

READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR OF ECONOMIC GROWTH & NEIGHBOURHOOD SERVICES

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| TO: | HOUSING, NEIGHBOURHOODS AND LEISURE COMMITTEE | | |
| DATE: | 29 JUNE2022 | | |
| TITLE: | FOOD SERVICE PLAN 2022-2023 | | |
| LEAD COUNCILLOR: | CLLR McEWAN | PORTFOLIO: | EDUCATION & PUBLIC HEALTH |
| SERVICE: | REGULATORY SERVICES | WARDS: | ALL |
| LEAD OFFICER: | KATIE HEATH | TEL: | 0118 937 2254 |
| JOB TITLE: | Acting PRINCIPAL ENVIRONMENTAL HEALTH OFFICER - FOOD & SAFETY | E-MAIL: | Katie.heath@reading.gov.uk |

1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 This report sets out the updated Food Service Plan for the period 2022-2023. This Plan has been drawn up in accordance with the Food Standards Agency Framework Agreement on Official Feed and Food Controls by Local Authorities.
- 1.2 The Food Service Plan typically covers a one-year period and should be updated annually. Due to the Covid-19 pandemic no plan was required or submitted for 2020-2021 and no plan was completed for 2021-22. Due to the ongoing impact of the pandemic on services, the backlog of work created by suspended services and resourcing difficulties, the Food Service Plan submitted now covers the period April 2022 through to March 2023 detailing the work plans of the Food & Safety Team which remains in line with the FSA recovery plan.
- 1.3 Appendix 1 - Food Service Plan 2022-2023

2. RECOMMENDED ACTION

- 2.1 *That Members note the content of the Food Service Plan for 2022-2023 at Appendix 1*

3. POLICY CONTEXT

- 3.1 The Food Standards Agency (FSA) is an independent Government department responsible for protecting public health and consumers' wider interests in food. Part of their role is to ensure that local authorities comply with the 'Framework Agreement on Official Feed and Food Controls by Local Authorities'. This agreement details:

- Publicly available local service plans to increase transparency of local enforcement services should be published (i.e. the Food Service Plan).
- agreed food law enforcement standards for local authorities
- enhanced monitoring data with greater focus on inspection outcomes and which provides more detailed information on local authority performance
- an audit scheme aimed at securing improvements and sharing good practice.

3.2 The Framework agreement recognises that all Food officers should be correctly authorised and a documented procedure must be in place for the authorisation of officers based on qualifications, competence and in accordance with the Food Safety Act Code of Practice and centrally issued guidance.

3.3 Food Officers carry out inspections of food premises, undertake food sampling, investigate complaints about food premises including infectious diseases or food poisoning cases. Environmental Health Officers consider the hygiene of food premises (including operating the Food Hygiene rating Scheme) and ensure that food is microbiologically fit and safe for consumption while Trading Standards and Environmental Health Officers consider food standards. Food Standards includes ensuring food is described accurately and not in a misleading manner as well as ensuring food is not chemically contaminated.

4. THE PROPOSAL

4.1 Current Position:

4.1.1 As part of the Framework Agreement, the Council must submit monitoring data to the Food Standards Agency, this is normally carried out annually through the LAEMS return however in line with the FSA Recovery Plan these have been replaced with intermittent in-year 'temperature check' surveys.

4.1.2 Substantive content of the monitoring data, typically provided to the FSA annually, will still be collated and is used to form the basis of the Food Service plan and review of the previous year's performance. It also informs the forthcoming targets and Key Performance Indicators. Across the period 2021-2023 the Food Service Plan aligns with the requirements of the FSA Recovery Plan in order to address the backlog of inspections created during the pandemic and to prioritise limited resources to high-risk work activities.

4.1.3 Following changes to staffing, a decline in available resources to the Food and Safety Team and the impacts of Covid-19 this Food Service Plan includes incomplete data on previous year's performance in some areas. The forthcoming year, 2022-23 will see further impacts by Covid-19 as the backlog

of work created in the pandemic, alongside resourcing impacting on the performance of the team.

4.2 Options Proposed

- 4.2.1** The Food Service Plan 2022/23 sets out that within the Borough there are over 1600 premises producing, retailing or serving food, this is an increase of 13% on the number of premises since the previous plan. The plan details the performance of the food service during previous years (2019-2022) and future performance plan for 2022/23.
- 4.2.2** Overall the Food Service achieved 89% of the total number of Food Hygiene Inspections due in 2019/20 and 17% of the Food Standards Inspections due in 2019/20. Proactive inspections in both categories were suspended on 16th March 2020.
- 4.2.3** The Recovery Plan breaks required activities down into stages with a focus on resuming and continuing higher risk activities and official controls with specified intervention timescales above lower risk activities. Local Authorities are required to advise the FSA where it will not be possible to achieve the required work activities within the phase.
- 4.2.4** The Council has been liaising with the FSA and has advised that it will be unable to fully meet the requirements of phase 2 of the recovery plan due to ongoing recruitment challenges. The Council will be unable to meet the required number of inspections relating to newly registered (unrated) premises but continues to progress through higher risk A and B rated premises in line with corporate targets.
- 4.2.5** The team are continuing work to address resourcing issues and have placed several recruitment adverts throughout 2020-22. The Service continues to seek alternative means to bolster resourcing and is looking to recruit apprentices from September 2022.
- 4.2.6** Throughout 2022-23 Food Service KPIs will align with the FSA Recovery Plan with a primary focus on achieving A, B, and unrated inspections for food hygiene and A and unrated inspections for Food Standards. In addition, the Food & Safety Team plan identified and will prioritise the following key pieces of work which align with the Councils corporate objectives;
- Ensuring that all officers are appropriately and correctly authorised to carry out their remit of work;
 - Ensuring that all officers are appropriately qualified, trained which documented competency in line with Food Law Code of Practice;
 - Ensuring that the service works to correct and up to date standard operating procedures to ensure consistency and to work within the parameters of the Food Law Code of Practice and Practice Guidance;
 - Fully resume a food hygiene and standards sampling programme to support interventions carried out within Reading's premises and ensure that the food sold is safe to eat and not misleading to the consumer whilst supporting wider national programmes to achieve this across England;
 - Increasing awareness and up take of our paid advice service for food hygiene and standards within our local community and Reading based businesses,

including resuming our food hygiene training courses which are available to local residents and businesses;

- Improving digital access to our Food Service through our webpages and enabling interaction through social media platforms;
- Resetting the way special treatment premises licences are issued to ensure that premises meet the required standards set by Reading's byelaw prior to trading;

4.3 Other Options Considered

- 4.3.1 In order to prioritise and deliver the Food Service Plan and in response to the resourcing issues within the service, compounded by the national shortage of qualified officers a review of the Primary Authority Partnership Service has been carried out. The Council has been part of the Primary Authority Partnership service since it commenced in 2011 however the resource position of the Food Service has changed substantially during this time. As identified within the Food Service Plan we are currently operating with just over 50% FTE's in post and have a substantial backlog of work to prioritise arising from the Covid-19 pandemic. Primary Authority Partnership places a focus on paid work with national businesses that sit outside our borough, this disadvantages the service provided to local businesses and residents and does not align with the corporate objectives. Following this review the Environmental Health (food hygiene) element of the PAP will be stood down, however the Trading Standards support will continue (Food Standards).

5. CONTRIBUTION TO STRATEGIC AIMS

- 5.1 The Food Service Plan 2022-23 with the Council's vision 'To help Reading realise its potential - and to ensure that everyone who lives and works here can share the benefits of its success' at its core. The Service Plan supports and aligns with the following corporate objectives and the Food & Safety Team Plan has prioritised work activities around these objectives:

| | |
|---------------------|--|
| Healthy Environment | Undertaking food hygiene and standards inspections, revisits to non-compliant premises and enforcement action where necessary. Investigation of food safety, labelling and composition complaints Investigation of allegations of food borne illness and outbreak management. Management of the Food Hygiene Rating Scheme and encouraging higher food hygiene ratings through the re-rating process. Providing advice to existing and potential food businesses Encouraging the adoption of good hygiene practices at all stages of the food chain |
| Thriving Community | Encouraging the adoption of good hygiene and safety practices at all stages of the food production chain Contributing to statutory consultation on new and existing food businesses |

| | |
|-------------------|--|
| | <p>Management of the Food Hygiene Rating Scheme and encouraging higher food hygiene ratings through the re-rating process.</p> <p>Providing advice to existing and potential food businesses including operation of food hygiene training courses.</p> <p>Supporting food hygiene and safety at Reading Festival and other local events.</p> <p>Issue of Export Health Certificates and endorsements for local businesses.</p> |
| Inclusive Economy | <p>Providing advice to existing and potential food businesses and providing access to affordable food hygiene training courses.</p> <p>Providing a paid advice service for complex and bespoke business needs.</p> <p>Responding to complaints and service requests within our statutory response times.</p> <p>Developing our social media and web presence to ensure our services are accessible to all.</p> |

5.3 Full details of the Council's [Corporate Plan](#) are available on the website and include information on the projects which will deliver these priorities.

5.4 The Food Service Plan 2022-23 contributes to the TEAM Reading values:

| | |
|-------------------|---|
| Together | The Food Service Plan outlines how the Food Service works with external and internal partners to deliver its statutory duties. This plan incorporates a wider team plan with a focus on strengthening the competence of the service to deliver the Food Service Plan to the best of its ability. |
| Efficiency | The Food Service Plan incorporates a wider Team Plan which outlines the key work requirements of the team and details the work required to best deliver the Food Service Plan. |
| Ambitious | The Food Service Plan, which incorporates a wider Team Plan strives to maximise the amount and breadth of work covered by the team, prioritising work to make a difference within Reading's local community with a focus on Reading businesses and residents. |
| Make a Difference | The Food Service Plan outlines the work undertaken by the Council to support and improve the health and wellbeing of its residents by monitoring the food hygiene and food standards conditions of local establishments used by Reading's residents. Where current conditions are found to be less than broadly compliant the food service works with businesses to improve these conditions, ensure the business is legally compliant and will utilise enforcement powers where necessary. |

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 6.1 There are no environmental or climate implications arising from the Food Service Plan 2022-23 or its implementation. Consideration has been given to the potential implications that could arise from this plan and there are no additional points outside of general Council working practice.
- 6.2 Implementation of this plan requires food inspections to be carried out. The Food Service have access to pooled bus passes and a large number of premises are based within Reading Town Centre where inspections can be carried out by foot. In general, use of public transport and travel by foot or bicycle is encouraged over the use of personal or pool vehicles. Interventions are recorded on paper which requires a copy to be left at the premises at the time of the intervention. The Food Service supports the wider request for mobile working solutions which will reduce the Council's carbon footprint.

7. COMMUNITY ENGAGEMENT AND INFORMATION

- 7.1 There is no requirement to consult the community on the Food Service Plan.

8. EQUALITY IMPACT ASSESSMENT

- 8.1 Not required. Agreement to and implementation of the Food Service Plan 2022-23 does not have a differential impact on; racial groups; gender; people with disabilities; people of a particular sexual orientation; people due to their age; people due to their religious belief.

9. LEGAL IMPLICATIONS

- 9.1 The Food Service plan is written in accordance with the nationally agreed Framework Agreement with the FSA. No delegation is required to implement the recommendations of this report or the Food Service Plan. The plan sets out how the authority will meet its statutory obligations.

10. FINANCIAL IMPLICATIONS

- 10.1 The Food Service plan sets out the service budget and resources required to deliver the Council's statutory services.

- 10.2 The revenue implications arising from running the service are set out below:

| | 2021/22 £000 | 2022/23 £000 | 2023/24 £000 |
|------------------------------|-----------------|-----------------|-----------------|
| Employee costs (see note1) | 522 | 457 | 472 |
| Other running costs | 39 | 39 | 39 |
| Capital financings costs | | | |
| Expenditure | 561 | 496 | 511 |
| Income from: | | | |
| Fees and charges (see note2) | -24 | -24 | -24 |
| Grant funding | | | |
| (specify) | | | |
| Other income | -68 | -2 | -2 |
| Total Income | -92 | -26 | -26 |

| | | | |
|------------------------|-----|-----|-----|
| Net Cost(+)/saving (-) | 461 | 470 | 485 |
|------------------------|-----|-----|-----|

10.3 There are no capital implications arising from implementation of the Food Service Plan or operation of the Food Service.

10.4 Value for Money (VFM)

The Food Service Plan 2022-23 outlines statutory work required to be undertaken by the Council. The Food & safety Team Plan, forming appendix 5 of the Plan, details additional non-statutory work which is required in order to deliver a fit for purpose service. As part of this revenue generating activities, including expanding our paid advice service for local businesses, have been including within priority work.

10.5 Risk Assessment.

A risk assessment was submitted with the Business Case proposal for discontinuing the Primary Authority Partnership service.

11. BACKGROUND PAPERS

11.1 *Appendix 1 - Food Service Plan 2022-23 includes all key documents within its appendices. In addition the following background papers are relevant to the Food Service Plan:*

Food Law Code of Practice [Food and Feed Codes of Practice | Food Standards Agency](#)
Food Law Code of Practice Guidance [Food and Feed Codes of Practice | Food Standards Agency](#)



Reading
Borough Council

Working better with you

Food Service Plan 2022-23

1. FOOD SERVICE AIMS AND OBJECTIVES

- 1.1 The council has a statutory duty to enforce food law, overseen and audited by the Food Standards Agency (FSA). The council must produce a plan setting out how it will deliver its functions. This document aims to discharge the duty for Reading Borough Council and has been written in accordance with the FSA Framework Agreement (Amendment 5), which is based on statutory Codes of Practice.

It is the council's aim to protect the health of residents, visitors and those working in the town through the efficient and effective enforcement of food safety laws in the Borough.

- 1.2 Key to the way the service is delivered is consideration of the five principles of good regulation:

- Targeting, via risk-based approach
- Proportionality
- Accountability
- Consistency
- Transparency

1.3 Objectives

To ensure that standards required by legislation are met and that preventative health measures are adopted and maintained by businesses.

To achieve the key aims, the following objectives have been adopted:

- To prevent unsafe food reaching the public through the application of mandatory duties and discretionary powers.
- To ensure food is correctly labelled and complies with appropriate compositional requirements.
- To direct resources to the highest risk food premises and activities and to improve standards by the effective use of the enforcement powers available. Following the impact of the Covid-19 pandemic, resources will be targeted in line with the FSA's Recovery Plan (as amendment), focussing initially on unrated and newly registered businesses that have had no previous interventions.
- To ensure a consistent approach to food inspections by officers.
- To ensure that officers are qualified, adequately trained and competent.
- To highlight bad practice in food businesses.
- To ensure consumers are given information as to the hygiene conditions at food premises in the Borough through the use of the Food Hygiene Rating Scheme.
- To encourage and facilitate the training of food handlers and proprietors of food businesses.

- To encourage and facilitate the improvement of food safety and food standards by the use of a paid service for bespoke advice.
- To proactively respond to changes and proposals for improvement in UK legislation.
- To work with our partners including the UK Health Security Agency.

1.4 Links to Corporate Objectives and Plans

1.4.1 The Council has a number of priorities which sit within the Corporate Plan 2021/22. The delivery of the Food Service plan links to the following priorities:

| Priority | How will we work toward this? |
|---------------------|--|
| Healthy Environment | <p>Undertaking food hygiene and standards inspections, revisits to non-compliant premises and enforcement action where necessary.</p> <p>Investigation of food safety, labelling and composition complaints</p> <p>Investigation of allegations of food borne illness and outbreak management.</p> <p>Management of the Food Hygiene Rating Scheme and encouraging higher food hygiene ratings through the re-rating process.</p> <p>Providing advice to existing and potential food businesses</p> <p>Encouraging the adoption of good hygiene practices at all stages of the food chain</p> |
| Thriving Community | <p>Encouraging the adoption of good hygiene and safety practices at all stages of the food production chain</p> <p>Contributing to statutory consultation on new and existing food businesses</p> <p>Management of the Food Hygiene Rating Scheme and encouraging higher food hygiene ratings through the re-rating process.</p> <p>Providing advice to existing and potential food businesses including operation of food hygiene training courses.</p> <p>Supporting food hygiene and safety at Reading Festival and other local events.</p> <p>Issue of Export Health Certificates and endorsements for local businesses.</p> |

| | |
|-------------------|--|
| Inclusive Economy | <p>Providing advice to existing and potential food businesses and providing access to affordable food hygiene training courses.</p> <p>Providing a paid advice service for complex and bespoke business needs.</p> <p>Responding to complaints and service requests within our statutory response times.</p> <p>Developing our social media and web presence to ensure our services are accessible to all.</p> |
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To achieve this aim, the Food & Safety Team and Trading Standards Team will:

- Inspect food premises and businesses in accordance with the Food Law Code of Practice and FSA's Recovery Plan (as amended) relating to the impact of Covid-19.
- 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
- Initiate appropriate enforcement action to secure compliance with the relevant legal requirements
- Prepare, participate and implement national, regional and local sampling programmes for food that is produced, stored, distributed, handled or consumed;
- Aim to effectively discharge the Council's statutory duties, functions and responsibilities relating to the enforcement of Food Safety legislation
- Aim to effectively discharge the Council's statutory duties, functions and responsibilities in relation to the control of spread of communicable disease and food poisoning.

1.4.2 The following KPIs are in place for the Food & Safety team for 22-23:

- 100% of Food Hygiene Premises rated A due before 31 March 23 to be completed
- 90% of Food Hygiene Premises rated B due before 31 March 23 to be completed
- 75% of new registrations (those awaiting inspection) to be completed before 31 March 23
- 100% of Food Standards Premises rated A due before 31 March 23 to be completed.

N.B. these targets are remaining under constant review during the period 21-23 due to the ongoing impact of the Covid-19 pandemic and resourcing issues.

- 1.4.3 The Council also recognises the risks associated with failing to deliver this plan and this is detailed in the Directorate's risk register. A local risk register can be found within Appendix 5, the Food & Safety Team Work Plan for April 2022 – March 2023.

2. BACKGROUND

2.1 Profile of the Authority

- 2.1.1 Reading Borough Council was created as a unitary authority in April 1998 and currently has a population of 161,780. Unemployment (those claiming job seekers allowance) as of January 2021 stands at 6.4% within the town, higher than the national average of 5%. 77 languages are spoken across Reading. Reading is classed as the 3rd most unequal city in terms of wealth and 5 of our neighbourhoods are within the 10% most deprived in the country.

Reading is an urban authority and the town centre is one of the largest in the South of England, attracting many shoppers and visitors to the area. Regeneration to local areas, e.g. Bracknell present new challenges to Reading in addition to the impacts of the pandemic. Between February 2020 and February 2021 the footfall in Reading had declined by 66.4%. Reading is a University and college town, with many of the small food businesses around the University do the bulk of their trade during term time.

- 2.1.2 Manufacturing industry has declined over the years and the area is now the centre of high technology within the Thames Valley. There are no large food manufacturers in the town.
- 2.1.3 There is excellent access to the road system via the M4 (East/West) and the nearby M3 and A34 (North/South). Reading train station continues to provide excellent transport links to the town and in December 2019 the Elizabeth line began development (between Reading and London Paddington) placing Reading on the TFL underground map. Works are underway to create a new train station at Green Park, improve commuter access to business in that area.
- 2.1.4 Businesses in Reading utilises its good transport links and close proximity to Heathrow Airport to transfer their raw ingredients and products. There are also UK distribution centres for Waitrose frozen products and Tesco ambient products within the town, further highlighting its excellent geographical location and communication links.
- 2.1.5 Reading is a market town, the market operating four days per week, and has a flourishing twice monthly Farmers' market where producers from the surrounding locality sell their own produce. There are also 2 weekly food markets as well as an annual chilli festival and specialist food festival.
- 2.1.6 The town hosts a number of festivals and cultural events which bring visitors and itinerant traders to the area. The most significant music festival is Reading Festival which is the 2nd largest festival in the UK after Glastonbury.

2.2 Organisational Structure

- 2.2.1 The Council has an approved constitution setting out how the Council operates, how decisions are made and the procedures followed to ensure that these are efficient, transparent and accountable to local people. A copy of the Council's constitution is available at:

[Constitution of the Council May 2018 \(reading.gov.uk\)](#)

- 2.2.2 The Scheme of Delegations sets out who is responsible for making decisions, including the authority for the service of enforcement notice. A copy of the Scheme of Delegations is available at:

[200210-Delegations-Register.pdf \(reading.gov.uk\)](#)

- 2.2.3 The Council operates a Committee Structure, with the Food & Safety Team reporting to the Housing, Neighbourhoods & Leisure (HNL) Committee. The councillor with responsibility for Food & Safety is the Lead Councillor for Health, Wellbeing and Sport.

- 2.2.4 Appendix 1 sets out the Team structure of Public Protection. Public Protection sits under the Assistant Director for Planning, Transport and Public Protection within the Directorate for Economic Growth and Neighbourhood Services.

- 2.3.5 The officer with lead responsibility for food matters (and whose contact details have been notified to the FSA) is Katie Heath, Acting Principal Environmental Health Officer, Food & Safety, supported by Matthew Golledge, Public Protection Manager.

- 2.3.6 Provisions have been made for the outsourcing of public services including the analysis of food and water samples for composition and microbiology. Please see section 3.5 below.

