

WOKING BOROUGH COUNCIL FOOD SAFETY SERVICE PLAN 2019/2020

1. Service Aims and Objectives

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1.1.1. The objectives of the food safety service are:

- to ensure that food and drink intended for sale 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;
- to investigate suspected and confirmed food poisoning incidents, to locate the source of contamination and to prevent it spreading to protect the health of the public;
- to provide information and advice on food safety matters for business and members of the public.

1.2. Links to Corporate Objectives and Plans

1.2.1. This food safety service plan is the Council's expression of its commitment to the delivery of a continually improving food service, in line with the corporate vision and values to provide excellent services in a forward thinking and sustainable way.

1.2.2. The food safety service contributes to the Council's priority of promoting health and well being, healthy diet is also one of the 6 priorities agreed by the Woking Health and Wellbeing Board, and, it contributes to the Community Strategy priorities of improving access to information on health and preventing illness.

1.2.3. This plan provides information about the food safety services, the means by which they are provided and the means for monitoring and reviewing service performance against set standards.

2. Background

2.1. Profile of the Borough of Woking

2.1.1. The Borough of Woking covers 6,359 hectares and has an estimated population of 99,200 (mid 2011).

2.1.2. The Borough is a major employment centre and Woking town a substantial and developing shopping, commercial and entertainment centre. The town centre is surrounded by a number of smaller village centres hosting a range of food businesses.

2.2. Organisational Structure

2.2.1. The food safety service is delivered by officers within the Environmental Health Service, which is part of Place. The food safety service reports to elected members via the Overview and Scrutiny Committee and Executive Committee. The service is managed by the Environmental Health Manager, who also holds specialist responsibility for food safety. Specialist services for food examination are provided by the Public Health England (PHE) and Eurofins Laboratories.

2.3. Scope of the Food Safety Service

2.3.1. The food safety service provides the following:-

- Inspections of food premises.
- Operation of the national food hygiene rating scheme, including publication of rating scores on the Food Standards Agency (FSA) website.
- Approvals for specific premises under European food hygiene regulations.
- Investigation of complaints regarding food and food premises.
- Investigation of notifications of food poisoning.
- Sampling of food and drinking water.
- Promotion of good food safety standards through advice, education to the public and businesses.
- Enforcement action under the European food hygiene regulations.

2.3.2. Depending on fluctuations in business need, officers will carry out food work alongside other Environmental Health work, including health and safety at work and environmental control. Specialist knowledge will be retained by a lead officer but information and operational procedures will be disseminated throughout the Environmental Health team. The Food Law Code of Practice (COP) competency criteria for food officers are followed.

2.4. Demands on the Food Safety Service

2.4.1. There are 810 food premises in the Borough (figures as at 1st April 2018). The break down by primary food hygiene activity is shown below.

2.4.2. Profile of food premises in the Borough

Primary Food Hygiene Activity	Total
Distributors/Transporters	4
Importers/Exporters	2
Manufacturers/Packers	8
Restaurants and other caterers	603
Retailers	156
Mobile Food Unit	37
Total	812

2.4.3. There are currently two approved premises in the Borough, a sausage manufacturer which provides product to large retailers and caterers e.g. national supermarket and pub chains, in-flight caterers etc. and a manufacturer of soups and sauces supplying national retail and catering establishments.

2.4.4. The Environmental Health Team is based at the Civic Offices in Woking Town Centre, which is open to visitors 9.00 to 16.45 Monday to Friday. The team are contactable in the office by telephone, mail, e-mail, via the Council's website and in person, and are contactable by mobile phone and e-mail via the office whilst out in the field. In an emergency a member of the team can be contacted outside of office hours by means of the Environmental Health Call Out Service. Inspection of food premises are normally undertaken during office hours however the service is extended outside office hours as required, to ensure officers can assess food handling practices at all premises, regardless of their opening hours.

