

# Policy Committee

08 July 2024



**Reading**  
Borough Council  
Working better with you

<b>Title</b>	Food Service Plan 2024-2025
<b>Purpose of the report</b>	To make a decision
<b>Report status</b>	Public report
<b>Report author</b>	Katie Heath, Principal Environmental Health Officer, Food & Safety
<b>Lead Councillor</b>	Cllr Ruth McEwan – Education & Public Health
<b>Corporate priority</b>	Healthy Environment
<b>Recommendations</b>	1. That Members approve the content of the statutory Food Service Plan for 2024-2025

## 1. Executive Summary

- 1.1. This report sets out the updated Food Service Plan for the period 2024-2025. The Food Service Plan is a statutory requirement for all Local Authorities who undertake official food controls and is detailed within the Food Law Code of Practice set by the Food Standards Agency (FSA). The Food Service Plan outlines the Local Authorities commitment to development of the food service.
- 1.2. The FSA set a standard template for the Food Service Plan which must be drawn up in accordance with the FSA Framework Agreement on Official Feed and Food Controls by Local Authorities. The Food Service Plan must include qualitative and quantitative performance reviews of delivery against previous plans and outline how national priorities and standards will be addressed and delivered locally. The Food Service Plan serves to assist Local Authorities in aligning with the principles of good regulation, focus on key delivery issues, provide an essential link with corporate and financial planning, set objectives, manage performance and provide information on service delivery to key stakeholders.
- 1.3. The Local Authority must put in place arrangements for the regular review and update of the Food Service Plan. We find it useful to complete this on an annual basis after the close of year figures have become available (End of April).
- 1.4. It was recommended in a previous FSA Audit that the Food Service Plan be submitted for approval by Members in addition to Senior Officers.
- 1.5. This Food Service Plan outlines the Food Services key achievements for 2023-24 and outlines service objectives and work plans for 2024-25.
- 1.6. From the 2023-2024 outputs, there remains a backlog of inspections, particularly Food Hygiene inspections, following Covid-19 and in part due to a number of vacant posts within the team. The Team have recently appointed three officers to fill the existing vacancies, two of whom will require further development to be able to undertake official food controls. At present there remains a deficit of resources to meet the requirements of the Food Law Code of Practice, clear the backlog of inspections and maintain the required number of inspections and complete all other work identified within the Food Service Plan, including statutory requirements that fall to the Food & Safety Team. There is additional work that falls within the remit of the Food Service which is priority and falls outside the

scope of the Food Service Plan. Further details on this area are detailed within the Food Service Plan, including full details on the total number of inspections that are due/overdue. We need to constantly prioritise and reprioritise the work assigned to the Food Service to deal with high-risk matters arising and ultimately, we are accountable to the Food Standards Agency (FSA).

- 1.7. Having now recruited and since meeting with the FSA to agree an improvement plan we now predict that where all areas of the FSA improvement plan can be successfully implemented as intended it is anticipated that the authority will be able to meet the full requirements of official controls detailed within the Food Law Code of Practice by the end of 2024-25.

## **2. Policy Context**

- 2.1. The FSA is an independent Government department responsible for protecting public health and consumers' wider interests in food. Part of their role is to ensure that local authorities comply with the 'Framework Agreement on Official Feed and Food Controls by Local Authorities'. The Agreement details:
  - That publicly available local service plans to increase transparency of local enforcement services should be published (i.e. the Food Service Plan).
  - agreed food law enforcement standards for local authorities.
  - enhanced monitoring data with greater focus on inspection outcomes and which provides more detailed information on local authority performance.
  - an audit scheme aimed at securing improvements and sharing good practice.
- 2.2. The Framework Agreement recognises that all Food officers should be correctly authorised, and a documented procedure must be in place for the authorisation of officers based on qualifications, competence and in accordance with the Food Safety Act Code of Practice and centrally issued guidance.
- 2.3. Food Officers carry out inspections of food premises, undertake food sampling, investigate complaints about food premises including infectious diseases or food poisoning cases. Environmental Health Officers consider the hygiene of food premises (including operating the Food Hygiene Rating Scheme) and ensure that food is microbiologically fit and safe for consumption while Trading Standards and Environmental Health Officers consider food standards. Food Standards includes ensuring food is described accurately and not in a misleading manner as well as ensuring food is not chemically contaminated.

