



Reading
Borough Council

Working better with you

Food Service Plan 2024-2025

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 24-25:

- 100% of Food Hygiene Premises rated A due before 31 March 25 to be completed.
- 80% of Food Hygiene Premises rated B due before 31 March 25 to be completed.
- 70% of new registrations (those awaiting inspection) to be completed before 31 March 25.
- 100% of Food Standards Premises rated A due before 31 March 25 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 Service risk register. A local risk register can be found within Appendix 5, the Food & Safety Team Work Plan for April 2024 – March 2025.

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 doing 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. A further train station has now opened at Green Park which has created improved commuter access to the high number of businesses in that area.

2.1.4 Businesses in Reading utilise 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. The town has further seen creation of a street food area that trades across the weekend from Thursday to Sunday.

2.1.6 The town hosts a number of festivals and cultural events which bring visitors and itinerant traders to the area. The most significant music festival is Reading Festival which is the 2nd largest festival in the UK after Glastonbury.

2.2 Organisational Structure

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

[Constitution of the Council May 2023 \(reading.gov.uk\)](https://www.reading.gov.uk/constitution)

- 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 within the constitution.
- 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 The Food & Safety Team sits within Public Protection. 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 hygiene 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 The authority has appointed two lead officers for food standards matters; Katie Heath and Ian Savill, Principal Officer, Trading Standards both of whom are supported by the Consumer Protection Group Manager and Public Protection Manager.
- 2.3.7 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 The Trading Standards Team who continue to provide assured business advice and support in Food Standards matters through the Primary Authority Partnership Scheme and currently supports 9 partners.
- 2.3.3 The Principal Environmental Health Officer – Food & Safety is responsible for managing the topic area of food within Public Protection. Approximately 72% of the Food & Safety Team is directed at official controls for food safety and approximately 7% of the Trading Standards Service is directed at food standards work (including work allocated through Primary Authority).
- 2.3.4 The Food & Safety Team have continued to experience significant recruitment and resourcing challenges throughout 2023-24. The team carried two vacant FTEs for the year and was unable to fill these posts despite several recruitment attempts. The Team lost a further 0.86 FTE through a member of staff transferring teams and 0.81 FTE has been under secondment since March

2023. The team did successfully recruit an apprentice in September 2023. The team have recently successfully recruited and has been recently joined by three FTE in May 2024 however two FTE will require further qualification and training before being authorised to undertake official controls.

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. The 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	10
Food Importer/Exporter	9
Food Distributor/Transporter	28
Supermarket/Hypermarket	51
Small Retailer	232
Retailer Other	101
Restaurant, Café, Canteen	303

Hotel, Guest House	30
Pub, Club	113
Takeaway	197
Caring Establishment	149
Schools, Colleges	80
Mobile Unit	70
Restaurant, Caterer Other	274
Unknown, not classified	1
Total	1648

- 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. There are a further 2 premises which are in the process of being assessed for approval.
- 2.4.3 There are a 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. The Food & Safety Team attend event Safety Advisory Group (SAG) meetings regularly and will provide advice and guidance to event organisers regarding food safety matters.
- 2.4.4 Reading Borough Council works in collaboration with Festival Republic at Reading Festival annually. The festival takes place over the August Bank Holiday weekend. 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.
- 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 Regulatory Policy

- 2.5.1 The Council has previously adopted the Enforcement Concordat, which was replaced by the Regulator's Compliance Code until 5 April 2014, when it was replaced by the Regulator's Code, effective from 6 April 2014. The Council's 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 has six main themes:

- 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 official controls required by the Food Law Code of Practice. 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 approached by the FSA's Performance Management Team and has provided information to explain the completed and outstanding official controls. The FSA have provided

a report to the authority outlining areas of improvement required. This can be found at Appendix 6. In response the authority has put together an Improvement Plan which can be found at Appendix 7.

