



Food Law Enforcement Service Plan

Statutory Official Food Controls

April 2017 - March 2020

1. Service aims and objectives

Our aims and objectives are:

- To work in cooperation with the Food Standards Agency (FSA) as the national food safety regulator by following the requirements of the national Framework Agreement.
- To ensure food business operators run successful businesses, fully compliant with food hygiene law and incorporating good practice, but not tied up in 'red-tape'.
- To participate in the national Food Hygiene Rating Scheme (FHRS) in order to enable members of the public to make informed choices about where they eat or purchase food.
- To participate in the Eat Out Eat Well – Healthy Food Award initiative in Suffolk in order to encourage businesses to provide healthy food options to consumers.
- To educate the community as a whole, both business and public, to ensure safe and healthy food contributes to the health and well-being of the community.
- To prevent the spread of infectious diseases in homes, workplaces and schools.
- To ensure food placed on the market complies with food safety requirements.

The Food Safety Team has an important role to play in ensuring food premises are hygienic, food is safe and infectious disease is kept under control. The food industry is a major employer and is governed by numerous legislative requirements. Many Ipswich businesses are small to medium sized enterprises, which have particular difficulty in coping with all these requirements. The Food Safety Team plays a key role in keeping the businesses which wish to receive help up to date and ensuring those that don't or can't keep up to date, do abide by the law, thereby creating a level playing field for all. By participating in the national Food Hygiene Rating Scheme (FHRS) and the Eat Out Eat Well – Healthy Food Award initiative in Suffolk, businesses are encouraged to improve the standard of their offering and customers are informed of those standards and given the choice of purchasing safe and healthy foods.

The Food Safety service has links to the Council's Corporate Plan – 'Building a Better Ipswich 2017': Priority 4 – Building a Healthier Ipswich. The Plan makes the following food-related statements:

In terms of our direct provision we will:

- Ensure that all catering outlets in council facilities are rated 4 or 5 in the national Food Hygiene Rating Scheme;

In terms of our enabling role we will:

- Ensure all established eating places are rated 4 or 5 in the national Food Hygiene Rating Scheme.

2. Background

Profile of the Local Authority:

Ipswich is the county town of Suffolk. The population of the Borough is 135,600 and a third of a million people live within 15 miles of the town centre. There are a huge variety of restaurants and bars, there are theatres and cinemas as well as a summer arts festival, maritime spectacular and many other outdoor events. Ipswich also has three museums including Christchurch Mansion and a number of beautiful parks. Ipswich is a financial services centre and many people are employed in various public sector organisations based here. There are a number of industrial and retail parks as well as the Port of Ipswich. Ipswich is the home of University of Suffolk. Ipswich enjoys excellent transport links with London and the rest of the country, is surrounded by unspoilt countryside and is close to the Suffolk coast.

Organisational Structure:

Ipswich Borough Council employs more than 1,000 people delivering a wide range of quality services to the people of the town.

The Council has 48 elected councillors, representing 16 wards, with a Leader and Executive model, together with 'scrutiny' and other committees and panels.

The organisational structure for the Food Safety Team is:

Head of Housing and Community Services

Operations Manager Environmental Health

Principal Environmental Health Officer Food Safety & Public Health

Food Safety Officers

The Council uses the Public Health England Food, Water and Environmental Microbiology Laboratory, 61 Colindale Avenue London NW9 5EQ for microbiological sampling. We use Eurofins Laboratories, 28-32 Brunel Road, Acton, London W3 7XR as our Public Analyst.

3. Scope of the Food Service

The service undertakes the following food safety functions:

- Inspections of food premises and food
- Advising businesses of regulatory requirements and changes

- Lead agency in the Council with regard to food businesses in council-owned premises
- Sampling of food from food businesses
- Enforcement of food safety law
- Education of food handlers
- Investigating and controlling outbreaks of food poisoning and infectious diseases
- Responding to food alerts from the Food Standards Agency
- Investigating complaints about food and food businesses
- Dealing with unfit food
- Inspection and clearance of imported food
- Ship sanitation certification
- Testing of water supplies

The core food safety service is provided by Ipswich employees but specialist contractors may be used for short-term projects or where capacity is an issue.

The service has entered into a joint warranting arrangement with the other Suffolk District Councils so that in emergencies, regulatory staff are authorised to operate across council boundaries.

The Port Health function is provided through an agreement with Suffolk Coastal Port Health Authority.

