

**FOOD SAFETY SERVICE PLAN 2020-21**  
**ENVIRONMENTAL HEALTH**  
**COMMUNITY SERVICES**  
**SURREY HEATH BOROUGH COUNCIL**

**Contents**

Section		Page Number
1	Service Aims and Objectives	2
2	Background	3
3	Service Delivery	5
4	Resources	9
5	Quality Assessment	10
6	Review 2019/20	11
7	Service Priorities for 2020/21	11
Appendix 1	Sampling Results 2019/20	14
Appendix 2	Local Authority Priority Food Safety Work (for period to 30th September 2020) – Food Standards Agency	15

## **Section 1 – Service Aims and Objectives**

### **1.0 Aims and Objectives**

**1.1** The aim of the food safety service is to help ensure that food and drink intended for human consumption, which is produced, stored, distributed, handled or consumed within the Borough is without risk to the health or safety of the consumer. This will be met through the following objectives: appropriate and proportionate enforcement of food safety legislation, carrying out inspection of food and food premises, sampling and analysis of foodstuffs, the investigation of complaints regarding food and food premises, including cases of food poisoning, and the provision of advice to businesses and the public on legislative requirements and good food hygiene practice.

### **2.0 Links to Corporate objectives and plans**

**2.1** The Food Safety Service Plan sets out how the Council will deliver the service in accordance with the national priorities and standards required by the Food Standards Agency (FSA) and how the food safety service contributes to the Corporate priorities set out in the Council's Annual Plan 2020/21. The plan provides information about the service, the means by which is provided and the means for monitoring and reviewing the service against set standards.

**2.2** The Council has 2 Corporate Success Measures relevant to food safety:

- The percentage of food premises achieving a Food Hygiene Rating 3 or above (i.e. Satisfactory, Good or Very Good)
- The percentage of food premises that are inspected within 28 days of being due and number of inspections completed

### **3.0 Licensing Committee**

**3.1** The Environmental Health and Licensing Manager reports annually to the Licensing Committee on the food safety activities that have taken place over the last year and on the plans for the forthcoming year.

### **4.0 Annual Appraisals and Monthly one-to-one meetings**

**4.1** Targets from the Annual Plan are included as objectives in individual officer annual appraisals and monitored throughout the year in one-to-one meetings.

### **5.0 Equality Scheme**

**5.1** The Council's Equality Strategy demonstrates its commitment to equality internally and externally and ensures that all sections of the community are given an opportunity to contribute to the wellbeing of the

community. The Strategy has been taken into account in the drafting of this plan.

## **Section 2 – Background**

### **6.0 Profile of the Borough**

**6.1** Surrey Heath covers 36.5 square miles in North West Surrey and has a population of 86,144 (Census 2011). Approximately 9.8% of the Borough's residents are from a range of ethnic minorities.

### **7.0 Organisational Structure**

**7.1** The food safety service is delivered by the Food and Safety Team within Environmental Health which is part of Community Services. The team is led by the Senior Environmental Health Officer (Food and Safety) who holds the required specialist responsibility for food safety. The Team leader reports to the Environmental Health and Licensing Manager. Specialist services for food examination are provided by Public Health England (PHE) and Hampshire Scientific Services.

### **8.0 Scope of Food Service**

**8.1** To fulfil statutory obligations on the Council in relation to food safety through:

- The inspection of food premises.
- The operation of the national Food Hygiene Rating Scheme
- The investigation of complaints relating to food items, premises or food related illness, and food alerts.
- The sampling of foodstuffs and application of imported food controls.
- Enforcement of food safety legislation.
- The promotion of high standards of food safety through advisory activities
- The gathering and processing of information including the completion of official returns.

**8.2** The Surrey and Buckinghamshire Trading Standard Service is responsible for Food Standards enforcement and Food Hygiene for primary production e.g. farms. They also lead in enforcing the Food Information Regulations 2014 in relation to allergens, although the Council has an advisory role. Formal liaison takes place at the quarterly meetings of the Surrey Food Liaison Group, or on an ad hoc basis as required.