- 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 per year is increasing making a significant contribution to the number of new premises/ those that have changed ownership on the database. There has been a 251% increase in the number of registrations received per year in comparison to 10 years ago. The increase in number of premises registering per year is displayed below:



- 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 both Food Hygiene and Food Standards. The authority is yet to adopt the new Food Standards Risk Rating Model and is currently in the process of implementing a new MIS.
- 3.1.7 For Food hygiene, 96% of premises are currently rated as 'broadly compliant'. A premises is 'broadly compliant' if none of the individual scores for hygiene, structure or confidence in management exceed 10. Non broadly compliant premises require follow up revisits, education and enforcement action.
- 3.1.8 For Food Standards, 92% 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.
- 3.1.9 The following targets for food premises inspections due to be visited in 2024-25 can be seen below. These targets have been set to ensure that our priorities are focussed towards premises that present the highest risk for both food hygiene and food standards. Although there are no corporately set targets inspections of C, D and E premises for food hygiene and B and C categories for food standards will be carried out as resources permit. :

	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. The borough currently has a large number of NIR premises listed for Food Standards which appears disproportionate compared to those listed for Food Hygiene. The authority will undertake a review of the recorded NIR premises for Food Standards.

3.1.11 Category E food hygiene inspections and category C food standards inspections can be carried out via an alternative enforcement strategy (AES) 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. Due to resourcing issues the authority has not been able to carry out AES interventions over the past year. We anticipate that with the increase in filled FTE posts this will be able to take place.

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 are 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 2024/25, including those overdue from previous years is:

Category/ Frequency	Number of inspections Due 2024/25
A / at least every 6 months ¹	5
B / at least every 1 year	26
C / at least every 18 months	232
D / at least every 2 years	389
E / Alternative Enforcement Strategy	391
Outside the Programme (incl. Reading Festival)	46
Unrated ²	120
Total	1,209

¹ This number excludes A's that may arise between 01/04 and 30/09.

² 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 2024/25 are:

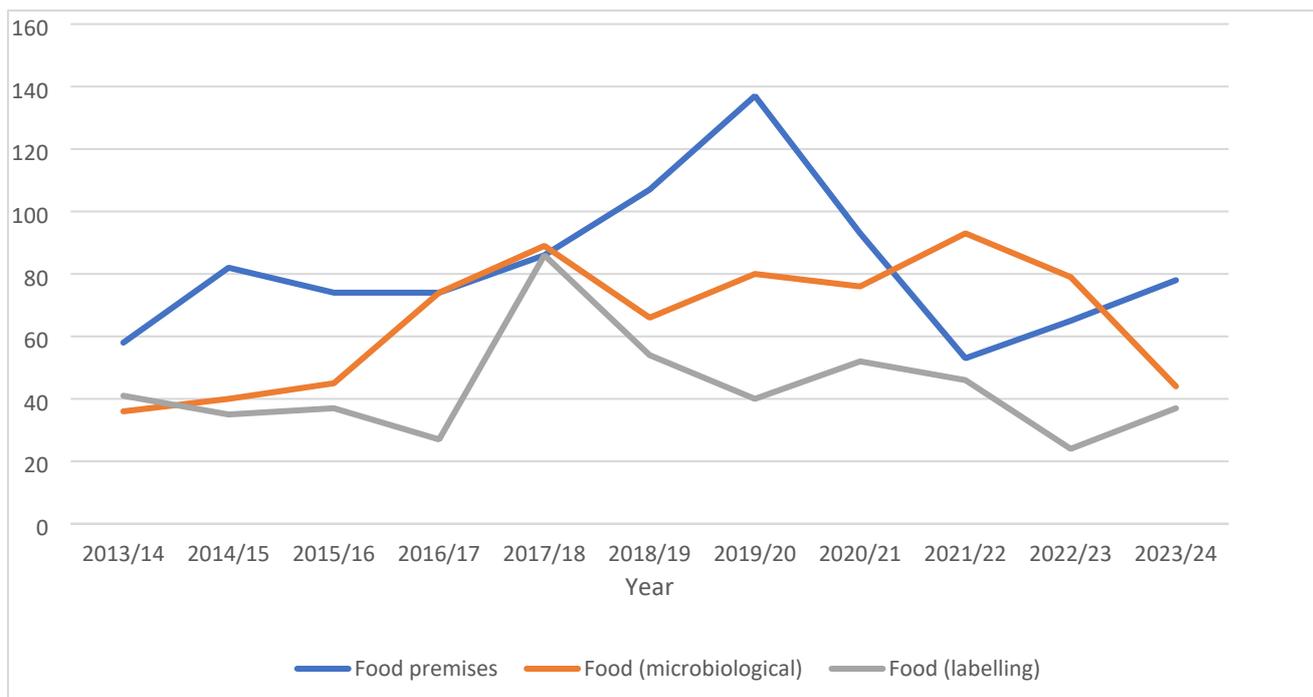
Category/ Frequency	Number of Inspections due 2024/25
A / at least every 1 year	0
B / at least every 2 years	263
C / alternative enforcement strategy	314
Outside the Programme	181
Unrated ¹	271
Total	1,029