2.3 Scope of the Food Service

- 2.3.1 The Food & Safety Team deals with food safety, some aspects of food standards relating to caterers, infectious disease, special treatments, safety at sports grounds licensing, statutory planning, building control and licensing consultation and health and safety at work including accident investigation. Trading Standards has responsibility for activities such as food standards relating to manufacturing and retail, fair trading, product safety, metrology, animal health, animal feed, petroleum and consumer advice.

- 2.3.2 Up until June 2022 both the Food & Safety and Trading Standards teams have been active leads in the Primary Authority Partnership Scheme. Environmental Health Staff have been providing assured advice for Food Hygiene and Health & Safety matters while the Trading Standards team provide advice on Food Standards. Reading Borough Council currently work with 11 businesses across Environmental Health and Trading Standards with further partners in Trading Standards only. Following a review of our Primary Authority Service in Autumn 2021, due to resourcing challenges a business case was put forward and subsequently approved to remove Environmental Health functions from our Primary Authority Services. This is currently being implemented and will be in full effect by June 2022.

- 2.3.3 The Principal Environmental Health Officer – Food & Safety is responsible for managing the topic area of food within Public Protection. Approximately 50% of the Food & Safety Team is directed at official controls for food safety and approximately 16% of the Trading Standards

Service is directed at food standards work (including work allocated through Primary Authority).

2.3.4 The Food & Safety Team are currently experiencing significant recruitment challenges with only 56% posts filled. Repeated attempts at recruitment have been made however these have not proved successful. It has not been possible to recruit our previous casual workers and the team has only secured one contractor for a three-month contract. This is a slight increase on the number of posts that were in post throughout 21-22 which stood at 46%

2.3.5 The service is based at:

Public Protection
Reading Borough Council
Civic Offices
Reading
RG1 2LU

Tel: Food Safety Enquiries 0118 937 3787
Food Standards Enquiries 03454 040506 (c/o Citizens Advice Bureau)

E-mail: consumer.protection@reading.gov.uk

Website www.reading.gov.uk.

The office is open Monday to Friday from 0900 to 1700 hours. The emergency 'out of hours' telephone number is 0118 937 3737 where there is a duty officer available to deal with emergency only food matters as appropriate during specific periods.

2.4 Demands on the Food Service

2.4.1 There are annual variations on demand based on a broad range of factors. The Borough has seen the overall number of businesses increase and there is a relatively high turnover, particularly in the takeaway sector. The table below details the number of food premises contained in each category at the time of writing this plan:

| Type of premises | Number of Premises |
|------------------------------|--------------------|
| Primary Producer | 0 |
| Manufacturer/Packer | 13 |
| Food Importer/Exporter | 7 |
| Food Distributor/Transporter | 28 |
| Supermarket/Hypermarket | 42 |
| Small Retailer | 233 |
| Retailer Other | 90 |

| | |
|---------------------------|-------------|
| Restaurant, Café, Canteen | 301 |
| Hotel, Guest House | 35 |
| Pub, Club | 119 |
| Takeaway | 185 |
| Caring Establishment | 142 |
| Schools, Colleges | 70 |
| Mobile Unit | 92 |
| Restaurant, Caterer Other | 278 |
| Total | 1635 |

- 2.4.2 There are currently 7 businesses which have received approval (including conditional approval) under one or more of the product specific regulations. These premises handle a combination of namely fishery products, minced meat & meat preparations, meat products and cold store/rewrapping activities. These premises are inspected in line with their risk rating.
- 2.4.3 There are number of outdoor events per year, mainly during May to September, where Food & Safety staff and/or Trading Standards staff attend and carry out inspections including food inspections and food sampling. These events occur during weekdays and weekends. Attendance at these events is determined by risk and the number of food traders likely to be present. Particular attention is paid to events where food businesses that are due an intervention or yet to have been inspected.
- 2.4.4 Reading Borough Council works in collaboration with Festival Republic at Reading Festival annually. During this period Food & Safety and Trading Standards attend site and conduct food hygiene and safety inspections in addition to other safety checks. Throughout the festival weekend the Food & Safety team will typically carry out approximately 150 inspections.
- 2.4.5 The Borough is multi-cultural and contains a wide range of food premises managed and run by many diverse ethnic groups. Many retail premises specifically cater for these populations and many registered home caterers prepare food dishes from their home countries. There are an increasing number of food brokers and the Council is endeavouring to identify them.
- 2.4.6 Many businesses operate outside office hours and in which case will be inspected during those periods.
- 2.4.7 The service has seen a rise in businesses that trade online as part of a High Street model. There is also a trend for customers to order food online from/via Facebook, Amazon, Deliveroo, Uber Eats and Just Eat

and have it delivered to their house thus the customer has no idea where the food is produced or where the wrapped food is stored.

The service has also seen a rise in businesses trading as 'Dark Kitchens', where a single premises/business trades as multiple business on line. This way of trading has an impact on consumer information and raised questions about listings on the food hygiene rating scheme and requirement for businesses to register.

2.5 Regulation Policy

2.5.1 The Council has previously adopted the Enforcement Concordat, which has subsequently been updated to the Regulators Compliance Code. The Corporate Enforcement Policy is attached as Appendix 2. This policy is supplemented by a specific food law enforcement policy that can be found in Appendix 3.

2.5.2 The Regulators' Code sets out the following main provisions:

- Regulators should carry out their activities in a way that supports those they regulate to comply and grow
- Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views
- Regulators should base their regulatory activities on risk
- Regulators should share information about compliance and risk
- Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply
- Regulators should ensure that their approach to their regulatory activities is transparent

3. SERVICE DELIVERY

3.1 Premises Inspections

- 3.1.1 The Council's general policy is to inspect all food premises that are due for inspection based on the minimum frequency as set by in the Food Law Code of Practice. However, resources will always be directed towards higher risk activities and this may result in some lower risk activities being delayed. The aim is to ensure compliance with the legal requirements covering the safe handling and production of food, the quality, composition, labelling, presentation and advertising of food and of the materials or articles in contact with food.
- 3.1.2 As a result of Covid-19 our inspection services were substantially interrupted throughout the period March 2020 to May 2021, resulting in a backlog of premises awaiting inspection. We have also seen an increase in the number of domestic registered food premises during this period. The Council is implementing the FSA's Recovery Plan in order to prioritise work, focussing on unrated and newly registered premises, premises subject to ongoing enforcement action, reactive work and those presenting the highest risk.
- 3.1.3 As the designated food authority, the Council discharges its duty under the Food Safety Act 1990 and Regulation 2017/625 (retained) by carrying out regular, primary food hygiene and food standards inspections of high-risk premises.
- 3.1.4 The number of new premises that register with the Local Authority is approximately 230 per year making a significant contribution to the number of new premises/ those that have changed ownership on the database.
- 3.1.5 The current profile of premises within Reading can be seen at point 2.4.1 above.
- 3.1.6 The Food Law Code of Practice rating scheme is used for Food Safety as well as food Standards.
- 3.1.7 For Food hygiene, 97% of premises are currently rated as 'broadly compliant'. A premises is 'broadly compliant' if none of the individual scores for hygiene, structure or confidence in management exceed 10. However, inspections which have taken place more recently indicate a decline in standards following the pandemic. The Council estimates that approximately 40% of premises will not be broadly compliant and will require follow up revisits or enforcement action.
- 3.1.8 For Food Standards, 88% of premises are rated as broadly compliant. Premises are considered to be 'broadly compliant;' where an individual score for current compliance or confidence in management does not exceed 10. This figure is expected to increase as we progress through the backlog of food standards inspections which was in place prior to the delays introduced by the pandemic.
- 3.1.9 The following targets for food premises inspections due to be visited in 2022-23 are:

| | Food Hygiene | Food Standards |
|------------|--------------|----------------|
| Category A | 100% | 100% |

| | | |
|------------------|-----|-----|
| Category B | 90% | N/A |
| Category C | N/A | N/A |
| Category D | N/A | - |
| Category E | N/A | - |
| Category Unrated | 75% | N/A |

3.1.10 There are also a number of food hygiene and food standards inspections that have been given a non-inspectable risk (NIR) score. Examples of these premises include for food hygiene, importers based in the Borough where there is just an office and no storage or distribution of the product in the Borough (food broker) and inspections that are carried out at outdoor events where the trader is registered outside of the Borough.

3.1.11 Category E food hygiene inspections and category C food standards inspections can be carried out via an alternative enforcement strategy or using an official control such as inspection, partial inspection or audit. Where the alternative enforcement strategy is chosen, a visit is made by a Regulatory Support Officer or newly qualified authorised officer who will complete a questionnaire with the business.

3.1.12 Officers will have due regard to the FSA guidelines on the importation of food when carrying out routine inspections, will consider traceability of food products and will be mindful of the implications of food fraud or unauthorised ingredients.

3.1.13 The resource requirements for allocated work is detailed in section 4 below.

Food hygiene

3.1.14 The frequency of food hygiene inspections is determined by the risk rating system stipulated in the code of practice. Risk categories may change if food handling activities change, consumer complaints are received or other non-compliance is identified. The number of inspections due in 2022/23, including those overdue from previous years is:

| Category/ Frequency | Number of inspections Due 2022/23 |
|---------------------------------|--|
| A / at least every 6 months | 3 |
| B / at least every 1 year | 29 |
| C / at least every 18 months | 266 |

| | |
|--------------------------------------|--------------|
| D / at least every 2 years | 533 |
| E / Alternative Enforcement Strategy | 367 |
| Outside the Programme | 36 |
| Unrated ¹ | 212 |
| Total | 1,410 |

¹ This number excludes new premises that will register within the year.

Food Standards – labelling and composition

3.1.15 The frequency of food standards inspections is determined by the risk rating system stipulated in the Code of Practice. The number of inspections due in 2022/23 are:

| Category/ Frequency | Number of Inspections due 2021/22 |
|--------------------------------------|--|
| A / at least every 1 year | 3 |
| B / at least every 2 years | 281 |
| C / alternative enforcement strategy | 422 |
| Outside the Programme | 250 |
| Unrated ¹ | 370 |
| Total | 1,326 |

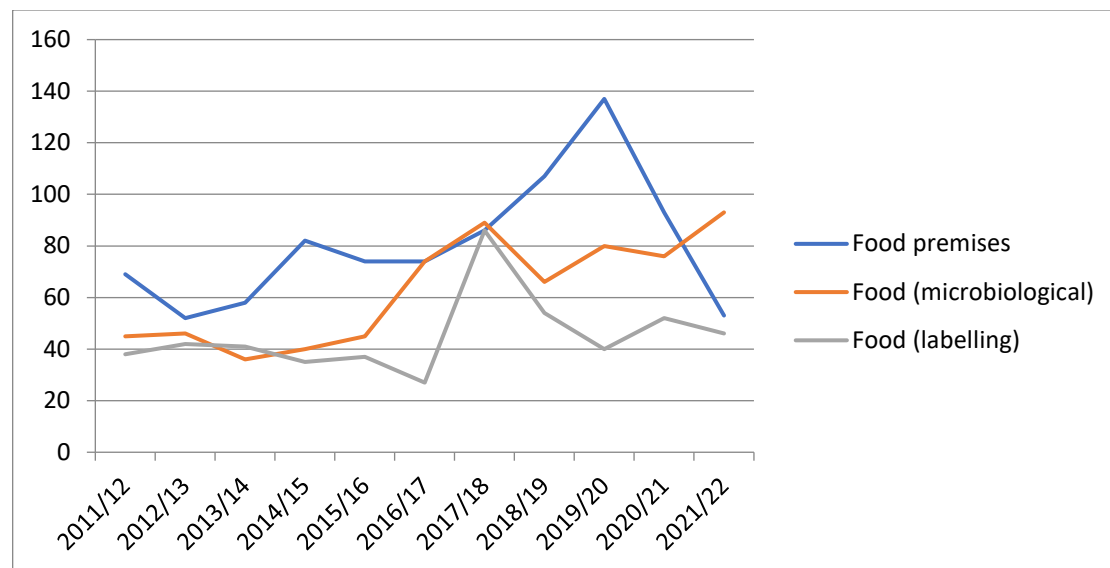
¹This number excludes new premises that will register within the year

3.2 Food Complaints

3.2.1 There is a documented food complaint procedure. All food complaints are investigated in accordance with the Food Law Code of Practice, practical guidance and in-house procedures. Complaints that are identified as posing an immediate risk to health are responded to within one day. Other food complaints are investigated and responded to

within 5 working days. The Primary Authority/home authority principle is employed where the food is manufactured in another borough.

3.2.2 The graph below details the trends for food complaints received since 2011/2012:



3.2.3 Estimates for this year suggest the figures for microbiological food will remain broadly constant, labelling complaints are likely to go up whilst the number of complaints about food premises rather than food will return to the pre-pandemic level or higher as people return to eating out and premises re-open. Industry shortages in staffing are also likely to have an impact on the number of food premises complaints received.

3.3 Primary Authority Partnerships

3.3.1 Primary Authority Partnerships are run via the Office of Product Safety and Standards (OPSS). The Authority no longer offers a home authority partnership arrangement and has converted all partnerships to Primary Authority Partnerships (PAPs). In addition, the authority has taken new partnerships where it would have previously not qualified to be the home authority because the location of the businesses head office is not in the local authority area.

3.3.2 There are 20 partnerships predominantly in the hospitality industry of which 11 cover food hygiene and safety and food standards. The most significant and active partnerships are with JD Wetherspoon, Greene King and the WSH Group.

3.3.3 No new partnerships were taken on in 2021/22, following a change in ownership our partnership with Stonegate Pub Co Limited was terminated at their request.

3.3.4 Due to the Covid-19 pandemic work with the specialist Sushi PA working group has not progressed.

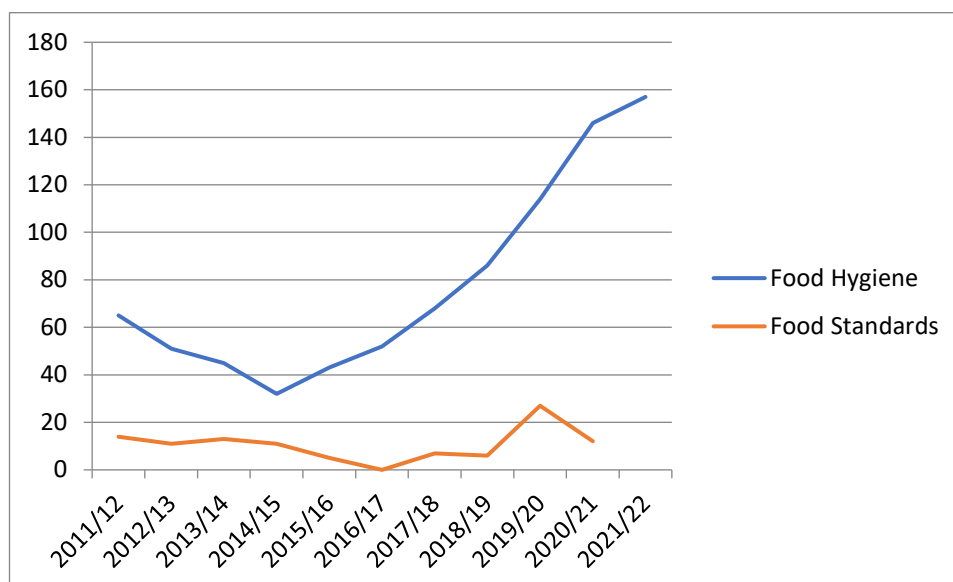
3.3.5 Under normal working circumstances each partnership has a work plan and officers have regular meetings with the company to discuss enquiries from other councils and progress the work plan. Due to the

Covid-19 pandemic the requested work from partners has been interrupted and the Council has amended its approach to partners accordingly.

- 3.3.6 The Covid-19 pandemic has created additional work pressures within the team and a substantial backlog of food hygiene and food standards inspections now exists. Additionally, the Food & Safety Team have suffered loss of resources through members of staff leaving and has been unable to recruit to posts. Primary Authority Partnership does not align with the Council's Corporate objectives and there is a national shortage of qualified officers. A review has been carried out regarding the Council's ability to continue to deliver the Primary Authority Partnership alongside its statutory duties and a recommendation has been made to remove this function from the Food & Safety Team. This has been approved and will be removed by the end of June 22.

3.4 Advice to Business

- 3.4.1 The enforcement policy states that the Service will provide advice to businesses in the first instance to assist them in complying with the law and to help them maintain high standards of food safety or standards.
- 3.4.2 Businesses can contact the Food & Safety Team, where they will be directed to advice leaflets and other information available on the website. If the food business operator requires further advice, a paid for service is offered.
- 3.4.3 The number of service requests from businesses for advice on food and drink are detailed in the graph below. A substantial amount of business advice is provided during routine interventions and is not accounted for within these numbers:



- 3.4.4 It is anticipated that the number of requests for food hygiene advice will continue to increase and that those for food standards will also increase following the change to the requirements of the Food Information Regulations 2014 due to Natasha's Law, the introduction of out of home calorie labelling and promotion of our paid advice services.

3.5 Food Sampling

3.5.1 Food samples are taken in accordance with the authority's sampling procedure and the joint annual sampling plan. Sampling programmes have been developed and implemented to:

- Assess the microbiological quality of food produced and offered for sale;
- Determine the compositional standards and descriptive integrity of food.

3.5.2 The sampling plan reflects the following requirements:

- (i) the procurement of samples taken during food hygiene and food standards inspections, taking into consideration the FSA guidelines for imported food and feed controls.
- (ii) specifically targeting foods produced and distributed nationally, from producers and manufacturers based in Reading.
- (iii) in response to consumer and business complaints regarding food standards and food hygiene, and
- (iv) the participation in agreed national, regionally co-ordinated and local sampling programmes and in particular projects concerning imported foods.
- (v) the Rapid Alert System for Food & Feed (RASFF) annual and quarterly reports.

3.5.3 The plan may be changed from time to time during the year to reflect new or changes in legislation and other local or national issues of concern.

3.5.4 Food samples are procured in accordance with the Code of Practice and legislation as appropriate.

3.5.5 Samples for microbiological analysis are sent to the food examiner at:

Public Health England
Food, Water and Environmental Microbiology Services, Porton
Porton Down
Salisbury
SP4 0JG
Tel 01980 616766

3.5.6 **Samples for chemical and compositional analysis are sent to the Public Analyst at:**

Hampshire Scientific Services
Hyde Park Road
Portsmouth
Hampshire
PO5 4LL
Tel. 023 9282 9501

Food Safety – Microbiological Sampling

3.5.7 Resources are allocated through Public Health England. Microbiological food sampling projects are co-ordinated within the sampling county liaison group. The PHE Porton laboratory carries out the analysis of the samples.

3.5.8 For 2022/23 the food sampling budget for microbiological analysis is £6,422.00 which is held on account by PHE.

3.5.9 No target for microbiological analysis has been set this year due to the ongoing impact of the pandemic. Samples will be selected for analysis on a risk basis dependent on resourcing. Where resources permit we will continue to contribute to national and local sampling programmes.

3.5.10 There are 12 private water supplies in Reading. Most are considered low risk. Two of the boreholes are boreholes that supply a large quantity of people. Sampling is carried out by their commercial owners whilst the other 10 boreholes are for single dwellings.

Food Standards Quality and Compositional Sampling

3.5.11 Trading Standards manages a coordinated annual sampling programme through Trading Standards South East Group (TSSE) and a local sampling programme. Any local sampling is shared with TSSE and other members of the group are invited to also take part in the sampling.

3.5.12 The total budget for food standards and feeding stuff sampling for the year 22-23 is £11,000. The Council has an ESPO framework agreement for public analyst and testing services and £44,000.00 for a four-year period commencing in 2019 was awarded to the Council for sampling through the public analyst.

3.5.13 In 2021/22 the Council bid through TSSE to undertake sampling of Sweets and soft drinks from the USA for presence of colours and preservatives and snacks, cereals and bakery products from India, Belgium and France for the presence of undeclared milk and egg. The Council will also participate in campaigns ran by the Public Analyst and will bid to participate in relevant sampling programmes and campaigns throughout 23-23, including Operation Opson.

3.6 Investigation of Outbreaks and Control of Food Related Illnesses and Infectious Diseases and Food Poisoning Outbreaks

3.6.1 The Service investigates all notifiable food poisoning incidents and outbreaks associated with food occurring in Reading. Officers will liaise with the Consultant in Communicable Disease Control (CCDC) in the investigation of diseases or outbreaks and where it is necessary to exclude infected persons from work or children from school in accordance with the Berkshire Joint Infectious Disease Outbreak Control Plan (2013).