## **3. The Proposal**

### **3.1. Current Position:**

- 3.1.1. As part of the Framework Agreement, the Council submits monitoring data to the Food Standards Agency, this is carried out quarterly with more detailed monitoring provided at the end of the year. Monitoring data is used to form the basis of the Food Service Plan and review of the previous year's performance. It also informs the forthcoming targets and Key Performance Indicators (KPI).
- 3.1.2. The Food Service Plan 2024-25 outlines that within the Borough there are currently 1648 premises producing, retailing or serving food. Over the past 10 years there has been a 250% increase in the number of new food premises registering with the Council. As a result, the need to inspect new premises in addition to the existing planned inspections continues to increase.
- 3.1.3. Throughout 2023-24 the Food Service focussed its resources on carrying out priority work in line with internal key performance indicators and to address our most longstanding overdue premises, full details of achieved inspections in 23-24 and remaining inspections

that have been carried over into 24-25 can be found in sections 3.1.14, 3.1.15, 6.4.2 and 6.4.3 of the Food Service Plan.

<b>Objective</b>	<b>Priority/Source</b>	<b>Target (%)</b>	<b>Set</b>	<b>Achieved (%)</b>	<b>Met/Not Met</b>
Inspection of Food Hygiene Premises risk rated A (due/overdue)	Corporate KPI Food Law Code of Practice	100 100		100	Met
Inspection of Food Hygiene Premises risk rated B (due/overdue)	Corporate KPI Food Law Code of Practice	80 100		89	Met <sup>1</sup>
Inspection of Food Hygiene Premises risk rated C	Food Law Code of Practice	100		63	Not Met
Inspection of Food Hygiene Premises risk rated D (overdue)	Food Law Code of Practice	100		38	Not Met
Inspection of Food Hygiene Premises risk rated E (overdue)	Food Law Code of Practice	100		3	Not Met
Inspection of Food Standards Premises risk rated A	Corporate KPI Food Law Code of Practice	100 100		100	Met
Inspection of Food Standards Premises risk rated B (due/overdue)	Food Law Code of Practice	100		45	Not Met
Inspection of Food Standards Premises risk rated C (due/overdue)	Food Law Code of Practice	100		34	Not Met
Unrated (newly registered) Food Hygiene Premises	Corporate KPI Food Law Code of Practice	70 100		47	Not Met
Prioritisation (high/low) of all unrated (newly registered)	Food Law Code of Practice	100		100	Met

Food Hygiene Premises				
Prioritisation of all unrated (newly registered) Food Standards Premises	Food Law Code of Practice	100	0	Not Met
Proactive and reactive sampling for food hygiene and food standards	Food Law Code of Practice	No target set	144	Met

<sup>1</sup> There were no remaining B's awaiting inspection at the end of March 24 that were open, trading and available for inspection.

Key –

Risk Rating A – These are the premises presenting the highest risk to consumers either from the methods of processing, distribution reach and clientele served, poor levels of compliance or a combination of the above. Food Hygiene premises risk rated A require an intervention/inspection every 6 months. For Food Standards this is every 12 months.

Risk Rating B – the risk rating is again determined through scores awarded under the categories of processing methods, distribution, clientele served and level of compliance. For food hygiene those premises rated B require an intervention/inspection every 12 months.

Risk Rating C – for Food Hygiene these premises require an inspection every 18 months.

N.B. The risk rating categories are set nationally by the FSA in the Food Law Code of Practice.

- 3.1.4. Please see paras 6.4.2 and 6.4.3 of the Food Service Plan for further details on inspections completed in 2023-24.
- 3.1.5. From the total number of inspections due and overdue in 2023-24 the Food Service achieved 36% of the total number of Food Hygiene Inspections due and 29% of the total Food Standards Inspections due.
- 3.1.6. An increase in the number of non-compliant premises was anticipated however this has not been shown through the inspections completed. At present 4% of our total premises are not broadly compliant for food hygiene and 8% are not broadly complaint for food standards. Accordingly, there has been a decline in the number of enforcement notices served this year.
- 3.1.7. The total level of non-compliance across the borough portfolio for food hygiene remains the same as 2023-24 however the level of non-compliance for food standards has reduced by 3%.
- 3.1.7.1. Non-compliance for Food Hygiene is categorised as premises that score less than 3 (Generally Satisfactory) against the scoring criteria of Food Hygiene practices, structure and Confidence in Management.
- 3.1.7.2. Non-compliance for Food Standards is determined as premises that score general failure in current compliance and have little or no basic or technical knowledge of food law.
- 3.1.8. The current breakdown of food hygiene ratings of food premises (falling within the rating scheme) in the borough is:

Food Hygiene Rating	Descriptor	Number of Premises	Change from - 23-24
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5	Very Good	1050	-10
4	Good	251	-15
3	Generally Satisfactory	150	+3
2	Improvement Necessary	25	-8
1	Major Improvement Necessary	19	-6
0	Urgent Improvement Necessary	2	-1

3.1.9 The Authority has responded reactively in line with the Food Law Code of Practice requirements and has received 575 food related service requests in 2023-24 including, but not limited to, food incidents and alerts, food hygiene complaints and food standards complaints.