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

3.2 Food Complaints

3.2.1 There are documented food complaint procedures. Food complaints are triaged upon receipt and those that require further investigation 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 3-7 working days, depending on issue. 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 2013/2014:



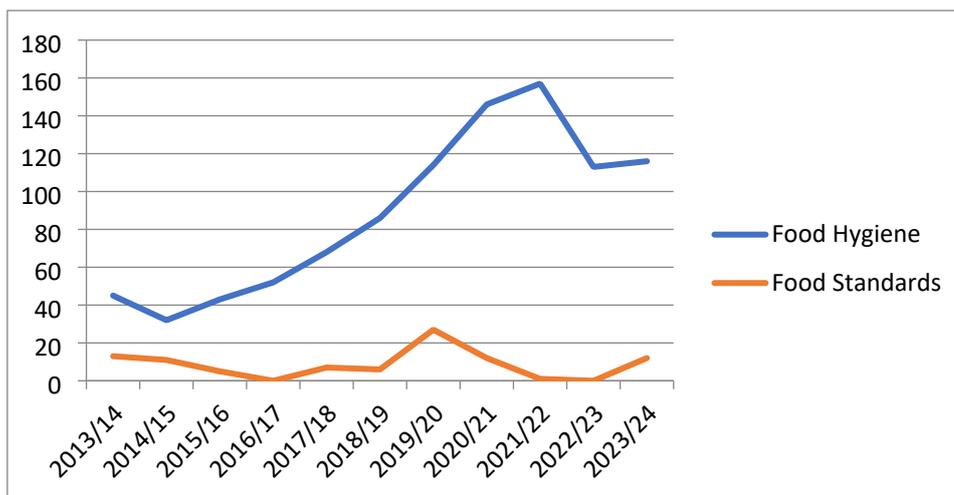
3.2.3 Estimates for this year suggest the figures for microbiological food will continue to decline whereas labelling complaints and complaints about food premises will continue to rise.

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 stabilise and stay broadly the same. Food standards advice requests had declined over recent years, this is believed to be related to differences in our reporting which had focussed on paid food standards advice. Non-chargeable food standards advice has continued to take place across all years and is anticipated to remain similar for 2024/25. The Council are continuing to look at options to advertise our paid food advice services.

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 2024/25 the food sampling budget for microbiological analysis is £6,422.00 which is held on account by UKHSA.

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 where required.

3.4.13 There has been a decline in available grants and sampling projects ran by the FSA over recent years. The FSA is currently running a grant for imported food sampling which we have made a bid for funding through TSSE. The Council intends to increase its quality and compositional sampling this year and intends

to participate in relevant campaigns ran by the Public Analyst, TSSE and locally identified areas of interest, subject to funds being available.

