



Reading
Borough Council

Working better with you

Food Service Plan 2023-2024

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.
- 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 support 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 2022-2025. 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>
Inclusive Economy	<p>Providing advice to existing and potential food businesses.</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, prioritising and delivering our resources in accordance with the Food Law Code of Practice as far as practicable.
- 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 23-24:

- 100% of Food Hygiene Premises rated A due before 31 March 24 to be completed
- 80% of Food Hygiene Premises rated B due before 31 March 24 to be completed
- 70% of new registrations (those awaiting inspection) to be completed before 31 March 24
- 100% of Food Standards Premises rated A due before 31 March 24 to be completed.

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 2023 – March 2024.

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 174,200 (ONS Census 2021). The Unemployment (those claiming job seekers allowance) rate is 4.2% (ONS October 2022) within the town, higher than the national average of 3.8% (ONS February 2023). 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. 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 including the new Elizabeth line (between Reading and London Paddington) which placed Reading on the TFL underground map. Works remain underway to open a new train station at Green Park, which will 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 October 2022 \(reading.gov.uk\)](https://www.reading.gov.uk/constitutions/constitution-october-2022)

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 \(reading.gov.uk\)](https://www.reading.gov.uk/constitutions/200210-Delegations-Register.pdf)

- 2.2.3 The Council operates a Committee Structure, with the Food & Safety Team reporting to the Housing, Neighbourhoods & Leisure (HNL) Committee and Policy Committee. The councillors with responsibility for Food & Safety are the Lead Councillor for Environmental Services and Community Safety and the Lead Councillor for Education and Public Health.
- 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, Principal Environmental Health Officer, Food & Safety, supported by Rob Abell, Consumer Protection Group Manager and 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 As of June 2022 the Food & Safety Team are no longer involved in the Primary Authority Partnership Scheme. This remains an area of work for the Trading Standards Team who continue to provide assured business advice and support in Food Standards matters.
- 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 and resourcing challenges with only 59% posts filled. This is a slight increase on the number of posts that were in post throughout 22-23 which stood at 56%.
- 2.3.5 The service is based at:
- Public Protection
Floor 1 South Rear
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. There is no standard emergency out of hours cover available for Food matters except for the Christmas period where the office is routinely closed. emergency 'out of hours' telephone number is 0118 937 3737.

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	9
Food Importer/Exporter	7
Food Distributor/Transporter	26
Supermarket/Hypermarket	45
Small Retailer	228
Retailer Other	99
Restaurant, Café, Canteen	556
Hotel, Guest House	34
Pub, Club	119
Takeaway	191
Caring Establishment	144
Schools, Colleges	76
Mobile Unit	82
Restaurant, Caterer Other	0

Total	1616
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- 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 the Food & Safety Team 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.
- 2.4.8 The service has also seen a rise in businesses trading as 'Dark Kitchens', where a single premises/business trades as multiple business online. This way of trading has an impact on consumer information and raises 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 Following Covid-19 and loss of team resources our inspection services are still facing substantial challenge and we have been unable to complete all tasks required by the FSA Recovery Plan to date. There remains a backlog of overdue and awaiting inspections. There continues to be an increase in newly registered food premises within the borough. The Council is continuing to prioritise work, focussing on high-risk (A & B) unrated and newly registered premises, premises subject to ongoing enforcement action, reactive work and those presenting the highest risk. The Council has been unable to deliver the required milestones of the FSA Recovery Plan and will be unable to carry out all inspections required by the Food Law Code of Practice.
- 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 255 per year making a significant contribution to the number of new premises/ those that have changed ownership on the database. There has been a 480% increase in number of registrations received per year over last 10 years and last year saw a 6% increase from the previous year.
- 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, 96% of premises are currently rated as 'broadly compliant', a decline in 1% from the previous year. 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 throughout the past year indicate that currently 16% of premises inspected are not broadly compliant. This figure shows that there has been a 333% increase in the number of non-broadly compliant premises for food hygiene. Non broadly compliant premises are requiring follow up revisits, education and enforcement action.

3.1.8 For Food Standards, 89% 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. However, inspections which have been carried out across the past year shows that 32% of premises are not considered to be broadly compliant.

3.1.9 The following targets for food premises inspections due to be visited in 2023-24 are:

	Food Hygiene	Food Standards
Category A	100%	100%
Category B	80%	N/A
Category C	N/A	N/A
Category D	N/A	-
Category E	N/A	-
Category Unrated	70%	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 2023/24, including those overdue from previous years is:

Category/ Frequency	Number of inspections Due 2023/24
A / at least every 6 months	8
B / at least every 1 year	53
C / at least every 18 months	147
D / at least every 2 years	548
E / Alternative Enforcement Strategy	359
Outside the Programme (incl. Reading Festival)	197
Unrated ¹	65
Total	1,377

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

Food Standards – labelling and composition

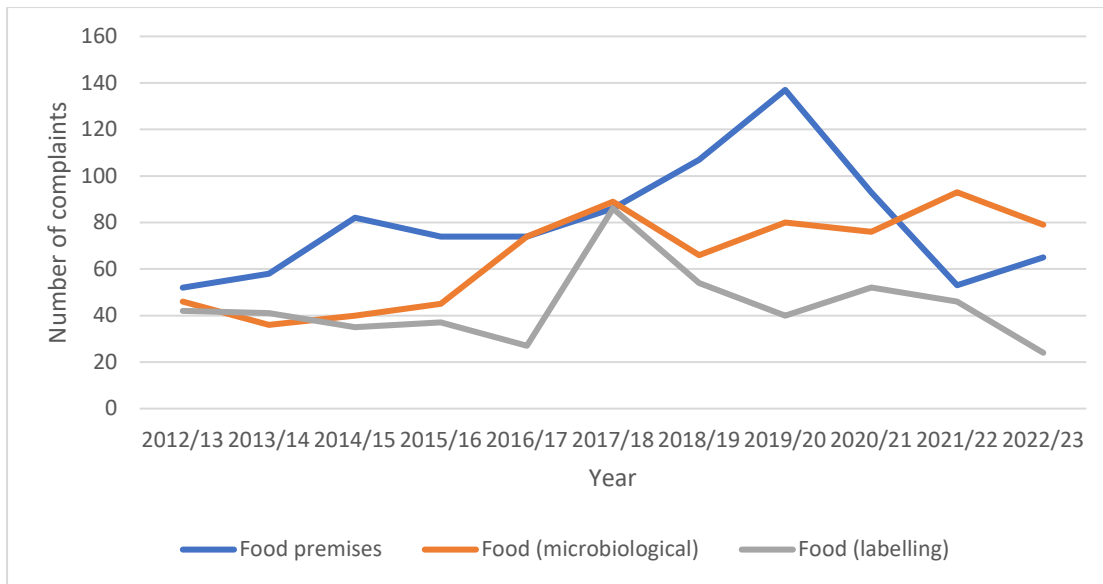
3.1.15 The frequency of food standards inspections is determined by the risk rating system stipulated in the Code of Practice. The number of inspections due in 2023/24 are:

Category/ Frequency	Number of Inspections due 2023/24
A / at least every 1 year	4
B / at least every 2 years	439
C / alternative enforcement strategy	712
Outside the Programme	172
Unrated ¹	284
Total	1,611

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 2012/2013:



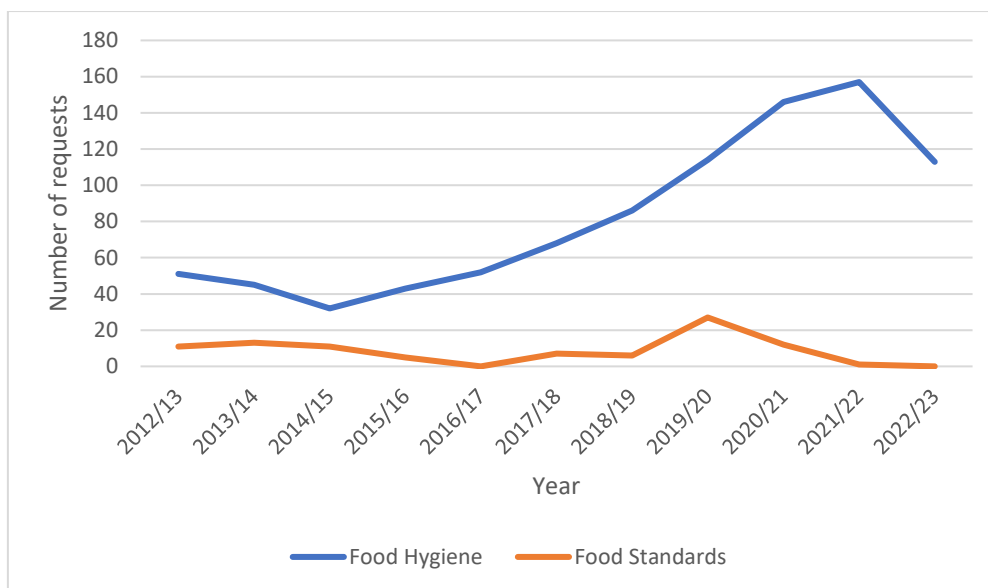
3.2.3 Estimates for this year suggest the figures for microbiological food will remain broadly constant, labelling complaints are likely to continue to reduce whilst the number of complaints about food premises rather than food will continue to rise.

3.3 Advice to Business

3.3.1 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.

3.3.2 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.

3.3.3 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:



3.3.4 It is anticipated that the number of requests for food hygiene advice will continue to increase. Food standards advice requests have declined over recent years, therefore review of how this service is advertised and how we record this information would be beneficial.