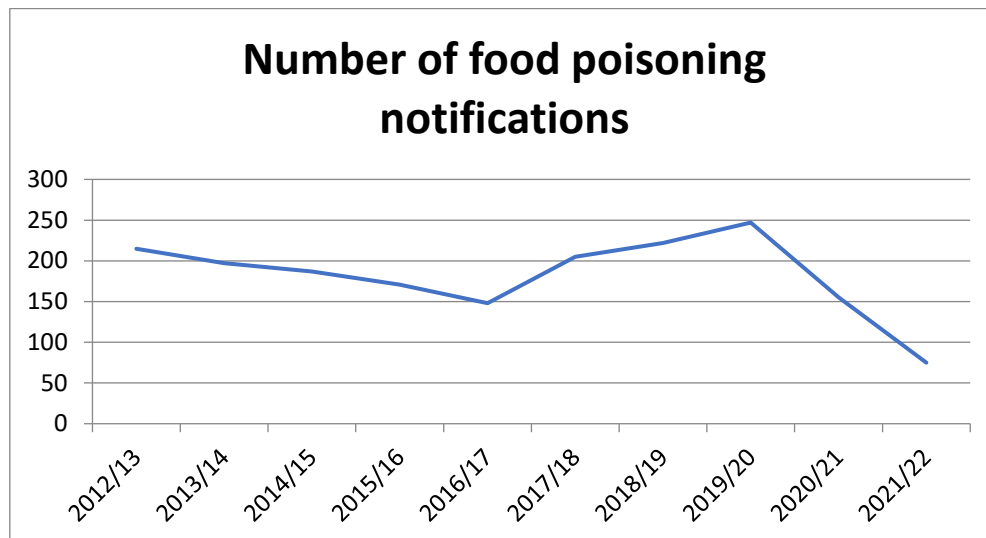
3.6.2 Investigations into infectious disease aim to:

- (i) Determine whether the infected person works with food or cares for others particularly if the others are a vulnerable group.
- (ii) Identify the source of infection
- (iii) Prevent spread or reoccurrence of the infection
- (iv) Take formal action in appropriate cases where breaches of food legislation have contributed to a food poisoning outbreak
- (v) Provide information to affected persons.

3.6.3 The target for response is as follows:

| | |
|--------------------------|----------------|
| Food Poisoning outbreaks | 100% in 1 day |
| Food Poisoning (cases) | 100% in 2 days |

3.6.4 The annual number of food poisoning notifications are detailed below:



3.6.5 It is anticipated that the number of notifications for 2022/23 will increase as people continue to return to socialising, events and dining outside of the home. The Local Authority is only called upon for cases of lower risk food poisoning such as *Bacillus cereus*, *Clostridium*, *Giardia*, *Salmonella* and *Shigella* as well as to assist TVPHE in finding the source of other cases such as *Cryptosporidium*, however further changes may be brought about by the creation of UKHSA (previously PHE) and other agencies.

3.6.6 The number of outbreaks is projected to increase as genome typing of bacteria continues to link cases nationwide, which previously had no common themes.

3.7 Food Safety Incidents

3.7.1 All food safety incidents are dealt with in accordance with the Food Safety Act, Code of Practice and Practical guidance on food hazards and the procedure for food safety incidents. The team is committed to responding to appropriate notifications of food hazards and working with the FSA and food businesses to ensure that food is safe to eat.

3.7.2 The team will receive Food Alerts (FAFA), Product Recall Notices (PRIN) and allergy alerts via an automated daily or weekly digest email alert. The Lead Food Officer or Senior Officer in charge will determine what action needs to be taken on the Food Alert. Generally, such situations are dealt with through voluntary co-operation or surrender of the food.

Food Fraud

3.7.3 The Council is committed to detecting fraudulent activity. This includes various illegal acts committed for economic gain including false labelling, establishments operating illegally, illegal importation of foods and diversion of meat products into the animal feed chain via the bakery production.

- 3.7.4 Whistle-blower, anonymous complaints or partial information is taken seriously and collated or followed up.

3.8 Liaison with Other Organisations

- 3.8.1 Arrangements are in place to ensure consistency with other organisations and by officers delegated to represent the Council. This is achieved through membership of local specialist groups.
- 3.8.2 The Public Protection Manager attends and participates in the Berkshire Environmental Health Managers Group. One of the Berkshire Managers has specialist responsibility for food safety and attends the Berkshire Food Safety Liaison Group once per year.
- 3.8.3 A Senior EHO or Lead Food Officer will attend and participate in the Berkshire/Oxfordshire Food Safety & Health and Safety Liaison Group (BOFSLiG) that will meet 3 times per year. One of the members of this group aims to go to the food sampling group at least once per year to provide strategic direction.
- 3.8.4 The officer with specialist responsibility for sampling attends and participates in the Berkshire Food Sampling Group.
- 3.8.5 The Trading Standards food specialist or lead food officer attends and participates in the Regional Food Focus Group of TSSE which meets 2 times per year.
- 3.8.6 The service has regular contact with professional bodies, the Chartered Institute of Environmental Health and the Trading Standards Institute as well as the national regulators FSA and OPSS and will participate in relevant forums as they are available
- 3.8.7 For imported or exported foods, the team liaises with relevant port of entry local authorities where action is required as well as the Animal & Plant Health Agency (APHA).
- 3.8.8 A representative for the Food & Safety Team sits on the Safety Advisory Group (SAG) which covers all festivals and community events within the town and offers support or advice regarding food safety.
- 3.8.9 Officers within the team liaise with Planning and Building Control services as a statutory consultee for Food & Safety matters, providing advice to the teams and applicants regarding food safety matters accordingly.

3.9 Food Promotion/ Projects

Food Hygiene Rating Scheme

- 3.9.1 The Authority has run and issued awards for good standards of hygiene in food premises since 1975. In 2011 the authority joined the national Food Hygiene Rating Scheme (FHRS) run by the FSA. The rating is given at the end of routine or partial inspections in the form of a window/wall sticker including information about the scheme and how their rating is made up. The information is uploaded to the website approximately once every 2 weeks. Premises can request a revisit if they are not satisfied with their rating or lodge an appeal with the Lead

Food Officer. On payment of a fee another full inspection will be carried out within 3 months.

- 3.9.2 Since 1999 the Food & Safety team has successfully run in collaboration with Festival Republic and Central Fusion, a separate Alfresco Award for the food traders at Reading Festival. In 2011 the award was expanded to encompass the principles of the Food Hygiene Rating Scheme and a sticker unique to Reading Festival was designed. Each year any traders achieving 5 rating will be given a unique Reading Festival wall sticker for the duration of the festival and nominated for one of three Al Fresco Awards (Bronze, Silver or Gold). All food traders are inspected at the festival. The cost of this work is funded by the festival organisers. The festival organisers and food service contractor take great interest in the total number of traders in each food rating category and traders who achieve two or less are scrutinised before being allowed to return to the festival in the following year. Al Fresco Award winners are given incentives to attend the following year's festival such as a free pitch at the next year event.

Food Hygiene Education

- 3.9.3 Under normal circumstances staff deliver a Level 2 Food Safety in Catering Course on a one-day basis about 6 times per year. The same course is offered to companies, organisations or schools at their premises on request. Courses are also run for specific ethnic minority groups both in English and their own language. This was cancelled during the pandemic but service will resume this year.

Natasha's Law

- 3.9.4 On 1st October 2021 an amendment to the Food Information Regulations 2014 came into force in England requiring an increase in provision of consumer information regarding allergens. This is a result of Natasha's Law following the death of Natasha Ednan-Laperouse in 2016 after she consumed a baguette from a national sandwich chain which contained sesame. PPDS foods are now required to be labelled with the name, ingredients list and allergens where products are made on site. In order to support businesses with this change social media communications were issued and will be included within our ongoing programme for social medial communications as part of a new initiative to increase the awareness of our team and its work locally. Advice is provided directly to food businesses during interventions and we will continue to provide this whilst we progress through our backlog of inspections. Following the implementation of requirements for businesses to provided allergen information on the 14 specified allergens in 2015 we anticipate that a substantial proportion of smaller businesses will still be unaware of this new requirement and require further support or enforcement action to comply.

Food Export Certification

- 3.9.5 Since the UK exited the EU on 30 December 2020 we have seen an uptake in requests for Export Health Certificates. Prior to this we consulted with all food businesses in the borough to ascertain the likelihood of service demand. Those being received have been from companies who were not previously known exporters. As businesses adapt to new trading restrictions and processes we anticipate that we will receive occasional requests for Export Health Certificates or

Endorsements to the EU and other third countries. Senior officers are authorised with APHA to issue Certificates for fishery products.

Out of Home Calorie Labelling

- 3.9.6 From 6 April 2022 it became mandatory under The Calorie Labelling (Out of Home) Regulations 2021 for certain food businesses to provide information on the calorie content of prepared food products. This applies to large scale businesses (>250 employees) and includes franchises and 3rd party delivery platforms. When undertaking interventions it will be required that these consider whether calorie information is available, whether it is clearly displayed, how the information was calculated and that it is available on other sale platforms. Following the enforcement policy, where non-compliance is notified improvement notice may be required.

4. RESOURCES

4.1 Financial Allocation

The budget for Food & Safety in 2022/23 is £516,300.00 (gross) / £490,200.00 (net). This excludes some Food Standards inspection and complaint work which falls under the Trading Standards budget but does provide for Food Standards Sampling. The Food & Safety budget also covers the provision of other, non-food related work, including safety at sports grounds licensing, special treatments licensing and health and safety enforcement. Financial provision for legal action as part of our enforcement policy is provided centrally and is not included in the above budget.

4.2 Staffing Allocation

- 4.2.1 The Food & Safety team has an allocation of 11.01 FTE (including management), the number of persons currently in post is 6.16 FTE, this includes Food Standards services obtained from the Trading Standards Team. A full review and restructure of services, including Public Protection is underway with final implementation scheduled for July 22. The team carry out the full spectrum of food hygiene, food standards, infectious disease, health and safety, special treatments, Primary Authority Partnership and certain forms of licensing activities. Officers in the team are broadly multidisciplinary, however certain aspects of their role such as the inspection of high-risk premises are restricted based on their competency and qualifications. For example, an Environmental Health Officer who has not reached specific competency criteria will not be able to prohibit a food premises from operating. This allocation does not include Business Support functions and those officers allocated to carry out that work. There is currently approximately 1FTE allocated to this work which includes process food business registrations, inputting and allocating service requests and inputting food hygiene inspections on our data management system.

- 4.2.1 As part of the planning process for ensuring that the Council meets its statutory duties, it must ensure that it has sufficient staffing capacity to deliver its inspection and enforcement programmes. Based on a percentage of each officer's time being spent on food hygiene activities only and including factors such as maternity, part time working hours, competencies etc, there are currently 4 FTE officers available against an estimated need of 9.45FTE for food hygiene and a further 1.43 FTE

against an estimated additional need of 2.34FTE for food standards. Please see APPENDIX 5 for further detail on the Food & Safety Teams work priorities and resource requirements. Unfortunately, due to national shortages of qualified Environmental Health Officers, the Council has difficulties recruiting to vacant posts in the team. The Council have also been unable to recruit casual officers or sufficient contractors to assist with the delivery of statutory functions. The Council was unable to deliver its inspection programme in 2021/22 and did not fully meet the requirements of the FSA's Recovery plan priorities. At present it is anticipated that this will remain the same for 2022/23.

4.3 Staff Development Plan

- 4.3.1 One to one meetings are held for all officers approximately 6-8 times per year where professional and personal development is discussed and encouraged. Officers are requested to complete annual Training Needs Assessment's to ensure that training needs are identified and they are able to meet their 10 hours CPD as specified in the Food Law Code of Practice.
- 4.3.2 Due to changes in circumstances of our staff and greater part time working the Council continues to invest in online training (ABC Food Law) for staff in order to ensure that they meet their CPD requirements.
- 4.3.3 Consistency training for use of the Food Hygiene risk rating scheme will be undertaken as part of the FSA national consistency exercise.
- 4.3.4 Courses will be undertaken according to officer specialisms, as the course becomes available and according to officer training plans and service needs
- 4.3.5 Newly appointed staff are subject to a Council wide probation scheme and must complete a practical training log within the Team before they are deemed competent and authorised accordingly.
- 4.3.6 Following the change to the Food Law Code of Practice the Council has identified that it needs to undertake a review of its staff competency requirements in food hygiene and standards. This item is included within the Teams priority work for this year. The new competency framework has yet to be applied to newly appointed or existing staff due to resource limitations.

5. QUALITY ASSESSMENT AND INTERNAL MONITORING

- 5.1 The Council does not hold any external accreditation, however it conducts a rigorous monitoring procedure to ensure the national and local performance indicators it has set itself are specific, measurable, achievable, realistic and targeted to achieve best value.

The monitoring of the plan is conducted by:

- (i) Regular (minimum bi-monthly) monitoring of achievement of targets, actions and time taken by team managers or delegated officers.
- (ii) Submission of food hygiene and food standards statistical returns to the FSA
- (iii) Officers are provided with details of actions not responded to within the specified target times

- (iv) Regular one to one meetings
- (v) Annual appraisals of staff
- (vi) Publication of annual performance achievements
- (vii) Checks of accuracy of improvement and prohibition notices served.
- (viii) Shadowing of staff to check consistency and accuracy of inspections.

5.2 An internal audit of the framework for robust and timely food hygiene inspections was carried out in 2019. Following this audit a number of actions were identified and have since been implemented. Remaining items regarding QA monitoring and the timescale for inspection of newly registered premises remain outstanding. Please see APPENDIX 4 for more detail.

5.3 As part of its wider commitment to customer service the Council is taking part in a council wide customer excellence programme to review and streamline its services and to ensure that they are accessible to all.

6. **REVIEW**

6.1 The annual performance achievement is compared with the target set and any underachievement is explored and the appropriate action taken. Due to the Covid-19 pandemic no Food Service Plan was produced in 2020/21 or 2021/22 and targets for food interventions were not fully met. The Council is still recovering from the impact of Covid-19 on its services and interventions, as required by the Code of Practice, will continue to be impacted throughout the period 22-23. The data below details the performance that was achieved in 2019/20, 2020/21 and 2021/22, due to the reporting system it is not possible at this time to ascertain the percentage achieved of the overall interventions due.

Number of Inspections

6.1.2 Food Hygiene

| | Achieved inspections 2019-20 | % Of inspections achieved 2019-20 | Achieved Inspections 2020-21 | Achieved inspections 2021-22 | % Of inspections achieved 2021-22 |
|--------------------------------------|-------------------------------|-----------------------------------|-------------------------------|------------------------------|-----------------------------------|
| Premise Rating - A | 4 | | 2 | 2 | 100% |
| Premise Rating - B | 63 | | 9 | 28 | 88% |
| Premise Rating - C | 233 | | 38 | 48 | |
| Premise Rating - D | 311 | | 51 | 63 | |
| Premise Rating - E | 111 | | 48 | 5 | |
| Premise Rating - Unrated | Unable to report ¹ | | Unable to report ¹ | 124 | |
| Premise Rating - Outside | 152 | | N/A | 128 | |
| Total proactive interventions | 874 | 89% | 148 | 398 | |

| | | | | | |
|----------------------------|--------------|--|------------|-----------------|--|
| Number of revisits | 173 | | 7 | 39 ² | |
| Total Interventions | 1,047 | | 155 | 437 | |

¹ Due to our reporting system it has not been possible to distinguish the initial risk rating of these premises therefore the number of 'unrated' premises which have been inspected within year cannot be confirmed. As of 10/01/2022 available data indicates that of the above 102 inspections were conducted at previously unrated (newly registered) premises.

² This includes revisits carried out at premises outside the scope, i.e. Reading Festival.

6.1.3 Food Standards

| | Achieved inspections 2019-20 | % Of inspections achieved 2019-20 | Achieved inspections 2020-21 | Achieved inspections YTD 2021-22 | % Of inspections achieved 2021-22 |
|--------------------------------------|------------------------------|-----------------------------------|------------------------------|----------------------------------|-----------------------------------|
| Premise Rating - A | 241 ³ | | 12 | 4 | 100% |
| Premise Rating - B | | | 48 | 75 | |
| Premise Rating - C | | | 14 | 60 | |
| Premise Rating - Unrated | | | Unable to report | 111 | |
| Premise Rating - Outside | | | | 19 | |
| Total proactive interventions | 241 | 17% | 74 | 250 | |
| Number of revisits | 22 | | 1 | 7 | |
| Totals | 263 | | 75 | 257 | |

Formal Actions

6.1.4 During the period 2018 to 2021 the authority took the following enforcement action:

| Enforcement Type | 2018/19 | 2019/20 | 2020/21 | 2021/22 (YTD) |
|--|---------|---------|---------|---------------|
| Voluntary closure | 2 | 0 | 1 | 1 |
| Seizure, detention & surrender of food | 1 | 2 | 0 | 1 |
| Suspension/revocation of approval or licence | 0 | 0 | 0 | 1 |
| Emergency prohibition notice | 2 | 3 | 0 | 0 |
| Prohibition order | 1 | 3 | 0 | 0 |

| | | | | |
|---|-----|-----|-----|-----|
| Simple caution | 0 | 0 | 0 | 0 |
| No of premises where Improvement notices served | 16 | 11 | 0 | 2 |
| No of Hygiene Improvement notices served | 30 | 21 | 0 | 8 |
| No of FIR Improvement notices served | 0 | 1 | 0 | 0 |
| Remedial action & detention notices | 0 | 1 | 0 | 0 |
| Written warnings (Food Hygiene) | 655 | 910 | 129 | 381 |
| Written warnings (Food Standards) | 32 | 75 | 35 | 104 |
| Prosecutions concluded | 1 | 1 | 0 | 0 |

Food Sampling

6.1.5 The following shows the number of samples hygiene and compositional taken and unsatisfactory.

| | Number of Food Hygiene Samples | Number of unsatisfactory results | Number of Food Standards Samples | Number of unsatisfactory results |
|---------|--------------------------------|----------------------------------|----------------------------------|----------------------------------|
| 2017/18 | 63 | 22 | 46 | 19 |
| 2018/19 | 65 | 23 | 23 | 13 |
| 2019/20 | 29 | 8 | 30 | 20 |
| 2020/21 | 42 | 3 | 14 | 4 |
| 2021/22 | 11 | 0 | 29 | 7 ¹ |

¹ N.B. Not all results have been received to date.

Food Promotional Activities

6.1.6 The number of inspections carried out at Reading Festival in 2021 have been included in the table above at para 6.1.2. 132 Premises inspections were conducted for food hygiene including all premises trading within the inspection site. A further 12 contravention revisits were carried out during the festival period.

Food Hygiene Training Courses

6.1.7 The following Level 2 Training Courses have been ran since 2018

| | Number of Courses | Number of Students |
|---------|-------------------|--------------------|
| 2018/19 | 4 | 64 |
| 2019/20 | 6 | 56 |
| 2020/21 | 0 (Covid) | N/A |
| 2021/22 | 0 (Covid) | N/A |

6.2 Variations from the Service Plan

6.2.1 Due to the Covid-19 pandemic no service plan was set for 2020-21 or 2021-22 and a number of resources were allocated to carry out work associated with Covid-19. The following items were not met from the 2019/20 service plan and remain outstanding:

- The Council did not meet its inspections targets to carry out 100% of Food Hygiene Inspections A-D, 80% E and Unrated or 100% Food Standards Inspections A, 50% B, 10% C and 60% Unrated. However, due to changes in resourcing it has also not been possible to identify the number of inspections carried out in comparison to their initial risk rating in order to accurately report against these targets. This is a noted area of improvement.
- The Council did not run a Street Compliance Project
- The Council did not commence a project to review and address issues that have been noted regarding the non-registration of food businesses that have been identified as trading through online platforms such as Amazon, Facebook, Deliveroo.
- There has been a continued reduction in the number of food samples conducted despite service plan aims to increase this activity.
- Internal monitoring of officers has not been fully carried out in accordance with the authority's protocols and was identified as an area of action following the internal audit, please see point 6.3 below.
- A number of policies and procedures require updating.

6.3 Areas of Improvement

6.3.1 An internal audit was carried out in 2019. The Action Plan can be found in Appendix 4. As a result of the Covid-19 pandemic and continued changes to resourcing these actions remain partially or wholly outstanding.