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).

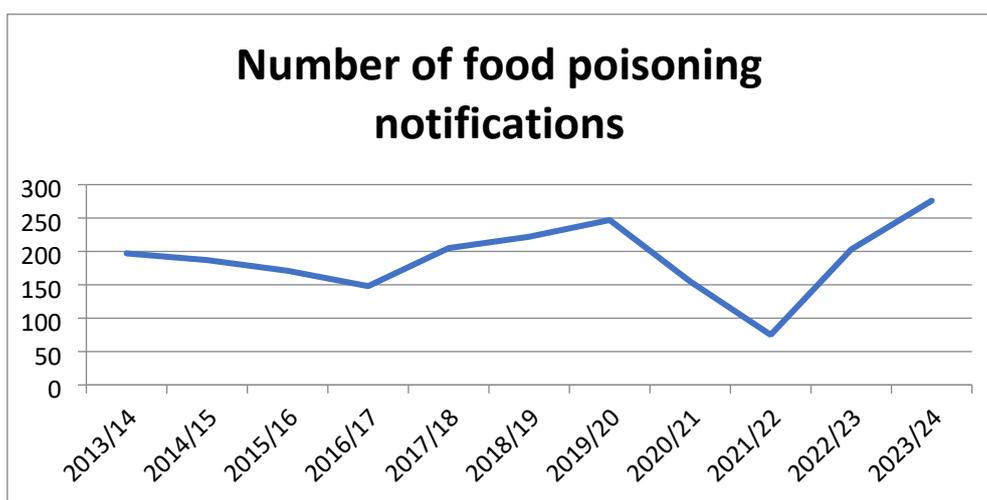
3.5.2 Investigations into infectious disease aim to:

- (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 The Council has seen an increase in the number of notifications in 2023/24 which is proportionate with national reporting of increased levels of food poisoning and norovirus incidents. On this basis it is anticipated that reported numbers will continue to rise into 2024/25. The Local Authority is primarily 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 also projected to increase nationwide 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, liaising with the FSA and National Food Crime Unit (NFCU) and other LAs where required.

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 Thames Valley Food Safety & Health and Safety Liaison Group 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). The Council is currently in discussion with the event organisers to ensure that appropriate arrangements are in place for the management of food safety during the event. Due to changes in funding, it is likely that there will be changes to the Council's involvement in food hygiene inspections at the festival this year however they will retain oversight and continue to work with the organisers to ensure that here are suitable control measures in place. The Alfresco Award did not take place in 2023/24 and will not be continued in 2024/25. The Council are liaising with the festival organisers to ensure that there continues to be display of festival food hygiene ratings.

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 carries 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 was unable to implement and promote and extension to these schemes in 2023/24 as planned. It is hoped that this can be carried out in 2024/25 allowing to purchase 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 Although inspection activity over the past year demonstrates an increase in the number of broadly compliant premises a significant area of non-compliance remains 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 continues to face an 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.

Management Information System (MIS)

- 3.9.2 The authority was due to implement a new MIS in March 2024, the implementation of this has been postponed and is currently scheduled for July 2024. The new MIS is due to encompass all regulatory service areas of work including Food Hygiene and Food Standards. The implementation of the new MIS remains a directorate priority. A member of the Food & Safety Team continues to be seconded to this project and further resource and support continues to be required across the team to provide information, generate template documentation, and test the system. The amount of resource required to ensure that the new MIS is fit for implementation has been greater than anticipated which has impacted the delivery of other food hygiene and food standards work.

Food Standards Delivery Model

- 3.9.3 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 it was anticipated that this would be live within our new MIS in April 2024. This has not currently been met and we have no further update on when this will be available. 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. 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. A project is underway to review the unrated and outside of scope premises (see para 3.9.4 below), however further resource will be required in order to review and implement the new delivery model.