3.4 **Food Sampling**

3.4.1 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.

3.4.2 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) Information received via the International Food Safety Authority Network (Infosan) distributed by the FSA.

3.4.3 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.

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

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

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

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

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

Food Safety – Microbiological Sampling

- 3.4.7 Resources are allocated through the UK Health Security Agency. Microbiological food sampling projects are co-ordinated within the sampling county liaison group. The Porton laboratory carries out the analysis of the samples.
- 3.4.8 For 2023/24 the food sampling budget for microbiological analysis will be approximately £6,000.00 which is held on account by UKHSA. We are still awaiting confirmation of the final award.
- 3.4.9 We will continue to participate in proactive national and regional sampling programmes which align with our premises and priorities. A target of 120 microbiological samples is in place for this year, including samples taken as part of these studies. Reactive samples will be carried out on a risk basis.
- 3.4.10 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

- 3.4.11 Trading Standards manages a coordinated annual sampling programme through Trading Standards Southeast 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.
- 3.4.12 There is no set budget for Food Standards Sampling. Sampling is purchased through our agreement with HKSS.
- 3.4.13 There has been a decline in available grants and sampling projects ran by the FSA over the past year, the Council is currently not participating in any active projects and was allocated minimal funding for imported food sampling in 2022/23. The Council will continue to participate in relevant campaigns ran by the Public Analyst, subject to funds being available and will bid to participate in relevant sampling programmes and campaigns throughout 23-24, including Operation Opson.

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

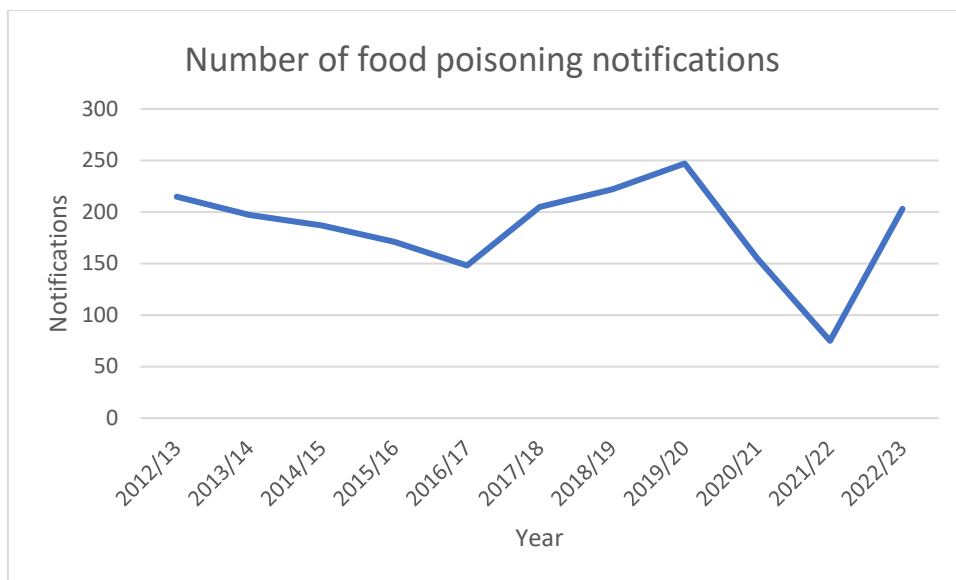
3.5.1 The Service investigates all notifiable food poisoning incidents and outbreaks associated with food occurring in Reading. Officers will liaise with the Consultant in Communicable Disease Control (CCDC) in the investigation of diseases or outbreaks and where it is necessary to exclude infected persons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

- 3.5.2 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.

3.5.3 The target for response is as follows:

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

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



3.5.5 It is anticipated that the number of notifications for 2023/24 will increase to pre-pandemic levels.. 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.

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

3.6 Food Safety Incidents

3.6.1 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.

3.6.2 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

3.6.3 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.

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

3.7 Liaison with Other Organisations

3.7.1 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.

3.7.2 The Lead Food officer or nominated deputy will attend and participate in the Berkshire, Buckinghamshire and Oxfordshire Food Safety & Health and Safety Liaison Group (BOFSLiG) that meets three times per year. A member of this group attends the National Food Hygiene Focus Group.

3.7.3 The officer with specialist responsibility for sampling attends and participates in the Berkshire Food Sampling Group.

3.7.4 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.

3.7.5 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

- 3.7.6 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).
- 3.7.7 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.
- 3.7.8 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.

3.8 Food Promotion/ Projects

Food Hygiene Rating Scheme

- 3.8.1 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.
- 3.8.2 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

- 3.8.3 The Authority provide written and verbal advice to food businesses and members of the public upon request and information on common matters can also be found on the authority's webpages. The Authority is not currently running any food hygiene training courses.
- 3.8.4 The Authority have a paid advice service whereby businesses can pay to receive bespoke food hygiene advice to their business, including a site visit, or bespoke food standards/labelling advice.

Improving Food Hygiene Compliance

- 3.8.5 Following a decline in the standards of premises for food hygiene and an increase in the number of non-broadly compliant premises further focus to

improve these premises is required. The Team currently carry out further interventions to assess compliance of these premises and where necessary will undertake enforcement action, including the service of legal notices in order to achieve compliance. The Authority have a paid FHRS re-rating visit scheme and also have a paid food hygiene advice service which is available to businesses. The Authority intend to implement and promote and extension to these schemes whereby businesses can take advantage of an improvement package, this will provide a combination of a paid advice bespoke to the business, pre-rerate spot check and FHRS re-rate visit.

Allergen Information and controls

- 3.8.6 Inspection activity over the past year has demonstrated a decline in broadly compliant premises for Food Standards, areas of non-compliance are predominantly the provision of allergens information, including information provided through PPDS requirements. Further work is required to improve the level of compliance with provision of allergen information to ensure that the local community can make informed choices about the food they buy. Advice is provided directly to businesses during inspection interventions and advice leaflets have been produced and are shared with businesses. Further promotion of these requirements can be disseminated via social media communications. Revisits to assess progress and compliance can be aligned with revisits to non-broadly compliant food hygiene premises however where non compliance is continuing then staff will be supported and encouraged to carry out enforcement action, including service of Improvement Notices.

3.9 Challenges

Cost of Living Crisis

- 3.9.1 The country is facing unprecedented challenge in the cost of living which is affecting consumers and businesses. Supported by recent inspection activity businesses are struggling with rising costs that are impacting on their financial resources and willingness to undertake improvements to comply with requirements under food legislation. This is having a significant impact on the increase in enforcement activity that is required to secure compliance.

Retained EU Law

- 3.9.2 The retained EU law currently in place will be automatically revoked at the end of 2023 unless primary legislation. The EU law which provides detail to food hygiene and standards requirements is not primary law and will therefore be revoked at the end of 2023. There is currently no update or detail available as to whether and how food hygiene and standards provisions will be adopted and implemented going forwards. This creates uncertainty for regulation of business and statutory requirements for Local authorities.

Management Information System (MIS)

- 3.9.3 The authority is currently working to set up and implement a new MIS. Arcus will replace the existing Civica MIS across all services including Food Hygiene and Food Standards. This is a Directorate priority. A member of the Food & Safety Team is currently seconded to this project and further resource and support will be required across the team to provide information, generate template documentation and test the system. The new MIS is due for

implementation in February 2024 which may have a detrimental impact on the authorities statutory reporting capabilities for this year.

Food Standards Delivery Model

- 3.9.4 The new food standards delivery model is due for implementation throughout the year. A phased implementation approach is being rolled out by the FSA and no fixed date for implementation has been provided to RBC to date. The new delivery model will update the risk rating approach undertaken by authorities and has added allergens as a separate category. The new risk rating will provide for an intervention period, based on risk, between 1 month and 10 years as opposed to the current variation of 1 to 3 years, this will provide a structure to increase interventions for high risk and non-compliant premises. Implementation of the new model will require transfer of all premises and intervention data to the new risk rating and scores affixed appropriately. There are currently no MIS modules in place to complete this with. Transfer of data to the new model may increase the number of high-risk premises requiring more frequent interventions. The authority currently has a large number of overdue interventions and an outstanding backlog of unrated premises (including some premises incorrectly recorded as outside of scope) that will require review and prioritisation.

Other Priorities

- 3.9.5 The Food & Safety Team have responsibilities beyond food hygiene and standards. This includes health and safety accident investigation, sports ground safety and special treatment premises. Enforcement of these matters shares the same pool of officers.

4. RESOURCES

4.1 Financial Allocation

The budget for Food & Safety in 2023/24 is £570,000.00 (gross) / £544,000.00 (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 9.24 FTE (including management). Of these 4.9 FTE are allocated to Food Hygiene work and 2.3 FTE for Food Standards, a further 0.5FTE is provided by the Trading Standards team for Food Standards work. At present there are 2.6 FTE in post (including temporary contracts) for delivery of Food Hygiene work and 1.56 FTE in post for Food Standards work. Public Protection is continuing to undergo a workforce review, moving into phase 3 a review of all job roles under the Principal posts will be carried out. For the duration of this workforce review the team is unable to permanently recruit to vacant posts. The timescale for completion of the workforce review is November 23. The team carry out the full spectrum of food hygiene, food standards, infectious disease, health and safety, special

treatments 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 1 FTE allocated to this work which includes processing food business registrations, inputting and allocating service requests and inputting food hygiene inspections on our MIS.