### 3.2. Options Proposed

3.2.1. The Local Authority is required to deliver all official controls as detailed within the Food Law Code of Practice. The Authority has not met this requirement in 2023-24 and has been engaged by the FSA to discuss and review these matters. The FSA have provided a summary report to the authority regarding our delivery of official controls and has identified two significant areas where improvement is required. These areas are:

a) Resolve shortfall of resources.

b) Realign with the Code of Practice for official controls, specifically in relation to Food Hygiene Inspections.

A full copy of the report can be found in Appendix 6 of the Food Service Plan.

In response and as required by the FSAs report the Authority has produced an improvement plan to address these areas. The improvement plan can be seen in Appendix 7 of the Food Service Plan. The authority has identified fourteen points of improvement that it will implement. Where all areas of the plan can be successfully implemented as intended it is anticipated that the authority will be able to meet the full requirements of official controls detailed within the Food Law Code of Practice by the end of 2024-25.

3.2.2. The Food Service Plan identifies that there remains a deficit of resources to undertake all work allocated to the Food Service. The Team has now successfully recruited three permanent officers, two of whom are currently unqualified and require training and development to be able to undertake official controls as detailed within the Food Law Code of Practice. We expect these officers to be fully operational by January 2025. The full remit of the Food Services work is outlined in Appendix 5 of the Food Service Plan and identifies that with all posts filled there remains a deficit of resources to complete all required work. Officers delivering the Food Service are also responsible for delivering a wider remit of work including sports ground safety, health and safety enforcement, accident investigation, special treatment licensing and infectious disease investigation.

3.2.3. In line with corporate and service priorities the Food Service is supporting and participating in the development and implementation of ARCUS MIS, the back-office system which will help deliver the service. Once delivered, it is anticipated that the system will better support mobile working which will increase the efficiency of the service. The Food Service has one officer on secondment to work on this project. The timescale for implementation has been extended which will impact delivery of work within the Food Service.

3.2.4. The Food Service will continue to prioritise the following key pieces of work which align with the Councils corporate objectives:

- Carry out a planned inspection programme focussing on high-risk activities first and foremost which keep consumers safe, whilst supporting the business to improve.
- Continue to operate a food hygiene and standards sampling programme to support interventions carried out within Reading’s premises and ensure that the food sold is safe to eat and not misleading to the consumer whilst supporting wider national programmes to achieve this across England.
- Continue to advertise our paid advice service for food hygiene and standards within our local community and Reading based businesses.
- Improve digital access to our Food Service through our webpages and enable interaction through social media platforms.
- Undertaking a review of officer authorisations in line with a larger corporate piece on delegations and enforcement to ensure that all officers are appropriately and correctly authorised to carry out their remit of work.
- Ensure that all officers are appropriately qualified, trained with documented competency in line with Food Law Code of Practice.
- Ensure that the service works to correct and up to date standard operating procedures to ensure consistency and to work within the parameters of the Food Law Code of Practice and Practice Guidance.

### 3.3. Other Options Considered

3.3.1. The Food Service has a number of other responsibilities beyond delivery of Food Hygiene and Food Standards Services, this includes but is not limited to investigation of infectious disease, health and safety accidents, sports ground safety work at our designated stadium and regulated stand and registration and inspection of Special Treatments. A number of these work streams are also high priority to ensure the safety of residents and visitors to Reading. A full breakdown of the Service’s work responsibilities can be found in Appendix 5 of the Food Service Plan.

3.3.2. The Service continues to risk assess incoming and existing work to focus resources on priority matters.

3.3.3. The Service is planning, if resources allow, to undertake a project actively targeting our non-broadly compliant premises and improving the food hygiene ratings in Reading. This project will include an educational visit, spot check and food hygiene re-rating inspection.