### **9.0 Demands on the Food service**

**9.1** The food safety service is part of Environmental Health and Licensing which also deliver health and safety, pollution and a range of licensing activities. The food safety team are located at Surrey Heath House,

Knoll Road, Camberley, GU15 3HD and can be accessed via the Council's Contact Centre during normal office hours and individual officers can be contacted by direct dial or email. The public can also e-mail general food related service enquiries to [environmental.health@surreyheath.gov.uk](mailto:environmental.health@surreyheath.gov.uk) and aspects of the service can be accessed via the Council's website.

**9.2** Most food safety activities are conducted during office hours however officers regularly carry out routine inspections and sampling in the evening. The service can be accessed in an emergency out of hours via the Council's out of hours service e.g. in case of a food poisoning outbreak.

**9.3** In Surrey Heath, as of the 1<sup>st</sup> April 2020, there were 624 food businesses subject to inspection. The food hygiene activity profile of food premises in the Borough is shown in Table 1 below:

**Table 1 - Primary Food Hygiene Activity of Food Premises in the Borough**

<b>Primary Food Hygiene Activity</b>	<b>Total</b>
Primary producer	1
Distributors/Wholesalers	14
Importers/Exporters	1
Manufacturers/Packers	12
Restaurants and other caterers	477
Retailers	99
Mobile Food Unit	20
<b>Total</b>	<b>624</b>

**9.4** There are specific hygiene rules and prior approval requirements for businesses that conduct certain processes involving foods of animal origin. There are currently no such premises operating in the Borough.

**9.5** The service responds to requests for advice and guidance from persons who are interested in starting new food businesses, including new food business operators taking over existing food businesses.

## **10.0 Enforcement Policy**

**10.1** All formal and informal enforcement actions taken against food businesses are in accordance with the Environmental Health Enforcement Policy.

## **Section 3 – Service Delivery**

This section provides details of how the service is delivered.

## 11.0 Food Premises Interventions

11.1 Food premises are inspected in accordance with the Food Law Code of Practice (FLCOP) as published by the Food Standards Agency. The food premises inspection programme is based on the priority risk rating and inspection frequencies set out in the FLCOP ensuring highest risk premises are inspected more frequently than the lower risk premises. The inspection frequency profile of Surrey Heath food businesses as at 1<sup>st</sup> April 2020 is at Table 2 below:

**Table 2 – Risk Profile of Food Businesses as at 1<sup>st</sup> April 2020**

Risk Category	Frequency of Inspection	Total
A	Every 6 months	0
B	Once a year	12
C	Every 18 months	103
D	Every 2 years	266
E	Alternative enforcement every 3 years – visit or self-assessment questionnaire	230

11.2 Most E rated businesses for example newsagents, chemists, childminders, home bakers are sent a self-assessment questionnaire when they are due for an intervention. The returned questionnaires are reviewed, then risk assessed by officers and followed up by an intervention if necessary.

11.3 The food inspections due in 2020/21 are listed in Table 3 below.

**Table 3- Food Inspections Due in 2020 / 2021**

Risk Category	Number of Inspections due
A	0
B	11
C	64
D	138
E	83
Total	296

11.4 Revisits are also conducted to non-compliant premises and new businesses that register during the year will require inspection. The Council will aim to carry out 100% of all inspections due within 28 days of the due date and to inspect all newly registered food businesses within 28 days of registering.

11.5 Food Hygiene Ratings are issued to those within the scope of the national Food Hygiene Rating scheme in accordance with the Food Standards Agency 'Brand Standard' for the scheme. Re-rating inspections are carried out where businesses with a 0-4 rating apply for

a re-inspection having carried out the required improvements. There is a £150.00 cost recovery charge to the business for a re-rating application. Whilst it is currently still not mandatory for businesses to display their rating window stickers, the service will follow up any reports of inaccurate ratings being displayed or advertised and where necessary refer the case to Trading Standards colleagues for enforcement action.

- 11.6** In 2019/20 the team completed 391 food safety interventions in total which included 274 food hygiene inspections/audits, the remainder being made up of food hygiene revisits, sampling and advisory visits. 81 new businesses were inspected. 289 warning notices and letters were issued to businesses and 13 Hygiene Improvement Notices were served on 6 premises. 8 applications for a food hygiene re-rating re-inspection were received from businesses and in each case the business achieved an improved food hygiene rating.

