021 where food inspection work will resume, however, the Government pushed back opening for a further 4 weeks, and due to the continuation of the pandemic, and the rising numbers of cases the majority of the recovery work on food inspections is still on hold. We have continued to respond to reactive work, and where there is imminent risk, across the pandemic, in both food and in Health and safety enforcement.

In general terms we have been using in house officer to deal with our Covid related activity, and reactive work load. We have brought in Contractors to deal with the ‘recovery’ element (i.e. the food inspection work). However, there have been difficulties in getting contractors to back fill the work of the food officers while they have been carrying out work on Covid. Availability of competent officers has been low nationally, due to the high demand brought about by Covid. We have managed to secure some officers however not as full FTEs (as of September 2021 we have 6 Contractors, 2.4FTE working on food recovery and 2 FTE on Covid related activities). These contractors have not all been with us over the duration of the pandemic, mainly joining us in the

2021 22 inspection year. We have been actively seeking contractors for most of the year, at present we are trying to secure 2 additional FTE to carry out food visits to backfill PPP officers, and as of 16th April 2021 we secured an additional 0.2 FTE Food Authorised officer.

One Food Authorised Officer (0.8FTE) returned from maternity leave mid April 2021.

One officer has since left PPP (August 2021). Recruitment is on hold due to Wokingham's departure from PPP.

PPP In House Staffing Levels for Food Hygiene and Covid and Health and Safety

Category of staff	Acceptable Food Related Qualification	Number of Officers in post April 2021 (FTE in post)	Full Time Equivalent FTE carrying out Covid work	Full Time Equivalent FTE carrying Out Food Enforcement
C&P Strategic Manager	BSc in Environmental Health MSc in Environmental Health Diploma in Environmental Health	1 (0.81 FTE)	0.5	-
Principal Environmental Health Officer	BSc in Environmental Health MSc in Environmental Health Diploma in Environmental Health	1 (1 FTE)	0.9	0.1
Senior/Environmental Health Officers	BSc in Environmental Health MSc in Environmental Health Diploma in Environmental Health	8 (7 FTE)	6.5	0.5
Senior Food Safety Officer	EHRB Higher Certificate NEBOSH certificate/Diploma	1 (1 FTE)	0.9	0.1
Total		11 (9.81FTE)	8.8 FTE	0.7 FTE

Food Hygiene Contractors

MM	EHO	Covid High Risk work	From May 2020 onward	0.8 FTE
AB	EHO	Food Inspection	Oct to Dec 2020; April 2021 onwards	0.4 FTE
DB	EHO	Covid LCT and Food Insp	Nov 2020 onwards	0.2 FTE
SB	H&S	Covid Patrol work	Jan 2021 to Aug 2021	0.6 FTE
ET	EHO	Food insp and reactive	Feb 2021	1 FTE
OB	H&S	Covid Patrol	July 2021	1 FTE
LY	EHO	Food Inspections	Aug 2021	0.5 FTE

Food Standards Resources

Over the last 16 months resource in these areas of work has been much reduced as priorities within PPP moved to dealing with COVID related issues and following national guidance from the FSA work was limited to High risk reactive work. We are now heading into the Recovery phase under direction from the FSA with a national plan running from 1 July 2021 to 2023/24. It sets out a framework for re-starting the delivery system in line with the Food Law Codes of Practice.

There is little scope at present to recover costs associated with such planned activity. However, the FSA provide a small grant fund, around £12 000 for the delivery of regional feed inspections. The PPP also recover costs for its primary authority role. There is a £30, 000 sampling budget from PPP.

Category of staff	Acceptable Food Standards Related Qualification	Number of Officers in post April 2021 (FTE in post)	Full Time Equivalent FTE carrying Out Food standards Enforcement
Senior/Trading Standards Officers Food Competent	Diploma in Trading Standards Diploma in Consumer Affairs Diploma in Consumer Affairs and Trading Standards	8	1.5
Total		8	1.5

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 a number of areas.
- The Lead Officer is required to evidence these and further managerial and overview competencies.
- 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.

The PPP have always supported learning and development within its disciplines. This ethos is being expanded to ensure future proofing and expansion of technical skills that allow the service plan to become more accessible to colleagues within the partnership. The PPP also encourages staff development and building on core qualifications using structured annual appraisals, audit of skills and regular one to one meetings.

The PPP strategic management team have developed, and recruited a new lead officer (Training & Development) responsible for building on an already established skills framework (as set out by the FSA) who will work alongside the lead food / feed officer to ensure competency amongst staff involved in these areas of service delivery is maintained and embedded across all of PPP. This will incorporate better use and understanding of systems database, and application of regulatory skills and legal processes aimed at minimising risk to prosecution cases. This will also include ensuring that minimum continued professional development is maintained as required by the Codes of Practice.

SECTION 3 WORK ACTIVITY 2020 2021 FOOD HYGIENE and COVID

Timeline of work activity February 2020 to September 2021

The table at Appendix 1 summarises the work that the Food Hygiene Compliance and Programme Team have been carrying out over the period of the pandemic, and up to September 2021.

It demonstrates the range of Covid work undertaken, and the extent to which we have been involved with the control of Covid.

Due to the extent of this work, and the priority that this was given by PPP and by the Public Health Teams and Gold Command, the work of the team has changed and programmed work has not been able to be done, mainly programmed food inspections. In the main this has tied in with the Food Standards Agency direction that we do not do face to face visits during the pandemic. However, since July 2021 FSA recovery plan has come in opening up visits.

However, as officers are still engaged with Covid there will be inspections overdue. It is detailed in the plan how we are managing the work, and the recovery work.

At all times Covid control work was prioritised over food hygiene recovery work. The only exception would have been in the case of imminent risk to the consumer, and for reactive work.