Food Standards – Unrated and Outside of Scope Premises

- 3.9.4 The authority has a large number of unrated premises awaiting intervention for Food Standards. This is a longstanding backlog, and a further number of premises are listed as outside of scope, including a number of premises that are incorrectly listed. The team is utilising a further apprentice working with the Trading Standards Team to review and contact these lists of businesses and will be carrying out a project to risk rate them accordingly.

FSA Improvement Plan

- 3.9.5 The FSA have been monitoring the Council's progress with the Covid Recovery Plan and alignment to the Code of Practice requirements for Official Controls. The Council has not met a number of required Official Controls and has engaged formally with the FSA to address this issue. The Council has been

provided a report from the FSA summarising their findings and have finalised an improvement plan to realign with the Code of Practice. These documents can be found in Appendix 6 and 7 accordingly.

Other Priorities

- 3.9.6 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 2024/25 is £571,000.00 (gross) / £545,000.00 (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). As at 01/04/24 there were 3.45 FTE in post (including temporary contracts) for delivery of Food Hygiene work and 2.09 FTE in post for Food Standards work. Public Protection remains in phase 3 of a workforce review. Consultation is due to be launched shortly for all job roles which sit under Principal level. There should be no decline in resources as a result of this stage of the review. The Team have now been able to advertise and successfully recruit to existing vacant posts within the team and has recently appointed 3 officers: one qualified Environmental Health Officer (EHO) and two officers in training. 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.

- 4.2.2 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, as of 01 April 2024 there were 2.85 FTE of authorised officers in place for food hygiene and

1.99 FTE of authorised officers in place for food standards against an estimated need of 5.16 FTE and 1.56 FTE respectively. Please see Appendix 5 for further detail on the Food & Safety Teams work priorities and resource requirements.

4.2.3 Throughout the majority of 2023/24 the Council was unable to successfully recruit to vacant posts within the Food & Safety Team and lost a further experienced officer. Additionally, the team lost an increasing amount of the seconded post to the MIS project. In March 2024 the Food & Safety Team successfully recruited 3 officers, as detailed at point 4.2.1 above. These officers started with the team in May 2024. As a result of recruitment and resourcing challenges, and further items that are noted within the Team plan (Appendix 5), the Council did not fully meet the requirements of the Food Law Code of Practice with respect to food official controls in 2024/25. The Council has been in discussion with the FSA regarding these matters and an Improvement Plan has now been agreed and implemented. Please see appendices 6 and 7 for more detail.

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 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. Consistency training in other areas of enforcement, including seizure, has been identified as a requirement and will be scheduled for 2024/25.

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. Cascade training is provided to other staff within the team following attendance at these courses.

4.3.5 Newly appointed staff are subject to a Council wide probation scheme and must complete theory and practical training logs 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 remains outstanding but continues to be a service priority.

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, in particular with regard to catching up with C, D and E rated premises for food hygiene. The Council intends to deliver the agreed improvement plan as far as reasonably practicable.

6.3 The data below details the performance that was achieved in 2023/24.

6.4 Number of Inspections

6.4.1 A summary of completed inspections can be seen below:

6.4.2 Food Hygiene

	Achieved inspections 2023-24	No Due in Year	% Of inspections achieved 2023-24	Target in line with KPI's / Code of Practice
Premises Rating - A	7	7	100%	100%
Premises Rating - B	48 ¹	54	89%	80% / 100%
Premises Rating – C	94	144	63%	100%
Of which C – Not Broadly Compliant	8	9	89%	100%
Premises Rating - D	204	544	38%	100%
Of which D – Not Broadly Compliant	0	0	N/A	100%
Premises Rating - E	9	356	3%	100%
Premises Rating - Unrated	118 ²	65	57%	70% / 100%
Premises Rating - Outside	137 ³	47		
Total proactive interventions	525			
Number of revisits	57		N/A	
Total Interventions	582			

¹ All B premises that were open and trading and available for their due/scheduled inspection throughout this period were inspected.