## **12.0 Food Complaints**

- 12.1** The service will investigate all complaints about food or a food premises.
- 12.2** In 2019/20, 92 complaints were received from the public. Of these 56 related to food and 36 related to hygiene in premises.

## **13.0 Primary Authority Partnership Scheme**

- 13.1** The Council participate in the national Primary Authority Partnership Scheme (PAPS). PAPS entitles businesses or organisations which operate across local authority boundaries to ask for a Partnership with a Local Authority (LA). The businesses will work closely with their partner LA to ensure they are complying with food safety legislation and the LA can charge the business for their time on a cost recovery basis. The aim of PAPS is to lead to greater compliance by the business and also greater consistency and co-ordination of regulatory enforcement by LAs.
- 13.2** All officers have access to the Primary Authority Register and check the database for PAPS and any Inspection Plans that must be followed prior to carrying out an inspection or investigation.
- 13.3** The Council is Primary Authority for food hygiene matters for Krispy Kreme, Exclusive Hotels (who own Pennyhill Park Hotel), Manning Impex (a food importer), Kerry Foods, (a large multi-national food manufacturer), Huel (nutritional shakes manufacturer) and the Health Food Manufacturers Association (HFMA). Activity includes meetings with representatives and providing advice and assistance to other LAs

who have queries following inspections and when investigating food complaints.

**13.4** Approximately 15 days per year is currently spent on this activity and it is anticipated that there will be similar demand in 2020/21.

#### **14.0 Advice to Business**

**14.1** The service provides free advice to potential and existing food business operators via advisory visits or information on the website and telephone/email advice. In 2019/20 the service responded to 48 food enquiries and carried out 5 advisory visits

**14.2** Advice is also given to businesses via Collectively Camberley, the Council's communications team and the service has links to the licensed trade via the Council's Licensing officers and local Pub Watch schemes.

**14.3** During 2019/20 officers carried out food hygiene advisory visits and compliance checks for all traders at Camberley's Food & Drink Festival.

#### **15.0 Food Inspection and Sampling**

**15.1** The service takes part in routine food sampling and environmental swabbing of food premises based on local intelligence and as part of county and national sampling programmes. Sampling and swabbing also takes place during food complaint and outbreak investigations. Samples for examination are submitted to the Public Health England (PHE) laboratory in Porton Down which holds the necessary UKAS accreditation for microbiological examination of food samples.

**15.2** During 2019/20, a total of 72 samples were collected from 20 retail and restaurant/takeaway food businesses for microbiological examination. The results showed that 37.5% of the samples were classified as unacceptable or unsatisfactory (see Tables 4 and 5 in Appendix 1). All unsatisfactory results are followed up with advice by letter or a visit to the relevant business and follow up sampling if required. An estimated 20 days are allocated to this activity.

**15.3** It is planned that the service will participate in sampling and environmental swabbing programmes in 2020/21 in accordance with national priorities as consulted on and agreed by the Surrey Food Study Liaison Group. PHE has provided the Council with a sampling credit allocation of £3,386 for 2020/21 and a courier service for delivering samples to the laboratory is included.

**15.4** Public Analyst food examination services are provided by Hampshire Scientific Services located at Portsmouth. A courier service will continue to be employed to take these samples to the laboratory as and when required.

## **16.0 Control and Investigation of Outbreaks and Food Related Infectious Diseases**

- 16.1** The service works in partnership with PHE to investigate cases of food poisoning and related illnesses. Our aim is to try to locate the source and ensure infection is contained.
- 16.2** On receipt of a notification of a food poisoning case, a risk-based approach is adopted when carrying out investigations to decide whether further information is required. Officers aim to identify cases involving high-risk groups or occupations such as pre-school children or food handlers. Relevant statutory powers are used, where necessary, to exclude those infected from attending pre-school settings or work, to prevent the spread of the disease within the community. In 2019/20 the Council was notified of 126 cases of food related infectious disease.
- 16.3** Officers attend the Surrey Health Protection Group which meets three times a year and includes representatives from the other Surrey LAs, PHE and water utilities, to share best practice and discuss cases of interest and regional investigations

## **17.0 Food Safety Incidents**

- 17.1** The service has a Food Safety Incident procedure in respect of the appropriate response to product recall/withdrawal notices and food alerts from the Food Standards Agency (FSA).
- 17.2** The FSA regularly issue electronic Food Alerts to LAs specifying required actions regarding food safety concerns regarding a particular food product. Actions required range from circulating to officers for information to visiting premises and removing products from sale.
- 17.3** In 2019/20 there were 190 reported incidents by the FSA.