4. Demands on the Food Service

Food premises are subject to interventions at intervals determined by risk rating, in accordance with the inspection rating system within the Food Standards Agency Code of Practice. The frequency of intervention is dependent on the rating score and this determines the category for each premises. The number of premises within each category fluctuates to some extent as businesses close and new ones open. The figures at 1st January 2017 are as follows:

Category	Intervention interval	Total number of premises
A	6 monthly	5
B	12 monthly	33
C	18 monthly	236
D	24 monthly	451
E	36 monthly	413
Unrated	Within 28 days of opening	40
Total		1178

The Food Safety Team is currently able to carry out 720 planned interventions per year. This equates to 20 interventions per fte field officer per month. Other interventions that become due in the year include revisits to poorer performing businesses and re-rating request visits where businesses have made improvements and request Officers to give a new food hygiene rating. Visits are also undertaken to advise new business owners, to carry out sampling and to investigate complaints received. Drainage and pest control issues can also lead to visits to a number of premises at the same time. A number of businesses only trade at night or weekends and these have to be considered when planning the inspection programme.

As at 1st January 2017 there are 1,244 food premises registered in Ipswich, 1,178 of which are in the inspection programme. There is currently one business approved under EC Regulation 853/2004. In addition to food businesses that are based in Ipswich, there are a variety of events that involve visiting food businesses where the Food Safety Team need to provide food safety assurance. These include the market on Cornhill and a number of events especially in the parks and at the Waterfront (i.e. Maritime Festival, MELA, Music Day and Fireworks in Christchurch Park). Ipswich is also a Primary Authority Partner to two large organisations – East of England Co-operative Society (142 food premises in the East of England) and ‘Vertas’ (providing school meals to 34,000 children every day, as well as a number of other commercial food outlets).

The Food Safety Team is located at Grafton House, the main office block for Ipswich Borough Council. The Council Offices are open between 8:30am and 5pm Monday to Friday.

5. Regulation Policy

This Food Law Service Plan dovetails with the Environmental Health Enforcement Policy which explains the Councils approach to enforcement including informal action and the options available to it as well as the options available to business aggrieved by that action to appeal decisions.

6. Interventions at Food Establishments

The Council is committed to carrying out inspections at a frequency that is determined by the Food Law Code of Practice. The service will carry out approximately 720 routine or initial food safety interventions from the period 1 April 2017 to the 31 March 2018 plus revisits and re-rating visits where necessary. At the time of writing a similar number of interventions are predicted for 2018/19 and 2019/2020. These interventions are targeted at Category A-E businesses. Category E business interventions are carried out in accordance with the Alternative Enforcement Strategy as required by the Food Law Code of Practice.

As at 1st January 2017, of 976 businesses covered by the national Food Hygiene Rating Scheme, 877 (89.8%) are of a 4 (good) or 5 (very good) standard – well in line with the national average. As previously mentioned the Council’s Corporate Policy will have a long-term aim of ensuring all businesses are either a 4 or 5 rating.

A primary aim of the inspection programme is to achieve measurable year on year improvements in inspection outcomes. We continue to maintain a year on year figure of improving 82% of businesses previously rated 0,1,2 to a rating of at least 3 (broadly compliant). This target will now be amended to address the above-mentioned Corporate Plan aim.

Regulations relating to customer information on allergens came into force in December 2014. At that time information was sent by the Food Safety Team to all relevant businesses in the weeks prior to the legislation coming into force. Allergen awareness has formed an important component of food hygiene visits since then. This is work which we are doing in partnership with the Trading Standards service. Recent high profile court cases, leading to the arrest and imprisonment of food business operators for manslaughter, have highlighted how important this work is in helping protect lives of vulnerable people and protecting food businesses from the consequences of failure to abide by the law.

7. Food Complaints

The Food Safety Team investigates complaints it receives relating to food and food businesses where Ipswich Borough Council is the enforcement authority and will liaise with

the Home, Primary and Originating Authority where appropriate. In 2016 there were 194 complaints and 141 other requests for advice. The Food Safety Team aims to make a first response to this type of complaint within 48 working hours.

8. Home Authority Principle and Primary Authority Scheme

The Council supports the Home Authority Principle and will provide advice to businesses where they act as the Home or Originating Authority. Officers have regard to information that they receive from any liaison with Home/Organising Authorities and where advice has been received, the relevant Authority will be kept informed of actions taken by this Council.

The Council acknowledges the Primary Authority Partnership scheme and appropriate adjustments are made to the way in which interventions are undertaken when businesses have a primary authority arrangement with another Local Authority.

As previously mentioned Ipswich Borough Council acts as Primary Authority Partner for two major food businesses and charges each business on an hourly-rate basis for the time it is involved in advising them. The Primary Authority Officer has regular liaison with other Local Authorities who require information regarding the businesses. This is not charged as it is recognised Ipswich officers benefit from the same arrangement with other Primary Authority Partnerships.

9. Advice to Business

Officers are committed to building positive working relationships with food business operators and work with them to help them comply with the law and to improve food safety standards. The two Primary Authority Partnerships we run are ground-breaking in Suffolk – no other Suffolk Local Authority has been involved in a partnership, even though they are self-funding.