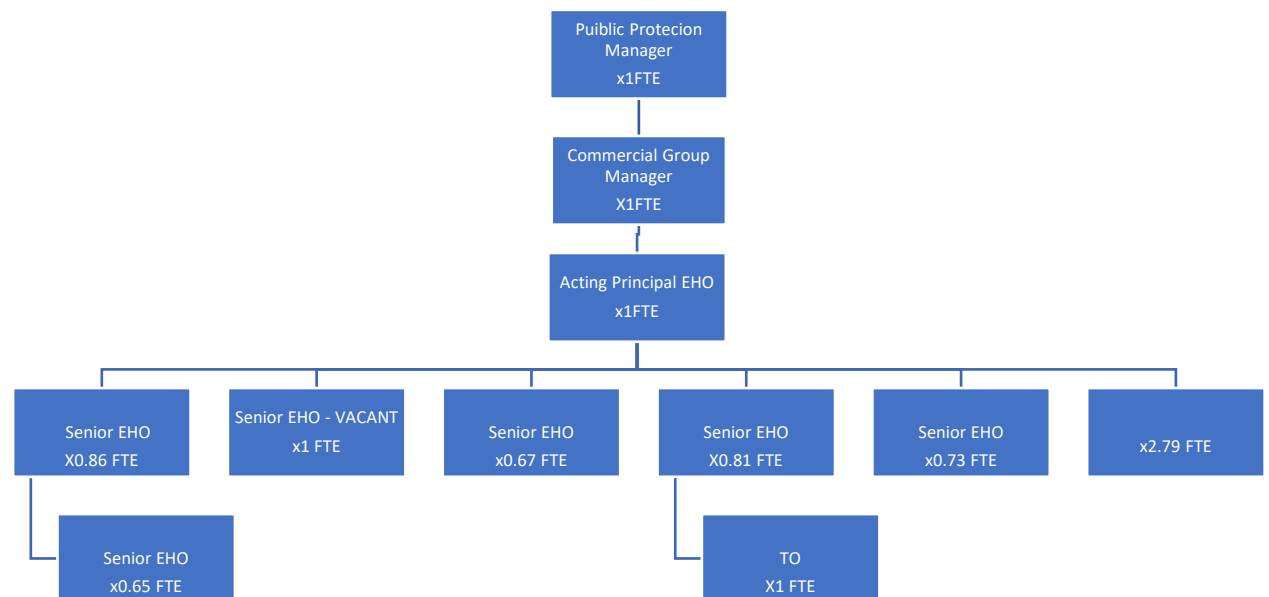
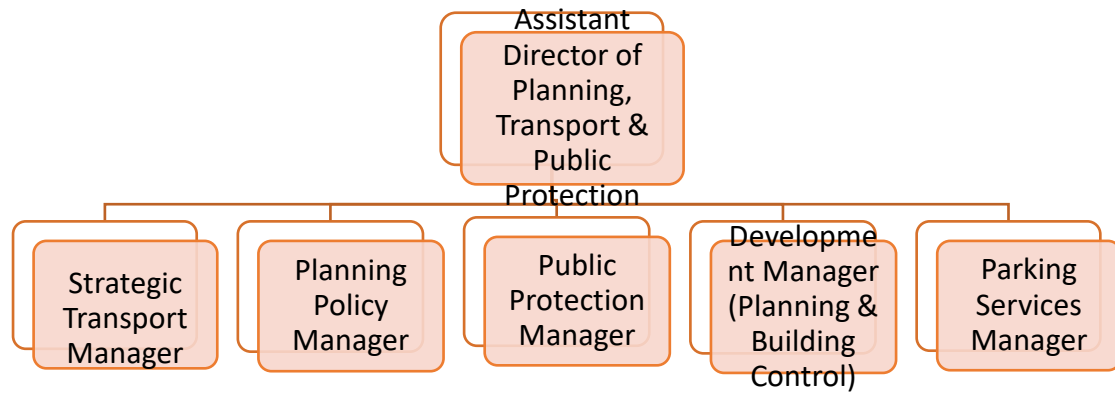
6.3.2 Further training is required in order to allow accurate reporting of interventions against targets.

7.0 Approval

7.1 This plan, including its appendices, has been agreed by the Public Protection Manager and Assistant Director for Planning, Transport and Public Protection.

Appendix 1

Public Protection Structure Chart



APPENDIX 2

Corporate Enforcement Policy

Reading Borough Council Corporate Enforcement Policy

Contents:

| Section | Subject | Page No |
|----------------|---|----------------|
| 1.0 | Introduction | 3 |
| 2.0 | Status of the Enforcement Policy | 3 |
| 3.0 | Scope and meaning of Enforcement | 3 |
| 4.0 | Need for an Enforcement Policy | 3 |
| 5.0 | Legal Provisions | 4 |
| 6.0 | General Principles | 4 |
| 7.0 | Expectations of Business | 5 |
| 8.0 | Obstruction of Officers and Powers of Entry | 5 |
| 9.0 | Appointment of Officers & Identification | 6 |
| 10.0 | Shared Enforcement Role | 6 |
| 11.0 | Provision for Interests of Consumers and Businesses | 6 |
| 12.0 | Choice of Appropriate Enforcement | 7 |
| 13.0 | Who Decides on Enforcement Action | 8 |
| 14.0 | Monitoring of Policy | 8 |
| 15.0 | Appeals, Complaints and Comments | 8 |

Reading Borough Council

CORPORATE ENFORCEMENT POLICY

1.0 INTRODUCTION

- 1.1 Fair and effective enforcement is essential to protect the economic interests and health and safety of the public, businesses and the environment. This Policy sets out what businesses and individuals being regulated by the Council can expect from Enforcement Officers.
- 1.2 This Policy commits the Council to good enforcement policies and procedures.

2.0 STATUS OF THE ENFORCEMENT POLICY

- 2.1 The Corporate Enforcement Policy was first approved by the Cabinet of Reading Borough on 20th March 2006, and was revised in 2009. The current version of the Policy is effective from February 2012.
- 2.2 In addition to this Corporate Policy, some individual Service Areas may have specific Enforcement Policies relevant to their work.

3.0 SCOPE AND MEANING OF ENFORCEMENT

- 3.1 This Policy applies to all the legislation enforced by officers of the Council.
- 3.2 Enforcement includes any action taken by officers aimed at ensuring that individuals or businesses comply with the law. This is not limited to formal enforcement action such as prosecution; it also includes, for example, the inspection of premises for the purpose of checking compliance with Acts of Parliament or Regulations.

4.0 NEED FOR AN ENFORCEMENT POLICY

4.1 A clear enforcement policy ensures that:

- (a) all those who live and work in Reading are able to have a clear understanding of the Corporate Policy covering the Council's enforcement functions.
- (b) all statutory notices issued by the Council are checked by an experienced officer for appropriateness, legal validity, content and technical information;

- (c) any information given to a business, landlord or individual, whether written or verbal, clearly identifies those requirements which are mandatory and those which are advisory;
- (d) any enforcement action is proportionate to the risks involved; and
- (e) officers follow a consistent approach to enforcement.

5.0 LEGAL PROVISIONS

5.1 The following legislation and guidance will be taken into account in the enforcement activities of the Council:

- a) The Enforcement Concordat (adopted by the Council on 14 March 2000)
- b) Legislative and Regulatory Reform Act 2006
- c) Regulatory Enforcement and Sanctions Act 2008
- d) Regulation of Investigatory Powers Act 2000
- e) Police and Criminal Evidence Act 1984
- f) Criminal Proceedings and Investigation Act 1996
- g) Freedom of Information Act 2000, Data Protection Act 1998 and Environmental Information Regulations 2004
- h) Human Rights Act 1998
- i) Local Government Acts
- j) Race Relations Act 1976 and Equality Act 2010
- k) Crime and Disorder Act 1998
- l) Other relevant Acts e.g. Public Health Acts, Housing Acts, Anti-Social Behaviour Act 2003, Criminal Justice and Public Order Act 1994, Clean Neighbourhoods and Environment Act 2005, Proceeds of Crime Act 2002, Localism Act 2011 etc.
- m) The Code for Crown Prosecutors
- n) Home Office Guidance on use of simple cautioning
- o) Local Service Plans
- p) Guidance from the Local Better Regulation Office
- q) Regulators' Compliance Code

Any other relevant Governmental Guidance or professional advice

6.0 GENERAL PRINCIPLES

6.1 Each case is unique and must be considered on its own merits. However, there are general principles that apply to the way each case must be approached. These are outlined in this Policy, and are based on the Enforcement Concordat, which was adopted by the Council on 14th March 2000. The Concordat is a voluntary Code of Practice developed by the Government in

partnership with local authorities and representatives of consumer and business interests.

The Enforcement Concordat contains the following principles:

- (a) **Standards:** set clear standards for the level of service and performance which the public and businesses can expect to receive;
 - (b) **Openness:** provide information and advice in plain language on the legislation and rules the Council applies, and disseminate this as widely as possible;
 - (c) **Helpfulness:** actively work with businesses and individuals, especially small and medium sized businesses, to advise on and assist with compliance; and provide an opportunity for discussion and for compliance before formal enforcement action is taken
 - (d) **Complaints about the Council's enforcement service:** provide well publicised, effective and timely complaints procedures which are easily accessible to businesses, the public and community groups;
 - (e) **Proportionality:** minimise the costs of compliance for businesses by ensuring any enforcement action required is proportionate to the risks; prosecute when appropriate
 - (f) **Consistency:** carry out our duties in a fair, equitable and consistent manner.
- 6.2 In addition to the principles of the Enforcement Concordat, the Council is required to carry out its regulatory activities relating to trading standards, environmental health and licensing in a way which is consistent, transparent, accountable, proportionate and targeted, in accordance with the Principles of Better Regulation.
- These principles underpin how Reading Borough Council's regulatory services work with businesses. The Council sees businesses - whether compliant or not - as its customers, and builds appropriate relationships. Any advice and support given to customers is authoritative and accessible, focussing on the needs of specific business sectors.
- 6.3 The Council will also have regard, where appropriate, to the priority regulatory outcomes published by the Local Better Regulation Office, which is a statutory body set up in 2008 to improve enforcement and regulatory activity in certain sectors. It has a statutory duty to specify matters to which local authorities must give priority when allocating resources, and is responsible for publishing priority regulatory outcomes, which assist local authorities in focussing their enforcement activities.
- 6.4 The Council is also under a duty to have regard to the Regulators' Compliance Code, which again applies to trading standards, environmental health and licensing, and which is largely based on the Principles of Better Regulation. The Code applies when determining general policy or setting standards, but not to individual cases.
- 6.5 The Council also operates the Primary Authority scheme and will have regard to guidance issued by the Local Better Regulation Office in carrying out enforcement activity within the scope of the scheme.

- 6.6 Further details of the Principles of Better Regulation, the Regulators' Compliance Code, the Primary Authority scheme and priority regulatory outcomes can be found in the relevant Departmental Enforcement Policies.
- 6.7 The Code, the priority regulatory outcomes, the primary authority scheme and the Principles of Better Regulation do not apply to enforcement activity relating to planning, listed buildings, advertisements, protected trees or building control.

7.0 EXPECTATIONS OF BUSINESS

- 7.1 In their own interests, and in order to avoid the need for enforcement action, businesses are expected:
- to be proactive in seeking advice
 - to be open in disclosing information to the Council when required
 - to be cooperative and willing to discuss problems

8.0 OBSTRUCTION OF OFFICERS AND OFFICERS' POWERS OF ENTRY

- 8.1 Enforcement Officers have a wide variety of duties, many of which need them to act as investigators similar to Tax Inspectors, Revenue and Customs officers and police officers. To enable them to act effectively, the law has given strong powers of entry, seizure and inspection. If individuals or companies obstruct officers or do not provide the requested information, the law also imposes punishments. Officers rarely have to use these powers, but for them to be effective the Council will continue to uphold and support them.
- 8.2 Officers will use their powers of entry only when necessary to effect an inspection of the premises or in the process of an investigation. The Council will **always** actively support officers acting in good faith, including prosecuting those individuals who obstruct or assault officers during investigations or inspections.
- 8.3 When the legislation allows, an officer may examine premises and articles, take photographs, remove articles, take samples or require information and may in some instances be accompanied by other persons. In appropriate cases an officer may seek a warrant from a Magistrates' court to gain entry into premises.
- 8.4 An officer will be expected to explain both the justification and the legal basis for the above actions upon demand.

9.0 APPOINTMENT OF OFFICERS AND IDENTIFICATION

- 9.1 All enforcement officers are required to carry identification in the form of an "Authority to Enter" card bearing their photograph. If an officer does not show his/her card, he or she may be asked to show it by anyone who is

requested to allow entry. If no card is produced, entry may be legitimately refused. If a member of the public has any doubt about the officer's identity, he/she may telephone the Council on 0118 937 3737 to confirm this.

10.0 SHARED ENFORCEMENT ROLE

10.1 Enforcement officers investigating breaches of the law must consider whether there is a shared or wider enforcement role. In some instances Council Officers from one Section work closely with officers of other Sections, or the Police, the Fire and Rescue Service, the Health and Safety Executive, the medical profession and others. Officers will respect confidentiality so far as it is appropriate to do so, and will not divulge any information which is not relevant to the case in question. However, the Council has a duty to inform certain government bodies of statutory notifications, for example, reporting certain accidents or occupational diseases to the Health & Safety Executive, or notices of intended prosecutions to the Office of Fair Trading.

10.2 If another agency or authority is the enforcing authority for a particular activity, officers will inform them of any contraventions they observe during the performance of their duties; for example, officers must consult the Fire Authority before serving a statutory notice to provide or improve means of escape in a house in multiple occupation. When appropriate, enforcement issues are referred to other agencies. For example:

Health and Safety Executive

Emergency Services

Thames Water

Royal Society for Prevention of Cruelty to Animals

Other Local Authorities

The Environment Agency, Department of Environment, Food and Rural Affairs,

Department for Work and Pensions, the UK Border Agency and other

Government Departments and Agencies

10.3 Confidentiality, data-protection and information-sharing are covered in detail in separate Council policies with reference to the Data Protection Act 1998 and Freedom of Information Act 2000, and the Environmental Information Regulations 2004.

11.0 PROVISION FOR INTERESTS OF CONSUMERS AND BUSINESSES

11.1 This enforcement policy has taken into account the interests of consumers and businesses in Reading. Visits to businesses sometimes occur out of normal working hours to cope with their extended operating hours. Similarly, many residents are only available in the evenings and visits are often arranged for mutual convenience. Where possible, interpreters and translators will

accompany officers where business persons, consumers and residents are unable to communicate in English.

12.0 CHOICE OF APPROPRIATE ENFORCEMENT PROCEDURES

12.1 Compliance should normally be achieved through informal action such as letters or giving advice. Where this does not result in compliance, or in more serious instances, formal enforcement action will be considered, e.g. issuing a statutory notice, offering a formal caution, or prosecution. The Code for Crown Prosecutors will be taken into account, among other factors, in deciding whether a caution or prosecution is appropriate.

12.2

(a) Informal action includes:

- (i) Educational Courses
- (ii) Giving Advice
- (iii) Visits to Check
- (iv) Warning Letters
- (vi) Consideration Notices
- (vii) Undertakings

(b) Formal Action includes:

- (i) Notice of Intention
- (ii) Works Notices
- (iii) Abatement Notices
- (iv) Improvement Notices
- (v) Works in default
- (vi) Prohibition Notices
- (vii) Control orders
- (viii) Closing Orders
- (ix) Seizure and Detention
- (x) Simple Cautions
- (xi) Enforcement Notices and other Notices under the Town and Country Planning Acts
- (xii) Injunction
- (xii) Revocation of licence
- (xiii) Fixed Penalty Notices
- (xiv) Anti-Social Behaviour Orders and Contracts
- (xiv) Prosecution

12.3 More information on different types of enforcement action can be found within each Service's enforcement Policy where appropriate.

13.0 WHO DECIDES WHAT ENFORCEMENT ACTION IS TAKEN?

- 13.1 For less serious infringements of the law, decisions about the most appropriate course of action may be made by the enforcement officer(s). Decisions are based upon professional judgment, legal guidelines, statutory codes of practice and priorities set by the Council and/or Central Government.
- 13.2 For more serious offences (where the nature of the offence points towards prosecution, simple caution and/or seizure), decisions about enforcement, may be taken by Enforcement / Investigating Officer(s) and/or senior managers from the relevant Section, and the Head of Legal Services where appropriate.

14.0 MONITORING AND REVIEW OF POLICY

- 14.1 All officers are required to adhere to this policy. Managers, including Team Leaders, are required to monitor the implementation of the policy by enforcement officers and make any necessary suggestions and recommendations for improvement. Any variance from the policy should be reported to the appropriate Service Manager who will ensure that it is addressed in the Service Plan, and that the necessary training is given to the officer(s) concerned.
- 14.2 This Policy will be reviewed when there is any significant change in legislation or other circumstances which affect its effectiveness and validity.

15.0 APPEALS, COMPLAINTS AND COMMENTS

- 15.1 The Council has published its Corporate Appeals and Complaints Procedures, which can be found on the Council's web-site: www.reading.gov.uk, where copies of this Policy are also available. In addition, most legislation that we enforce has an in-built appeals procedure whenever formal enforcement action is taken. These procedures will be explained as appropriate. Complaints may also be made to the Local Government Ombudsman (www.lgo.org.uk).
- 15.2 In addition to the corporate complaints procedure any person can take up their complaint with the Service Manager or Service Director in the first instance, should they so wish. Paper copies of this Policy may also be obtained from the relevant Service Director, and comments on the Policy should also be made to the Director. Copies will be made available on request in Braille, large type or in languages other than English where this is a reasonable requirement.

APPENDIX 3
FOOD ENFORCEMENT POLICY
CONTENTS

| Chapter | Subject | Page |
|----------------|--|-------------|
| 1 | Introduction | 27 |
| 2 | Policy Statement | 27 |
| 3 | The Approach to Enforcement | 27 |
| 4 | Practical Implementation of the Policy | 29 |
| 5 | Maintaining a High Quality Service | 32 |
| 6 | Enforcement Procedure | 33 |
| 7 | Review of the Policy | 40 |

1. INTRODUCTION

- 1.1 Reading Borough Council, as a “food authority”, has a duty to enforce within its area the provisions of the Food Safety Act 1990 (the Act) (as amended), the Food Safety and Hygiene (England) Regulations 2013 (FSHER 2013), a series of regulations made under the European Communities Act 1972 being implemented into UK legislation and other associated legislation. The Council carries out this duty by employing suitably qualified staff who are authorised to enforce the requirements of the legislation listed above. In developing this enforcement procedure, the Council has had regard to the guidance in the Codes of Practice issued by The Food Standards Agency (FSA).
- 1.2 While the Corporate enforcement policy sets out the general approach to enforcement throughout the council, and recommends that specific procedures should be developed to enforce particular pieces of legislation, this Food Enforcement Policy outlines how council officers will enforce Food law.
- 1.3 The policy covers the following:
 - (a) Policy Statement
 - (b) The Approach to Enforcement
 - (c) Practical Arrangements for Implementing the Policy
 - (d) Maintaining a High Quality Service
 - (e) Enforcement Procedure

2. POLICY STATEMENT

- 2.1 The Council has made effective arrangements to enforce the Act, the FSHER 2013 and all associated regulations and codes of practice, with the aim of ensuring that all food and drink intended for human consumption which is produced, stored, distributed, handled or consumed within the Borough is without risk to the health and safety of consumers, and is packaged and marketed within labelling and compositional requirements.
- 2.2 Should a member of the public or business wish to seek advice or make a complaint under the provisions of the Act, the Council will provide a prompt, courteous and efficient service for the handling of the enquiry in accordance with the Council’s service standards.

3. THE APPROACH TO ENFORCEMENT

- 3.1 The introduction of the FSHER 2013 formalises the requirement for enforcing authorities to ensure that operators of food businesses produce an effective documented management system for food that takes into account hazard analysis and critical control points (HACCP) when dealing with food issues.
- 3.2 This has resulted in increased demands on enforcement officers who have to assess the effectiveness of the documented system, and also on the operators of food businesses and food handlers who are now required to demonstrate their knowledge of how to prepare, store and present food in a safe manner so as not to pose a risk to health. A wide variety of statutory and non-statutory guidance exists to assist in the interpretation and compliance of the law.

- 3.3 The Council carries out its duties on a risk rating basis and applies the law in a proportionate and transparent manner. To this end the Council will:
- 3.3.1 Enforce and execute the provisions of the Act, the FSHER 2013 and associated Regulations.
 - 3.3.2 Register all food businesses as required by legislation.
 - 3.3.3 Inspect food premises with a frequency determined by an assessment of the potential risks guided by the Food Law Code of Practice issued by the FSA.
 - 3.3.4 Make consistent enforcement decisions in accordance with the procedure detailed in Section 6 of this policy.
 - 3.3.5 Comply with official guidance issued by FSA and where applicable, Department of the Environment, Food and Rural Affairs (DEFRA) and the Department of Health (DH).
 - 3.3.6 Liaise with the other food authorities in the area through the Berkshire and Oxfordshire Food Liaison Group, and through the Trading Standards South East (TSSE) Food Focus Group to ensure a consistent and agreed approach in dealing with food safety and food standards issues respectively.
 - 3.3.7 Participate in an inter authority auditing programme with other Local Authorities in the region for food safety and food standards.
 - 3.3.8 Liaise with the Food, Water and Environmental Microbiology Services, Porton Food Sampling Group to agree a national, regional and local sampling programme of microbiological food sampling. Liaise with TSSE, Hampshire and Worcestershire laboratories to participate in regional and where available national food standards sampling programmes. The Council also shares its local sampling programmes with TSSE.
 - 3.3.9 Investigate all cases and outbreaks of food poisoning based on risk and the single case protocol which details which organisation (the Local Authority or Thames Valley Public Health England (TVPHE)) will investigate which each organism. Liaison with the Thames Valley Infectious Disease Group ensures a consistent approach when dealing with individual cases or outbreaks of food poisoning.
 - 3.3.10 Follow the principles of the Primary Authority (PA) scheme as set out in the Regulatory Enforcement and Sanctions Act 2008.
 - 3.3.11 Where a business with an outlet in Reading has a PA in another area then the Authority will search the PA register for any additional information about the business, an inspection plan which directs the inspection, any PA advice given to the business which indicates that this area of the inspection has been approved by the PA. Feedback will be provided to the PA as it directs. Any business with a PA where enforcement is required will be carried out with the knowledge of the primary authority. Depending on the type of enforcement action an enforcement notification will be made to the primary authority register.
 - 3.3.12 Actively promote the PA scheme, engage new PA businesses, allocate officers to work with them who will create a work plan for each

business to achieve their goals. The Authority will work with other enforcement authorities to ensure businesses are protected from inconsistent or unreasonable enforcement, provided with a critical friend and a communication bridge to other enforcement authorities. Where there is a local failure at the business or deviation from the agreed policy, the authority cannot defend the business against enforcement action.