- 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 2.6 FTE officers available against an estimated need of 8.03 FTE for food hygiene. Please see Appendix 5 for further detail on the Food & Safety Teams work priorities and resource requirements. Unfortunately, due to the ongoing workforce review the Council has been unable to recruit to vacant posts across the past year and typically struggles to recruit qualified and competent officers due to national shortages of qualified Environmental Health Officers. The Council did not fully meet the requirements of the FSA's Recovery plan in 2022/23 with respect to Food Hygiene. Due to the current level of resourcing and other challenges (see section 3.9) the Council will be unable to deliver the full requirements of the Code of Practice for inspection schedules of both food hygiene and food standards in 2023/24.

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. An annual review is held with each officer once per year. Training and development needs are included in one to ones and annual reviews. Officers are required to complete 20 hours CPD (30 for Chartered Environmental Health Practitioners) of which 10 hours must be carried out in food related matters 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. Additional consistency training is carried out throughout the year, including specific consistency relating to Reading Festival inspections.
- 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 identified that it needs to undertake a review of its staff competency requirements in food hygiene and standards and in line with changes to Council delegations and authorisations. This work was scheduled for 2022/23 but was unable to be carried out, it remains a priority for 2023/24.

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) Quarterly monitoring reports and updates to the Group and Service Managers.
 - (iii) Submission of food hygiene and food standards statistical returns to the FSA
 - (iv) Regular one to one meetings
 - (v) Annual reviews of staff
 - (vi) Publication of annual performance achievements
 - (vii) Checks of accuracy of improvement and prohibition notices served.
 - (viii) Ad hoc shadowing of staff to check consistency and review of inspections.
- 5.2 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.
- 6.2 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 23-24.
- 6.3 The data below details the performance that was achieved in 2022/23.

6.4 Number of Inspections

6.4.1 Where a KPI or target in the Recover has been allocated to the team this has been included in the information below.

6.4.2 Food Hygiene

	Achieved inspections 2021-22	% Of inspections achieved 2021-22	Achieved inspections 2022-23	% Of inspections achieved 2022-23	Target in line with KPI's / Recovery Plan
Premise Rating - A	2	100%	4	100%	100%
Premise Rating - B	28	88%	35	100%	100%
Premise Rating – C	48		148	56%	100%
Of which C – Not Broadly Compliant			13	100%	100%
Premise Rating - D	63		48		
Of which D – Not Broadly Compliant			6	100%	100%
Premise Rating - E	5		14		
Premise Rating - Unrated	124		185 ¹	87%	75%
Premise Rating - Outside	128		153		
Total proactive interventions	398				
Number of revisits	39 ²		69		
Total Interventions	437		674		

¹ As at 01/04/22 there were 212 unrated premises due for inspection. A total of 185 unrated premises have been inspected throughout the year. Throughout the year 294 new premises registered and as of 01/04/23 there are a total of 65 unrated premises still awaiting inspection. The numbers do not account for premises that have registered and been subsequently closed due to not trading.

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

6.4.3 Food Standards

	Achieved inspections YTD 2021-22	% Of inspections achieved 2021-22	Achieved inspections 2022-23	% Of inspections achieved 2022-23	Target in line with KPI's / Recovery Plan
Premise Rating - A	4	100%	3	100%	100%
Premise Rating - B	75		115		
Premise Rating - C	60		99		
Premise Rating - Unrated	111		195		

Premise Rating - Outside	19		N/A		
Total proactive interventions	250		412		
Number of revisits	4		5		
Totals	257		417		

6.4.4 Formal Actions

During the period 2018 to 2023 the authority took the following enforcement action:

Enforcement Type	2018/19	2019/20	2020/21	2021/22	2022/23
Voluntary closure	2	0	1	1	2
Seizure, detention & surrender of food	1	2	0	1	2
Suspension/revocation of approval or licence	0	0	0	1	0
Emergency prohibition notice	2	3	0	0	2
Prohibition order	1	3	0	0	1
Simple caution	0	0	0	0	0
No of premises where Improvement notices served	16	11	0	2	5
No of Hygiene Improvement notices served	30	21	0	7	12
No of FIR Improvement notices served	0	1	0	0	0
Remedial action & detention notices	0	1	0	0	0

Written warnings (Food Hygiene)	655	910	129	381	621
Written warnings (Food Standards)	32	75	35	84	117
Prosecutions concluded	1	1	0	0	0

6.4.5 Food Sampling

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	27	19
2022/23	109	27	13	4 ¹

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

6.4.6 Food Promotional Activities

The number of inspections carried out at Reading Festival in 2022 have been included in the table above at para 6.4.2. 142 Premises inspections were conducted for food hygiene including all customer facing premises trading within the festival site. The Council undertook two contravention revisits in addition to this with the remainder passed to Reading Festival to carry out this year.

6.5 Variations from the Service Plan

6.5.1 The following items were not met from the 2022/23 service plan and remain outstanding:

- The Council were unable to meet the full requirements of the FSA recovery plan and has not been able to achieve 100% of C food hygiene inspections that were due at 01/04/2022. The FSA recovery plan requested that Local Authorities

move quicker than the plan where possible. It has not been possible to achieve this and little progress has been able to be made into D and E rated food hygiene inspections.

- The FSA recovery plan was unclear as to whether specific actions were required to prioritise unrated food standards premises for inspection. The Council has not carried out prioritisation of unrated food standards premises and had an existing backlog of these premises awaiting inspection prior to Covid-19. Where possible food standards inspections have been carried out at all due premises in conjunction with food hygiene inspections. High risk 'A' rated premises for food standards have been inspected as required by the recovery plan. It has also been identified that the number of unrated premises for food standards is larger than anticipated as a number of premises have been historically miscoded as 'outside of scope'. We are seeking to correct this as we progress through our inspections.
- Internal monitoring of officers has not been fully carried out in accordance with the authority's protocols.
- A number of policies and procedures continue to require updating.

6.6 Areas of Improvement

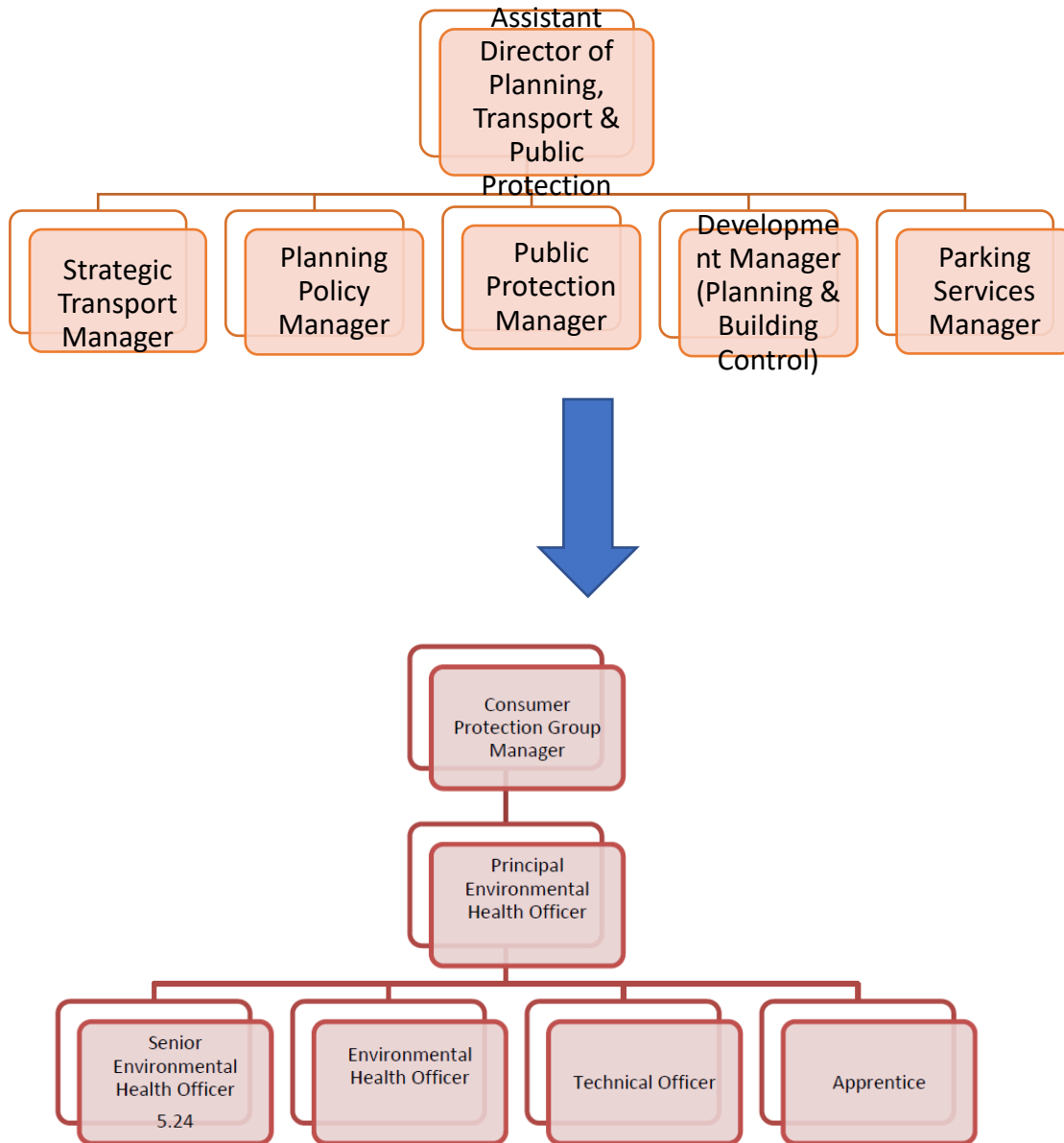
- 6.6.1 As identified above we continue to have deficiencies in the status of policies and procedures in comparison to the Food Law Code of Practice. This is an area where improvement is required, including ensuring that the correct policies and procedures are in place and that those in place are up to date.
- 6.6.2 Further improvement is required in the implementation of internal monitoring procedures to ensure that the council is able to meet the requirements of its protocols and to ensure that officers are appropriately monitored.
- 6.6.3 Further improvement is required in the implementation of the Competency Framework for officers that started with the authority or changed roles within the authority after March 2021.
- 6.6.4 An area of improvement which is underway is to review and update the scheme of delegations and authorisations for officers to exercise their powers. Coinciding with this a review and update of the Council's enforcement and prosecution policies are being carried out.