Increasingly officers will direct businesses to web-based resources, particularly those produced by the FSA although, as with the change in regulations relating to allergens, when appropriate, printed information is supplied. Both new and existing businesses are encouraged to contact the service for advice. In 2016 we dealt with 100 newly-registered businesses.

10. Food Sampling

Food sampling is carried out to establish whether foodstuffs are safe to eat and primarily considers microbiological content (Trading Standards have responsibility for sampling for allergens, false labelling, adulteration etc.).

Food samples are taken either in response to complaints or as part of the Council's proactive surveillance programmes to ensure that food produced and/or sold in Ipswich is safe to eat. The Council participates in a regional sampling programme, coordinated by the Eastern Region Coordinated Food Sampling Liaison Group and a national sampling programme coordinated by Public Health England. Both provide intelligence that can identify what the focus of food safety visits to businesses should be.

During 2016 10 food samples were taken from a variety of businesses. Following greater prioritisation in this area of work and recent training of staff, it is expected that approximately 60 samples per year will be taken from 2017.

11. Control and Investigation of Outbreaks and Food Related Infectious Disease

Notifiable infectious diseases are reported to the Council by Public Health England (PHE). Some reported illness requires investigation by local authorities to both establish the cause and to try and limit spread. All food poisoning or suspected food poisoning notifications, other than single-case *Campylobacter* (see below), are responded to and the aim is to do this within 24 hours of receipt. Investigation and control of major outbreaks is undertaken in conjunction with the Consultants in Communicable Disease Control at Public Health England. Investigation of outbreaks, the establishment of an Outbreak Control Team and control measures are all implemented in accordance with the Norfolk, Suffolk and Cambridgeshire Joint Communicable Disease Incident/ Outbreak Management Plan April 2015. This plan is subject to regular review and was devised with input from the Suffolk Environmental Health services.

The total numbers of infectious disease notifications for 2016 was 191. None of these required investigation as an 'outbreak'. 35 of these notifications were investigated in accordance with the agreed protocol 'Norfolk, Suffolk and Cambridgeshire Public Health Response to Notifiable Gastrointestinal Infections and Legionnaires' Disease'. Many of the notifications are of single cases of *Campylobacter* infection, which does not warrant investigation as it is such a wide-spread organism and with only single cases there is no evidence to point towards a particular cause.

12. Food Safety Incidents

The Council receives electronic notifications of all Food Alerts issued by the Food Standards Agency. Officers respond to such notifications in accordance with the requirements of the Food Law Code of Practice.

88 Food Alerts were received from the FSA in 2016. None were found to have major implications for Ipswich.

13. Liaison with Other Organisations

Officers represent the Council at the following food safety related meetings:

- Suffolk Food Liaison Group (Ipswich Principal EHO chairs this group)
- FSA food leads regional meetings

The Suffolk Food Liaison Group is comprised of lead officers from Suffolk Food Safety teams, Suffolk Trading Standards, FWEM laboratory Colindale, Public Health England, Food Standards Agency, and Field Veterinary Officers.

FSA food leads regional meetings are comprised of chairs and secretaries from Eastern Region Liaison Groups together with regional representatives from Food Standards Agency.

These Groups offer the opportunity to share information, organise low cost training for food safety officers and help to ensure consistent enforcement and consistent food hygiene ratings. They also enable professional officers to have access to regional and national food safety forums. With the general reduction in resources available to Suffolk environmental health services in recent years, resilience has been adversely affected. An initiative taken to counter the likely problems that would occur if there were a major incident has been the development of an authorisation agreement between the seven district and borough councils in Suffolk. This enables competent, authorised officers to work in other districts, in relation to food safety and health and safety, should the need arise. This agreement also encompasses the Suffolk County Council Trading Standards service. The type of event where

this arrangement could be beneficial includes a major food poisoning outbreak or a significant investigation where many witness statements are needed. The agreement was signed off by all of the Suffolk Councils in 2014.

In England, an increased responsibility for catering businesses to provide consumers with information about allergens was introduced with new regulations which came into effect in December 2014. The Food Safety teams across Suffolk worked closely with the Suffolk Trading Standards service to provide advance information to businesses. To some extent these new regulations changed the emphasis of many of the routine inspection visits made during 2014 and beyond and this is likely to be a continuing pattern over the next few years. The District Councils have powers to enforce the new regulations whilst the County Council have a duty to enforce.

In 2015 the Liaison Group agreed a set of joint procedures in accordance with the Framework Agreement and Food Law Code of Practice. This will allow the Group to regularly review and share joint procedures, cutting down on the amount of time each Local Authority has to spend on such tasks. It also helps to ensure consistency of approach across the County wherever this is possible. These procedures have been updated since 2015 and are due to be again soon, to take account of regular reviews of the Food Law Code of Practice by the Food Standards Agency.