- 3.3.13 Where there is no primary authority for food standards then the home authority principle is applied to complaints and enquiries where food does not originate in Reading.
- 3.3.14 Businesses based in Reading with no PA arrangements will be actively encouraged to have one and only a basic Home Authority service is provided where food is unsafe to stay on the market.
- 3.3.15 Ensure the continued development of all its enforcement officers and encourage officers to keep up to date on food safety and food standards issues.
- 3.3.16 Deal effectively and appropriately with all food incidents including food hazards and food fraud on a localised and non- localised scale to ensure the appropriate persons are notified of incident and the incident is reduced to a safe level.
- 3.3.17 Provide training and education to food businesses to help them comply with their legal requirements and ensure their food is safe.
- 3.3.18 Follow the brand standard guidance for the operation of the Food Hygiene Rating Scheme. Issue a Food Hygiene Rating Scheme (FHRS) sticker to those businesses that fall within the scheme. Consider appeals of ratings, provide a mechanism for rerating on payment of a fee

4. PRACTICAL ARRANGEMENTS FOR IMPLEMENTING OF THE POLICY

4.1 The Council carries out its duties in the following manner:

4.1.1 Pro-active Inspections

- (a) Pro-active inspections are carried out in the form of a rolling risk-based programme. At the beginning of each financial year, the Licensing, Food & Safety Manager will produce a report identifying those premises that are due for inspection during the year. The percentage of premises that are not broadly compliant at the beginning of the year and at three monthly intervals. Once the Authority has determined the extent of the relative risk and categorised the premises, inspections are made on the minimum frequency basis detailed in 3.1.10 of the food service plan for food hygiene and 3.1.15 of the food service plan for food standards.
- (b) Most food businesses serving open food or high risk food will be given a rating sticker at the end of the visit of between zero and 5 to reflect the food hygiene at the premises based on the code of practice risk rating for hygiene, structure and confidence in management. This information is available on the web and also a sticker on the window /door. New businesses will be inspected and rated as usual. Unannounced re-ratings will be made within 3 months of payment of a fee.

- (c) Category A, B or not broadly compliant C food hygiene and category A or not broadly compliant category B food standards will be inspected using the existing system of inspection, partial inspection or audit approach. The parameters of the risk rating can be changed during an inspection, partial inspection or audit.
- (d) Category C food hygiene or category B food standards premises that are considered broadly compliant for food hygiene or food standards may, at every other inspection date have an intervention such as a verification or surveillance visit rather than a full inspection, partial inspection or audit. At the verification /surveillance visit premises can be moved on to show a new inspection date but the values of the parameters which make up the risk rating will remain unchanged. As a new Food Hygiene Rating assessment cannot be made on these visits, it is unlikely that verification/surveillance visits will be made as a proactive visit.
- (e) Category D food hygiene premises may receive an official control such as a full inspection, partial inspection, audit or verification/surveillance visit and on every other visit a non-official control such as education and advice. As the FHRs score cannot be changed or altered in the way it is made up as a result of a verification/surveillance or non-official control visit then it is unlikely that these forms of proactive inspection will be used unless the business does not fall within the FHRs scheme.
- (f) Category E food hygiene or category C food standards can be subject to an alternative enforcement strategy such as a self-assessment questionnaire. Where the business is still required to have a FHRs score an inspection will be carried out by an authorised officer. Where the business does not fall within the FHRs then a Regulatory Support Officer or a newly qualified authorised officer will visit the premises to assess if the type of food served at the business has changed and complete a low risk questionnaire with the business. Childminders are also not part of the FHRs scheme. These businesses are sent a low risk questionnaire. Any business that does not return its questionnaire is visited by a Regulatory Support Officer. Premises where large quantities of food are prepared or stored or high standards of food control are maintained may be subject to inspection or verification and surveillance visits to ensure the premises has not substantially changed.
- (g) Certain premises that produce meat, fish, dairy or egg based food for other businesses will be covered by the product specific establishment regulations in EC Regulation 853/2004 for food hygiene. These premises are inspected as dictated by the risk rating.
- (h) Food Brokers are inspected for traceability documentation of the food.

4.1.2 Reactive Inspections

Reactive Inspections of food businesses will be carried out following the receipt of a complaint, which could be regarding a food complaint, for example concerning contamination of a food, complaint about hygiene standards of a food premises or via the notification of a suspected food poisoning.

4.1.3 Food Incidents

There are 3 ways in which the FSA categorises food incidents. These are Food Alert For Action (FAFA) where immediate action will be taken on receipt of the notification; Product Recall Notices (PRIN) and Allergy Alerts where no action is required.

4.1.4 Sampling

Food sampling as agreed by FSA, PHE at Porton, TSSE Group and the Berkshire Food Sampling Group is carried out on a national, regional and local basis, focusing on the specific needs of Reading. Proprietors of those food businesses involved in the sampling programme are informed of the outcome and are required to take remedial action where laboratory analysis of samples show unsatisfactory levels of hygiene. Formal sampling as guided by the FSA Code of Practice will be restricted to occasions where formal action is anticipated.

4.1.5 Imported Food

- (a) As an inland authority for the sale of imported food, the authority could carry out inspection of the food as part of the food premises inspections.
- (b) Imported food may fail to have the correct documentation or labelling or the authorised officer may suspect the food is unfit for human consumption. In cases where there is insufficient documentation or labelling officers will make sufficient reasonable enquiries to ascertain correct documentation and labelling. Where an authorised is satisfied that the food is suspected of failing to meet the requirements of the food safety legislation, the food will be sampled.
- (c) Where sufficient documentation and labelling is produced to satisfy the requirements of the authorised officer the food will be released. Where there is insufficient documentation the action will be taken on a risk to public health based approach.
- (d) Where food fails to meet food safety requirements steps will be taken to ensure it does not re enter the food chain in its current state in the UK.

4.1.6 Education & Training

Officers actively encourage food handlers to participate in food hygiene training to expand their knowledge and understanding of food safety issues. All inspections involve some form of education/training, which is to be provided during on-site discussions concerning food preparation procedures and by offering advice and information on matters requiring attention. We run regular training courses for food businesses in food hygiene. Additionally, where significant changes are made to food legislation the team will work with the Communications Team to update food businesses on legislative changes and local initiatives.

4.1.7 Enforcement Action

To ensure an effective, transparent and consistent approach to enforcement of food safety legislation, officers will follow the guidance in Section 6.

4.2 Enforcement in Council-owned food premises

Any contraventions of food law found at businesses that are owned and run by the Council will be brought to the attention of the appropriate Head of Service and the Service Director who will be required to rectify the defect or deficiency within an agreed timescale where there is a significant breach or ongoing breaches of food law.

4.3 Who will implement the policy?

4.3.1 Responsibility for implementing the policy rests with the Licensing, Food & Safety Manager delegated through the Regulatory Services Manager under the authority of the Head of Planning, Development and Regulatory Services. Day to day activities are carried out by authorised officers. The Food Lead Officers are responsible for the planning, organisation and subsequent monitoring of all aspects of the policy. Inspections, sampling, investigations relating to food and training will be carried out by officers authorised under the Act and FSHER 2013 and as detailed in the FSA Code of Practice.

4.3.2 Trading Standards Officers, Environmental Health Officers and some Technical Officers in the Regulatory Services Department are authorised to deal with aspects of food legislation in accordance with the competency matrix and authorisation scheme of the Service.

5. MAINTAINING A HIGH QUALITY SERVICE

5.1 The Council is committed to ensuring that the highest practicable standard of customer service is integrated into all aspects of service delivery within a reasonable cost. All staff will adopt a professional approach, and performance monitoring will be carried out to ensure compliance with agreed targets. The service will also be audited by peer authorities and by reviewing any complaints against the service that may be received.

5.1.1 Professionalism

- (a) The Council ensures that all authorised officers have access to appropriate professional training and other resources required in order to maintain a high level of professionalism and competence.
- (b) The Lead Food Officers (Licensing, Food & Safety Manager and Principal EHO (Food)) will monitor the performance of authorised officers.

5.1.2 Monitoring the implementation of the policy

- (a) The Licensing, Food & Safety Manager and Principal EHO (Food) will monitor the following aspects of the Policy:
 - (i) Compliance with agreed targets for pro-active inspections
 - (ii) Compliance with agreed targets for reactive inspections/complaints
 - (iii) Compliance with agreed targets for written reports following inspections
 - (iv) The number of requests for service received year to year
 - (v) The number of food incidents received year to year
 - (vi) The number of sampling initiatives carried out year to year
 - (vii) The number of training courses and candidates run year to year

- (viii) The results of course evaluation sheets from year to year
 - (ix) The results of inter-authority auditing
 - (x) The number and nature of complaints made against the service
 - (xi) The results of specific target monitoring i.e. Number of businesses that have implemented a documented food safety management system.
- (b) Specific actions to achieve these aims are detailed in the Food Service Plan.

6. ENFORCEMENT PROCEDURE

6.1 Local authorities have a variety of options available to them when implementing food safety legislation. Action can be either informal (persuasive) or formal (compulsory). The various options available are detailed below.

6.2 Any general information, inspection plans, PA advice available on the PA register will be considered before any intervention in a business with a PA. Where formal action is considered because of ongoing local failures then a formal notification through the PA website will be made. In the majority of but not all of the cases, this will negate the need for formal enforcement action.

6.2 INFORMAL ACTION

Authorised officers may use informal procedures if they are satisfied that such procedures will secure compliance with the requirements of food safety legislation within a reasonable time scale.

6.2.1 No action

In certain circumstances contraventions may not warrant any action. This can be where the cost of compliance outweighs the benefit to public health. A decision to take no action must be recorded in writing and must take into account the public health implications of the contravention.

6.2.2 Verbal Advice

For minor breaches of the law we verbally advise the offender clearly identifying the contravention and including a deadline by which the action must be taken. This might be done when the authorised officer has confidence in the food business operator that the work would be carried out. Failure to comply would result in more severe enforcement action.

6.2.3 Written Warning and advice

- (a) During or on completion of an inspection the authorised officer will discuss as far as possible with the operator of the business, any problems that are identified and will explain what is necessary to rectify the problem.
- (b) After all visits to food businesses an inspection report form will be left with the person in charge of the business at the time of the visit. The inspection report form will detail the main findings and make a clear distinction between legal requirements and recommendations. The

form will contain details of areas inspected, person seen at the premises, visiting authorised officer, their contact details, date/ time of the visit and clear contact details regarding an Officers manager to allow a food business operator to take a matter further if they are not happy with the response of an officer.

- (c) In certain circumstances and particularly if the food business operator was not present at the visit to the food premises and it is known that the food business operator is not based at this premises a letter or a copy of the inspection report form will be sent to his office. This is particularly appropriate where there are legal requirements that must be carried out and it is a multi site business.
- (d) Where a letter is sent out after the visit, the letter will detail the hazards identified by enforcement officers during their inspection and the remedial action required. A clear distinction will be made between matters that are legal requirements and those that are recommendations and the measures that are required to secure compliance with the legislation.
- (e) It will be clear from both the inspection report and any subsequent letter that the operator can approach the Section for additional advice/assistance should it be necessary.

6.2.4 Follow up visits

Where significant breaches of the legislation have been identified during a previous visit to the premises, a revisit will be carried out to monitor progress towards compliance. Wherever practicable, and in all cases where a formal notice has been served or prosecution instituted the revisit will be undertaken by the same officer who carried out the original inspection.

6.3 FORMAL ACTION

- 6.3.1 In deciding what enforcement action is necessary, an authorised officer will have regard to the nature and severity of the contravention and the effects on public health. Regard will also be given to the food safety history of the business and attitude of the food business operator in complying with legislative requirements. Formal action will be instigated where informal action has failed to ensure that a food business operator has performed the duties imposed on them by relevant food safety legislation. A decision on what type of action to take may not necessarily be made at the time of the inspection.

6.3.2 Improvement Notices & Hygiene Improvement Notices

- (a) An authorised Officer may consider the use of an Improvement Notice or Hygiene Improvement Notice as appropriate in any of the following or combination of the following situations:
 - (i) where there is a history of non-compliance or delay in compliance of food safety legislation;
 - (ii) where formal action is proportionate to the risk to public health;
or
 - (iii) where it is believed that for an informal approach is not likely to be effective.

- (b) A Hygiene Improvement Notice gives the food business operator on whom the notice is to be served a minimum of 14 days in which to make a representation in respect of works improvement required. An Improvement Notice sets no minimum time for compliance with the notice and is designed to be used with the Food Information Regulations 2014
- (c) An Improvement Notice or Hygiene Improvement Notice will clearly detail which regulations have been contravened and what remedial action is necessary. Information will be sent explaining the recipient's right to appeal. The notice will specify the time within which compliance is required. The time allotted will be dependent on the nature of the problem, the public health risks involved and the availability of the solution.
- (d) An authorised officer serving an Improvement Notice or Hygiene Improvement Notice must be satisfied that they have adequate evidence to successfully prosecute for non-compliance should the situation arise.
- (e) The authorised officer will visit as soon as is reasonably practicable following expiry of the time allowed for compliance to check whether the contraventions of food safety legislation have been remedied. If they have not, an offence has been committed and the investigating officer shall prepare a report for the Head of Planning, Development and Regulatory Services.
- (f) The Head of Planning, Development and Regulatory Services will decide whether it is necessary and appropriate to instigate prosecution proceedings in respect of the food business operator subject to the Head of Legal Services being satisfied as to the available evidence.

6.3.3 Prohibition Procedures: Formal closure of a food premises using Emergency Prohibition Notice/Order or Hygiene Emergency Prohibition Notice/Order

- (a) Authorised Officers may serve the above notices where there is an imminent risk to public health. The notice will either:
 - (i) prohibit the use of the entire premises or part of the premises;
 - (ii) prevent the use of certain equipment; or
 - (iii) prohibit a particular process or treatment
- (b) The notice and subsequent order will require immediate closure of the premises, or the cessation of a process or use of specific equipment.
- (c) Following the service of an Emergency Prohibition Notice (EPN) or Hygiene Emergency Prohibition Notice (HEPN) the local authority must within three days apply to a Magistrates' Court for an Emergency Prohibition Order (EPO) or Hygiene Emergency Prohibition Order (HEPO) respectively. Where an order is not applied for the proprietor may claim compensation for loss of earnings arising as a result of the EPN or HEPN. The food business operator will have one complete day's notice of the Council's intention to make the application to the court. During the closure period frequent checks will be made to the business to ensure that it has not reopened without the permission of the authorised officer.

- (d) The EPN, HEPN, EPO, HEPO and accompanying notes will contain the following information:
 - (i) The name of the business and its address;
 - (ii) The matters that are considered to pose an imminent risk;
 - (iii) Details as to how to request that the premises may be allowed to open following the service of the EPO or HEPO;
 - (iv) The circumstances that will entitle the Food Business Operator to compensation for any losses following the service of the Emergency Prohibition Notice or Hygiene Emergency Prohibition Notice.
- (e) The Council will apply to the Court for its costs from the Food Business Operator in making the application and the work carried out beyond that of a normal inspection.
- (f) An authorised officer may serve a Notice seeking voluntary closure of the food business if the officer believes there is an imminent risk of injury to health as in the emergency prohibition procedures and he has confidence in the management of the business that they will not reopen until the imminent risk to health is removed. In these circumstances there is no opportunity for the business to seek compensation from the Council for loss of earnings as there is no need to apply to the court for confirmation of the notice in the form of an order.
- (g) The voluntary closure will be confirmed in writing and frequent checks will be made to the business to ensure that it has not reopened without the permission of the authorised officer.

6.3.4 Closure of food business after prosecution & prohibiting the food business operator from managing it - Prohibition Order/ Hygiene Prohibition Order

- (a) If a food business operator is successfully prosecuted for breaches of relevant food law and satisfactory evidence is provided to the court that the business continues to pose a risk of injury to health, the food authority can apply to the Magistrates' Court for a Prohibition Order. If successful, the food business operator and/or manager are prohibited from running a food business.
- (b) If a person is prohibited from managing a food business the information is circulated nationally via the Chartered Institute of Environmental Health (CIEH) to reduce the likelihood of that person setting up business in another area. If the Prohibition Order has been lifted the food authority will notify the CIEH as soon as is reasonably possible.

6.3.5 Inspection, Detention and Seizure of Suspect Food

- (a) Any food that fails to meet food safety requirements or has not been produced, processed or distributed in compliance with the hygiene regulations may be detained to allow further time for investigation or seized. When food has been detained or seized the food business operator will be provided with written notice as soon as is reasonably practicable.
- (b) The food will be presented to a JP as soon as possible but within two days, when a decision on further action will be made. This two day

period may be extended if necessary to ensure that parties attend and be represented if they choose.

- (c) A food condemnation notification will be given to the person in charge of the food when the officer intends to have the food dealt with by a Justice of the Peace (JP).

6.3.6 Suspension/withdrawal of approval or conditional approval

- (a) Any premises that has received approval under EC Regulation 853/2004 by the Food & Safety Team is given an approval number based on the stem of RG followed by the next numerical value which is notified to the FSA.
- (b) The approval will be suspended or withdrawn if the business fails to comply with the relevant hygiene regulations.
- (c) The business may be given a conditional approval (including approval number) rather than full approval on the first inspection after application. The conditional approval allows the businesses to trade provided if it meets certain conditions within six months. In order to obtain conditional approval the business must meet the structural requirements and produces a commitment to implement the other issues specified in writing within six months of the granting of the conditional approval. When all the requirements have been met an approval will be granted. If the requirements of the conditional approval are not met within six months of the granting of the conditional approval, the conditional approval for the business will be suspended or withdrawn.
- (d) The suspension, withdrawal of approval or conditional approval will be given in writing to the business and an appeals mechanism will be available to the business.

6.3.7 Remedial Action Notice

- (a) Authorised Environmental Health staff can serve a Remedial Action Notice on a food business operator that operates a food premises that is subject to approval. The notice will provide provision for prohibiting the use of equipment, any part of the establishment, the imposition of conditions upon, or prohibiting or reducing the rate of processing of the food. This Notice may be used in the following situations:
 - (i) When the rate of operation is detrimental to the ability of the business to comply with the regulations;
 - (ii) On a continuing serious breach of the hygiene regulations that gives rise to a risk to public health.

6.3.8 Prosecution

- (a) Food handlers and the owners of food businesses found to be contravening food safety and food standards legislation will be given reasonable opportunity to comply. However, in some situations the seriousness of the offence may be such that prosecution is appropriate. The following circumstances may result in prosecution proceedings being brought:
 - (i) The alleged offence involve a serious breach of the law such that public health, safety or wellbeing is or has been put at risk;

- (ii) The alleged offence involves a failure to correct a serious potential risk to food after a reasonable opportunity to correct the matter;
 - (iii) The offence involves a failure to comply in full or part with the requirements of a statutory Notice;
 - (iv) There is a history of similar offences relating to risk to public health
- (b) In such cases, the Council will consider:
- (i) The seriousness of the offence;
 - (ii) The previous history of compliance with relevant legislation;
 - (iii) The ability of the defendant to establish a due diligence defence;
 - (iv) The availability and capability of witnesses and the evidence available.

6.3.9 Deciding Whether to Prosecute

- (a) Not every contravention of the law should be prosecuted through the Courts. The Authority will weigh the seriousness of the offence (taking into account the harm done or the potential for harm arising from the offence) with other relevant factors, including the financial circumstances of the defendant, mitigating circumstances and other public interest criteria.
- (b) The Council will have regard to The Code for Crown Prosecutors issued under Section 10 of the Prosecution of Offences Act 1985 in deciding whether to prosecute in any particular case. Thus, before starting proceedings, the Head of Legal Services must be satisfied that there is a realistic prospect of a conviction based on the evidence (that is, there must be sufficient admissible, substantial and reliable evidence to secure a conviction). In addition, the Council will balance, carefully and fairly, the various public interest criteria against the seriousness of the offence. These public interest criteria include:-
 - (i) the likely sentence (if convicted);
 - (ii) previous convictions and conduct of the defendant;
 - (iii) whether there are grounds for believing the offence is likely to be repeated;
 - (iv) the prevalence of the offence in the area;
 - (v) whether the offence was committed as a result of a genuine mistake or misunderstanding;
 - (vi) any delay between the offence taking place and the date of trial;
 - (vii) the likely effect the prosecution will have on the defendant;
 - (viii) whether the defendant has put right the loss or harm caused.
- (c) The Council will have regard to the Regulators Code which came into force in 2014 and must be applied to food law. The enforcement approach must be reasonable, proportionate, risk based and consistent with good practice. It must consider the economic impact and minimise costs as well as encourage compliance.

- (d) If a number of offences have been committed and prosecution is deemed to be appropriate, then in selecting the offences for prosecution, regard will be had to the need to reflect the seriousness of the matter and to give the Court adequate sentencing powers to deal with the matter appropriately.