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

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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
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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 Manger 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 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

Food & Safety Team Work Plan Apr 22 - Mar 23 - Progress Review

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]	End of Year Update
S	<p>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 New registered premises per year = c. 230</p>	<p>Requirement of Food Law COP. Service Plan Priority / Target</p>	<p>Premises subject to hygiene requirements inspected and compliant to ensure safe food. Education of local businesses</p>	<p>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. Due to Covid targets will remain under review. Aim: 100% A premises 90% B Premises 50% Unrated premises inspected</p>	<p>No of inspections completed: 445 (31.5% of all inspections due, excluding new registrations) No of new premises registered in year: 294. Achieved: 100% A 100% B 67% C 87% Unrated against existing unrated premises at start of year however this does not account for all premises registered during the year.</p>
S	<p>Food Hygiene Revisits and subsequent enforcement of non-compliant premises. Approximately 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.</p>	<p>Food Law COP</p>	<p>Staged enforcement action in line with the Corporate Enforcement policy to improve food hygiene standards and ensure safe food.</p>	<p>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.</p>	<p>Number of revisits carried out: 69 This equates to approximately 16% of premises being non broadly compliant and requiring follow up action.</p>

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]	End of Year Update
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	<i>Staged enforcement action in line with the Corporate Enforcement policy to improve food hygiene standards and ensure safe food.</i>	<i>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.</i>	Number of food enforcement notices issued in year: 23 HIN - 12 HEPN - 2 NOI - 2 HEPO - 1 Food Detention - 1 Illegal import (POAO) - 3 Vol Closure - 2
S	Approval of Premises Process applications for new approval activities. Inspect and review existing approved premises.	Food Law COP	<i>Approval activities authorised and published. Food products accurately labelled and traceable.</i>	<i>Applications and inspections carried out within SOP timeframe. Full approval awarded after max 6 months or removed.</i>	No of approval applications received: 1 No of approval visits carried out: 3 Conditional approvals issued: 2
S	Food Hygiene Re-Rating visits (FHRS) for premises not overdue/due inspection Avg 30 requests received per year	FHRS Brand Standard	<i>Increase in FHRS and improved compliance with FH requirements. Increased consumer confidence in premises</i>	<i>All inspections carried out within 3 months.</i> <i>Applications for premises that are overdue/due inspection will be refunded to business.</i>	Re-ratings received - 33
S	Respond to FHRS Appeals Estimate 10 per annum	FHRS Brand Standard	<i>Appeals handled in accordance with Brand Standard. Maintain confidence in Food Hygiene Inspections</i>	<i>Appeals responded to within timeframe. Appeals resolved without moving to Corporate Complaint.</i>	Number of FHRS Appeals received - 2
S	Food Standards Inspection Programme Until 31 March 2023. No of due and overdue inspections = 1326	Food Law COP. Service Plan Priority / Target	<i>Premises subject to standards requirements inspected and compliant to ensure safe, correctly</i>	<i>In line with FSA guidance priority inspections up to 31/03/23 are - Unrated, Cat A,</i> <i>Due to Covid targets will remain under review.</i>	Number of Food Standards Inspections completed - 412 (31% of total due, excl. new premises)

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]	End of Year Update
	New registered premises per annum approx. 230		<i>labelled food which does not mislead the consumer. Education of local businesses</i>	Aim: 100% A premises	Number of new registered businesses received in year - 294
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 enforcement action in line with the Corporate Enforcement policy to improve the level of information provided to consumers and ensure they can make an informed 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. Any court proceedings to be brought within time limit.</i>	Number of Food Standards Revisits - 5 1.2% of premises inspected have been revisited. This does not accord with the number of non-broadly compliant premises marked in section 3.1.8 of the plan above.
S	Food, Water & Environmental Sampling (Microbiology) Average 150 samples per annum.	<i>Food Law COP Sampling Plan Local/National sampling programme</i>	<i>Ensuring food offered for sale is microbiologically safe and does not present a risk to health. Reduction in incidence of food borne illness.</i>	<i>Unsatisfactory samples followed up with further intervention and re-sampling where necessary.</i>	Number of microbiological samples conducted: 109 Number of unsatisfactory samples: 27
S	Food Standards Sampling Estimate 50 samples per annum	<i>Food Law COP Sampling Plan Local/National sampling programme</i>	<i>Ensuring food offered for sale is correctly labelled, safe and does not mislead the consumer. Reduction in food complaints and referrals.</i>	<i>Unsatisfactory samples followed up with further intervention and re-sampling where necessary.</i>	Number of Food Standards Samples conducted: 13 Number of unsatisfactory results: TBC

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]	End of Year Update
N S	National Food Hygiene Rating Scheme (FHRS) Administration	Discretionary function to take part in scheme. All LA's in England participate. Expectation of Customers.	Enabling consumer to assess food hygiene and safety. Provide consumer confidence in Reading businesses	Premises details uploaded to FHRS website fortnightly. Display of correct premises information	Uploads to FHRS rating website carried out fortnightly. Business appeal period waived on written submission from business. Database does not permit for FHRS re-rates to be recorded correctly. Local bypass implemented.
S	Annual FSA Return (LAEMS) Temperature check returns	Food Law COP	Transparent Food Hygiene and Standards performance.	LAEMS Return or equivalent accurately completed within time limit	Completed in April 2022. Temperature check responses completed and submitted in July 22, October 22 and January 2023.
S	Drafting, Implementation and maintenance of Policies and Procedures, plus ongoing annual review. Following update and reissue of the new COP in March 2021 a full review and update of all documented procedures must be carried out including drafting and implementation of those not previously in place.	Food Law COP requires each LA to have written policies and procedures in place for the following: <ul style="list-style-type: none"> • Approval • Food Business Establishment Database • Food Incidents and Alerts • Authorisation • Control Verification • Corporate Complaints • Food Complaints • Sampling • Equipment 	Enabling staff to efficiently, fairly and transparently conduct their role and respond to service requests and complaints. Provision of good customer service.	Documented procedures in line with Food Law COP.	Little progress made. Minor amendments completed to Schools SOP, Notice SOPs (service of notices) and inspection procedure to accommodate recent changes.

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]	End of Year Update
		<ul style="list-style-type: none"> • Official food controls and other activities • 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	<p>Annual review and inspection of Cooling Towers for the prevention and control of Legionella spp. 3 premises</p> <p>Development, maintenance and implementation of SOPs</p>	Statutory duty under HSWA1974	Inspected, managed and maintained cooling towers reducing the likelihood of legionnaires disease.	All cooling towers registered and inspected. Cooling Towers risk rated 'A' inspected annually.	<p>One new evaporative condenser registered and inspected.</p> <p>No statutory requirement at present to inspect all cooling towers.</p>
	<p>Inspection and certification of registering special treatment premises. New registrations Operator and/or premises) per year = Approx. 30</p>	Local Govt Miscellaneous Provisions Act	Compliant premises. Reduced incidence of blood borne infection.	Mobile and domestic premises inspected and compliant prior to certificate being issues. Backlog of commercial premises awaiting inspection removed.	<p>No of inspections completed: 10</p> <p>No of new registrations: Premises (incl. 1 operator) - 17 Additional operators - 79</p> <p>Number of outstanding (backlog) inspections: 60</p>

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]	End of Year Update
	Backlog of existing premises = 81				
S	Special Treatment Revisits. Approx 20% of premises are found to be non-compliant requiring further attention and enforcement action.	Local Govt Miscellaneous Provisions Act Health and Safety at Work Etc Act 1974	Compliant premises. Reduced incidence of blood borne infection.	Revisits carried out within timeframe. Legal notices complied with in accordance	Number of revisits for Special Treatment premises - 1 (10% of inspections)
N S	Review of Special Treatment certification and inspection regime. Removal of tacit consent	Certification is currently issued without inspection of premises. Certification is timely and costly to remove once issued. Businesses should be assessed for compliance before certification to ensure risk to public health is minimised	Improved compliance in premises, reduction of revisits and further enforcement action. Reduced incidence of blood borne infection.	New system implemented. All newly registered premises receive inspection within timeframe prior to registration certificate being issued.	In progress. New inspections now carried out but further research shows tacit consent cannot be fully removed. Wider issue with special treatments require further work
S	Investigation of Infectious diseases and outbreaks including: Food borne illness & Legionnaire's disease. (Excl. Covid 19) Estimate 250 cases per year	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. Service requests responded to within internal standards.	Number of cases notified: 203
S	Statutory H&S return to HSE	National Enforcer requirement for the compilation of statistics and	Contribute to national enforcement statistics. Inform and develop future	Return completed accurately and by deadline.	Completed

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]	End of Year Update
		interventions with poor performing authorities	interventions and national policy		
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.	Completed. Recommendations for improvement are unable to be implemented within the required timescale.
S	Sports Ground Safety Inspection programme	Statutory requirement Safety at Sports Ground Act 1975 and associated legislation	Structurally 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.	Designated Sports Ground - 3 DPI's completed Regulated Stand - no current Safety Certificate in place, not currently in operation. No DPI's completed.
S	Annual review and issue of Safety Certificate for Reading FC	Statutory requirement Safety at Sports Ground Act 1975 and associated legislation	Structurally safe and well managed sports ground	Annual issue of Safety Certificate. Annual review of updated Operations Manual.	Not completed
S	Complete Review of Reading FC Operations Manual	Statutory requirement Safety at Sports Ground Act 1975 and associated legislation	Structurally safe and well managed sports ground	Review of Operations Manual completed with written report of review issued to Reading FC. Follow up action taken in accordance with time frame.	No longer required.
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.	No application for Safety Certificate received. Unable to complete.
S	SAG attendance Reading FC	Statutory requirement Safety at Sports	Structurally safe and well managed sports ground	Quarterly meetings carried out with wide attendance. TOR in place.	All meetings have taken place with attendance by the Food & Safety Team.