## **18.0 Liaison with Other Organisations**

- 18.1** The service has various liaison arrangements in place to help ensure consistency of enforcement to share best practice and coordinate activity Surrey including representation on the following groups: The Surrey Food Liaison Group (SFLG), the Surrey Environmental Health Managers Group (SEHMG) and the Surrey Health Protection Group
- 18.2** The SFLG meets quarterly and in addition to representation from the 11 Surrey LAs there is representation from Trading Standards, the PHE sampling laboratory, the FSA and SEHMG.

Other liaison arrangements include:

- Liaison with other Council Services including Licensing, Private Sector Housing (regarding housing above food premises), Planning and Building Control
- Contact with the Consultant in Communicable Disease Control
- Liaison and joint visits with the Fire Safety Officer from Surrey Fire and Rescue
- Liaison as necessary with the Approvals team at FSA, Egg Marketing Inspectorate and Plant Health and Seeds Inspectorate (PHSI)
- Liaison and referrals from the UK Border Agency on immigration
- Access to national online reference and professional networking resources e.g. Knowledge Hub, EHCNet
- Notification from water utility companies when a commercial water supply is to be disconnected at a business within the Borough.

## **19.0 Food Safety Promotion**

- 19.1** Non-statutory food safety promotion is limited, but food safety advice for the public and businesses is available on the website together with relevant information on the Food Standards Agency national food safety campaigns.
- 19.2** Food businesses with a 5 rating are given the opportunity to publicise their rating via the Council's social media channels.

## **Section 4 – Resources**

### **20.0 Financial Allocation 2020/21**

- 20.1** The total budget for the food safety and health and safety services, including salaries, support services, equipment, etc. is £346,797.

### **21.0 Staffing Allocation**

- 21.1** Currently there are 4 officers authorised and competent in food safety. The time allocated to food safety equates to a total of 2.20 FTE officer time and there is an additional 0.2 FTE administrative support. The Council's Contact Centre receives initial telephone calls, emails and other correspondence for the service.
- 21.2** All officers are authorised to undertake all aspects of the food safety service.
- 21.3** The Environmental Health & Licensing Manager in conjunction with the Senior EHO is responsible for assessing competency and recommending levels of authorisation to the Executive Head of Community in line with the Authorisation Policy.

### **22.0 Staff Development Plan**

- 22.1** The Council's staff appraisal scheme highlights the specific development and training needs of each officer. The Environmental Health & Licensing Manager monitors to ensure that these needs are identified and met by the scheme.
- 22.2** The training and development of staff is achieved through attending courses, on-line training, information updates in team meetings and staff mentoring. The Senior EHO maintains a training log for all officers and ensures that they achieve the 10 hours a year continuing Professional Development (CPD) in food safety required by the Food Standards Agency to maintain food officer competency.
- 23.4** EHOs are encouraged to be Members of the Chartered Institute of Environmental Health (CIEH), in order to further demonstrate competence and professional accreditation. It is a membership requirement that officers achieve a total of 20 hours Environmental Health related CPD (30 hours for Chartered Members) and where possible development opportunities will be provided to facilitate this.
- 23.5** Corporate training is also provided for general subjects such as IT, Safeguarding, health and safety, and customer service skills.
- 23.6** The Council subscribes to the Regulatory Information and Management System (RIAMS) which provides online access to relevant reference material which is automatically updated and version controlled so that officers have access to the most up to date information and legal references.