6.3.10 Simple Caution

- (a) A simple caution may be issued instead of a prosecution. The Council will have regard to the guidance contained in the Ministry of Justice circular Simple Cautions for Adult Offenders (November 2013) in deciding whether or not to offer alleged offenders the chance of a formal caution.
- (b) The following conditions should be fulfilled before a caution is administered:
 - (i) There must be evidence of the alleged offender's guilt sufficient to give a realistic prospect of conviction;
 - (ii) The alleged offender must admit the offence;
 - (iii) The alleged offender must understand the significance of a simple caution and give an informed consent to being cautioned.
- (c) If there is insufficient evidence to consider taking a prosecution, then a simple caution must not be considered.
- (d) There is no legal obligation for a person to accept the offer of a simple caution and no pressure should be applied to the Food Business Operator to accept one. If the alleged offender refuses to accept a simple caution a prosecution will normally be pursued.

7. REVIEW OF THE POLICY

This enforcement policy will be reviewed annually or when changes in legislation or centrally issued guidance makes this necessary.

Appendix 4
Internal Audit Action Plan

| Ref | Risk | Recommendation | Priority | Management Response | Responsible Officer(s) | Target Date |
|-----|--|--|------------|---|---------------------------------|--------------------|
| 1 | Without effective document control, the service might not be able to provide the necessary information to deal with queries and confidently report on accurate information. | <p>The service should :</p> <p>1) include a procedure for changes to risk ratings in the Food Premise Inspections policy detailing the sign off process which should be evidenced on the completed inspection documentation.</p> <p>2) Ensure Business Support officers complete a check of accuracy on each document to ensure information being entered into Civica is correct and reflects the inspection and is authorised by way of signature on the report itself.</p> | Priority 3 | <p>1) There will be a procedure for document control which will include the changes in risk rating and the evidence for the change in risk rating. There will be a system of proper recording on the database.</p> <p>2. A sample of the work of Business Support Officers will be audited on a quarterly basis by the Principal EHO and the work of the enforcement officers will be checked at 121s.</p> | Aoife Gallagher & Lisa Richards | 31st December 2019 |
| 2 | Not completing initial inspections within the 28 day timeframe may cause potential increased risk to consumer protection and the reputation of the Authority due to possible changes in the type and nature of business operation and the food safety management controls in place | The Food and Safety Team should carry out interventions at all food hygiene establishments in the area, at a frequency which is not less than that determined under the intervention rating scheme set out in the FLCoP. | Priority 2 | The performance of officers is closely monitored to ensure that high risk inspections are carried out within their due date. Any high risk businesses will also be added to this category to ensure that they are inspected within this timeframe. Under the current team working conditions it will not be possible to fully comply with this target and a target of 75% of the unrated businesses (specifically high risk businesses) are to be inspected within the 28 days. | Aoife Gallagher & Lisa Richards | On-going |

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| | | | | | | |
|---|---|--|------------|---|---------------------------------|--------------------|
| 3 | Where regular monitoring is not undertaken, there is a risk that the data reported and used to plan interventions may not be accurate and not compliant with the FLCoP minimum frequency intervention guidelines. | In order to improve the monitoring of food premise data it is recommended that a quarterly report is devised and used for monitoring and performance monitoring purposes. It is suggested that this report can be reviewed to assess performance levels. | Priority 3 | A quarterly report will be run by the Principal EHO and 10% of all inspections in that quarter will be used for monitoring and performance monitoring. This process will be documented within the updated internal monitoring procedure. | Aoife Gallagher & Lisa Richards | 31st December 2019 |
| 4 | There is a risk of non-compliance to food law if control activates and procedures are not used to verify the effectiveness of official controls in place. | The service should : 1) Revise the Internal Monitoring procedure to ensure it is fit for purpose and reviewed annually 2) Ensure all internal monitoring activities are carried as described in the Internal Monitoring Procedure. | Priority 2 | The internal monitoring procedure will be updated, all managers and staff within the team will be made aware of the changes. Thereafter all internal monitoring procedures will then be carried out in accordance with the updated procedure. | Aoife Gallagher & Lisa Richards | 31st December 2019 |
| 5 | Failure to have a clear policy and guidance for staff increases the risk that Officers are not able to properly protect themselves or the council from accusations of not acting properly or fairly which could result in action being taken against or reputational damage to the Council. | The service should ensure all staff are aware of their responsibilities under the Staff Code of Conduct to declare any financial and non-financial interests. The service may wish to remind all staff on an annual basis of this requirement. | Priority 3 | We will use the corporate staff code of conduct form when recruitment takes place. We will then link this form to the annual appraisal so that it is reviewed annually in case there are changes in circumstances within that year. | Aoife Gallagher & Lisa Richards | On-going |

APPENDIX 5**Food & Safety Work Plan Apr 2022 - Mar 2023**

This Work plan identifies the work streams currently undertake by the Food & Safety Team which sits within Public Protection. This work plan covers both annual recurring work (A) and individual, one off projects (O) that fall within the remit of the Food & Safety team and have been identified as action required. In collating this plan consideration has been given to present and emerging risks including arising from known legislative changes. It does not account for future legislative changes that have not been published at this time. This work plan covers the period April 2022 through to March 2023 and takes into account the FSA Recovery plan in service delivery. Work streams have been identified as Statutory (S) or Non-statutory (NS).

Work streams have been RAG rated according to priority with Red considered highest priority.