2020 – 2021 Measures of Volume

Please note that these figures are in relation to work carried out by Food Hygiene Authorised Officers in the Compliance and Programme team, and as such may differ from figures set out for the whole of the Public Protection Partnership.

Covid Compliance Checks

These include patrol work to check on compliance and more in depth audits. Also includes checks to ensure premises remain closed when were required to by Covid regulations.

These patrols ranged from visiting all premises in a certain area, at other times it was concentrated on a sector, or led by complaints coming in or by intelligence coming into the dedicated CV19 inbox which we set up.

The officers (both Environmental Health and Trading Standards and licensing Officers) would give out advice and recommendations and took more formal action only when needed.

The legislation was constantly changing and so the officers had to ensure that they were always up to date with the legislation. Legislation and guidance would be published on the same day as it came into force which lead to a much pressurised turn around for officers.

Examples include hospitality industry, garden centres, estate agents, pet shops, funeral directors etc

2020 21 Covid compliance Visits	Bracknell	West Berks	Wokingham
	434	693	739

Covid Reactive

There was a large number of reactive work generated by Covid. From businesses asking for advice on how to comply, or what the legislation meant, to members of the public or employees complaining about premises and their Covid measures.

2020 21 Covid Reactive*	Bracknell	West Berks	Wokingham
	214	543	328

*These figures are the reactive workload of the Food Hygiene officers in relation to Covid. In total the service received around 2000 Covid related Service Requests

Local Contact Tracing (West Berks)

The number of positive cases that have been transferred from the National to PPP as the Local Contact Tracers. These are ones that the National service have not been able to reach, or ones that the National service have not been able to get the completed questionnaire from. The objective is to get in contact with these positive cases, to check on welfare issues and signpost assistance where needed, to give information on isolation and to get names of contacts within the definition of Covid.

Nov 2020	Dec 2020	Jan 2021	Feb 2021	Mar 2021	Apr 2021	May 2021	Jun 2021	Jul 2021	Aug 2021	Sep 2021
90	102	307	113	31	30	31	30	318	413	454

In addition to these figures we also covered contact tracing for Bracknell and for Wokingham at weekends and Public Holidays.

Food Hygiene Measures of Volume

2020 21 Food Premises Food hygiene Inspection Work

As previously discussed the main food hygiene inspection programme was suspended in 2020 21, and into 2021 22 due to Covid; both restrictions in doing face to face inspection visits; food premises being closed due to the pandemic, and a redeployment of the food competent officers to front line Covid compliance and control work.

We did carry out a number of remote food hygiene contacts with premises – in particular the high risk premises which were still operating during Covid (for example residential care homes and those rated as 'A', the highest risk premises. For example, there were three A rated premises, 2 were not open during the pandemic; one we discussed what progress was being made to comply. We attempted to make contact with others however many were temporarily closed during the pandemic.

	Contact with High Risk Food Businesses (non face	Inspection / Audits 2020 21
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	to face) 2020 21	
Bracknell	88	23
West Berkshire	97	28
Wokingham	26	28

These figures are a marked difference from the food inspection programme that has been carried out in previous years, were PPP would achieve 100% of inspections due and complete inspections of all unrated premises.

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.

Period	Food Safety		
	Bracknell	West Berkshire	Wokingham
2018 19	366	437	346
2019 20	296	438	292
2020 21	254	362	295

With the closure of food premises during the initial lockdown it would have been an assumption that we would have received a fraction of the service requests in a normal year. The service request numbers that we received were comparable to non Covid years, thus increasing the pressures on the service.

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.

Outdoor events

During normal years we enforce health and safety and food safety at a number of events. These events include the Henley Regatta, the Henley Festival, The Rewind Festival, Marvellous Festival, the Newbury Showground, Newbury Racecourse events, International Polo Event in Bracknell, Englefield Estate Concerts and Lapland UK.

We normally take an active involvement with the high risk events, and a light touch with smaller events.

However, due to Covid we have had to become involved in all events and gatherings, regardless of size, due to our work in enforcing Covid legislation and controlling the spread of Covid.

Since events have been permitted by Government to take place we have worked with the organisers to ensure that they have completed a suitable and sufficient Covid risk assessment. We have monitored events and we have followed up where there have subsequently been cases associated with events.

1.5 FTE has been assigned to this role (with other officers assisting at monitoring). We have increased the number of Safety Advisory Groups and increased the capacity of officers carrying out administration for the group.

April 2020 to 31st March 2021 - **Total events worked on 169**

Events included -
Centurion TP100 and the Autumn 100
Red Sky Summer Nights Drive in
Drive n Dine Henley
Lapland UK

April 2021 to 30th September 2021 – **Total events worked on 258**

Events included-
VFest
HRR
Rewind

Marvellous

Enforcement Action

Prosecution:

Following the discovery of rodent activity during a routine food inspection in 2018, a Village Store voluntarily closed. The case was heard in the Magistrate Courts January 2021 and a conditional discharge for 12 months given and full costs awarded to Council of £1247.26.

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 (now UK Health Security Agency) to investigate cases of infectious disease.

This work is in addition to the work we have been doing on Outbreaks with respect to Covid.

Period	Number of Infectious Disease Notifications Received (not including Covid)		
	Bracknell	West Berkshire	Wokingham
2018 19	200	268	300
2019 20	208	253	216
2020 21	125	166	253

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 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.

Food Sampling

There is comprehensive food standards sampling plan for 2021/22

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.

Promotional and Educational Work

This centred on Covid, both in our work on outbreak control and in the on line seminars that we ran for different sectors at pivotal points along the pandemic.

SECTION 4 PLANNED WORK ACTIVITY 2021 2022 FOOD HYGIENE and COVID

Please note that the Covid work planned in this section is for the Food Hygiene Authorised Officers in the Compliance and Programme team, other functional areas may also be carrying out Covid and this work will be co-ordinated.