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]	End of Year Update
		Ground Act 1975 and associated legislation		Meetings Minuted and actions taken within timeframe.	TOR's up to date. Meetings and actions minuted.
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.	No progress.
S	Review and respond to Licensing consultations concerning premises licences, events and street trading. Including attendance at SAG. Approx 100 consults per annum	Statutory consultee	Safer Events	Representation at and contribution to Safety Advisory Group Meetings Proactive review of Event documentation Liaison with Event operators and objection to events where deemed necessary.	No of consultations received: 126. (25% increase on estimate) All SAG meetings attended. Further work on role in SAG and procedures require.
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	In progress.
S	Review and respond to consultations from planning, building control. Including liaison with departments, draft and implementation of new procedures.	Statutory Consultee. Current procedures do not allow for a consistent or collaborative approach. Safe and compliant premises	Active contribution to consultations. Collaboration with neighbouring teams to ensure safe and compliant premises.	New SOP implemented Database actions reflect new SOP Referral of relevant premises through to Planning, Building Control Consultation on Planning and building control consultations.	No consultations received. No progress with new procedures
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. Targeted sampling	SR's responded to. 3 TARP notices served. No progress on SOPs to date

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]	End of Year Update
S	Feed Inspection of Feed Premises. Approx. 37 premises.	Feed Law Code of Practice	Safety and security in the food chain. Compliant feed premises.	Feed premises inspected. Revisits and enforcement action for non-compliant premises.	Number of inspections completed: 20
N S	Food Hygiene Training Courses.	Improve knowledge and skills of local businesses to increase compliance with food hygiene legislation, improve FHRS score and improve local public safety	Accessible learning opportunities to local businesses, Improved food hygiene knowledge and FHRS scores. Reduction in non-compliant premises	Minimum 4 Food Hygiene Courses (Internal/External) to be carried out per year. 75% candidates successfully passed Exam.	Courses are currently suspended
S	Reactive food & Safety work (service requests) (excl. Infectious disease/accidents, including Covid-19) <ul style="list-style-type: none"> • Dirty food premises • Microbiological, chemical & labelling • Allergens • Health, safety & Welfare • Business advice • Covid-19 Approximately 1263 per annum.	Food Law COP and FSA guidance on service return. HWSA/EAR	Ensure food on sale is safe to eat, produced hygienically, correctly labelled and does not mislead the consumer. Ensure premises are safe to work in and visit.	90% Service requests responded to within service response time.	Number of Service requests received (including licensing consultations and Food Standards complaints - 952 SR's responded to within response time: 91%
N S	Paid advice visits - Food Hygiene. Approx 10 requests per year.	Improve food hygiene compliance of businesses.	Improved hygiene standards and compliance at first and subsequent inspection.	Requests for business advice carried out within 28 days. Premises subject to paid advice will be broadly compliant or	No of requests received: 1 No carried out: 1

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]	End of Year Update
		Provision of support and advice to local businesses Income generation		better after first formal inspection	
N S	Food Standards and bespoke labelling advice (paid) Approximately 1 request per annum	Improve food standard compliance of businesses. Provision of support and advice to local businesses Income generation	Improved standards and compliance of labelling and consumer information. Reduction in further interventions.	Requests for business advice carried out within 28 days. Premises subject to paid advice will be broadly compliant or better after next inspection. Premises subject to paid advice will require less enforcement action.	Number received: none
N S	Improve Food Hygiene & Health & Safety presence on RBC website and social media	Modernise and improve communications with customer. Enhance transparency and accessibility of service.	Improved communications to and accessibility of service to customers. Reduction in service requests and enquiries. Improved compliance of food businesses.	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/Twitter Feeds regarding food hygiene & Safety.	Improvements made to Food Hygiene page, contact forms, food registration form, re-rate requests and chargeable visit forms. No progress made on Health and Safety webpage. Alterations made to Special Treatments applications.
S	Ensure all officers appropriately authorised and competent. Full review of all staff competency required under new COP and new training scheme to be implemented	Food Law COP.	Service wide review of officer authorisations and delegations Review of officer competencies and skills in line with FSA new competency framework	Competent/authorised/ skilled and knowledgeable staff	Competency review under FLCOP postponed to 23-24. Required competency for new officers, contractors and role changes not completed.

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]	End of Year Update
S	Authorisation and Delegations Review including implementation of new authorisation system for staff	Food Law COP / HSWA Delegations Register. Service Plan Priority	Review the delegations register and ensure officer authorisations are up to date - as part of the corporate review of the constitution and delegations register	Delegations register is up to date There are clear lines of delegated authority for officers to have the necessary powers and authority	Updated list of all applicable legislation provided. Work in progress across Public Protection.
N S	Administration of PAPs - invoicing Updating and management of PAP register	Service Plan Priority / Target	Cost recovery Transparency of PAP management and published advice	Invoices issued within timeframe. PAP register maintained up to date. Display of correct personnel. Enquiries and enforcement requests responded to within timeframe.	Completed. PAP service fully withdrawn for Food & Safety in June 2022. No further work required.
N S	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 15 PAPs for FH/FS/H&S Issue of PAP export Certificates	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	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.	PAP service fully withdrawn for Food & Safety in June 2022. No further work required.

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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]	End of Year Update
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	Completed. All pre and during event SAGs attended as required by Food & Safety. All public facing traders inspected and Alfresco Award issued. H&S review of pyrotechnic and special effects carried out in line with premises licence.
N S	Undertake SR review, including response time, and implement triage system.	Service requests require prioritisation to ensure that these are effectively dealt with in line with available resources.	Resources directed to highest public health risk. Improve efficiency.	Service requests responded to in accordance with public health risk presented. Increase in service requests responded to within timeframe.	No progress. Existing triage system in place.
N S	Issue of Export certificates, including development of SOPs and administration of authorisation. Estimate <5 per annum	Chargeable service. Support of local businesses and neighbouring LAs	Export certificates issued for local businesses for fishery and limited animal products following EU Exit.	Zero rejection of export certificates at EU border.	Number of certificate applications received: 0 SOPs have not been drafted for this area of work at present. Premises attestations to support export of product have been issued.
S	Covid Response - response to service complaints, proactive inspections and provision of business advice in line with Covid restrictions.	Coronavirus regulation Service Plan Priority	Ensure that businesses and facilities are covid secure to support a safe return to 'normal	Businesses are supported to ensure they are compliant with covid restrictions. Effective action is taken for non-compliance.	All allocated work completed. None outstanding based on current enforcement measures.

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]	End of Year Update
	Revisits to non-compliant premises. Attendance at internal & external meetings. Ongoing learning needs due to rapid changes in legislation.		Respond to outbreaks in line with the management control plan	Covid infections and outbreaks are kept to a minimum. Breaking chains of transmission and preventing and containing outbreaks	
S	Development, Implementation and Maintenance of Health and Safety SOPs. Training and development of staff in Health and Safety	Health and Safety has taken a backseat for more than a decade. Control measures required to be implemented by businesses during the pandemic have identified gaps in business knowledge and skills and required more focused work in health and safety.	Competent, knowledgeable and confident staff. Improved business compliance with health and safety legislation, safer work places.	Documented and implemented SOPs. Staff training records. Staff authorisation.	No Progress made.
S	Food Service Plan	Food Law Code of Practice Service Plan priority	Plan to demonstrate how the council will deliver its functions 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	Plan drafted and agreed through committee.	Completed
N S	Proactive project targeting unregistered	Existing and increasing problem. Active	Few complaints about unregistered food	Online monitoring of Reading based premises operating as	Not completed. FSA yet to publish updated advice for dealing with

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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]	End of Year Update
	online food businesses; Requirement to registered, provision of FH/FS advice, follow up enforcement action.	consideration being given by FSA ABC programme. Public Health Issue.	businesses. Increased confidence in hygiene and safety of online food traders.	food businesses would should reduced number of unregistered premises.	online premises including aggregator role.
S	Respond to FOI Request	Statutory function - Freedom of Information Act 2000	Customer service Legally compliant Council	FOI responded to and closed within 20 days	28 FOI's received. 89% responded to within service response time. All received FOI's responded to.

APPENDIX 5

Food & Safety Work Plan Apr 2023 Mar 24

This Work plan identifies the work streams currently undertaken 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 those 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 2023 through to March 2024.

Work streams have been identified as Statutory (S) or Non-statutory (NS).

Work streams have been prioritised 1-3 with 1 considered highest priority.