The FSA recovery plan can be found in Appendix 6 of the Food Service Plan 22-23

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcome [what difference will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finish | Lead | Service Plan Priority (RAG) | Corporate Plan Priority | Annual Requirement [A]/ One off project [O] |
|---------|---|--|--|---|---|--|----------|----------|------|-----------------------------|-------------------------|---|
| S | Food Hygiene Inspection Programme Until 31 March 2023. Premises inspected in accordance with FSA Guidance on Service return No of premises due/overdue inspection for this year = 1410 | <i>Requirement of Food Law COP.</i> <i>Service Plan Priority / Target</i> | <i>Premises subject to hygiene requirements inspected and compliant to ensure safe food. Education of local businesses</i> | <i>In line with FSA guidance priority inspections up to 31/03/23 are - Unrated, Cat A, Cat B (overdue) High Risk Cat C/D Overdue.</i> <i>Due to Covid targets will remain under review. Aim: 100% A premises</i> | PEHO - Management of inspection lists, monitoring of inspection and consultation with officers - 20 Days (0.08 FTE) Inspections (avg 3 hours incl officer administration) = 4677 | Induction training of new officers in line with Food Law COP. All officers to maintain Food CPD through ABC online training and available courses | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|-----------------|--|--|--|--|--------------|--------------|------|--|----------------------------|--|
| | | | | | | | | | | | | |
| | New registered premises per year = c. 230 | | | 90% B Premises 50% Unrated premises inspected | Hours (2.9 FTE) | | | | | | | |
| S | Food Hygiene Revisits and subsequent enforcemen t of non- compliant premises. Approximate ly 40% of premises are being found to be non- compliant. Estimate 656 premises. Ongoing non- compliance will require issue of formal notices and potentially lead to prosecution. | Food Law COP | Staged enforce ment action in line with the Corporat e Enforce ment policy to improve food hygiene standards and ensure safe food. | Increase in FHRS at re- rate or next inspection. NC premises will be noted as Compliant on database and Notices will be complied with. Premises revisited on time in accordance with notice expiry date. Any court proceedings to be brought within time limit. | PEHO - Consultation /Review of notices - 5 days (0.02 FTE) Inspecting Officers (1 day per premises avg) = 4750 Hours (2.8 FTE) | Induction training of new officers in line with Food Law COP. All officers to maintain Food CPD through ABC online training and available courses | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|--------------|---|--|--|--|-----------|------------|------|--|----------------------------|--|
| | | | | | | | | | | | | |
| S | Ongoing Enforcement including issue of notices. Resulting from ongoing or immediate non-compliance where a risk to public health and safety is presented. Approx 55 per annum | Food Law COP | Staged enforcement action in line with the Corporate Enforcement policy to improve food hygiene standards and ensure safe food. | Increase in FHRS at re-rate or next inspection. NC premises will be noted as Compliant on database and Notices will be complied with. Premises revisited on time in accordance with notice expiry date. Any court proceedings to be brought within time limit. | Officers (incl review by second officer) 1.5 Days per Notice/Premises 0.36 FTE | All officers to maintain Food CPD through ABC online training and available courses. Introduction and shadowing for new officers prior to authorisation . Refresher training for existing | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment | A |
| S | Approval of Premises Process applications for new approval activities. Inspect and review | Food Law COP | Approval activities authorised and published. Food products accurate | Applications and inspections carried out within SOP timeframe. Full approval awarded after | Average 2 new premises a year (min 5 days for each new premises) Inspection to existing | Induction training of new officers in line with Food Law COP. All officers to maintain | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcome [what difference will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finish | Lead | Service Plan Priority (RAG) | Corporate Plan Priority | Annual Requirement [A]/ One off project [O] |
|------------------|---|---------------------|--|---|--|--|----------|----------|------|--------------------------------------|---|--|
| | | | | | | | | | | | | |
| | existing approved premises. | | ly labelled and traceable. | max 6 months or removed. | premises (6) at 1 day each. Total 16 days / 44.5 Hours (0.03 FTE) | Food CPD through ABC online training and available courses | | | | | | |
| S | Food Hygiene Re-Rating visits (FHRS) for premises not overdue/due inspection Avg 30 requests received per year | FHRS Brand Standard | Increase in FHRS and improved compliance with FH requirements. Increased consumer confidence in premises | All inspections carried out within 3 months. Applications for premises that are overdue/due inspection will be refunded to business. | 0.5 days per premises (pre & post admin, inspection and liaison with business) 15 officer Days = 111.3 Hours (0.07 FTE) | Review of updated Brand Standard | 01/04/22 | 31/03/23 | PEHO | A | Healthy Environment Thriving Community | A |
| S | Respond to FHRS Appeals Estimate 10 per annum | FHRS Brand Standard | Appeals handled in accordance with Brand Standard | Appeals responded to within timeframe. Appeals resolved without | PEHO - 1 day per appeal (10 days) Officer time - 0.5 day per appeal (5 days) = | Familiarisation with updated Brand Standard. | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment Thriving Community | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcome [what difference will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finish | Lead | Service Plan Priority (RAG) | Corporate Plan Priority | Annual Requirement [A]/ One off project [O] |
|---------|---|--|---|---|---|---|----------|----------|------|-----------------------------|-------------------------|---|
| | | | . Maintain confidence in Food Hygiene Inspections | moving to Corporate Complaint. | 111.3 Hours (0.07 FTE) | | | | | | | |
| S | <p>Food Standards Inspection Programme Until 31 March 2023.</p> <p>No of due and overdue inspections = 1326</p> <p>New registered premises per annum approx. 230</p> | <p><i>Food Law COP.</i></p> <p><i>Service Plan Priority / Target</i></p> | <p><i>Premises subject to standards requirements inspected and compliant to ensure safe, correctly labelled food which does not mislead the consumer.</i></p> | <p><i>In line with FSA guidance priority inspections up to 31/03/23 are - Unrated, Cat A,</i></p> <p><i>Due to Covid targets will remain under review. Aim: 100% A premises</i></p> | <p>EH/TS Officers - 1.5 hours per inspection (including officer administration) Total officer hours - 2334 Hours (1.38 FTE)</p> | <p>Training to all officers in new PPDS and calorie labelling requirements .</p> <p>Training for all unauthorised /new officers in Food Standards inspections</p> | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|-------------------------|---|--|---|---|-------------|--------------|------|--|----------------------------|--|
| | | | | | | | | | | | | |
| | | | Educatio n of local business es | | | | | | | | | |
| S | Food Standard Revisits. Estimate 30% of premises required revisits following decline in standards and new legislation. Approx. 467 | <i>Food Law COP</i> | <i>Staged enforce ment action in line with the Corporat e Enforce ment policy to improve the level of informat ion provided to consume rs and ensure they can make an informe d choice.</i> | <i>Increase in compliance and confidence in management at next inspection. Revisits carried out in line with contravention deadline. Notices reassessed for compliant within identified timescale. NC premises will be noted as Compliant on database and Notices will be complied with.</i> | (EH/TS) 0.5 days per inspections. = 1456 Hours (0.86 FTE) | Training to all officers in FIRIN Notices | 01/4/ 22 | 31/03 /23 | PEHO | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|---|---|---|--|---|--------------|--------------|------|--|----------------------------|--|
| | | | | | | | | | | | | |
| | | | | Any court proceedings to be brought within time limit. | | | | | | | | |
| S | Food, Water & Environmen tal Sampling (Microbiolog y) Average 150 samples per annum. | <i>Food Law COP Sampling Plan Local/Nat ional sampling programm e</i> | <i>Ensuring food offered for sale is microbio logically safe and does not present a risk to health. Reductio n in incidenc e of food borne illness.</i> | <i>Unsatisfactory samples followed up with further intervention and re- sampling where necessary.</i> | S/EHO's - 25 days preparation and sampling = 185.5 Hours SEHO - Quarterly Meetings attended. (0.5 days) = 14.84 Hours PEHO - Allocation and monitoring (3 days) = 22.26 Hours Total = 222.6 Hours (0.13 FTE) | Practical training and authorisation for new officers. All officers to undertake sampling to maintain competence | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|---|--|--|---|--|---|--------------|--------------|--|--|---|--|
| | | | | | | | | | | | | |
| S | Food Standards Sampling Estimate 50 samples per annum | <i>Food Law COP Sampling Plan Local/Nat ional sampling programm e</i> | <i>Ensuring food offered for sale is correctly labelled, safe and does not mislead the consume r. Reductio n in food complain ts and referrals .</i> | <i>Unsatisfactory samples followed up with further intervention and re- sampling where necessary.</i> | SCPO - 20 days preparation and sampling = 148.4 Hours PEHO - 2 days monitoring = 14.84 Hours Total = 163 Hours (0.1 FTE) | Practical training and authorisation for new officers. All officers to undertake sampling to maintain competence | 01/04 /22 | 31/03 /23 | PEHO PTSO | R | Healthy Environment | A |
| N S | National Food Hygiene Rating Scheme (FHRS) Administrati on | <i>Discretion ary function to take part in scheme. All LA's in England participat e. Expectati on of</i> | <i>Enabling consume r to assess food hygiene and safety. Provide consume r confiden</i> | <i>Premises details uploaded to FHRS website fortnightly. Display of correct premises information</i> | Business Support - Fortnightly submission of ratings 24 days per annum PEHO - 5 days per annum housekeepin | New Business support staff trained in data maintenance and upload. Officers refreshed on data maintenance and recording | 01/04 /22 | 31/03 /23 | PEHO Busines s Suppor t Manag er | R | Healthy Environment Thriving Community | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|---|--|--|--|---|--------------|--------------|------|--|---|--|
| | | | | | | | | | | | | |
| | | Customer s. | ce in Reading business es | | g. = 37 Hours (0.02 FTE) | | | | | | | |
| S | Annual FSA Return (LAEMS) Temperatur e check returns | Food Law COP | Transpar ent Food Hygiene and Standard s perform ance. | LAEMS Return or equivalent accurately completed within time limit | PEHO - Housekeepin g & reporting (10 days) = 74 Hours (0.04 FTE) Business Support - 5 days | Training on Civica App and LAEMS required for PEHO and Business Support | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment Thriving Community | A |
| S | Drafting, Implementa tion and maintenanc e of Policies and Procedures, plus ongoing annual review. Following update and reissue of the new COP in March 2021 a full | Food Law COP requires each LA to have written policies and procedure s in place for the following: • Approva l • Food Business | Enabling staff to efficient ly, fairly and transpar ently conduct their role and respond to service requests and | Documented procedures in line with Food Law COP. | PEHO/SEHO - 5 days per procedure, plus additional days for sub- procedures, e.g. enforcement . Estimate 777 Hours (0.45 FTE) | Officer familiarisatio n with new areas of work. | 01/04 /22 | 31/03 /23 | PEHO | A | Healthy Environment Thriving Community Inclusive Economy | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|--|---|--|-----------|-------------------|-------|------------|------|--|----------------------------|--|
| | | | | | | | | | | | | |
| | review and update of all documented procedures must be carried out including drafting and implementation of those not previously in place. | Establish ment Databas e <ul style="list-style-type: none"> • Food Incident s and Alerts • Authoris ation • Control Verifica tion • Corpora te Complai nts • Food Complai nts • Samplin g • Equipm ent • Official food controls and other activitie s | complain ts. Provision of good custome r service. | | | | | | | | | |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|--|--|--|-----------|-------------------|-------|------------|------|--|----------------------------|--|
| | | | | | | | | | | | | |
| | | <ul style="list-style-type: none"> • Enforcement • Control and investigation of outbreaks and food related infectious disease • Information • Registration • Conflict of Interest • Sampling Policy • Enforcement Policy • Complaints Policy • Contingency Plan | | | | | | | | | | |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | | | | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|---|---|---|---|---|----------|------------|------|--|--|--|
| | | | | | | | Start | Finis h | Lead | | | |
| S | Annual review and inspection of Cooling Towers for the prevention and control of Legionella spp. 3 premises Developmen t, maintenance and implementat ion of SOPs | Statutory duty under HSWA1974 | Inspecte d, managed and maintain ed cooling towers reducing the likelihoo d of legionnai res disease. | All cooling towers registered and inspected. Cooling Towers risk rated 'A' inspected annually. | Officers - Inspections (including shadowing) 9 days PEHO/SEHO - SOPs, training & authorisatio n 5 days 0.06 FTE | Training of new, unauthorised officers in the risks and controls relating to Legionella. Shadowed/sh adowing inspections. Refresher training for existing staff. | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment | A |
| | Inspection and certification of registering special treatment premises. New registrations Operator and/or | Local Govt Miscellaneous Provisions Act | Complia nt premises · Reduced incidenc e of blood borne infection · | Mobile and domestic premises inspected and compliant prior to certificate being issues. Backlog of commercial premises awaiting | Inspecting officers - 2 hours per premises. 0.13 FTE | Training of new officers in special treatment inspection including shadowed visits. | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment Thriving Community Inclusive Economy | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | | | | | | | | | | | |
| | premises) per year = Approx. 30 Backlog of existing premises = 81 | | | inspection removed. | | | | | | | | |
| S | Special Treatment Revisits. Approx 20% of premises are found to be non- compliant requiring further attention and enforcement action. | Local Govt Miscellan eous Provisions Act Health and Safety at Work Etc Act 1974 | Complia nt premises . Reduced incidenc e of blood borne infection . | Revisits carried out within timeframe. Legal notices complied with in accordance | 1 day per premises. 0.1 FTE | Training and refreshment of authorised and new officers in appropriate notices | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment | A |
| N S | Review of Special Treatment certification and inspection regime. Removal of tacit consent | Certificati on is currently issued without inspection of premises. Certificati on is | Improve d complian ce in premises , reductio n of revisits and | New system implemented. All newly registered premises receive inspection within timeframe prior to | PEHO/SEHO - Research, drafting and implementat ion of new procedures. Committee Review. Training officers | Officers and Business Support trained in new system once implemented . | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment Thriving Community Inclusive Economy | O |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | timely and costly to remove once issued. Businesses should be assessed for compliance before certification to ensure risk to public health is minimised | further enforcement action. Reduced incidence of blood borne infection. | registration certificate being issued. | (incl. Business Support). Estimate 15 days (111 Hours) (0.07 FTE) | | | | | | | |
| S | Investigation of Infectious diseases and outbreaks including: Food borne illness & Legionnaire's disease. | National and Local Policy | Reduced incidence of infectious disease and outbreaks including food borne illness | Cases investigated in line with internal SOPs and Thames Valley single case protocol. Outbreaks investigated in line with National Guidance. | S/EHO - 0.5 days per case/outbreak = 810 Hours (0.48 FTE) | New officers trained in internal and local SOPs. ABC training available to all officers. | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | (Excl. Covid 19) Estimate 250 cases per year | | | Service requests responded to within internal standards. | | | | | | | | |
| S | Statutory H&S return to HSE | National Enforcer requirement for the compilation of statistics and interventions with poor performing authorities | Contribute to national enforcement statistics. Inform and develop future interventions and national policy | Return completed accurately and by deadline. | PEHO Housekeeping and return (3 days (0.01 FTE) | Training in Civica App (or alternative) to compile relevant data reports. | 01/04/22 | 31/03/22 | PHO | R | Healthy Environment | A |
| S | Sports Ground Safety - Complete SGSA Audit | Statutory requirement Safety at Sports Ground Act 1975 and associated legislation | Structurally safe and well managed sports ground | Annual audit completed within timeframe. Actions addressed and completed within timeframe. | Service Manager - 0.5 days PEHO - 3 days Total - 0.02 FTE | Familiarisation of new staff with relevant SOPs. | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment Thriving Community Inclusive Economy | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| S | Sports Ground Safety Inspection programme | Statutory requireme nt Safety at Sports Ground Act 1975 and associate d legislation | Structur ally safe and well managed sports ground | Min. 3 during match inspections carried out following risk assessment process. Inspection reports provided within SOP timeframe and enforcement action taken accordingly. | Service Manager - 1.5 day PEHO - 6 days SEHO - 6 days Inspection, pre & post admin. Total 100.17 Hours (0.06 FTE) | Familiarisatio n of new staff with relevant SOPs. Shadowed visits to be completed. New staff to undertake LCB Safety at Sports Ground training. | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment Thriving Community Inclusive Economy | A |
| S | Annual review and issue of Safety Certificate for Reading FC | Statutory requireme nt Safety at Sports Ground Act 1975 and associate d legislation | Structur ally safe and well managed sports ground | Annual issue of Safety Certificate. Annual review of updated Operations Manual. | PEHO/SEHO 5 days Each = 74 Hours (0.04 FTE) | New staff to undertake LCB Safety at Sports Ground training. | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment Thriving Community Inclusive Economy | A |
| S | Complete Review of Reading FC Operations Manual | Statutory requireme nt Safety at Sports Ground Act 1975 | Structur ally safe and well managed sports ground | Review of Operations Manual completed with written report of | PEHO/SEHO 121 Hours (17 days) for first review | New staff to undertake LCB Safety at Sports Ground training. | 01/04 /22 | 31/03 /23 | PEHO | A | Healthy Environment Thriving Community Inclusive Economy | O |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | | | | | | | | | | | |
| | | and associated legislation | | review issued to Reading FC. Follow up action taken in accordance with time frame. | Follow up reviews and amendments - 7.5 days. Total 24.5 days = 0.1 FTE | | | | | | | |
| S | Review of Operations Manual and Issue of new Safety Certificate for Palmer Park Regulated Stand Plus initial engagement and sent up of SAG meetings | Statutory requirement Safety at Sports Ground Act 1975 and associated legislation | Structurally safe and well managed sports ground | Established SAG Meeting schedule Clear and consistent lines of communication. Issue of new Safety Certificate. | PEHO/SEHO 121 Hours (17 days) for first review Follow up reviews and amendments - 7.5 days. SAGs - 20 hours per annum. Engagement 2 days Total = 0.13 FTE | New staff to undertake LCB Safety at Sports Ground training. | 01/04/22 | 31/03/23 | PEHO | A | Healthy Environment Thriving Community Inclusive Economy | A/O |
| S | SAG attendance Reading FC | Statutory requirement Safety at Sports | Structurally safe and well managed | Quarterly meetings carried out | PEHO - attendance, pre and post admin incl. | New staff to undertake LCB Safety at Sports | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment Thriving Community | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | | | | | | | | | | | |
| | | Ground Act 1975 and associated legislation | sports ground | with wide attendance. TOR in place. Meetings Minuted and actions taken within timeframe. | action review and minutes. Est. 37 Hours per annum (0.02 FTE) | Ground training. Safety Advisory Group Training for allocated officers. | | | | | Inclusive Economy | |
| S | Drafting, implementation and maintenance of SOPs for Sports Ground Safety | Requirement of SGSA and sports ground safety regulation. Identified requirement of annual SGSA audit | Improved performance at annual SGSA audit. Officer consistency will improve customer service | Documented procedures for sports ground safety work. | PEHO/SEHO - Est. 20 days (research, drafting, implementation, review). 0.09 FTE | New staff to undertake LCB Safety at Sports Ground training. | 01/04/22 | 31/03/23 | PEHO | A | Healthy Environment Thriving Community Inclusive Economy | A/O |
| S | Review and respond to Licensing consultations concerning premises licences, | Statutory consultee | Safer Events | Representation at and contribution to Safety Advisory Group Meetings | PEHO/SEHO - attendance at monthly SAG - 6 days, incl. preparation. 18 days | Safety Advisory Group Training for allocated officers. | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment Thriving Community | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | events and street trading. Including attendance at SAG. Approx 100 consults per annum | | | Proactive review of Event documentation Liaison with Event operators and objection to events where deemed necessary. | All officers - review and respond to consultations (1 hour each) Total = 233.6 Hours (0.14 FTE) | | | | | | | |
| N S | Undertake review of FH role in licensing consultations and align team, including draft and implementation of new SOPs | Current procedure does not align with licensing objectives . Inconsistent approach to license reviews. | Improved customer service through officer consistency. Contribution to Public Safety. | New SOP implemented Database actions reflect new SOP | PEHO - 10 days. (0.04 FTE) | Familiarisation of all staff on new SOPs | 01/04/22 | 31/03/23 | PEHO | A | Healthy Environment Thriving Community | O |
| S | Review and respond to consultations from planning, building control. | Statutory Consultee . Current procedures do not allow for | Active contribution to consultations. Collaboration | New SOP implemented Database actions reflect new SOP Referral of relevant | PEHO - 5 days S/EHO - Review & Response to consultation | Familiarisation of all staff on new SOPs | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment Thriving Community | O/A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcome [what difference will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finish | Lead | Service Plan Priority (RAG) | Corporate Plan Priority | Annual Requirement [A]/ One off project [O] |
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| | | | | | | | | | | | | |
| | Including liaison with departments, draft and implementation of new procedures. | a consistent or collaborative approach. Safe and compliant premises | with neighbouring teams to ensure safe and compliant premises. | premises through to Planning, Building Control Consultation on Planning and building control consultations. | s. Referral of non-compliant premises. Est. 50 per annum at 2 hours each. Total 0.08 FTE | | | | | | | |
| S | Imported Food (Official Controls) | Food Law COP | Food products offered for sale will be legally compliant, properly labelled and safe to eat. | Service requests actioned within timeframe. Targetted sampling | Resourcing for individual cases included in inspections & SRs above. PEHO/SEHO - Draft and implementation of Procedures - included above. | Familiarisation of all staff on new SOPs. Training of new and existing officers on notices | 01/04/22 | 31/03/23 | PEHO | R | Healthy Environment Thriving Community | A |
| S | Feed Inspection of Feed Premises. Approx. 37 premises. | Feed Law Code of Practice | Safety and security in the food chain. | Feed premises inspected. Revisits and enforcement action for non- | RBC currently have no authorised officers available to | 2 x Officers to receive bespoke training in Animal Feed Hygiene and | 01/04/22 | 31/03/23 | PEHO | A | Healthy Environment | O/A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcome [what difference will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finish | Lead | Service Plan Priority (RAG) | Corporate Plan Priority | Annual Requirement [A]/ One off project [O] |
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| | | | | | | | | | | | | |
| | | | Compliant feed premises. | compliant premises. | undertake this work. Estimate 0.5 days per premises (Total 137 Hours) 0.2 FTE | HACCP and complete competency assessment once COP updated | | | | | | |
| NS | Food Hygiene Training Courses. | Improve knowledge and skills of local businesses to increase compliance with food hygiene legislation, improve FHR score and improve local public safety | Accessible learning opportunities to local businesses, Improved food hygiene knowledge and FHR scores. Reduction in non-compliant premises | Minimum 4 Food Hygiene Courses (Internal/External) to be carried out per year. 75% candidates successfully passed Exam. | Training officers - 1.5 days per course. SEHO - 5 days per annum to review and maintain training materials and training centre. 0.05 FTE Business Support - 4 hours per course | New officers shadow/shadowed delivery of training course. | 01/04/22 | 31/03/23 | PEHO | A | Thriving Community Inclusive Economy | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | | | | administrati on. | | | | | | | |
| S | Reactive food & Safety work (service requests) (excl. Infectious disease/acci dents, including Covid-19) <ul style="list-style-type: none"> • Dirty food premises • Microbiologi cal, chemical & labelling • Allergens • Health, safety & Welfare • Business advice • Covid-19 | Food Law COP and FSA guidance on service return. HSWA/EA R | Ensure food on sale is safe to eat, produce d hygienic ally, correctly labelled and does not mislead the consume r. Ensure premises are safe to work in and visit. | 90% Service requests responded to within service response time. | All officers - 1 hour per SR on average. 1263 Hours (0.74 FTE) | Familiarisatio n of new officers with SOPs New officers shadow/shad owed visits to complex complaints. | 01/04 /22 | 31/03 /23 | PEHO | R | Thriving Community Inclusive Economy Services Building Relationships | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | Approximate ly 1263 per annum. | | | | | | | | | | | |
| N S | Paid advice visits - Food Hygiene. Approx 10 requests per year. | Improve food hygiene complianc e of businesse s. Provision of support and advice to local businesse s Income generatio n | Improve d hygiene standards and compliance at first and subsequ ent inspectio n. | Requests for business advice carried out within 28 days. Premises subject to paid advice will be broadly compliant or better after first formal inspection | S/EHO - 0.5 days per premises (incl. corresponde nce and preparation) 0.02 FTE | N/A | 01/04 /22 | 31/03 /23 | PEHO | A | Thriving Community Inclusive Economy | A |
| N S | Food Standards and bespoke labelling advice (paid) Approximate ly 1 request per annum | Improve food standard complianc e of businesse s. Provision of support and advice to | Improve d standards and compliance of labelling and consume r | Requests for business advice carried out within 28 days. Premises subject to paid advice will be broadly compliant or better after | SCPO - 1 day per annum 0 FTE | N/A | 01/04 /22 | 31/03 /23 | PEHO | A | Thriving Community Inclusive Economy | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | local businesse s Income generatio n | informat ion. Reductio n in further interven tions. | next inspection. Premises subject to paid advice will require less enforcement action. | | | | | | | | |
| N S | Improve Food Hygiene & Health & Safety presence on RBC website and social media | Modernise and improve communic ations with customer. Enhance transpare ncy and accessibili ty of service. | Improve d communi cations to and accessibi lity of service to custome rs. Reductio n in service requests and enquirie s. Improve d complian ce of | Develop H&S page on RBC webpage. Improve complaints service for customers. FSA complaints page removed. Publication of cooling tower register. Food Team posts on corporate Facebook/Twi tter Feeds regarding food hygiene & Safety. | PEHO - initiation, review and implementat ion - 3 days SEHO/SCPO - 10 days 0.06 FTE | Nominated officer(s) require familiarisatio n with corporate standards for publications and website | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment Thriving Community | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | | | | | | | | | | | |
| | | | food business es. | | | | | | | | | |
| S | Ensure all officers appropriatel y authorised and competent. Full review of all staff competency required under new COP and new training scheme to be implemente d | Food Law COP. | Service wide review of officer authoris ations and delegati ons Review of officer compet encies and skills in line with FSA new compet ency framewo rk | Competent/au thorised/ skilled and knowledgeabl e staff | PEHO - 10 days Officers - 5 days per officer (x8) 0.22 FTE | PEHO review of new COP standards PEHO to attend FSA webinar(s) regarding new competency requirements . | 01/04 /22 | 31/03 /23 | PEHO | R | N/A Legal requirement | O / A |
| S | Authorisatio n and Delegations Review | Food Law COP / HSWA | Review the delegati ons | Delegations register is up to date | PEHO - 10 days | N/A | 01/04 /22 | 31/03 /23 | Matthe w Golled ge | R | N/A - Legal Requirement | O |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | including implementa tion of new authorisatio n system for staff | Delegatio ns Register. Service Plan Priority | register and ensure officer authoris ations are up to date - as part of the corporat e review of the constitut ion and delegati ons register | There are clear lines of delegat ed authori ty for offi cers to ha ve the ne cessary p owers and authority | SEHO - 10 days 0.09 FTE | | | | | | | |
| N S | Administrati on of PAPs - invoicing Updating and manage ment of PAP register | Service Plan Priority / Target | Cost recovery Transpar ency of PAP manage ment and publis hed advice | Invoices issued within timeframe. PAP register maintained up to date. Display of correct personnel. Enquiries and enforcement requests | PAP Officers/ PEHO - 5 days per annum Business Support - 20 days per annum 0.03 FTE | N/A | 01/04 /22 | 30/06 /22 | PEHO Busines s Suppor t Manag er | G | N/A | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | | | responded to within timeframe. | | | | | | | | |
| N S | <p>Servicing of PAPs - Annual work plan, meetings, response to queries & enforcement, review of policies/procedures, issue of assured advice, review and update of published out of date advice</p> <p>15 PAPs for FH/FS/H&S</p> <p>Issue of PAP export Certificates</p> | Service Plan Priority / Target of £66,000 per annum [75% EH / 25% TS]. Projected target of £33,000.00 in 22-23 | Well managed PAP service compliant with statutory guidance | <p>Level of service aligns with requirement of statutory guidance. PAP advice up to date and reviewed within timeframe. Enquiries and enforcement actions responded to within timeframe.</p> | <p>75% Food & Safety PAP officers = 651 Hours per year (0.4 FTE/0.1 per quarter).</p> <p>Team consultation has identified this is not an accurate reflection of the time spent on PAP work including uncharged research, team meetings. It is therefore estimated that approx. 0.25 FTE is</p> | <p>Inexperience d officers to complete OPSS training and familiarisation. Officer handovers for PAP changes</p> | 01/04 /22 | 30/06 /22 | PEHO/PTSO | G | N/A | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | | | | | more accurate. | | | | | | | |
| N S | Reading Festival - Delivery of Alfresco Award, H&S monitoring & inspection, SAG Meetings and preparation . Review of Alfresco Award and future festival delivery. | Service Target | Safeguarding RBC residents and visitors | 100% of festival food premises inspected and scored under Alfresco rating. Gold, Silver & Bronze nominees made. Non-compliant traders revisited and referred to home authority. Food Team attendance at SAG Meetings prior to and during event. H&S hazards referred to Licensing | PEHO - 10 days (incl. SAG, team meetings, admin, preparation) Officers - 63 onsite days. 5 days H&S document review Training - Officers - 10 days 0.38 FTE | Event Safety training across Food & Safety & Licensing Teams. Nominated officers to received training in Safety Advisory Groups. Annual food hygiene consistency exercise. Pyrotechnic training. | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment Thriving Community Inclusive Economy | A |
| N S | Undertake SR review, including | Service requests require | Resources directed | Service requests responded to | PEHO 1 day SEHO 2 days | N/A | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment | O |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
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| | response time, and implement triage system. | prioritisa tion to ensure that these are effectivel y dealt with in line with available resources. | to highest public health risk. Improve efficienc y. | in accordance with public health risk presented. Increase in service requests responded to within timeframe. | Officers - 10 hours 0.02 FTE | | | | | | Thriving Community Inclusive Economy | |
| N S | Issue of Export certificates, including developmen t of SOPs and administrati on of authorisatio n. Estimate <5 per annum | Chargeabl e service. Support of local businesse s and neighbour ing LAs | Export certifica tes issued for local business es for fishery and limited animal products followin g EU Exit. | Zero rejection of export certificates at EU border. | PEHO/SEHO/ Officers - 20 days 0.09 FTE | Review of available COP and guidance documentatio n. Participation in online webinars Completion of Certifying officer course Shadowing/sh adowed inspections for each officer | 01/04 /22 | 31/03 /23 | PEHO | A | Healthy Environment Thriving Community Inclusive Economy | A |
| S | Covid Response - response to | Coronavir us regulation | Ensure that | Businesses are supported to ensure they | PEHO - Meetings | Ongoing training and familiarisatio | 01/04 /22 | 31/03 /23 | PEHO | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcome [what difference will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finish | Lead | Service Plan Priority (RAG) | Corporate Plan Priority | Annual Requirement [A]/ One off project [O] |
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| | | | | | | | | | | | | |
| | service complaints, proactive inspections and provision of business advice in line with Covid restrictions. Revisits to non-compliant premises. Attendance at internal & external meetings. Ongoing learning needs due to rapid changes in legislation. | Service Plan Priority | businesses and facilities are covid secure to support a safe return to 'normal' | are compliant with covid restrictions. Effective action is taken for non-compliance. Covid infections and outbreaks are kept to a minimum. Breaking chains of transmission and preventing and containing outbreaks | (169 Hours annually) Officers (incl. PEHO) Inspections (2 hours), revisits (3 hours) consultation (hour per week) - Est. 454 per annum Training and competency (1 hour per week/per officer) - 312 Hours Total 0.6 FTE | n for ALL officers at all changes of legislation and guidance | | | | | Thriving Community | |
| S | Development, Implementation and Maintenance of Health | Health and Safety has taken a backseat for more | Competent, knowledgeable and | Documented and implemented SOPs. Staff training records. | Review, development and implementation of SOPs and | Training & Development needs assessment. Refresher training for | 01/04/22 | 31/03/23 | PEHO | A | Healthy Environment Thriving Community | O/A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|---|---|--|--|--|---|--------------|--------------|----------------|--|----------------------------|--|
| | | | | | | | | | | | | |
| | and Safety SOPs. Training and development of staff in Health and Safety | than a decade. Control measures required to be implemen ted by businesse s during the pandemic have identified gaps in business knowledg e and skills and required more focused work in health and safety. | confiden t staff. Improve d business complian ce with health and safety legislatio n, safer work places. | Staff authorisation. | additional materials as required. PEHO/Lead SEHO - 25 days each. SEHOs - Training, developmen t and review of new SOPs. Shadowed visits. 10 days each Total estimate 90 days 0.4 FTE | all staff in all areas of H&S commencing with priority matters including: LPG Electrical Safety Asbestos Accident investigation Special Treatments | | | | | | |
| S | Food Service Plan | Food Law Code of Practice | Plan to demonst rate how the council | Plan drafted and agreed through committee. | Review of previous years performance . | Further training in Civica (or replacement) to run | 01/04 /22 | 30/06 /22 | Katie Heath | R | Healthy Environment | A |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|--|---|---|--|---|--|--------------|--------------|------|--|---|--|
| | | | | | | | | | | | | |
| | | Service Plan priority | will deliver its function s to protect the health of residents , visitors and those working in the town through the efficient and effective enforce ment of food safety laws in the Borough | | Target setting for upcoming year and assessment of resources. PEHO - 10 days 0.045 FTE per annum | appropriate reports. | | | | | | |
| N S | Proactive project targeting unregistered | Existing and increasing problem. | Few complain ts about unregist | Online monitoring of Reading based premises | Project lead to identify current trading | RIPA Training/Refr eshers for all officers. | 01/04 /22 | 31/03 /23 | PEHO | A | Healthy Environment Thriving Community | O |

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcom e [what differen ce will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finis h | Lead | Serv ice Plan Prio rity (RA G) | Corporate Plan Priority | Annual Require ment [A]/ One off project [O] |
|------------------|---|---|--|--|--|---|----------|------------|------|--|----------------------------|--|
| | | | | | | | | | | | | |
| | online food businesses; Requirement to registered, provision of FH/FS advice, follow up enforcement action. | Active consideration being given by FSA ABC programme. Public Health Issue. | ered food businesses. Increased confidence in hygiene and safety of online food traders. | operating as food businesses would should reduced number of unregistered premises. | premises in Reading. RIPA authorisation. Allocation of premises. 5 days. Team members - engagement, intervention and enforcement of identified premises. Estimate: 1 day per premises. Conservative estimate of 50 premises = 50 days 0.025 FTE | | | | | | Inclusive Economy | |
| S | Respond to FOI Request | Statutory function - Freedom of Informati | Customer service Legally compliant Council | FOI responded to and closed within 20 days | Estimate 20 per annum. 1 day per FOI (avg) = 20 days | All Senior officers require training and familiarisatio | 01/04/22 | 31/03/23 | PEHO | R | Inclusive Economy | A |

OFFICIAL

| S / N S | Action, [what are going to change deliver or improve] | Reason | Outcome [what difference will this make] | Success Measures [how will know we have delivered] | Resources | Training Needs | Start | Finish | Lead | Service Plan Priority (RAG) | Corporate Plan Priority | Annual Requirement [A]/ One off project [O] |
|---------|---|-------------|--|--|-----------|--------------------------------------|-------|--------|------|-----------------------------|-------------------------|---|
| | | on Act 2000 | | | 0.09 FTE | n with the updated corporate system. | | | | | | |

| Required Resource | Available Resource |
|-----------------------------------|--|
| Total Resource Required: 14.64FTE | Expected in post resource 22/23: 5.66 (Food Hygiene) 0.5 (Food Standards) Total allocated resource 22/23 (incl Food Standards): 11.01 FTE |

Risk Log

The following risks have been identified against the delivery of this work plan:

| | Risk | Likely Impact |
|----|---|---|
| 1. | Vacant posts | There are a number of vacant posts within the team that have not been successfully recruited to throughout the year. Vacant posts place a greater demand on existing staff to undertake the allocated work and with absent resources the work plan will not be delivered. |
| 2. | National Shortage of EHOs | Unable to attract and recruit qualified and competent staff to existing or future vacancies. Unable to locate qualified/competent agency personnel |
| 3. | Removal of Casual officer pay per inspection scheme | Unable to attract and recruit qualified and competent officers to undertake food hygiene inspections in a casual capacity due to reduction in income. May impact retention of existing staff who were attracted by ability to undertake additional overtime inspections Reduction in support from existing officers from other EH teams due to reduction in income. |
| 4. | Covid 19 Control Measures | Inspections were periodically suspended in 20/21 due to the pandemic. A delay to inspections restarting in 21/22 occurred whilst approval to proceed was awaited. |

| | | |
|----|--|---|
| | | Further ongoing impact to inspections is incurred due to requirements for social distancing, self-isolation and vulnerabilities of domestic food businesses. Staff are required to wear PPE which makes some communication more difficult and staff are required to reduce their time on site or in enclosed spaces where possible. National requirements to self-isolate have required staff (as positive persons or close contacts) to self-isolate at home which will reduce the number of visits/inspections that can be carried out. |
| 5. | Reallocation of staff to Covid-19 work | Reallocation of staff to Covid-19 work since March 20 has reduced the amount of general food and safety work carried out. A reduction in food & safety work has negatively impacted the experience and confidence of staff resulting in less familiarity that will need to be rebuilt. This will require an increase in training time and time required to refamiliarize staff with SOPs. |
| 6. | Part-Time Staff | The Food & safety team comprises predominantly part time staff, this has led to a loss of FTE within the team and has reduced the amount of out of hours working, e.g. to inspect evening businesses and undertake sports ground safety work, that can be achieved. The Council's current overtime payment policy also acts as a barrier to attracting part time staff to carry out out of hours work. |
| 7. | Primary Authority Partnerships (PAPs) | The team have 15 PAPs which it is required to service and maintain on a cost recovery basis. A loss in staffed posts and a gradual increase in the amount of PAPs over recent years has required a greater number of officers to participate in PAP work to maintain a level of service. The team are currently unable to meet the requirements of the PAP statutory guidance to provide a full service for each PAP and has not been able to keep PAP advice up to date. Work carried out on PAPs reduces the available resource to conduct statutory work listed in this workplan however due to PAP agreements being in place and the expected service delivery on PAPs this work has often had to take priority over statutory functions. |

Appendix 6
FSA Recovery Plan

OFFICIAL - SENSITIVE: This information is for feed and food enforcement authorities use only. It should not be shared beyond its intended recipients.