FOOD HYGIENE WORK ACTIVITY FOR 2021 22 INSPECTION YEAR

Food Inspection Programme

2021 22 Food Hygiene Inspections Due

This table shows the number of inspections that are due and overdue an inspection/audit. The overdue visits are from the start of the disruption of face to face work when the pandemic began in February 2020.

It can be seen that allocation of the overdue is being carried out in line with FSA recovery plan. Should more resource become available, either by a reduction on Covid work or more contractors, more inspections can be carried out.

LA	Risk Category	overdue 19 20 (1 4 21)	still due 12 10 21	Allocated for inspecting in 2021 22	overdue 20 21 (1 4 21)	still due 12 10 21	allocated for inspection in 2021 22	Due 21 22 (1 4 21)	still due 12 10 21	allocated for inspection in 2021 22
Food Bracknell Forest	A	0	0	-	1	1	yes	0	-	-

	B	1	1	yes	8	8	yes	2	3	-
	C	16	13	yes	70	69	Part	31	29	-
	D	19	19	-	141	140	-	93	92	-
	E (by questionnaire)	78	68	yes	117	114	yes	93	91	yes
	Risk Category	overdue 19 20 (1 4 21)	still due 12 10 21	Allocated for inspecting in 2021 22	overdue 20 21 (1 4 21)	still due 12 10 21	allocated for inspection in 2021 22	Due 21 22 (1 4 21)	still due 12 10 21	allocated for inspection in 2021 22
Food West Berks	A	2	0	yes	0	0	-	0	-	-
	B	8	1	yes	30	1	yes	0	-	-
	C	43	42	yes	111	104	part	63	60	-
	D	60	58	-	205	194	-	141	134	-
	E (by questionnaire)	74	68	yes	122	112	yes	181	177	yes

	Risk Category	overdue 19 20 (1 4 21)	still due 12 10 21	Allocated for inspecting in 2021 22	overdue 20 21 (1 4 21)	still due 12 10 21	allocated for inspection in 2021 22	Due 21 22 (1 4 21)	still due 12 10 21	allocated for inspection in 2021 22
Food Wokingham	A	0	0	-	0	0	-	0	0	-
	B	3	2	yes	22	17	yes	0	0	-
	C	30	13	yes	109	82	part	43	40	-
	D	47	4	yes	144	140	-	128	125	-
	E (by questionnaire)	23	22	yes	115	114	yes	136	127	yes

Number of New Food Premises Registering in PPP

	Bracknell	West Berks	Wokingham	Total
2018 19	88	157	126	371
2019 20	84	190	152	426
2020 21	161	236	205	602

The number of new food premises registering with PPP during the pandemic was almost 1/3 more than in previous years. Many of these new premises were home caterers opening as other work activities ceased, in addition there were food businesses who were changing their operation to

permit opening etc.

PPP successfully applied for an FSA grant in 21 22. This is so that we can contact the newly opened premises to ascertain if they are still open (as anecdotally we suspect many will either have closed, or will not have opened), and to get information to find out the risk of the premises. Once this project is carried out we will ensure that the highest risk settings receive priority inspections. Through the pandemic we have been monitoring the unrated premises and contacting those that appear high risk to talk through their operation, in addition we have been assigning out as many as possible for inspection in 2021 22, this is to ensure any higher risk premises receive an inspection visit.

	Unrated brought forward from 2019/20 inspection year	overdue 2020/21 inspection year	Number of physical inspections carried out in 2020/ 21 on unrated premises
Bracknell	88	161	25
West Berks	13	236	12
Wokingham	17	217	21

Those premises that were brought forward from the 2019 20 inspection year would have been ones due for a visit however a hold put on as face to face visits ceased in February 2020.

Under normal circumstances PPP runs with very few unrated premises as our KPI was to inspect within 28 days of opening.

Work Activity Plan For 2021 22 For Food And H&S Authorised Officers In Compliance And Programme Team

This work activity makes the following assumption

- 1) Covid remains the priority over food and food recovery work
- 2) PPP remain carrying out the work we have done for Covid
- 3) The levels of cases going forward, and the introduction of new measures, or reduction of current measures, by the Government is unknown
- 4) We are unable to bring in more Food Contractors as there are none available nationally
- 5) We have limited in house resource and a hold put on recruitment to vacant posts while in the Wokingham transition.

In terms of recovery work it is unknown at writing whether there will be funding available to continue the food recovery work into 2022 23 inspection year, and whether the contractors will be available to carry out recovery.

Due to the extent of the recovery work needed in Food Hygiene, as a result of our continued involvement with Covid, and the difficulty in bringing in more competent resource, there will be major implications for the work in the 2022 23 inspection year. In this year the rollover inspections will need to be completed, in addition each year will add on the visits that are due in that year. With current staffing it will not be possible to carry out the visits unless there is a commitment to fund addition authorised officer in the 2022 23 budget.

	Work	officers	Estimation of volumes	Action plan	Priority rating
CV19 In box for high risk settings notification and information	7 days a week monitoring of the dedicated CV19 inbox used to notify the 3 Las of cases in high risk settings; PPP officers monitor and take appropriate action which will involve us or other Subject matter Experts taking prompt action	2 in house officers (MM CH)	The rate of notification into this e mail account remains very high at premises – it is unknown when this will begin to recede	One of the officers dealing with this work is leaving Nov 2021. Attempting to bring in a Lead Officer to ensure work continues. Also, redefine role of existing contractor	High Priority Unknown duration
Outbreak control work	PPP officers are involved in the Outbreak meetings, inspections of the premises to ascertain the Covid controls in place	2 in house officers (MM CH) plus other officers as required (1 contractor involved MMo)	Currently there are a number of settings – and the work is complex and time consuming.	One of the officers dealing with this work is leaving Nov 2021. Attempting to bring in a Lead Officer to ensure work continues. Also, redefine role of existing contractor	High Priority Unknown duration
High Risk Settings and control of Covid	Inspections and monitoring and taking appropriate action to control Covid in high risk settings such as large manufacturing, warehousing, care homes etc	2 in house officers (MM CH) plus other officers as required (2 contractors MMo / OB) involved)	There are a number of settings – and the work is complex and time consuming.	One of the officers dealing with this work is leaving Nov 2021. Attempting to bring in a Lead Officer to ensure work continues. Also, redefine role of existing contractor	High Priority Unknown duration