S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we have delivered]	Resources	Training Needs	Start			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
S	Food Hygiene Inspection Programme Until 31 March 2024. Premises inspected in accordance with FSA Guidance	Requirement of Food Law COP. Service Plan Priority / Target	Premises subject to hygiene requirements inspected and compliant to ensure Aim: 100% A premises 80% B Premises 70% Unrated premises inspected	PEHO - Management of inspection lists, monitoring of inspection and consultation with officers - 20 Days (0.08 FTE)	Induction training of new officers in line with Food Law COP. All officers to maintain Food CPD through ABC online	01/04/23	31/03/24	PEHO	1	Healthy Environment	A

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S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Pri ori ty (1- 3)	Corporate Plan Priority	Annual Requir ement [A]/ One off projec t [O]	
		Outco me [what differ ence will this make]				Start	Fin ish	Lead				
	on Service return No of premises due/over due inspectio n for this year = 1207 New registre d premises per year = c. 255 Total 1462 inspectio ns due.		<i>safe food. Educat ion of local busine sses</i>		Inspectio ns (avg 3 hours incl officer administr ation) = 4386 Hours (2.6 FTE)	training and available courses						
S	Food Hygiene Revisits and subseque	Food Law COP	<i>Staged enforc ement action in line</i>	<i>Increase in FHRS at re- rate or next inspection.</i>	PEHO - Consultat ion/Revie w of notices -	Induction training of new officers in line with	01/ 04/ 23	31/ 03/ 24	PEHO	1	Healthy Environment	A

S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we know we have delivered]	Resources	Training Needs	Start			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	<p>nt enforcement of non-compliant premises . Approximately 20% of premises are being found to be non-compliant . Estimate 292 premises. Ongoing non-compliance will require issue of formal notices</p>	<p>with the Corporate Enforcement policy to improve food hygiene standards and ensure safe food.</p>	<p>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.</p>	<p>5 days (0.02 FTE) Inspecting Officers (1 day per premises avg) = 2161 Hours (1.27 FTE)</p>	<p>Food Law COP. All officers to maintain Food CPD through ABC online training and available courses</p>						

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
	and potentially lead to prosecution.											
S	Ongoing Enforcement including issue of notices. Resulting from ongoing or immediate non-compliance where a risk to public health and safety is presented.	<i>Food Law COP</i>	<i>Staged enforcement action in line with the Corporate Enforcement policy to improve food hygiene standards and ensure safe food.</i>	<i>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</i>	Officers (incl review by second officer) 1.5 Days per Notice/Premises 0.16 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	01/ 04/ 23	31/ 03/ 24	PEHO	1	Healthy Environment	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]	expiry date. Any court proceedings to be brought within time limit.									
	Approx 25 per annum					for existing						
S	Approval of Premises Process applications for new approval activities . Inspect and review existing approved premises .	Food Law COP	Approval activities authorised and published. Food products accurately labelled and traceable.	Applications and inspections carried out within SOP timeframe . Full approval awarded after max 6 months or removed.	Average 1 new premises a year (min 5 days for each new premises) Inspection to existing premises (6) at 1 day each. Total 11 days / 80 Hours (0.05 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/ 23	31/ 03/ 24	PEHO	1	Healthy Environment	A

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S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will know we have delivered]	Resources	Training Needs	Start			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
S	Food Hygiene Re-Rating visits (FHRS) for premises not overdue/ due inspection Avg 35 requests received per year	FHRS Brand Standard	Increase in FHRS and improved compliance with FH requirements. Increased consumer confidence in premises	0.5 days per premises (pre & post admin, inspection and liaison with business) 18 officer Days = 130 Hours (0.08 FTE)	Review of updated Brand Standard	01/04/23	31/03/24	PEHO	2	Healthy Environment Thriving Community	A
S	Respond to FHRS Appeals Estimate 5 per annum	FHRS Brand Standard	Appeals handled in accordance	PEHO - 1 day per appeal (5 days) Officer time -	Familiarisation with updated Brand Standard.	01/04/23	31/03/24	PEHO	1	Healthy Environment Thriving Community	A

S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we know we have delivered]	Resources	Training Needs	Start			Service Plan Priority (1-3)	Annual Requirement [A]/ One off project [O]		
						Star t	Fin ish	Lead				
		with Brand Standard. Maintain confidence in Food Hygiene Inspections	Appeals resolved without moving to Corporate Complaint.	0.5 day per appeal (2.5 days) = 54 Hours (0.03 FTE)								
S	Food Standards Inspection Programme Until 31 March 2024. No of due and overdue inspections = 1050	Food Law COP. Service Plan Priority / Target	Premises subject to standards requirements inspected and compliant to	Aim: 100% A premises	EH/TS Officers - 1.5 hours per inspection (including officer administration) Total officer hours - 1958	Training to all officers in new PPDS and calorie labelling requirements. Training for all unauthorised/new officers in	01/04/23	31/03/24	PEHO SCPO	1	Healthy Environment	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Pri ori ty (1- 3)	Corporate Plan Priority	Annual Requir ement [A]/ One off projec t [O]	
		Outco me [what differ ence will this make]				Star t	Fin sh	Lead				
	New registre d premises per annum approx. 255 Total Inspectio ns due - 1305		<i>ensure safe, correc tly labelle d food which does not mislea d the consu mer. Educat ion of local busine sses</i>		Hours (1.15 FTE)	Food Standards inspectio ns						
S	Food Standard Revisits. Estimate 10% of premises required revisits following decline in	<i>Food Law COP</i>	<i>Staged enforc ement action in line with the Corpor ate Enforc</i>	<i>Increase in compliance and confidence in managem ent at next inspection. Revisits carried out</i>	(EH/TS) 0.5 days per inspectio ns. = 471 Hours (0.28 FTE)	Training to all officers in FIRIN Notices	01/ 4/2 3	31/ 03/ 24	PEHO SCPO	1	Healthy Environment	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]				Start	Finish	Lead			
	standards and new legislation. Approx. 130		ement policy to improve the level of information provided to consumers and ensure they can make an informed choice .	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. Any court proceedings to be brought							

S / NS	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will we know we have delivered]	Resources	Training Needs	Lead			Service Plan Priority (1-3)	Corporate Plan Priority		Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]					Start	Finish					
				within time limit.									
S	Food, Water & Environmental Sampling (Microbiology) Average 150 samples per annum.	Food Law COP Sampling Plan Local/National sampling programme	Ensuring food offered for sale is microbiologically safe and does not present a risk to health. Reduction in incidence of food borne illness.	Unsatisfactory samples followed up with further intervention and re-sampling where necessary.	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	Practical training and authorisation for new officers. All officers to undertake sampling to maintain competence	01/04/23	31/03/24	PEHO	2	Healthy Environment	A	

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resources	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]				Start	Finish	Lead			
					Hours (0.13 FTE)						
S	Food Standards Sampling Estimate 50 samples per annum	Food Law COP Sampling Plan Local/N ational samplin g progra mme	Ensuri ng food offere d for sale is correc tly labelle d, safe and does not mislea d the consu mer. Reduct ion in food compl aints and referr als.	Unsatisfact ory samples followed up with further interventio n and re- sampling where necessary.	SCPO - 20 days preparati on and sampling = 148.4 Hours PEHO - 2 days monitorin g = 14.84 Hours Total = 163 Hours (0.1 FTE)	Practical training and authorisat ion for new officers. All officers to undertake sampling to maintain competen ce	01/ 04/ 23	31/ 03/ 24	PEHO SCPO	2 Healthy Environment	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
N S	National Food Hygiene Rating Scheme (FHRS) Administration	Discretionary function to take part in scheme . All LA's in England participate. Expectation of Customers.	Enabling consumer to assess food hygiene and safety . Provide consumer confidence in Reading businesses	Premises details uploaded to FHRS website fortnightly . Display of correct premises information	Business Support - Fortnightly submission of ratings 24 days per annum PEHO - 5 days per annum housekeeping. = 37 Hours (0.02 FTE)	New Business support staff trained in data maintenance and upload. Officers refreshed on data maintenance and recording	01/ 04/ 23	31/ 03/ 24	PEHO Business Support Manager	1	Healthy Environment Thriving Community	A
S	Annual FSA Return (LAEMS) Temperature	Food Law COP	Transparent Food Hygiene and Standards	LAEMS Return or equivalent accurately completed within time limit	PEHO - Housekeeping & reporting (10 days) = 74 Hours	Training on Civic App and LAEMS required for PEHO and	01/ 04/ 23	31/ 03/ 24	PEHO	1	Healthy Environment Thriving Community	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
	check returns		performance		(0.04 FTE)	Business Support						
S	Drafting, Implementation and maintenance of Policies and Procedures, plus ongoing annual review. Following update and reissue of the new COP in March 2021 a full review and	Food Law COP requires each LA to have written policies and procedures in place for the following: <ul style="list-style-type: none"> • Approval • Food Business Establishment 	Enabling staff to efficiently, fairly and transparently conduct their role and respond to service requests and complaints.	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 familiarisation with new areas of work.	01/04/23	31/03/24	PEHO	2	Healthy Environment Thriving Community Inclusive Economy	A

S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we know we have delivered]	Resources	Training Needs	Start			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	update of all documented procedures must be carried out including drafting and implementation of those not previously in place.	Database • Food Incidents and Alerts • Authorisation • Control Verification • Corporate Complaints • Food Complaints • Sampling • Equipment • Official	Provision of good customer service.								