COVID-19 Local Authority Recovery Plan: guidance and advice to local authorities for the period from 1 July 2021 to 2023/24

Local authorities should also refer to the COVID-19 Local Authority Recovery Q&A.

Introduction

1. This Recovery Plan sets out the Food Standards Agency's (FSA) guidance and advice to local authorities for the period from 1 July 2021 to 2023/24. The associated COVID-19 Local Authority Recovery [Q&A](#) supplements the Recovery Plan.
2. The guidance and advice aim to ensure that during the period of recovery from the impact of COVID-19, local authority resources are targeted where they add greatest value in providing safeguards for public health and consumer protection in relation to food. It also aims to safeguard the credibility of the Food Hygiene Rating Scheme (FHRS).
3. The Recovery Plan provides a framework for re-starting the delivery system in line with the Food Law Codes of Practice (for England, Wales and Northern Ireland) for new food establishments and for high-risk and/or non-compliant establishments while providing flexibility for lower risk establishments. This should be implemented alongside delivery of:
 - official controls where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance that support trade and enable export
 - reactive work including enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints
 - sampling, and
 - ongoing proactive surveillance.

Important notes

4. All local authorities are expected to have regard to the guidance and advice in this Recovery Plan. This will apply from 1 July 2021 at which time it will supersede the guidance and advice provided in response to the COVID-19 pandemic that applies to 30 June 2021.
5. We recognise and acknowledge that local authorities will be starting from different positions in terms of the impact that COVID-19 has had to date, the challenges they will face during the recovery period and the resources that they have available.

6. Local authorities should, where they can, move at a faster pace in realigning with the intervention frequencies and other provisions set out in the Food Law Codes of Practice.
7. Where local authorities are unable to deliver in line with the recovery plan, they should alert us by emailing us so that we can explore together what support we might provide. Please contact us in:
 - England at LAengagement@food.gov.uk
 - Wales at lasupportwales@food.gov.uk
 - Northern Ireland at executive.support@food.gov.uk
8. We will be keeping our guidance and advice under close review and will amend and update it as necessary in response to changes in the COVID-19 situation.

Recovery Plan timeline

9. There are two phases to the Recovery Plan:
 - Phase 1 - 1 July to 30 September 2021
 - Phase 2 – 1 October 2021 to 2023/24.
10. In essence, Phase 2 will continue until a new food standards delivery model and a revised food hygiene intervention rating scheme are in place. The new delivery model for food standards is being piloted in England and Northern Ireland until the end of December 2021. Subject to the findings of an evaluation of the pilot and stakeholder consultation, it is anticipated that the new model will be rolled out nationally from April 2023. Work to review and revise the food hygiene intervention rating scheme is planned to commence shortly with a view to implementation in 2023/24.
11. An outline of the recovery plan is provided at Figure 1.

Figure 1: Outline of the Recovery Plan**Notes**

The key milestone dates within the Recovery Plan for higher risk establishments are shown.

For lower risk establishments not shown in the figure, local authorities have the flexibility to defer planned interventions and only undertake intervention where information/intelligence suggests that risks have increased/standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed.

In the case of food standards, the impact on the business of the new requirements on allergen labelling for products prepacked for direct sale - that apply from 1 October 2021 - should also be taken into account.

Principles common to Phase 1 and Phase 2**12. Some important principles underpin both Phase 1 and Phase 2:**

- when intelligence suggests risks have increased (irrespective of the risk category) local authorities should undertake interventions to assess and address those risks
- when an onsite intervention is undertaken, local authorities should programme subsequent interventions in line with the Codes of Practice
- local authorities should give new food hygiene ratings where appropriate interventions are undertaken and the establishment falls within scope of the FHRs
- where non-compliance is found at any intervention, local authorities should take appropriate action to secure compliance including formal enforcement action where necessary
- remote assessment may be used in certain circumstances – this includes to facilitate the targeting of what to focus attention on at a subsequent onsite visit, to help inform the need for onsite intervention at lower risk premises where an intelligence/information based approach is being used and, in England, in certain limited cases for FHRs requested re-visits.

Phase 1 (1 July to 30 September 2021)

13. In Phase 1, local authorities are expected to deliver the following:

- official controls where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance that are undertaken to support trade and enable export
- reactive work including enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints
- sampling in accordance with the local authority sampling programme or as required in the context of assessing food business compliance, and any follow-up necessary in relation to the FSA Surveillance Sampling Programme
- ongoing proactive surveillance to obtain an accurate picture of the local business landscape and to: identify open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities, or Food Business Operator (FBO)
- for 'new businesses', consideration of registration information and intelligence with appropriate onsite interventions carried out where there are concerns around public health/consumer protection
- for 'new businesses' where consideration of registration information and intelligence indicates low risk, initial visits should be prioritised and undertaken in accordance with the Codes of Practice and Practice Guidance taking account of the flexibilities provided
- planning for resumption of planned intervention programmes for high-risk category and non-compliant establishments in Phase 2.

Phase 2 (1 October 2021 to 2023/24)

14. In Phase 2, local authorities are expected to deliver the following:

- official controls where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance that are undertaken to support trade and enable export
- reactive work including, enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints
- sampling in accordance with the local authority sampling programme or as required in the context of assessing food business compliance, and any follow-up necessary in relation to the FSA Surveillance Sampling Programme
- ongoing proactive surveillance to obtain an accurate picture of the local business landscape and to: identify open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities or FBO
- for 'new businesses', consideration of registration information and intelligence with appropriate onsite interventions carried out where there are concerns around public health/consumer protection

- for 'new businesses' where consideration of registration information and intelligence indicates lower risk, initial visits should be prioritised and undertaken in accordance with the Codes of Practice and Practice Guidance taking account of the flexibilities provided
- implementing planned intervention programmes for high-risk category and non-compliant establishments in accordance with the timeline in Table 2
- implementing an intelligence/information based approach for lower risk category establishments
- responding to FHRS requested re-visits in line with the timelines specified in the FHRS Brand Standard for England or the statutory guidance in Wales and Northern Ireland.

Table 1 - Sector specific official controls and official controls that must be undertaken to support trade and enable export

| Activity | Requirements |
|---|---|
| Import controls at points of entry | Official controls in accordance with relevant legislation taking account of agreed temporary contingency measures to be taken at Border Control Posts (BCPs) during Covid-19. |
| Shellfish | Shellfish and water sampling from harvesting areas. |
| Granting of approval under Regulation (EC) No. 853/2004 | Granting of approvals in accordance with the relevant legislation and the Food Law Code of Practice. 'Distance communication' can be used in exceptional circumstances prior to physical visits to minimise time onsite. |
| Fishing vessels | Registration and inspection of fishing vessels remains extremely important to enable export certification requirements for fish to be fulfilled. |

Table 2 – Detailed timeline for Phase 2 of the recovery plan (1 October 2021 to 2023/24)

| Activity/Category | Timeline | Expectation |
|--|----------|--|
| Food/feed import controls at points of entry | Ongoing | In accordance with relevant legislative requirements |
| Official control monitoring relating to shellfish harvesting areas | Ongoing | In accordance with relevant legislative requirements |
| Conditional and full approval visits | Ongoing | In accordance with relevant legislative requirements |
| Inspection of fishing vessels | Ongoing | In accordance with separately issued FSA advice |

| Activity/Category | Timeline | Expectation |
|---|----------------------------------|--|
| Proactive surveillance to obtain an accurate picture of the local business landscape and to identify: <ul style="list-style-type: none"> - open/closed/recently re-opened/new businesses - change of operation, activities or FBO | Ongoing | Consideration of registration information and intelligence on the food business establishment identified through surveillance Undertake appropriate onsite interventions where there are concerns around public health/consumer protection |
| New food business establishments where consideration of registration information/intelligence indicates low risk | Ongoing | Initial visits should be prioritised and undertaken in accordance with the Food Law Codes of Practice |
| Management of food incidents and hazards (including outbreaks of foodborne illness) | Ongoing | In accordance with the Food Law Codes of Practice |
| Investigation and management of complaints | Ongoing | In accordance with the Food Law Codes of Practice |
| Enforcement action in case of non-compliance | Ongoing | In accordance with the Food Law Codes of Practice and the local authority's enforcement policy |
| FHRS requested re-visits | Ongoing | Wales and Northern Ireland - in accordance with the legislative requirements England – within three months of request if a charge is made and within six months if no charge but with use of remote assessment in place of onsite visit in limited circumstances on a trial basis |
| Sampling | Ongoing | In line with local authority sampling programme or as required in the context of assessing food business compliance, and any follow up necessary in relation to the FSA Surveillance Sampling Programme |
| Category A for hygiene | Over the period to 31 March 2022 | All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice. |

| Activity/Category | Timeline | Expectation |
|---|--------------------------------------|---|
| Category B for hygiene | Over the period to 30 June 2022 | All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice |
| Category A for standards | Over the period to 30 June 2022 | All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice |
| Category C for hygiene – less than broadly compliant (FHRS 0, 1 or 2) | Over the period to 30 September 2022 | All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice |
| Category D for hygiene – less than broadly compliant (FHRS 0, 1 or 2) | Over the period to 31 December 2022 | All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Food Law Codes of Practice |
| Category C for hygiene – broadly complaint or better (FHRS 3, 4 or 5) | Over the period to 31 March 2023 | For establishments with two consecutive food hygiene ratings of 5 (or equivalent standards if outside the scope of FHRS) one intervention may be missed and then the establishment put back in the system for interventions in accordance with the Codes of Practice (so the due intervention date would be moved forward by 18 months) For other establishments – those with hygiene ratings of 3 or 4 (or equivalent if outside the scope of FHRS) - should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Codes of Practice |
| Category D for hygiene – broadly complaint or better (FHRS 3, 4 or 5) | Ongoing | No interventions will be required during the recovery period unless intelligence/information suggests that risks have increased/standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed |

| Activity/Category | Timeline | Expectation |
|--------------------------|----------|--|
| Category E for hygiene | Ongoing | No interventions will be required during the recovery period unless intelligence/information suggests that risks have increased/standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed |
| Category B for standards | Ongoing | No interventions will be required during the recovery period unless intelligence/information suggests that risks have increased or if the establishment is otherwise considered a priority for intervention due to the risk posed or because of the impact on the establishment of the new requirements on allergen labelling for products prepacked for direct sale |
| Category C for standards | Ongoing | No interventions will be required during the recovery period unless intelligence/information suggests that risks have increased or if the establishment is otherwise considered a priority for intervention due to the risk posed or because of the impact on the establishment of the new requirements on allergen labelling for products prepacked for direct sale |

READING BOROUGH COUNCIL CLIMATE IMPACT ASSESSMENT TOOL

What You Need to Do:

The spreadsheet on the next tab has been designed to help you consider the climate change implications of a new project, proposal or recommendation. All Committee Reports, Project Business Cases and budget bid proposals require a climate impact assessment.

When rating the climate change impacts of your project/ proposal, there are two key issues to consider:

1. Impact on carbon emissions - will the project/ proposal:

| | |
|---|-----|
| * Reduce the overall amount of energy being used/waste being produced/transport emissions? | No |
| * Increase the overall amount of energy being used/waste being produced/transport emissions? | No |
| * Have no effect on the amount of energy being used/waste being produced/transport emissions? | Yes |

2. Impact on resilience to the effects of climate change - will the project/ proposal:

| | |
|--|-----|
| * Increase the ability of Reading, residents and/or RBC to withstand the effects of climate change? | No |
| * Reduce the ability of Reading, residents and/or RBC to withstand the effects of climate change? | No |
| * Have no effect on the ability of Reading, residents and/or RBC to withstand the effects of climate change? | Yes |

The tool requires you to consider these issues with reference to 8 different criteria e.g.: Energy Use; Waste Generation; Exposure to Heat Waves; Flooding, etc. Not all of these criteria will necessarily be relevant to your project/ proposal. Where a specific criteria is not relevant to your project/ proposal, assign a 'Nil' rating.

Where you identify either a positive or a negative impact, you are required to assess whether this impact will be High, Medium or Low. There is some guidance on the next tab to help you distinguish between High, Medium and Low impacts.

Results:

Once you have applied a rating to each of the 8 assessment criteria, you decide the overall rating your project/proposal should have. If your project has negative as well as positive impacts, you decide what the overall rating should be by weighing the positive and negative impacts, but you must explain how the overall rating given to your project/proposal has been derived. It is also compulsory to highlight any negative environmental impacts your project may have, which may have been 'masked' by the overall rating. You may do this in the commentary box below your rating.

Tips:

- 1. Concentrate on the most significant issues - there is the potential to consider the appraisal in a very detailed way. This should be avoided at this stage.
- 2. Where you have identified a negative impact, think about how you are going to manage or mitigate this impact and explain this in your report.

If you require assistance in completing the Climate Impact Assessment tab, please contact the Head of Climate Strategy (peter.moore@reading.gov.uk x4275) or the Sustainability Team Manager (ben.burfoot@reading.gov.uk x2232)

Once you have completed the Climate Impact Assessment tab, please email the completed spreadsheet to climateassessment@reading.gov.uk.

Project / Proposal Name or Reference:

Date:

Your Name:

APPENDIX RS-3

Food Service Plan 2022-23

04-May-22

Katie Heath

| 1. IMPACT ON CARBON EMISSIONS | | | | | |
|---|-----------------------------|--|--|--|--|
| HOW WILL THIS PROJECT/PROPOSAL AFFECT: | CONSIDERATIONS | IMPACT? | GUIDANCE IF NEGATIVE/NIL RATING HAS BEEN AWARDED | SUMMARISE HOW YOU PLAN TO MANAGE AND REDUCE ANY NEGATIVE IMPACTS | |
| 1 | ENERGY USE | <div>* More energy will be consumed or emissions generated (by RBC or others) = Negative Impact</div> <div>* No extra energy use is involved or any additional energy use will be met from renewable sources = Nil Impact</div> <div>* Energy use will be reduced or renewable energy sources will replace existing fossil fuel energy = Positive Impact</div> | Nil | <div>Consider:</div> <div>- Energy efficiency measures</div> <div>- Renewable energy</div> <div>- Reducing demand for energy</div> | It is not envisaged that, as a result of this plan, more energy will be consumed or emissions generated than there currently is. |
| 2 | WASTE GENERATION | <div>* More waste will be generated (by RBC or others) = Negative Impact</div> <div>* No waste will be generated = Nil Impact</div> <div>* Less waste will be generated OR amount of waste that is reused/ recycled will be increased = Positive Impact</div> | Nil | <div>Consider:</div> <div>- Re-usable/recycled goods</div> <div>- Recycling facilities</div> <div>- Reducing/reusing resources</div> | It is not envisaged that, as a result of this plan, more waste will be generated than there currently is. |
| 3 | USE OF TRANSPORT | <div>* RBC or others will need to travel more OR transport goods/people more often/further = Negative Impact</div> <div>* No extra transport will be necessary = Nil Impact</div> <div>* The need to travel, the use of transport and/or of fossil fuel-based transport will be reduced = Positive Impact</div> | Nil | <div>Consider:</div> <div>- Use of public transport</div> <div>- Reducing need to travel or transport goods</div> <div>- Alternative fuels/electric vehicles/walking and cycling</div> | It is not envisaged that, as a result of this plan, there will be any increase or decrease in the use of transport. |
| 2. IMPACT ON RESILIENCE TO THE EFFECTS OF CLIMATE CHANGE | | | | | |
| HOW WILL THIS PROJECT/PROPOSAL AFFECT THE ABILITY OF READING TO WITHSTAND: | CONSIDERATIONS | IMPACT? | GUIDANCE IF NEGATIVE/NIL RATING HAS BEEN AWARDED | SUMMARISE HOW YOU PLAN TO MANAGE AND REDUCE ANY NEGATIVE IMPACTS | |
| 4 | HEATWAVES | <div>* Increased exposure of vulnerable people and/or infrastructure to heat stress = Negative Impact</div> <div>* No increase in exposure to heat stress = Nil Impact</div> <div>* Reduced exposure of vulnerable people and/or infrastructure to heat stress = Positive Impact</div> | Nil | Greater need for cooling, ventilation, shading and hydration methods | N/A |
| 5 | DROUGHT | <div>* Water use will increase and/or no provision made for water management = Negative Impact</div> <div>* Levels of water use will not be changed = Nil Impact</div> <div>* Provision made for water management, water resources will be protected = Positive Impact</div> | Nil | Greater need for water management and perhaps reserve supplies | N/A |
| 6 | FLOODING | <div>* Levels of surface water run-off will increase, no management of flood risk = Negative Impact</div> <div>* Levels of surface water run-off & flood risk are not affected = Nil Impact</div> <div>* Sustainable drainage measures incorporated, positive steps to reduce & manage flood risk = Positive Impact</div> | Nil | Consider flood defence mechanisms or alternative arrangements (business continuity) | N/A |
| 7 | HIGH WINDS / STORMS | <div>* Exposure to higher wind speeds is increased or is not managed = Negative Impact</div> <div>* No change to existing level of exposure to higher wind speeds = Nil Impact</div> <div>* Exposure to higher wind speeds is being actively managed & reduced = Positive Impact</div> | Nil | Greater need for stabilisation measures, robust structures resilient to high winds | N/A |
| 8 | DISRUPTION TO SUPPLY CHAINS | <div>* Exposure to supply chain disruption for key goods and services is increased = Negative Impact</div> <div>* No change in exposure to supply chain disruption for key goods and services = Nil Impact</div> <div>* Exposure to supply chain disruption for key goods and services is reduced = Positive Impact</div> | Nil | Source key goods and services locally as it reduces exposure to supply chain disruption and boosts the local economy | N/A. The following have been considered: https://www.ukclimaterisk.org/wp-content/uploads/2021/06/CCRA3-Briefing-Agriculture-and-Food.pdf , https://www.efsa.europa.eu/en/topics/topic/climate-change-and-food-safety . It is acknowledged that Climate change proposes a substantial threat to the UK's food supply chain and safety of food (incl. Global |
| Weighing up the negative and positive impacts of your project, what is the overall rating you are assigning to your project?: | | | Net Nil | This overall rating is what you need to include in your report/ budget proposal, together with your explanation given below. | |

Guidance on Assessing the Degree of Negative and Positive Impacts:

Note: Not all of the considerations/ criteria listed below will necessarily be relevant to your project

| | |
|-------------------|--|
| Low Impact (L) | * No publicity |
| | * Relevant risks to the Council or community are Low or none |
| | * No impact on service or corporate performance |
| | * No impact on capital assets; or relates to minor capital assets (minor works) |
| Medium Impact (M) | * Local publicity (good or bad) |
| | * Relevant risks to the Council or community are Medium |
| | * Affects delivery of corporate commitments |
| | * Affects service performance (e.g.: energy use; waste generation, transport use) by more than c.10% |
| High Impact (H) | * Relates to medium-sized capital assets (individual buildings or small projects) |
| | * National publicity (good or bad) |
| | * Relevant risks to the Council or community are Significant or High |
| | * Affects delivery of regulatory commitments |
| | * Affects corporate performance (e.g.: energy; waste; transport use) by more than c.10% |
| | * Relates to major capital assets (larger buildings and infrastructure projects) |

In the box below please summarise any relevant policy context, explain how the overall rating has been derived, highlight significant impacts (positive and negative) and explain actions being taken to mitigate negatives and increase positives. This text can be replicated in the 'Environment and Climate Impacts' section of your Committee Report, though please note you may need to supplement this climate impact

There are no specific environmental or climate implications to this plan. Payments made to the Council are accepted electronically. Where accepted by the Food Business Operator subsequent correspondence with businesses, following inspection, will be supplied electronically. Applications for new business registrations are encouraged and accepted electronically. Horizon scanning will be carried out under the Food Service Plan to monitor areas of notable concern including increase in food poisoning incidences due to transmission of bacteria and food related viruses. Participation in national, regional and local sampling to monitor and identify emerging food safety concerns are included within this Plan.