Local Contact Tracing LCT	Operating a 7 day a week contact tracing service in West Berks and weekends for Wokingham and Bracknell. Involves contacting positive cases to trace any contacts, to try to find links to the source of infection and to assist with welfare issues	Scheme managed by in house officer (MM) – all officers participate in rota.	The numbers of cases to be contacted is extremely high at present.	Getting additional external staff in to assist as numbers are extremely high; looking to bring in a Lead Officer to assist to free in house officer time for other activity For the weekend rota we now request additional capacity is supplied by Wok and BF staff due to sheer volume of calls to be made	High Priority Unknown duration
Isolation calls	Calls to positive cases isolating who have indicated that they require assistance	Scheme managed by in house officer (MM) and calls done by officers outside the team weekdays	The number of calls to be made varies	Lead officer can assist	High Priority Unknown duration
Co-incidence reports and compliance visits	Detailed examination of the reports into Covid and settings to ascertain if there are premises etc implicated. Visiting those premises to look at Covid Controls.	in house officer (MM); visits carried out by officers	Creating the reports from the data is very time consuming.	The data analysis work needs to move back to PH Data Analyst	High Priority Unknown duration
Quarantine Hotels /	Carrying out inspections of these	Scheme	There are a number	Continue the work	High Priority

Bridging Hotels	premises in relation to Covid Controls and H&S	managed by in house officer (MM); visits done by officers	of premises – and the work is complex		Unknown duration
Event Safety	Ensuring events have suitable and sufficient Covid Risk Assessments and monitoring	One In house officer (FH) with contractor assistance	Events are still coming in at a high rate	Determination to be made as to this work and move back to the H&S element of Events	High Priority Unknown duration
Covid reactive work	Dealing with requests for information and complaints from businesses and public	In house officers	As businesses reopened and Covid restrictions lifted this work has reduced	At present the volume of work in this area has receded following the removal of Covid restrictions, however it is increasingly complex. We are dealing with this as part of H&S enforcement service	High Priority Limited duration
Food Reactive Work	Dealing with requests for information and complaints from businesses and public	In house officers	As premises reopen the volume of this work increased rapidly	This is a priority	High Priority Business as usual
Infectious Disease (ID) control work	Notifications of non Covid infectious diseases that come to us from PHE (now UK Health Security Agency UKHSA)	In house officers	We work to the UKHSA Single case protocol	We will be involved with high impact cases	High Priority Low case numbers
'A' rated food premises(3 premises)	Inspection of highest risk food premises (every 6 months)	Contractors	There are only a small number	These will be completed in the 21 22 inspection year	High priority (FSA recovery Plan – complete by end

					March 2022) Limited duration
'B' rated Food Premises (74 premises)	Inspection of the second highest food risk group (every year)	Contractors and in house officers and OOH overtime visit	There are a relatively small number	These have all been allocated out for inspection (both as in hour visits and as overtime).	Medium priority in 2021/22 (FSA recovery Plan – June 2022 to complete) Will prioritise in order of inspection date
'C' rated Food Premises – overdue 19/20; 20/21 (379 premises)	Medium risk food inspections (every 18 months)	Contractors and OOH overtime visit	Numbers are high	We will attempt to ensure these are inspected. One contractor has been moved into reactive following vacant post. There are no contractors available – this is a national issue	Low Priority for 21/22; however they must be inspection as per the FSA COP and the FSA recovery plan FSA Recovery Plan end Sept 2022 C's non broadly compliant
'C' rated Food Premises – due 21/22 (137 premises)	Medium rated food premises due in this inspection year				Low Priority for 21/22; however they must be inspection as per the FSA COP and the FSA recovery plan FSA Recovery Plan end Sept 2022 C's non broadly compliant, and end March 2023 rest C
D rated Food Premises – overdue 19/20; 21/22	Low risk food inspections overdue	Contractors and OOH	Numbers are high; we carry out partial	We will attempt to ensure these are	Low Priority for 21/22; however they must be

(635 premises)		overtime visit	inspections to focus on highest risk element)	inspected. One contractor has been moved into reactive following vacant post. There are no contractors available – this is a national issue	inspection as per the FSA COP and the FSA recovery plan FSA Recovery Plan end Dec 2022 D's non broadly compliant, and end March 2023 rest D
D rated Food Premises – due 21 22 (362 premises)	Low risk food inspections due in this year			These will be inspected should the higher risk premises have received an inspection	Low Priority for 21/22; however they must be inspection as per the FSA COP and the FSA recovery plan FSA Recovery end Dec 2022 D's non broadly compliant, and end March 2023 rest D
E rated food premises overdue and due (939 premises)	These are carried out via alternative enforcement strategy as per Food Law Code of Practice as are low risk (use of questionnaire, and inspection on non return). A authorised food officer must process the responses to determine risk	Surestart and overtime	High number – Alternative Enforcement Strategy carried out	The mailshot and collation is to be done by an officer brought in under the SureStart scheme; authored food officers will process on overtime. As such we can begin this work – a benefit of it is to provide a data base cleanse	Low Priority However, there is input from non food authorised officers which can be carried out in the 2021 22 inspection year, and there are great benefits in ensuring that we are running with an accurate database.
Unrated food premises	These are newly registered food premises. Previously we completed these within 28 days of opening. A consequence of the Covid lockdown has seen a third as many new food		648 from 2019 – 20221; plus premises registering in the 2021 22 inspection year (est	We are using FSA funding to contact these businesses to ascertain it they are still open, and their	High Risk are High Priority in the FSA Recovery Plan. Due to the sheer volume of unrated

	businesses open in the last 18 months.		an additional 500) Total - 1148	nature. (this is ongoing at time of writing) Authorised food Officers will prioritise higher risk premises Authorised Food Officers are allocated these higher risk premises for inspection in the 2021/22 inspection year.	premises we will prioritise higher risk premises in 2021/22
Primary Authority Arrangements	We are PA partners with a major food retailer			We will continue to work with our PA to ensure that we meet the requirements of the partnership	High Priority