S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we know we have delivered]	Resources	Training Needs	Start	Finish	Lead	Service Plan Priority (1-3)	Corporate Plan Priority		Annual Requirement [A]/ One off project [O]
	food controls and other activities <ul style="list-style-type: none"> • Enforcement • Control and investigation of outbreaks and food related infectious disease 											

S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we know we have delivered]	Resources	Training Needs	Start			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	<ul style="list-style-type: none"> • Information • Registration • Conflict of Interest • Sampling Policy • Enforcement Policy • Complaints Policy • Contingency Plan 										

S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we know we have delivered]	Resources	Training Needs	Start			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
N S	Inspection of notified cooling towers and evaporative condensers for the prevention and control of Legionella spp. Est. 1 premises per annum Development, maintenance and implementation of SOPs	HSWA1974 Inspected, managed and maintained cooling towers reducing the likelihood of legionnaires disease.	All cooling towers registered and inspected. Cooling Towers risk rated 'A' inspected annually.	Officers - Inspections (including shadowing) 2 days PEHO/SEHO - SOPs, training & authorisation 5 days 0.04 FTE	Training of new, unauthorised officers in the risks and controls relating to Legionella. Shadowed/shadowing inspections. Refresher training for existing staff.	01/04/23	31/03/24	PEHO/SEHO	2 Healthy Environment	A	

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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			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Start	Finish			Lead							
S	Inspection and certification of registering special treatment premises • New registrations Operator and/or premises) per year = Approx. 20 Backlog of existing premises = 60	Local Govt Miscellaneous Provisions Act	Compliant premises. Reduced incidence of blood borne infection.	Mobile and domestic premises inspected and compliant prior to certificate being issued. Backlog of commercial premises awaiting inspection removed.	Inspecting officers - 3 hours per premises. 240 Hours 0.14 FTE	Training of new officers in special treatment inspection including shadowed visits.	01/04/23	31/03/24	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A	
S	Special Treatment	Local Govt Miscellaneous Provisions Act	Compliant	Revisits carried out	1 day per premises. 29 Hours	Training and refreshment	01/04/23	31/03/24	PEHO	1	Healthy Environment	A	

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
	nt Revisits. Approx 5% of premises are found to be non- compliant requiring further attention and enforcement action.	neous Provisio ns Act Health and Safety at Work Etc Act 1974	premis es. Reduc ed incide nce of blood borne infecti on.	within timeframe. Legal notices complied with in accordance	0.04 FTE	nt of authorised and new officers in appropriat e notices						
N S	Review and replacem ent of Byelaws for Special Treatme nts	Byelaw s do not confor m with nationa l guidanc e and templat e. RBC does	Up to date byela ws adheri ng to nation al templ ates. Reduc ed	New byelaws in place.	PEHO/SE HO - Legal process to implem ent new byelaws Committe e adoption.	N/A	01/ 04/ 23	31/ 03/ 24	PEHO /SEH O	3	Healthy Environment Thriving Community Inclusive Economy	O

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
		Outcome [what difference will this make]				Start	Finish	Lead				
		not have a full copy of the signed byelaws .	burden for low risk activities.		Estimate 30 days (222Hours) (0.14FTE)							
S	Investigation of Infectious diseases and outbreaks including : Food borne illness & Legionnaire's disease. (Excl. Covid 19) Estimate 225	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. Service requests responded to within	S/EHO - 2 Hours per case 450 Hours Outbreak - PEHO/SEHO x 2 at 10 days each = 148 Hours (0.35 FTE)	New officers trained in internal and local SOPs. ABC training available to all officers.	01/04/23	31/03/24	PEHO	1	Healthy Environment	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
	cases per year Outbreak s: Estimate 1 per year			internal standards.								
S	Statutory H&S return to HSE	National Enforce r require ment for the compila tion of statisti cs and interve ntions with poor perfor ming authori ties	Contri bute to nation al enforc ement statisti cs. Inform and develo p future interv entions and nation al policy	Return completed accurately and by deadline.	PEHO Housekee ping and return (3 days (0.01 FTE)	Training in Civica App (or alternativ e) to compile relevant data reports.	01/ 04/ 23	31/ 03/ 24	PHO	1	Healthy Environment	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
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.	01/04/23	31/03/24	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A
S	Sports Ground Safety Inspection programme	Statutory requirement Safety at Sports Ground Act 1975 and associated	Structurally safe and well managed sports ground	Min. 3 during match inspections carried out following risk assessment process. Inspection reports provided within SOP	Service Manager - 1.5 day PEHO - 6 days SEHO - 6 days Inspection, pre & post admin. Total 100.17	Familiarisation of new staff with relevant SOPs. Shadowed visits to be completed .	01/04/23	31/03/24	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]	timeframe and enforcement action taken accordingly .									
		legislation			Hours (0.06 FTE)	New staff to undertake LCB Safety at Sports Ground training.						
S	Annual review and issue of Safety Certificate for Reading FC	Statutory requirement Safety at Sports Ground Act 1975 and associated legislation	Structurally safe and well managed sports ground	Annual issue of Safety Certificate . Annual review of updated Operations Manual.	PEHO/SE HO 5 days Each = 74 Hours (0.04 FTE)	New staff to undertake LCB Safety at Sports Ground training.	01/ 04/ 23	31/ 03/ 24	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A
S	Review of Operations Manual	Statutory requirement Safety	Structurally safe and well	Established SAG Meeting schedule	PEHO/SE HO 121 Hours (17 days)	New staff to undertake LCB Safety at	01/ 04/ 23	31/ 03/ 24	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A/O

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
	and Issue of new Safety Certificate for Palmer Park Regulated Stand Plus initial engagement and sent up of SAG meetings	at Sports Ground Act 1975 and associated legislation	managed sports ground	Clear and consistent lines of communication. Issue of new Safety Certificate .	for first review Follow up reviews and amendments - 7.5 days. SAGs - 20 hours per annum. Engagement 2 days Total = 0.13 FTE	Sports Ground training.						
S	SAG attendance Reading FC	Statutory requirement Safety at Sports Ground	Structurally safe and well managed	Quarterly meetings carried out with wide attendance . TOR in place.	PEHO & SEHO - attendance, pre and post admin incl. action	New staff to undertake LCB Safety at Sports Ground training.	01/ 04/ 23	31/ 03/ 24	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
		Act 1975 and associated legislation	sports ground	Meetings Minuted and actions taken within timeframe.	review and minutes. Est. 74 Hours per annum (0.04 FTE)	Safety Advisory Group Training for allocated officers.						
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.	01/04/23	31/03/24	PEHO	3	Healthy Environment Thriving Community Inclusive Economy	A/O

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
		Outcome [what difference will this make]				Start	Finish	Lead				
S	Review and respond to Licensing consultations concerning premises licences, events and street trading. Including attendance at SAG. Approx 125 consults per annum	Statutory consultee	Safer Events	Representation at and contribution to Safety Advisory Group Meetings Proactive review of Event documentation Liaison with Event operators and objection to events where deemed necessary.	PEHO/SEHO - attendance at monthly SAG - 9 days, incl. preparation. 27 days = 261 Hours All officers - review and respond to consultations (1 hour each) = 125 Hours Total = 386 Hours		01/04/23	31/03/24	PEHO	1	Healthy Environment Thriving Community	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
		Outcome [what difference will this make]				Start	Finish	Lead				
					(0.23 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/SEHO - 5 days. (0.02 FTE)	Familiarisation of all staff on new SOPs	01/04/23	31/03/24	PEHO	1	Healthy Environment Thriving Community	O
S	Review and respond to consultations from planning,	Statutory Consultee. Current procedures do not	Active contribution to consultations.	New SOP implemented Database actions reflect new SOP	PEHO - 5 days / 37 Hours S/EHO - Review & Response to	Familiarisation of all staff on new SOPs	01/04/23	31/03/24	PEHO	2	Healthy Environment Thriving Community	O/A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
		Outcome [what difference will this make]				Start	Finish	Lead				
	building control. Including liaison with departments, draft and implementation of new procedures.	allow for a consistent or collaborative approach. Safe and compliant premises	Collaboration with neighbouring teams to ensure safe and compliant premises.	Referral of relevant premises through to Planning, Building Control Consultation on Planning and building control consultations.	consultations. Referral of non-compliant premises. Est. 10 per annum at 2 hours each. Total 0.03 FTE							
S	Imported Food (Official Controls)	Food Law COP	Food products offered for sale will be legally compliant, properly labelled	Service requests actioned within timeframe. Targetted sampling	Resourcing for individual cases included in inspections & SRs above. PEHO/SEHO - Draft and	Familiarisation of all staff on new SOPs. Training of new and existing officers on notices	01/04/23	31/03/24	PEHO	1	Healthy Environment Thriving Community	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
			d and safe to eat.		implemen- tation of Procedur- es - included above.							
S	Reactive food & Safety work (service requests) <ul style="list-style-type: none"> • Dirty food premises • Microbiological, chemical & labelling • Allergens • Health, safety & Welfare 	Food Law COP and FSA guidance on service return. HSWA/ EAR	Ensure food on sale is safe to eat, produced hygienically, correctly labelled and does not mislead the consumer. Ensure premises	All Service requests responded to.	All officers - 2 hour per SR on average. 2100 Hours (1.23 FTE)	Familiarisation of new officers with SOPs New officers shadow/s hadowed visits to complex complaints.	01/04/23	31/03/24	PEHO	1	Building Relationships Thriving Community Inclusive Economy Services	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]	Resource s	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
							Start	Finish	Lead				
	<ul style="list-style-type: none"> Business advice Approximately 1050 per annum.			es are safe to work in and visit.									
N S	Paid advice visits - Food Hygiene. Approx 10 requests per year. (Subject to promotion)	Improve food hygiene compliance of businesses. Provision of support and advice to local businesses Income generation	Improved hygiene standards and compliance at first and subsequent inspection.	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. correspondence and preparation) 0.02 FTE	N/A		01/04/23	31/03/24	PEHO	2	Thriving Community Inclusive Economy	A
N S	Food Standards and	Improve food standards	Improved standards	Requests for business	SCPO -5 days per annum	N/A	01/04/23	31/03/24	PEHO	2	Thriving Community Inclusive Economy	A	