2.4.5. Across the Districts in Surrey, Woking has the most ethnically diverse area at 16.4% of the population, and hence has a significant number of business owners and consumers whose first language is not English. The service endeavours to provide both verbal and written advice to businesses regarding the legal requirements and efforts are made to provide communication in the appropriate language. The Environmental Health Service

uses several means including correspondence in several languages and in cases with severe communication difficulties, interpreters are used.

2.5 Enforcement Policy

- 2.5.1 The service has a documented Enforcement Procedure which is in line with the FSA Food Law Code of Practice (COP), Office for Product Safety and Standards and Local Government Regulation (LGR) guidance.
- 2.5.2 This has been endorsed by Members and made available to businesses and consumers on the Council's web site and as a leaflet.
- 2.5.3 The Council signed up to the Enforcement Concordat in 1998, and the enforcement policy embraces the required good enforcement principles.

3 Service Delivery

3.1 Food Premises Primary Inspections

- 3.1.1 There is a documented food inspection procedure in accordance with the FSA COP. The programme of food premises primary inspection is based on the priority risk rating and inspection frequencies set out in the FSA COP. Inspection records are maintained in a part computerised and part hard copy system which enables past records to be retrieved. In 2017/2018 99.8% of the 409 primary inspections due were carried out against targets set by the service of 100%. One food business was not inspected by its due date because it was an ice cream van that was not open due to seasonal trading.
- 3.1.2 In 2018/2019, 333 primary inspections are due, and as in previous years approximately 20% will require revisits. The target for inspection in 2018/19 is 100% of high and low risk premises and it is expected that this will be met.

3.2 Food Complaints

- 3.2.1 There is a documented food complaint investigation procedure in accordance with the FSA COP.
- 3.2.2 In 2017/2018, 113 food complaints and complaints about food premises were received. These complaint levels are likely to be similar in 2018/2019 and 2019/2020.

3.3 Primary Authority Partnership (PAP)

- 3.3.1 The Council has a PAP with Kentucky Fried Chicken (KFC) which covers food safety and health and safety in both their owned and franchised outlets. The PA Scheme entitles any businesses or organisations to ask for a Partnership with a Local Authority (LA). Those businesses are expected to work closely with the LA to ensure they comply with the Regulations that apply to them. This is expected to lead to greater compliance by the business, but also greater consistency and co-ordination of regulatory enforcement by LAs. A central register is maintained of all businesses with a PAP. We are expected to consult with other LAs before undertaking any enforcement work when a business has a PAP. This will have an impact on the service both as an enforcing authority needing to consult with other LA's before undertaking enforcement interventions in businesses within Woking, and as an authority with a PAP.
- 3.3.2 The PAP was launched in January 2011 following an existing Home Authority Partnership. Woking has a good working relationship with KFC, who have their head office in the Borough. During 2017/18 regular meetings have taken place to keep both parties updated on new legislation, new company procedures or initiatives and any LA contacts made. Other LA's need to consult with us before undertaking enforcement action within KFC's in their areas. We continue to provide advice to KFC on food safety matters and liaise with them regarding enquiries made by other LA's

on issues that affect the business on a national level. This will improve consistency of enforcement and propagate good practice.

- 3.3.3 During 2014/15 we agreed a Memorandum of Understanding with Surrey County Council Trading Standards (SCCTS) which sets out how we will work together in future to offer a PAP package to businesses which would allow them to receive advice in both Environmental Health and Trading Standards. To date the Association of Convenience Stores, a national retail trade association with over 30,000 members, Innovate, which provides catering in schools, The Caravan Club Limited, Graham White & Co, National Caravan Council and most recently the Hummingbird Bakery, a chain of bakeries across London, have signed up to a PAP with SCCTS and Woking Borough Council. Businesses are charged for this service.