SECTION 5 – WORK ACTIVITY FOOD STANDARDS AND FEED

Demands on the Feed and Food Standards Service

The Service offers confidential and impartial advice for businesses within its area. This includes dealing with complex and technical enquiries (such as allergen controls, nutritional and health claims, feed composition) along with inspecting, investigating complaints and monitoring activities; all of which are essential and significant proportions of the workload associated with feed and food service delivery. The 2021/22 strategic assessment identifies feed and food standards service delivery as one of its strategic priorities.

The Food Standards Agency has allowed local authorities to adopt a more flexible and varied approach in developing a suitable strategy to maintain

compliance. The FSA have issued national guidance on recovery. This includes a time frame for delivery on inspections across 21-22. As a result the PPP 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. Where there is a Primary Authority arrangements in place, officers will have regard to any inspection plan published.

Although changeable, the Partnership currently has approximately 3600 food businesses on its databases liable for food hygiene (primary production) & food standards intervention. Local Authority Enforcement Monitoring (LAEM) provides a detailed snap-shot profile for feed and food hygiene matters in respect of the number, type, risk, locality, and so on. The LAEM returns are reliant on proper maintenance of database use and the PPP resources specialist officers to ensure database quality is maintained across the partnership. This is in addition to other 'back-office' support services that deliver the PPP model.

Food Standards

Of those 3600 premises, where food standards are concerned, around 35 are classified as high risk, 430 medium risk, and approximately 1290 are low risk. Approximately 500 are outside of the scope of the programme. These figures are subject to recovery planned work that is looking at the existing profiles following a number of changes to the profile across the areas due to closures, re-opening and changes in practice.

The remainder are made up of unrated premises. This presents the biggest challenge for the service as these need to be brought back into the audit programme. The 2021/22 priorities work-plan for PPP recognizes resources will need to go into this area of work to ensure those premises not yet risk assessed will need to be so, and as such this is included in the feed and food service plan.

Feeding Stuffs

In terms of feed premises there are 350 primary producers (including livestock farms) and 100 inland feed premises. one of the

The risk rating for each premises 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 have regard to the principles of the Hampton Review, ensuring that no inspection is conducted without reason and local risk factoring is applied.

Primary Authority

PPP have Primary and Home Authority responsibilities, which includes allocating time to our major food producers. Currently, PPP have 1 arrangement in place relevant for the Trading Standards feed and food service; HiPP

Service Delivery

Interventions at Food and Feedingstuffs 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 feed and food advice and enforcement. Resources dedicated to feed and food 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 taken to increase levels of compliance. This fits with the PPP model or service delivery using Prevention, Intelligence and Enforcement (PIE) principles.

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

Where appropriate Animal Health Inspectors will carry out some of the feed and food hygiene inspections alongside their routine animal health visits.

Proposed Feed & Food Standards 2021-22 Intervention Programme.

Category	No of premises due (BFC)	No of premises due (WBDC)	No of premises due (WBC)	Total	Target/commentary	FSA Recovery Framework
HIGH	7	11	17	35	100% delivery expected	100% to receive an onsite inspection before 30 June 2022. Plan for visits to 30 th September 2021 – intervention programme starts 1 October 2021
MEDIUM	138	151	139	428	100% delivery expected	No interventions required during the recovery period unless intelligence/

						information suggests that risks have increased or a priority due to risk or because of the impact on the establishment of the new requirements on allergen labelling for PPDS
LOW	408	271	165	844	Inspections in response to complaints, request by the business or as part of identified projects.	No interventions required during the recovery period unless intelligence/ information suggests that risks have increased or a priority due to risk or because of the impact on the establishment of the new requirements on allergen labelling for PPDS.
UNRATED/OUT OF SCOPE	144	869	612	1625	Action plan to be introduced to address outstanding unrated list. Plus new ongoing registration of new businesses	In line with the Code of Practice
Inland Feed	3	8	8	19	100% delivery expected (funded visits)	
Primary Production (feed)	1	2	2	5	100% delivery expected (funded visits)	
Primary Production (food)	0	1	1	2	100% delivery expected	
Regional Feed	Approximately 100 premises (outside of PPP area – within TSSE region) which are grant funded. 100% expected.					

Estimated resources required for Feed, Food Hygiene (PP) & Food Standards programme.

Risk Rating	No. of Premises Due 2021-22	Estimated (hourly) time per intervention	Total
A/High	35	7	245
B/Medium	428	4	1712
New Premises/Unrated	1625	1	1625
Inland Feed and Primary Production Inspections	124	6	744

Feed and Food Service Requests & Complaints

Food and feed complaints are investigated by the service in line with departmental procedures. In responding to complaints we aim to ensure that:

- appropriate action is taken as necessary under relevant legislation
- feed and food is accurately labelled, advertised, wholesome and of the composition to meet legal standards
- industry standards and best practice are promoted
- new and existing business enquiries are responded to with appropriate levels of support and/or signposting

We expect the number of service requests associated with feed and food matters for 21-22 to be in line with previous years, regardless of Covid.

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 one food company in relation to food standards matters HiPP UK Ltd.