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S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
	bespoke labelling advice (paid) Approximately 5 requests per annum (subject to promotion)	d compliance of businesses. Provision of support and advice to local businesses Income generation	rds and compliance of labelling and consumer information. Reduction in further interventions.	advice carried out within 28 days. Premises subject to paid advice will be broadly compliant or better after next inspection. Premises subject to paid advice will require less enforcement action.	0.02 FTE							
N S	Improve Food Hygiene & Health & Safety presence on RBC	Modernise and improve communications with	Improved communications to and access	Develop H&S page on RBC webpage. Improve complaints service for	PEHO - initiation, review and implementation - 10 days	Nominated officer(s) require familiarisation with corporate	01/ 04/ 23	31/ 03/ 24	PEHO /SEHO	1	Healthy Environment Thriving Community	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
		Outcome [what difference will this make]				Start	Finish	Lead				
	website and social media	customer. Enhance transparency and accessibility of service.	ibility of service to customers. Reduction in service requests and enquiries. Improved compliance of food businesses.	customers. FSA complaints page removed. Publication of cooling tower register. Food Team posts on corporate Facebook/ Twitter Feeds regarding food hygiene & Safety.	SEHO/SC PO - 15 days 0.1 FTE	standards for publications and website						
S	Ensure all officers appropriately authorise	Food Law COP.	Service wide review of officer author	Competent /authorised/ skilled and knowledge able staff	PEHO - 20 days / 740 Hours Officers - 5 days	PEHO review of new COP standards PEHO to attend	01/ 04/ 23	31/ 03/ 24	PEHO	1	N/A Legal requirement	O / A

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S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we know we have delivered]	Resources	Training Needs	Start			Lead	Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead				
	d and competent. Full review of all staff competency required under new COP and new training scheme to be implemented	isation and delegations Review of officer competencies and skills in line with FSA new competency framework		per officer (x8) = 296 Hours 0.6 FTE	FSA webinar(s) regarding new competency requirements.							
S	Authorisation and Delegations Review including implementation	Food Law COP / HSWA Delegations Register.	Review the delegations register and ensure officer	Delegations register is up to date There are clear lines of	PEHO - 10 days SEHO - 10 days 0.09 FTE	N/A	01/04/22	31/03/23	PPM/CPGM	1	N/A - Legal Requirement	O

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
	of new authorisation system for staff	Service Plan Priority	authorisation s are up to date - as part of the corporate review of the constitution and delegations register	delegated authority for officers to have the necessary powers and authority								
N S	Servicing of PAPs (Food Standards Only) - Annual work plan, meetings		Well managed PAP service compliant with statut	Level of service aligns with requirement of statutory guidance. PAP advice up to date	Food Standards Officer (SCPO) - 0.1 FTE	Inexperien ced officers to complete OPSS training and familiarisa tion.	01/ 04/ 23	30/ 06/ 24	PTSO /SCP O	3	N/A	A

S / N S	Reason Action, [what are going to change deliver or improve]	Outcome [what difference will this make]	Success Measures [how will we know we have delivered]	Resources	Training Needs	Start			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Year	Month	Day			
	, response to queries & enforcement, review of policies/procedures, issue of assured advice, review and update of published out of date advice Issue of PAP export Certificates	ory guidance	and reviewed within timeframe. Enquiries and enforcement actions responded to within timeframe.		Officer handovers for PAP changes						

S / N S	Reason Action, [what are going to change deliver or improve]	Outco me [what difference will this make]	Success Measures [how will we know we have delivered]	Resource s	Training Needs	Start			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off projec t [O]
						Star t	Fin ish	Lead			
N S	Service Target Reading Festival - Delivery of Alfresco Award, H&S monitoring & inspection, SAG Meetings and preparation. Review of Alfresco Award and future festival delivery.	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	PEHO - 15 days (incl. SAG, team meetings, admin, preparation) = 181 Hours Officers - 63 onsite days. 5 days H&S document review = 504 Hours Training - Officers - 20 Hours 0.4 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.	01/04/23	31/03/24	PPM/CPGM/PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]										
				and during event. H&S hazards referred to Licensing								
NS	Undertake SR review, including response time, and implement triage system.	Service requests require prioritisation to ensure that these are effectively dealt with in line with available resources.	Resources directed to highest public health risk. Improve efficiency.	Service requests responded to in accordance with public health risk presented. Increase in service requests responded to within timeframe.	PEHO 1 day SEHO 2 days Officers - 10 hours 0.02 FTE	N/A	01/04/23	31/03/24	PEHO	2	Healthy Environment Thriving Community Inclusive Economy	0

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Star t	Fini sh	Lead	Ser vic e Pla n Pri ori ty (1- 3)	Corporate Plan Priority	Annual Requir ement [A]/ One off projec t [O]
		Outco me [what differ ence will this make]										
S	<p>Development, Implementation and Maintenance of Health and Safety SOPs.</p> <p>Training and development of staff in Health and Safety</p>	<p>Health and Safety has taken a backseat for more than a decade .</p> <p>Control measures required to be implemented by businesses during the pandemic have identified gaps in</p>	<p>Competent, knowledgeable and confident staff. Improved business compliance with health and safety legislation, safer workplaces .</p>	<p>Documented and implemented SOPs. Staff training records. Staff authorisation.</p>	<p>Review, development and implementation of SOPs and additional materials as required.</p> <p>PEHO/Lead SEHO - 25 days each.</p> <p>SEHOs - Training, development and review of new SOPs. Shadowed visits. 10 days each</p>	<p>Training & Development needs assessment. Refresher training for all staff in all areas of H&S commencing with priority matters including: LPG Electrical Safety Asbestos Accident investigation Special Treatments</p>	01/04/23	31/03/24	PEHO	2	Healthy Environment Thriving Community	O/A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Pri ori ty (1- 3)	Corporate Plan Priority	Annual Requir ement [A]/ One off projec t [O]	
		Outco me [what differ ence will this make]				Star t	Fin ish	Lead				
		business knowle dge and skills and require d more focused work in health and safety.			Total estimate 90 days 0.4 FTE							
S	Food Service Plan	Food Law Code of Practic e Service Plan priority	Plan to demon strate how the counci l will deliver its functi ons to protec t the health	Plan drafted and agreed through committee .	Review of previous years performa nce. Target setting for upcoming year and assessme nt of resources .	Further training in Civica (or replaceme nt) to run appropriat e reports.	01/ 04/ 23	30/ 06/ 24	PEHO	1	Healthy Environment	A

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S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Pri ori ty (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off projec t [O]	
		Outco me [what differ ence will this make]				Star t	Fin ish	Lead				
			of reside nts, visitor s and those workin g in the town throug h the efficie nt and effecti ve enforc ement of food safety laws in the Boroug h		PEHO - 10 days 0.045 FTE per annum							
S	Officer Training to ensure	Require ment for	Compe tent and	Minimum requireme	Minimum 30 Hours per		01/ 04/ 22	31/ 03/ 23	PEHO	1	N/A - Competency Requirement	0

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]				Start	Finish	Lead			
	competency in all relevant areas of work	professional status. Requirement under FLCOP	knowledgeable officer	nts for CDP met.	officer per annum. 0.14 FTE						
N S	Proactive project targeting improvement of hygiene standards within businesses	Compliant businesses with high food hygiene and safety standards.	Improvement in compliance and FHRS rating of businesses. Reduction in the number of Non-broadly complaint	Increase in Food Hygiene Rating following proactive project intervention.	Estimate 6 hours per premises. Estimate 30 premises to be prioritised. = 180 Hours / 0.11 FTE	Project familiarisation	01/04/23	31/03/24	CPGM / PEHO / SEHO	2 Healthy Environment Thriving Community	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]	(0-2 rated) businesses in Reading.									
S	Respond to FOI Request	Statutory function - Freedom of Information Act 2000	Customer service Legally compliant Council	FOI responded to and closed within 20 days	Estimate 30 per annum. 1 day per FOI (avg) = 30 days 0.13 FTE	All Senior officers require training and familiarisation with the updated corporate system.	01/04/23	31/03/24	PEHO	1	Inclusive Economy	A
N S	Arcus Project - Support to testing and implementation of Arcus MIS for Food Hygiene, Food	New MIS being implemented across Service	N/A	Tested and fully functioning MIS.	PEHO - 30 days Officers - 10 days each = 724 Hours 0.43 FTE	All officers will require training on new system	01/04/23	28/02/24	AD - PTPP	1	N/A - Directorate Requirement	O

S / N S	Action, [what are going to change deliver or improve]	Reason		Success Measures [how will know we have delivered]	Resource s	Training Needs			Service Plan Pri ori ty (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off projec t [O]	
		Outcome [what difference will this make]				Start	Finish	Lead				
	Standards , Health and Safety and Special Treatmen ts											
S	Accident Investigat ion. Full investigat ion off and bringing of appropria te legal action following serious health and safety accident and local wholesale r.	HSWA7 4 - Investig ation of acciden ts	Safer busines ses	Regular Case reviews, authorisati on to proceed, Work carried out in line with specified time frame for internal/ex ternal legal representa tives.	PEHO - 30 days / 217 Hours = 0.13 FTE SEHO's 0.4 FTE	Training in disclosure requireme nts and refresher on legal & enforcem ent procedure where required	Ong oing		PEHO /SEH O	1	Healthy Environment	0