## **Section 5 – Quality Assessment**

### **24.0 Quality Assessment**

- 24.1** The Food Safety Quality Monitoring Policy details the following mechanisms which are in place to ensure that a quality service is delivered in accordance with Food Standards Agency (FSA) and Council requirements:
- Adherence to Authorisation Policy
  - Regular one to one and team discussion on performance against the inspection programme and current case load.
  - Appraisal system to discuss competency and performance
  - Accompanied monitoring inspections with each food officer by SEHO
  - Statistical performance monitoring e.g. inspection programme; complaint numbers
  - Quarterly reporting on Corporate Success Measures
  - Completion of annual FSA Statutory Local Authority Enforcement Monitoring System (LAEMS)
  - Peer review benchmarking activities and sharing good practice via the Surrey Food Liaison Group and Surrey EH Manager's Group
  - Participation in FSA national consistency exercises

- Internal and external audits (e.g. Internal Audit and FSA)
- Customer Complaints Procedure
- Customer satisfaction surveys

**24.2** The outcome of monitoring activities is fed back to staff to ensure that any identified development needs are addressed.

## **Section 6 – Review**

### **25.0 Review of Performance**

**25.1** In addition to ongoing performance monitoring of the service, performance is reviewed on an annual basis by the Executive Head of Community and the Licensing Committee.

### **26.0 Identification of any Variation from the Service Plan in 2019/20**

**26.1** As at 31<sup>st</sup> March 2020 96.4% of food businesses received a food hygiene rating of 3 (Satisfactory), 4 (Good) or 5 (Very Good) against a target of achieving 95% of business with a rating of 3 or better.

**26.2** It was not possible to meet the food hygiene inspection targets as in light of the emerging COVID-19 pandemic in March 2020, local authorities were advised by the Food Standards Agency (FSA) to defer all planned food hygiene interventions. This was to reduce regulatory footfall in business establishments and to enable local authorities to divert resources to urgent reactive work and other wider public health actions required locally during the pandemic. Officers were redeployed to work on the Council's COVID-19 welfare response and enforcement of The Health Protection (Coronavirus, Business Closure) (England) Regulations 2020. However, 97% (274) of the food hygiene inspections due in 2019/20 were carried out and within 28 days of the due date.

## **Section 7 - Service Priorities 2020/21**

### **27.1 Impact of COVID-19 Pandemic**

**27.2** In April 2020 the Food Standards Agency (FSA) obtained approval from the Government for permitted deviations from the Food Law Code of Practice and this has had the effect of deferring planned food safety interventions. LAs have been advised that this deferral will continue until 30 September 2020 when the situation will again be reviewed. To reflect the impact of COVID-19 on the food business landscape and LA resources, the FSA have set out the priorities that the food safety service must follow in 2020/21 as the hospitality sector reopens, focusing interventions on those premises and incidents that present the greatest food safety risk. (see Appendix 2 Priority Food Safety Work).

The food service intervention work programme for 2020/21 will now be aligned to the revised FSA priorities. Remote interventions (i.e. telephone contact, electronic review of documentation/video/photographs) will take place prior to physical onsite inspections to enable them to be targeted and reduced in length.

- 27.3** Whilst acknowledging the competing demands on Environmental Health staff e.g. their role in Local Outbreak Control Plans, the FSA have advised that they expect LAs to risk assess their approach to redeploying resources to COVID-19 activities in order to ensure that the priority food work as prescribed is resourced to support and guide food businesses to operate safely. In the event of local lockdown LAs are expected to exercise professional judgment and take account of any direction or expectations set in relation to COVID-19 control measures required by their own LA and Public Health England (PHE).
- 27.4** The Council has updated the food safety advice available to businesses to provide information about changes to the food safety service and guidance has been made available on safely reopening food businesses after lockdown with regard to food safety issues such as effective cleaning, personal hygiene, water supply safety and pest control, in addition to COVID-19 controls.
- 27.5** The food sampling programme will be kept under review in light of the need for work prioritisation, access to food businesses and capacity at the PHE laboratory.
- 27.6** A recovery plan to address the backlog of outstanding interventions that will be due when restrictions are lifted will be drafted and the FSA have advised that further guidance on this will be forthcoming and it is therefore recognised that the Service Plan will need to be kept under review and amended as necessary. The FSA have acknowledged the difficulties this presents in service planning and have said that additional advice will be provided.