Advice to Business

As part of the PPP Model in service delivery, the Public Protection Partnership have implemented the principle of providing advice and information based on legislative requirements and recognised Codes of Practice. The newly created PPP website offers signposting and advice. Support services will handle all the initial requests and triage accordingly. Not only will customer facing services be delivered in this way, officers pro-actively provide advice and guidance during the programmed inspection of premises.

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

The Public Protection Joint Committee has agreed to continue supporting the Home Authority Principle but that this work will become chargeable at the same rate as Primary Authority work.

Feed and Food Sampling

The Partnership recognises the important contribution targeted sampling makes to the protection of the food chain.

The Service produces both its own annual sampling programme and contributes to local, regional and national programmes to establish the effectiveness of the management of food and feed standards in local businesses. Sampling is a way of testing the products integrity and endorse the effectiveness of any given management systems designed to ensure feed and food is safe, of correct composition and/or meets legal standards. Where evidence directs to poor management controls, or say deliberate adulteration and fraud, PPP will take action accordingly. The resilience within PPP is sufficiently flexible to take account of any areas which require attention as they arise i.e. food incident warnings, consumer complaints.

Testing this year will include looking at a range of issues around allergen control, in particular looking at new regulations, meat speciation, the accuracy of nutritional values displayed on menus, counterfeit / watered down wines and spirits, toxins / allergens in locally produced alcohol and raw pet food.

We anticipate this will translate to approximately 150 food and feed samples being taken in the next financial year.

Feed and 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.

Feed And Food Standards Promotional Work And Other Non-Official Controls And Interventions

The principles of Prevention, Intelligence and Enforcement (PIE) are applied to the PPP strategic delivery plan. The promotion of food standards and feed safety will be achieved through local initiatives, publicity and by supporting national initiatives. The Partnership will aim to deliver through its programme delivery a number of projects including:

- Contributing to the wider public health agenda through the promotion of healthier eating options.
- Raise awareness of food issues to local food businesses and residents.
- Provide advice to local business at the time of routine visits about upcoming changes to legislation, with specific focus this year on allergens with changes in legislation covering pre packed for direct sale and calorie information on menus.
- 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. For example, those that are available to download from www.businesscompanion.info and from the FSA.
- Implement the PPP communication strategy and further develop the PPP website and use of social media potential.
- Attendance to community fairs to promote the work of PPP as easing of Covid restrictions allows.

SECTION 6 - REVIEW OF DELIVERY PLAN

The PPP will review the plan, at the end of the financial year, as part of the overall service planning process to ensure it continues to meet the needs of our customers.

In year reviews are carried out regularly in the form of the Recovery Plan, the Business Continuity Assessment Plan and the Operational Risk Assessment Plan. These updates are discussed at Joint Management Board JMB every 2 weeks, at the Joint Public Protection Committee JPPC as part of updates, at Tactical Tasking Group TTG every 2 weeks and in team at team meetings.

Identification of any variation from the Delivery Plan

Variations from the plan will be reviewed at regular tasking meetings with management oversight. Variances will be documented, using operational risk registers and business continuity plans. If changes are made they would be subject to final agreement by the Public Protection Manager under delegated authority.

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 include;

- Ensuring that intelligence reports from sources such as the FSA direct our audit and intervention programme.
- Continue to improve the quality of data as we move towards using a single database and that that database provides the information we need to meet the Code of Practice requirements relating to the risk assessment of premise and the provision of statutory returns.
- Ensure any new system is in line with GDPR rules and recognised industry standards for the protection of all PPP stakeholders.
- Improve and promote communications by reviewing and implementing the PPP communication strategy.
- Ensure robust contingency planning by reviewing the PPP plans concerning emergency planning and business continuity
- Prioritising potential High and Medium risk along with new unrated premises
- Develop further a documented process / procedure for internal monitoring in line with the Code of Practice.
- Implementing the recent changes made in the Code of Practice around officer competency and authorisation linked into the services training and development plan.
- To revisit how the delivery of the PPP model can be better applied in delivering services to all stakeholders signed up to the inter authority agreement, and improve accordingly.

SECTION 7 - BUDGET

Service Budgets

Totals for 2021 22

Revenue: circa £600K
Fee income Food and H&S work : £12,000 (main source Primary Authority work)
Capital: Nil

Trading Standards Sampling Budget: £30K

SECTION 8 - KEY SERVICE PARTNERS

Key Service Partners and Partnerships

- LA Public Health Teams
- 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
- Trading Standards South East Limited (TSSEL).
- Feed and Food related working focus groups across the Thames Valley and South East.
- National feed programmes across neighbouring areas delivered on behalf of the FSA.
- National Agency's where cross cutting issues are identified such as the Environment Agency, Police, Social services and Educational establishments.
- Members of Bracknell, West Berkshire and Wokingham Councils

SECTION 9 - SECURING ACTIONS

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>

APPENDICES**Appendix 1 – Timeline showing work of Food Hygiene Authorised Officers February 2020 to September 2021**

Date	Government / FSA Position / PPP position	PPP Food Hygiene and H&S Authorised Officers Work carried out
February 2020	PPP aware of emerging details of risk of Covid 19	Hold put on face to face inspections; Details emerged regarding vulnerable groups which affected staffing and shielding. The PPP structure was changed to take account of the changing environment.
March 2020	On 20 March 2020, the Food Standards Agency (FSA) issued mandatory guidance to local authorities directing that food hygiene visits must not take place unless an officer is required to carry out an urgent reactive investigation.	Officers carried out remote contact with food businesses ie the high risk premises that were due for an inspection visit. Continued with reactive work coming through – and carried out physical visits where necessary
May 2020	Legionnaires - LA's assessment of risks of premises closing for a prolonged period - Hotels	Non visit – contact by PPP Ensure aware of sources of information on risk assessment (premises and officers) Ensure complying wrt legionnaires
May 2020	Legionnaires - garden centres – with hot tub display	Non visit – contact by PPP Ensure aware of sources of information on risk assessment (premises and officers) Ensure complying wrt legionnaires
May 2020	high risk premises – leisure premises and spa	Non visit – contact by PPP Ensure aware of sources of information on risk assessment (premises and officers) Ensure complying wrt legionnaires
June 2020	High Risk / Vulnerable Groups Care Homes	PPP officers started to take an active role in care home audits in West Berks; following specialist training in May 2020.