## 4. Contribution to Strategic Aims

4.1. The Food Service Plan 2024-25 supports the Council’s Vision ‘To help Reading realise its potential – and to ensure that everyone who lives and works here can share the benefits of its successes at its core. The Service Plan supports and aligns with the following corporate objectives and the Food & Safety Team Plan has prioritised work activities around these objectives:

Healthy Environment	<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>
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Thriving Community	Encouraging the adoption of good hygiene and safety practices at all stages of the food production chain Contributing to statutory consultation on new and existing food businesses Management of the Food Hygiene Rating Scheme and encouraging higher food hygiene ratings through the re-rating process. Providing advice to existing and potential food businesses. Supporting food hygiene and safety at Reading Festival and other local events.
Inclusive Economy	Providing advice to existing and potential food businesses. Providing a paid advice service for complex and bespoke business needs. Responding to complaints and service requests within our statutory response times. Developing our social media and web presence to ensure our services are accessible to all.

4.2. These themes are underpinned by “Our Foundations” explaining the ways we work at the Council:

- People first
- Digital transformation
- Building self-reliance
- Getting the best value
- Collaborating with others

4.3 Full details of the Council’s Corporate Plan and the projects which will deliver these priorities are published on the [Council’s website](#). These priorities and the Corporate Plan demonstrate how the Council meets its legal obligation to be efficient, effective and economical.

## 5. Environmental and Climate Implications

5.1. The environmental or climate implications arising from the Food Service Plan 2024-25 or its implementation is ‘Net Nil’. Consideration has been given to the potential implications that could arise from this Plan and there are no additional points outside of general Council working practice that apply.

5.2. The most significant activity from the Plan is inspection activity. The Food Service have access to pooled bus passes and a large number of premises are based within Reading Town Centre where inspections can be carried out by foot. In general, use of public transport and travel by foot or bicycle is encouraged over the use of personal or pool vehicles. Interventions are recorded on paper which requires a copy to be left at the premises at the time of the intervention. The Food Service Plan supports the wider request for mobile working solutions which will reduce the Council’s carbon footprint.

## 6. Community Engagement

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

## 7. Equality Implications

7.1. An Equality Impact Assessment has been completed and can be found at Appendix 3 to this report. Agreement to and implementation of the Food Service Plan 2024-25 does not have a differential impact on; racial groups; gender; people with disabilities; people of a particular sexual orientation; people due to their age; people due to their religious belief.

## 8. Other Relevant Considerations

8.1. The work of the Food Service contributes to positive public health outcomes by ensuring that food businesses operating in the borough are required to comply with relevant food

law and are safe places for residents and visitors to dine. The Service investigates incidents of infectious disease, complaints, and food incidents to ensure that businesses are legally compliant and do not pose a risk to consumers. Where businesses are found to be non-compliant a staged enforcement approach is undertaken to reach compliance. The Service also undertakes health and safety investigation work to reduce the risk to employees and visitors' health, safety in welfare, within business.

- 8.2. The Food Service Plan 2024-25 has due regard for the relevant legal provisions, Food Law Code of Practice, and other statutory guidance. The Food Service Plan comments upon upcoming regulatory changes where applicable Work streams commented on within the Food Service Plan are prioritised in accordance with public health implications.

## 9. Legal Implications

- 9.1. The Food Service Plan is written in accordance with the nationally agreed Framework Agreement with the FSA. No delegation is required to implement the recommendations of this report or the Food Service Plan. The Plan sets out how the authority will meet its statutory obligations. The Legal Team have been consulted in producing the Food Service Plan. Following this consultation, a review of the Council's Enforcement Policy and Food Enforcement Policy will be carried out.

## 10. Financial Implications

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

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

	<b>2023/24 £000</b>	<b>2024/25 £000</b>
Employee costs	539	529
Other running costs	42	42
<b>Expenditure</b>	<b>581</b>	<b>571</b>
Income from: Fees and charges	-24	-24
Other income	-2	-2
<b>Total Income</b>	<b>-26</b>	<b>-26</b>
Net Cost	555	545

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

- 10.4. The current resource allocation does not permit full delivery of the requirements of the Food Law Code of Practice and other work allocated to the Food & Safety Team. The Team is therefore focussed on delivering an effective service, focussed on risk, within the approved budget provision.

### Value for Money (VFM)

The Food Service Plan 2024-25 outlines statutory work required to be undertaken by the Council. The Food & Safety Team Plan, forming Appendix 5 of the Plan, details additional non-statutory work which is required to deliver a fit for purpose service. As part of this, revenue generating activities including expanding our paid advice service for local businesses, have been included within priority work.

## **11. Timetable for Implementation**

11.1. Not Applicable

## **12. Background Papers**

12.1. There are None.

## **Appendices**

1. Food Service Plan 2024-2025
2. Climate and Impact Assessment
3. Equality Impact Assessment