3.4 Advice to Businesses

- 3.4.1 The Council's approach to enforcement includes the offering of advice to businesses in the first instance to assist them in achieving a satisfactory standard of food safety and compliance with the law, where this does not compromise the safety of consumers.
- 3.4.2 Advice is provided during inspections, revisits and investigatory visits to premises, and on request at any time, for example to new businesses or businesses wishing to change products or activities. The EH service works with trade groups such as Woking Chamber of Commerce, Business Link and the Asian Business Forum. Advice to businesses is also provided by means of our webpages, direct mailings and press releases on particular food safety issues and new legislation. On occasion, free seminars are held for local businesses on new legislation/developments where there is a benefit in reaching a wider audience or to target a particular business sector to address a particular need.
- 3.4.3 Businesses are referred to local low cost food hygiene training providers to ensure that the training needs of local food handlers are being met.

3.5 Food Sampling

- 3.5.1 There is a documented sampling policy in accordance with the FSA COP and an annual sampling programme is produced. The programme includes participation in the PHE National Sampling Protocols, as well as sampling as part of the investigation of food complaints and food poisoning and the inspection of high risk food premises.
- 3.5.2 A sampling service level agreement has been drawn up with the PHE Food, Water and Environmental Microbiology Network, based in Porton Down, Salisbury. Samples for microbiological analysis can be taken by officers to the laboratory directly or via use of a courier service from the Civic Offices depending on the urgency and likelihood of enforcement action. Public analyst services are provided by Eurofins Laboratories in Acton, and samples are taken there by staff by train, or by courier, as required.
- 3.5.3 Each year a quota is given to each LA to cover the cost of food sample analysis. In 2017/2018 a total of 42 food samples were taken, the cost of which was within our allocation. Should the number of samples taken cause us to exceed the allocation we would be required to fund the difference.
- 3.5.4 Samples of drinking water may be taken and analysed by the PHE Food, Water and Environmental Microbiology Network when necessary.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

- 3.6.1 There is a documented infectious disease investigation procedure. Notifications of gastroenteritis, dysentery, food poisoning, leptospirosis, listeria, cryptosporidiosis, gardia lamblia, typhoid, paratyphoid and e-coli 0157 are routinely investigated. Campylobacter notifications are reviewed by the officers and investigated further if

there is potential for cases to be connected, or a food source is implicated or a person who is at a high risk of spreading the infection is affected. An investigation letter and Campylobacter fact sheet is sent to all cases. The investigations of outbreaks are carried out in accordance with the PHE Outbreak Control Plan.

- 3.6.2 In 2017/2018 176 infectious disease notifications were received by the service. The number received is likely to be similar in 2018/2019 and 2019/2020.

3.7 Food Safety Incidents

- 3.7.1 There is a documented Food Alert procedure covering the issue of a warning arising from an incident within the Borough and the response to warnings issued by the FSA. This has been drawn up in accordance with FSA COP. Food Alerts may comprise Food Alerts For Action, Product Recall Information Notices, Withdrawal Information Notices and Updates on Food Alerts. Alerts are reviewed immediately on receipt by the officers and an appropriate course of action decided on. Alerts received by the service for which action is taken are logged as service requests and the action taken documented. Where appropriate, local press coverage will be sought. Often, coordination between WBC and SCCTS is necessary to ensure appropriate enforcement action is carried out.
- 3.7.2 In 2017/2018 44 food alerts and 90 allergy alerts were received. All food alerts require a decision to be made on what action is appropriate. Approximately 5% of food alerts necessitate some type of action which may include press releases as well as visits, letters and telephone advice to premises. These figures are likely to be similar in 2018/2019 and 2019/2020.

3.8 Liaison with other Organisations

- 3.8.1 The service has various liaison arrangements in place to ensure that enforcement action taken in its area is consistent with those of neighbouring LAs.
- 3.8.2 The service has a representative on the Surrey Food Liaison Group which meets quarterly and is attended by the eleven Surrey LAs. As well as representatives from the LAs, the Group has representatives from SCCTS, Kent, Surrey and Sussex PHE (KSS PHE), the PHE Laboratories and the FSA. The Group is also attended by a representative from the Surrey Environmental Health Service Managers Group enabling consistency issues to be discussed by the managers of the different food services in Surrey. The Surrey PHE and Environmental Health Infection Control Group meet three times a year with representatives from KSS PHE, the PHE Laboratories, local water companies and the Surrey LAs.
- 3.8.3 Attendance at the meetings of these groups is a worthwhile activity and where demands on the service permit, an officer will attend. Arrangements for referring cases to the relevant enforcing authority e.g. another LA or SCCTS are covered in the food inspection and complaint / infectious disease investigation procedures.