June 2020	LA Outbreak Management work	CV19 inbox set up by PPP to monitor and action cases in high risk settings 7 days a week; Involvement with Outbreak Control Plan Designated as SMEs for a number of settings (retail, commercial, events etc)
June 2020	Outdoor Events	PPP officers working with organisers to ensure compliance on Covid 19 and on how to ensure tracing is carried out if there is a positive case identified at an event
July 2020	Reopening of high risk premises – pubs / restaurant	Engaged with Night-time Economy agenda on reopening Ensure aware of sources of information on risk assessment (premises and officers) Make arrangements for inspections when permitted to open
July 2020	Reopening of high risk premises – Hairdressers, barbers , beauty industry	Ensure aware of sources of information on risk assessment (premises and officers) Make arrangements for inspections when permitted to open
July 2020	Reopening of high risk premises – childcare and childminders	Work with children care teams, bring together national and local guidance, including risk of legionnaires, ensure premises are aware of the guidance and have risk assessed
July 2020	Emerging risk in premises such as cold stores and food manufacturers	Identified premises and contacted to discuss control
July 2020	Patrols in town centre areas	Carry out a series of patrols to advertise assistance available on website and gauge compliance. Take action where required
July 2020	FSA issues further directive regarding onsite visits from July to 30 September 2020; high priority - potential public health/consumer protection concerns in relation to new businesses setting up, businesses that have reopened after prolonged closure or businesses changing what they do, such as pubs providing takeaway food; Establishments subject to ongoing formal enforcement action; Establishments overdue/due an enforcement revisit. Where a higher risk rated premises is an A or B because of the additional score for vulnerable consumers, the officer should therefore carry out a remote assessment	PPP officers – Covid given priority – where possible - contacted unrated premises to evaluate potential risk; continued with contact of high risk premises due inspection to assess risk, remote inspections of care homes, where possible carried out FHRS revisits. Many premises were closed either due to restrictions or staffing shortages, or by decisions made by FBOs. Due to the vulnerable nature of residents etc many premises requested no physical visits, PPP complied with this to avoid being vectors for spread

	before the inspection to decide if a visit is required Medium priority - <u>a</u> ll category A, all category B and non-broadly compliant category C establishments for food hygiene that are overdue/due an intervention; establishments that are awaiting a requested re-inspection under FHRS	As part of our Risk Assessment – and endorsed by the FSA officers could conducting remote assessments prior to onsite visits, this involved contacting the FBO to go over systems and procedures thereby reducing on site time. Went out to advert for contractors – engaged two part time to start Oct and Nov to carry out food visits and assist with Covid
August 2020	Outbreak Control work	PPP Officers started to take an active role in outbreaks, for example associated with supermarkets, food manufacturers and food businesses as these started to open as takeaways
August 2020	Unrated Food Premises – increasing numbers of Registrations noted	It was noted that as the population were in lockdown and furlough, and the Covid restrictions kept food premises closed – more food premises opened as delivery and there were an increase of unrated food businesses opening from home. PPP Authorised Food Officers made contact remotely
August 2020	Premises reopening following first wave	PPP were actively involved with advice and enforcement of the legislation surrounding Covid restrictions in commercial premises
September 2020	Schools reopening	Schools reopening – meant that the number of cases into the CV19 inbox rose rapidly. This extended out to premises that remained open as essential
September 2020	Premises reopening	Officers began to carry out face to face Covid patrol visits Cases plateaued and dropped
October 2020	Local Contact Tracing set up	Officers as Superusers and contact tracers – 7 days a week for West Berks; weekends for Wok and BF.
October 2020	2 nd Lockdown	Covid compliance patrols; cases plateaued and began to reduce
October 2020	FSA issues further directive regarding onsite visits from Oct 202 to Jan 2021 – as previous with addition of introduction of a 'Low priority' category where local authorities should use an initial remote assessment to determine the need for an onsite visit for broadly compliant category C, all category D and all category E establishments overdue/due an inspection.	PPP prioritised the Covid compliance work; Contractor started Oct (0.4 FTE) and Nov (0.2 FTE) to cover food inspection work
December 2020	2 nd Lockdown ended; tier systems introduced	Officer enforced Covid Regulations; and carried out patrol work
January	3 rd Lockdown	

2021		
January 2021	FSA issues further directive regarding onsite visits from Oct 202 to Jan 2021 – as previous with addition of lowest priority work	PPP prioritised the Covid compliance work; additional Contractor started Feb (1 FTE) to cover food inspection work
February 2021	Quarantine Hotels	Officers carried out audits and ongoing monitoring of compliance and cases
8 March 2021	<p>Government Step approach</p> <p>Schools and colleges open from 8 March.</p> <p>Childcare and children's supervised activities resume</p> <p>Care home residents will also be allowed one regular visitor</p>	<p>Covid Compliance visits – Carried out in high volume areas, and in response to intel from the LCT data (both National and Local), and following reactive intel from public/employees etc</p> <p>Contact each Early Years provider to offer support and assistance with CV19 risk assessments due to rise of cases in these settings</p> <p>Covid Marshalls started patrols in West Berks – liaising with PPP officers</p> <p>Provide support to event organisers through review of Covid RA; use of SAG (Racecourse, Hungerford Football club)</p> <p>Hospitality industry – Webinars to assist with reopening for social gatherings outside</p> <p>Reactive workload surrounding Covid very high</p>
29 March 2021	<p>Government roadmap Step 1</p> <p>Outdoor gatherings (including in private gardens) of either 6 people (the Rule of 6) or 2 households will also be allowed, making it easier for friends and families to meet outside.</p> <p>Outdoor sports facilities such as tennis and basketball courts, and open-air swimming pools, will also be allowed to reopen, and people will be able to take part in formally organised outdoor</p>	<p>Covid Closed Premises Checks – to ensure those premises that should remain closed did so.</p> <p>Webinars for the non-essential retail premises who were due to open</p>