## **28.0 Review of Service Delivery Methods**

- 28.1** In response to the changes in the food premises intervention programme and the Government's work from home where you can guidance, the team has adapted to find new ways of delivering the food safety service. In line with corporate policy greater use has been made of telephone and email contact with electronic review of submitted documentation and photographs from businesses playing an increased role in assessing standards and communicating with businesses and the public on food safety matters. This will be kept under review to ensure that the advantages of new ways of working are retained, whilst maintaining a high standard of service delivery.

## **29.0 Computer System**

**29.1** The replacement of the Acolaid database with the IDOX Uniform system has been very resource intensive during 2019/20 with regard to extensive mapping and configuration work prior to data transfer. Significant work will be ongoing in 2020/21 to achieve the required level of functionality from the system, particularly with regard to performance monitoring reporting. Processes and procedures also need to be developed further to ensure officer consistency in the use of the system and additional officer training will also be required.

## **30.0 Brexit**

**30.1** The implications of Brexit will need to be kept under review as UK food legislation and food import/export provisions will be affected by leaving the EU, which may increase the demands on the service in the short term.

## **31.0 Corporate Objectives 2020/21**

**31.1** Whilst the service will continue to strive to meet the corporate success measure standards relating to food premises inspections it is recognised that these measures may need to be kept under review in light of further instruction from the FSA.

**31.2** Temporary staffing will be considered to achieve the service priorities and objective if resourcing becomes an issue due to competing demands on the service and staff vacancies.

Appendix 1

**Table 4 – Food Sampling Activity and Results 2019/20**

Sample Type	Number of Samples	Number of Unsatisfactory Samples
Dairy	2	0
Eggs	1	0
Fish	4	0
Fruits & Veg	1	0
Herb	2	0
Meat	3	0
Nut	1	0
Prepared Dishes	11	3
Environmental swab	39	25
Others	8	0
Total	72	28

**Table 5 – Type of Environmental Swab Sample and Reason for Unsatisfactory Sample Results 2019/20**

Sample	Number with Unsatisfactory results	Reason
Chopping board	8	Aerobic Colony Count (ACC)*
Food containers	7	Enterobacter**
Fridge door handle	6	Enterobacter
Vacuum packer machine	1	Enterobacter
Cash register	2	Enterobacter
WHB tap	1	Enterobacter
Prepared dishes	3	1 ACC & Enterobacter and 2 Enterobacter

\*Aerobic colony count is a measure of the total number of bacteria on a sample and is used as a measure of general hygiene

\*\* Enterobacteriaceae is group of gut bacteria and indicates poor personal hygiene

**Note:** Samples were taken from the following premises types:

Butcher = 4

Food Retailers = 4

Restaurant = 5

Take Away = 6

## Appendix 2

### **Local Authority Priority Food Safety Work (for period to 30th September 2020) – Food Standards Agency**

1. Local authorities should give high priority to ongoing proactive surveillance to obtain an accurate picture of the local business landscape. This will help inform which businesses to prioritise for onsite visits.

2. Onsite visits should be undertaken for the following:

#### High priority

- establishments where the local authority has identified potential public health/consumer protection concerns through proactive surveillance including, for example, 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 - unless the local authority is content from prior remote interaction with the business that that non-compliances have been rectified

#### Medium priority

- all category A, all category B and non-broadly compliant category C establishments for food hygiene that are overdue/due an intervention
- all category A/high risk establishments for food standards that are overdue/due an intervention
- establishments that are awaiting a requested re-inspection under FHRS
- establishments where applying COVID-19 requirements - e.g. social distancing - might impact on food safety or the ability of the local authority to conduct a physical inspection Remote assessment, where appropriate, should be used to facilitate the targeting of what to focus attention on at the subsequent onsite visit. For food hygiene, FHRS ratings should be given or updated as appropriate, following the onsite visit to reflect the findings.

#### Urgent Reactive Work:

- following up on food incidents
- investigating foodborne disease outbreaks
- following up on complaints
- proactively checking food businesses with Food Hygiene Ratings of 0, 1 or 2 (less than broadly compliant) to verify if they are continuing to trade and to establish if they have started to operate delivery services or have introduced new processes that enable them to diversify their menu (such as introducing ready to eat meals/food, or supplying vulnerable groups).