The Primary Authority Lead Officer has regular liaison with the Better Regulation Delivery Office (BRDO) which oversees the Primary Authority Partnership scheme.

The Principal Environmental Health Officer responsible for the Port Health contract has regular liaison with Suffolk Coastal Port Health Authority who provide the service at Ipswich Port. Returns about activity are received 4 times per year and an annual audit is carried out.

14. Food Safety promotional work and other non-official controls interventions

Food safety promotional work is undertaken where resources and work programmes allow. In particular Ipswich Borough Council supports Food Safety Week each year, as requested by Food Standards Agency and regularly supports media coverage of food safety matters such as the Food Hygiene Rating Scheme.

15. Resources

Financial:

Staffing costs are the most significant element of food safety work (approximately 90%).

For 2017/20 the Food Safety service establishment is:

- 1.0 fte Principal Environmental Health Officer,
- 0.76 fte Technical Officer,
- 2.0 fte Environmental Health Officers,
- 1.0fte Environmental Health Officer,

Staff development is undertaken and reviewed through the Performance and Development Review process that covers all Council staff. In particular consideration is given as to how each Officer will undertake and maintain the Continuing Professional Development requirements of the Code of Practice. The Code of Practice introduced a requirement for the assessment of competency and authorisation of all food officers to be completed by April 2016. This process has been completed and a programme of required update training, as identified by the process, is underway and will continue.

16. Quality assessment and internal monitoring

Monitoring arrangements are in place to assist in the quality assessment of the work being carried out as follows:

- Internal monitoring procedure and schedule
- Structured review of a sample of post inspection records
- Structured accompanied interventions with food safety officers
- Regular team meetings
- Policies requiring Officers to discuss poor-performing businesses with Principal EHO
- Corporate Performance Management System

17. Review of performance against the Service Plan

One to one meetings are carried out every six weeks with staff to review performance against the Service Plan. The Plan includes annual targets for interventions, which are also broken down into monthly targets for easier monitoring throughout the year. Monitoring of reactive work such as complaints and infectious disease response is checked at the same time.

The Council has recently adopted a Performance Management System and introduced a system of quarterly performance reports to be provided by all teams in the Council. Progress on all key performance indicators identified in area Service Plans are reported to the Corporate Management Team.

18. Identification of any Variation from the Service Plan

The one to one meetings and quarterly performance reports allow regular review against Service Plan targets and the ability to make adjustments as required. For a number of operational reasons the numbers of interventions fell behind target throughout 2016, but are now back on track and the 2016/17 target will be met. Other Key Performance indicators throughout 2016 were also met.

19. Areas of Improvement

Ipswich Borough Council will continue to seek service improvement. The requirements of the Framework Agreement and Food Law Code of Practice will be fully considered as part of the process.

20. Key performance indicators

These have been revised for 2017 to take account of new methods of working and reorganisation of workload. Targets have been increased to take account of greater efficiencies due to 'agile working' and therefore kpi's have been reviewed. They are now as follows:

- Percentage of food hygiene inspections completed against inspection plan (Cat A-E)
- Percentage of revisits completed where required by the Food Law Code of Practice
- Percentage of re-rating visits requests completed within target

21. Key Objectives

- Deliver a targeted intervention programme to ensure compliance with food hygiene law and the Food Standards Agency Code of Practice
- Implement the national Food Hygiene Rating Scheme publicising food hygiene standards in premises serving the public
- Undertake food sampling in accordance with national and regional programmes
- Respond to and investigate notifications of infectious disease and outbreaks
- Ensure food placed on the market complies with food safety requirements
- Provide advice and support to promote good food hygiene and healthy eating
- Maintain Officer competency by assessments as required by the Food Law Code of Practice
- Continue with the joint working initiative with Trading Standards to inform businesses of their duties laid down by legislation on allergens
- Continue to encourage businesses to partake in the Suffolk-wide Eat Out Eat Well initiative and undertake assessments whenever required
- Maintain the two Primary Authority Partnerships with East of England Co-operative Society and Vertas Group
- Principal Environmental Health Officer to monitor quarterly activity reports, submit imported food returns and complete annual audit to ensure Suffolk Coastal Port Health Authority are adequately undertaking Port Health controls at the Port of Ipswich in compliance with the contract we have with them
- Principal Environmental Health Officer to regularly monitor and update as necessary all internal procedures, to ensure they remain fit for purpose and encompass emerging legislation, codes of practice, guidance etc.

22. Review of Service Plan

This plan will be reviewed in March 2020, unless budgetary constraints or legislative changes mean a more urgent review is required.