	<p>sports.</p> <p>The 'stay at home' rule will end on 29 March but many restrictions will remain in place.</p>	
12 April 2021	<p>Government roadmap Step 2</p> <p>Opening of non-essential retail; personal care premises such as hairdressers and nail salons; and public buildings, including libraries and community centers.</p> <p>Indoor leisure facilities such as gyms will also reopen (but only for use by people on their own or in household groups); most outdoor attractions and settings including outdoor hospitality venues, zoos, theme parks, and drive-in cinemas.</p> <p>Self-contained accommodation such as campsites and holiday lets, where indoor facilities are not shared with other households, can also reopen.</p> <p>Hospitality venues will be allowed to serve people outdoors at Step 2 and there will be no need for customers to order a substantial meal with alcoholic drinks and no curfew, although customers must order, eat and drink while seated ('table service'). Wider social contact rules will apply in all these settings to prevent indoor mixing between different households.</p>	<p>Covid Compliance checks continued</p> <p>Reactive workload remains high</p> <p>Webinars to prepare for indoor opening and for events; Prepare for indoor entertainment venues such as cinemas and children's play areas; the rest of the accommodation sector, including hotels, hostels and B&Bs; and indoor adult group sports and exercise classes</p>
17 May 2021	<p>Government roadmap Step 3</p> <p>easing limits on seeing friends and family wherever possible,</p> <p>Most legal restrictions on meeting others outdoors will be lifted – although gatherings of over 30 people will remain illegal. Indoors, the Rule of 6 or 2 households will apply – we will keep under review whether it is safe to increase this.</p>	<p>Covid compliance checks continued, especially in hospitality industry</p> <p>High level of reactive work</p> <p>Increased work on Event safety and on large sporting events</p>

	<p>Business and activities</p> <p>Most businesses in all but the highest risk sectors will be able to reopen. In all sectors, COVID-Secure guidance will remain in place and businesses may not cater for groups bigger than the legal limits. Indoor hospitality will reopen – and as in Step 2, venues will not have to serve a substantial meal with alcoholic drinks; nor there be a curfew. Customers will, however, have to order, eat and drink while seated.</p> <p>Other indoor locations to open up in Step 3 include indoor entertainment venues such as cinemas and children's play areas; the rest of the accommodation sector, including hotels, hostels and B&Bs; and indoor adult group sports and exercise classes. The government will also allow some larger performances and sporting events in indoor venues with a capacity of 1,000 people or half-full (whichever is a lower number), and in outdoor venues with a capacity of 4,000 people or half-full (whichever is a lower number). In the largest outdoor seated venues, where crowds can be spread out, up to 10,000 people will be able to attend (or a quarter-full, whichever is lower).</p>	
June 2021	<p>Government roadmap Step 4</p> <p>remove all legal limits on social contact.</p> <p>Business, activities and events - reopen remaining premises, including nightclubs, and ease the restrictions on large events and performances that apply in Step 3..</p>	<p>With redaction of Covid legislation we move to using the Health and Safety at Work Act 1974 for Covid control</p> <p>Covid Patrols ceased and we moved to intelligence lead control visits.</p>
June 2021	Common Exposure work and co-incidence reports on premises	<p>When PH Data Analysts left PPP picked up the role in examining incoming data to ascertain co-incidence reports (ie premises where there were common exposures . PPP officers inspect</p>
July 2021	FSA Recovery Plan – Phase 1 (1 July 2021 to 30 Sept 2021 – unrated; phase 2 1 Oct 2021 to April 2023 (end March 2022 A's;	<p>Face to face food inspections could resume. To reduce time spent in confined areas officers carry out initial discussions</p>

	end June 2022 B's; end Sept 2022 C's non BC; end Dec 2022 D's non BC; end March 2023 remainder C's and D's)	remotely. Contractors brought in continue to carry out work as in house officers still heavily engaged with Covid work. Working on unrated high risk, and planned high risk. PPP prioritised the Covid compliance work; additional contractors started to cover food insp (0.5 FTE)
September 2021	Schools reopen after Summer	Isolation rule changes and contact tracing changes have increased the number of cases coming through CV19. Numbers of LCT cases extremely high; more capacity required.
September 2021	FSA Unrated Project	FSA grant to contact the large number of unrated premises to ascertain their risk and prioritise when their inspection will be
September 2021	Bridging hotels	PPP officers carry out Covid control inspections – and ongoing monitoring visits, and H&S inspections.

Appendix 2: ACRONYMS

AES	Alternative Enforcement Strategy
BIS	Department for Business, Innovation and Skills
COM TM	Commercial Team Manager
EHRB	Environmental Health Registration Board
FBO	Food Business Register
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
LCT	Local Contact Tracing
LFT	Lateral Flow Test
NEBOSH	The National Examination Board in Occupational Safety and Health
PEHO / PO	Principal Environmental Health Officer
PHE now UKHSA	Public Health England now UK Health Security Agency UKHSA)

PPP	Public Protection Partnership
S/EHO	Senior / Environmental Health Officer
SEHA	Senior Environmental Health Assistant
SFBB	Safer Food, Better Business
SFSO	Senior Food Safety Officer
SMEs	Small and Medium Sized Enterprises
TSSE	Trading Standards South East