3.9 Food Safety Promotion

- 3.9.1 Resources are focused on meeting our statutory food safety functions and therefore any promotional activities are limited. However the value of promotional work is recognised and events will be selected to ensure maximum impact with minimum use of resources.
- 3.9.2 During 2018/19 an officer attended the Community Safety Day held at Woking History Centre where they were able to offer advice on food safety to members of the public. Officers from the Environmental Health Service also carried out food hygiene advisory and compliance checks during the Woking Party In The Park event and Woking's Food and Drink Festival.

4 Resources

4.1.1 When the EH Team is fully staffed, the resources allocated to the food safety service are currently felt to be sufficient to meet the demands on the service outlined in this plan.

4.2 Financial Allocation

4.2.1 The budget for providing this service is contained within the appropriate Service Plans.

4.3 Staffing Allocations

4.3.1 There are currently 1.95 Full Time Equivalent (FTE) posts working on food law enforcement and related matters. They are appropriately qualified for the work undertaken in accordance with FSA COP. These posts are as follows:

- EHM – Competent and authorised to carry out all official controls (0.3 FTE in total)
- Deputy EHM - Competent and authorised to carry out all official controls (0.4 FTE in total)
- 2 x Senior EHO – Competent and authorised to carry out all official controls (0.9 FTE in total)
- Environment Officer – Competent and authorised to investigate infectious diseases and deal with Food Alerts (0.1 FTE in total)
- Business Support Officer - Provides administrative support to the food safety service (0.25 FTE)

4.4 Staff Development Plan

4.4.1 All members of staff are subject to ongoing appraisal with their line manager via the Performance Development Review (PDR) process, which includes discussions on personal and professional development. This provides the opportunity to identify any training needs and the arrangements can then be made to meet those needs. A record of training will be made on SharePoint or the record of Continuing Professional Development of the member of staff.

4.4.2 Staff that carry out any official food control duties must be assessed against the FSA COP, Chapter 4, to ensure that they are fully qualified and competent. The RDNA (Regulators Development Needs Assessment) tool has been used to assess competency and experience, and identify areas of further development need or training. This has been done across Surrey LA's and it is hoped common training needs may be addressed as a county with low cost training courses where possible.

4.4.3 Team meetings held on a fortnightly basis provide an ongoing opportunity for staff development to be discussed and training to be delivered. There is an adequate budget for staff training for the food safety team and attendance on external courses will be arranged as appropriate to maintain officer competency. Training provided by FSA, Chartered Institute of Environmental Health (CIEH) and other LA's is recognised as usually good value for money and such courses are most likely to be attended. Woking Borough Council holds the Investors in People Award.

4.4.4 A reference library for officers is maintained which contains the relevant legislation, COPs, Best Practice Guidance, Industry Guides and other reference material. Officers also have access to online reference material including the FSA website.

5 Quality Assessment

5.1 There is a documented quality monitoring procedure for this service. This details the mechanisms in place to ensure that the service is delivered in accordance with the FSA Food Law Enforcement - The Standard. Monitoring activities include:-

- on-going staff PDR
- fortnightly team meetings
- document review by EHM
- accompanied inspections
- statistical performance monitoring e.g. inspection and complaint numbers
- peer review benchmarking activities co-ordinated by the Surrey Food Study Group and participation in the FSA national consistency exercises
- customer complaints procedure – No complaints about the food safety service have been made in 2018/2019 to date.

5.2 Customer service satisfaction questionnaires are sent to all food business operators following a food hygiene inspection. The outcome of monitoring activities is fed back to staff to ensure that any appropriate corrective action is taken. Where possible the outcome and action taken is documented.

6 Review

6.1 Review Against the Service Plan

6.1.1 Performance is monitored against the objectives and standards set in the Service Plan and supporting policies and procedures at fortnightly team meetings. A full review of performance against the plan takes place annually when the next year's plan is being drafted.

6.2 Identification of any variation from the Service Plan

6.2.1 Where the review process identifies variances in the service delivered from that set out in the plan, the reasons for this will be documented. The service plan for the subsequent year will take account of the findings of the review and any relevant changes in circumstances.

6.3 Ongoing Improvements to the Service

6.3.1 Computer software is used to hold the food premises register and database. The Idox Uniform system also facilitates the completion of statutory returns to the FSA (Local Authority Enforcement Monitoring System (LAEMS)). The accuracy of the premises database is constantly reviewed as the business map of Woking evolves, and this will be continued through the coming year. We have recently taken part in a FSA Data Cleansing Exercise to improve consistency for consumers using the FHRS website and expect further similar exercises to take place in future.

6.3.2 We operate the FSA National Food Hygiene Rating Scheme (FHRS). This is a scheme whereby the risk rating following a food hygiene inspection is translated into a score which is then published on-line. Members of the public are then able to look at the score of a food business before they choose where to eat out. As well as being a good service to the public, it has also been shown to be an effective incentive for food business operators to improve food hygiene and safety in order to improve their scores. In January 2019, 88% businesses of those rated were rated 5 (very good)

and 97.3% were rated 3 or better. This PI is now included within the Green Book and reported quarterly.

- 6.3.3 Food safety work is included in 2 National Indicators (NI); as part of NI182 which is the satisfaction of businesses with LA Services and NI184 the number of food establishments broadly compliant with food hygiene law. A questionnaire has been produced to capture data relating to businesses satisfaction. Survey results from 2018/2019 so far indicate a high proportion of businesses feel they have been treated fairly and the contact with the Environmental Health Service has been helpful. For the latter NI, the current number of food establishments broadly compliant with food hygiene law is 97%.
- 6.3.4 An informal arrangement is in place between Surrey Heath Borough Council, Epsom & Ewell Borough Council, Guildford Borough Council and Woking Borough Council to assist and support each other where Lead Food Officers are absent through sickness or holiday etc. Food Officers from other LA's may phone and seek advice on enforcement action, or ask for assistance if they are not authorised and competent, for example, to serve a Hygiene Emergency Prohibition Notice (HEPN). This year training has been provided by WBC to food officers and legal colleagues in Surrey Heath BC on HEPN procedures and experiences. It is hoped this will be extended to other Surrey LA's in the coming year. The arrangement also includes review where an appeal by a business has been made against the Lead Food Officer's risk rating scoring following an inspection, which has led to a low FHRS rating. It is envisaged that this resilience will be developed even further between ourselves and Surrey Heath BC with our current arrangement of joint management of the two Environmental Health Services.
- 6.3.5 The Food Information Regulations 2014 were introduced in December 2014. Food allergen and food labelling advice is provided by SCCTS, although 2nd tier local authorities have also been given the power to enforce this legislation. An agreement has been made between Surrey LA's and SCCTS that officers from each organisation will advise businesses on compliance with these Regulations, however, complaints and incidences will be directed to SCCTS for enforcement action. Officers have received training and advice will be given during our routine food hygiene inspections or through direct enquiries to the Environmental Health Service where possible.
- 6.3.6 In 2018 we will be introduced a charge for re-inspections requested under the food hygiene rating scheme. This is where a rating of less than 5 has been achieved and the business has made improvements and wishes to be rated again. This will not affect officer revisits following an inspection where it is necessary to check that serious non-compliances have been actioned.
- 6.3.7 During 2018 the FSA have been reviewing official food controls as part of their 'Regulating Our Future' programme. It is anticipated that a centralised national food registration scheme will be introduced during 2019/20. This may require a review of how we process new food business registrations.
- 6.3.8 Although at this stage we are not sure of the implications of Brexit, it should be acknowledged that legislation, food importation / exportation and provision may be affected when the UK leaves the EU, where all our current food legislation has been formed. This may place extra burden on resources for the food safety service during the coming year.

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