² As at 01/04/23 there were 65 unrated premises due for inspection. A total of 118 unrated premises have been inspected throughout the year. Throughout the year 63 new premises registered and as of 01/04/24 there are a total of 120 unrated premises still awaiting inspection. The numbers do not account for premises that have registered and been subsequently closed due to not trading.

³ This number accounts for inspections at Reading Festival but excludes revisits to non-compliant premises at the festival.

6.4.3 Food Standards

	Achieved inspections 2023-24	No Due in Year	% Of inspections achieved 2023-24	Target in line with KPI's / Code of Practice
Premises Rating - A	19 ¹	5	100%	100%
Premises Rating - B	117	261	45%	100%
Premises Rating - C	107	312	34%	100%

Premises Rating - Unrated	115 ²	265	28%	100%
Premises Rating - Outside	21	171	12%	
Total proactive interventions	379			
Number of revisits	2			
Totals	381			

¹ The number of A inspections due at the beginning of the year were 5. Issues have been experienced with our database incorrectly reporting inspections as A despite the correct risk score being input. This has skewed some of our reports. As at 31.3.24 there were no A's awaiting inspection.

² As at 01/04/23 there were 265 unrated premises due for inspection. A total of 115 unrated premises have been inspected throughout the year. Throughout the year 263 new premises registered and as of 01/04/24 there are a total of 271 unrated premises still awaiting inspection. The numbers do not account for premises that have registered and been subsequently closed due to not trading.

³ This includes revisits carried out at premises outside the scope, i.e. Reading Festival.

6.4.4 Formal Actions

During the period 2018/19 to 2023/24 the authority took the following enforcement action:

Enforcement Type	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Voluntary closure	2	0	1	1	2	4
Seizure, detention & surrender of food	1	2	0	1	2	0
Suspension/revocation of approval or licence	0	0	0	1	0	0
Emergency prohibition notice	2	3	0	0	2	2
Prohibition order	1	3	0	0	1	0
Simple caution	0	0	0	0	0	0
No of premises where Improvement notices served	16	11	0	2	5	3

No of Hygiene Improvement notices served	30	21	0	7	12	4
No of FIR Improvement notices served	0	1	0	0	0	0
Remedial action & detention notices	0	1	0	0	0	0
Written warnings (Food Hygiene)	655	910	129	381	621	527
Written warnings (Food Standards)	32	75	35	84	117	101
Prosecutions concluded	1	1	0	0	0	0

6.4.5 Food Sampling

The following shows the number of hygiene and compositional samples taken and the number of unsatisfactory results received across the period 2017/18 through 2023/24.

	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	8
2023/24	132	45	12	8 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 2023 have been included in the table above at para 6.4.2. 137 Premises inspections were conducted for food hygiene including all high-risk customer facing premises trading within the festival site. The Council undertook a further 14 contravention revisits whilst onsite.

6.5 Variations from the Service Plan

6.5.1 The following items were not met from the 2023/24 service plan and remain outstanding:

- The Council has been unable to achieve the full requirements of official controls detailed within the Code of practice, namely with regard to C, D and E premises for food hygiene and B and C premises for food standards. The Council has also been unable to inspect all unrated premises within the specified timeframe and has not met its own internal KPIs on the number of unrated premises to be inspected for food hygiene.
- The Council has not fully met its identified objective of reviewing all 'outside of scope' premises for Food Standards.
- Internal monitoring of officers has not been fully carried out in accordance with the authority's protocols.
- A significant number of policies and procedures continue to require updating.
- Work to update the Enforcement Plan and officer authorisations was not completed as intended.
- The Council have not implemented the current requirements of the Code of practice Competency Framework. Following an update meeting held by the FSA in April 2024 the Council is aware that the Competency Framework is being reviewed and will be changing. The Council will therefore not be implementing the current Competency Framework and will continue to use its own assessment methods to determine and record officers competency.

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.

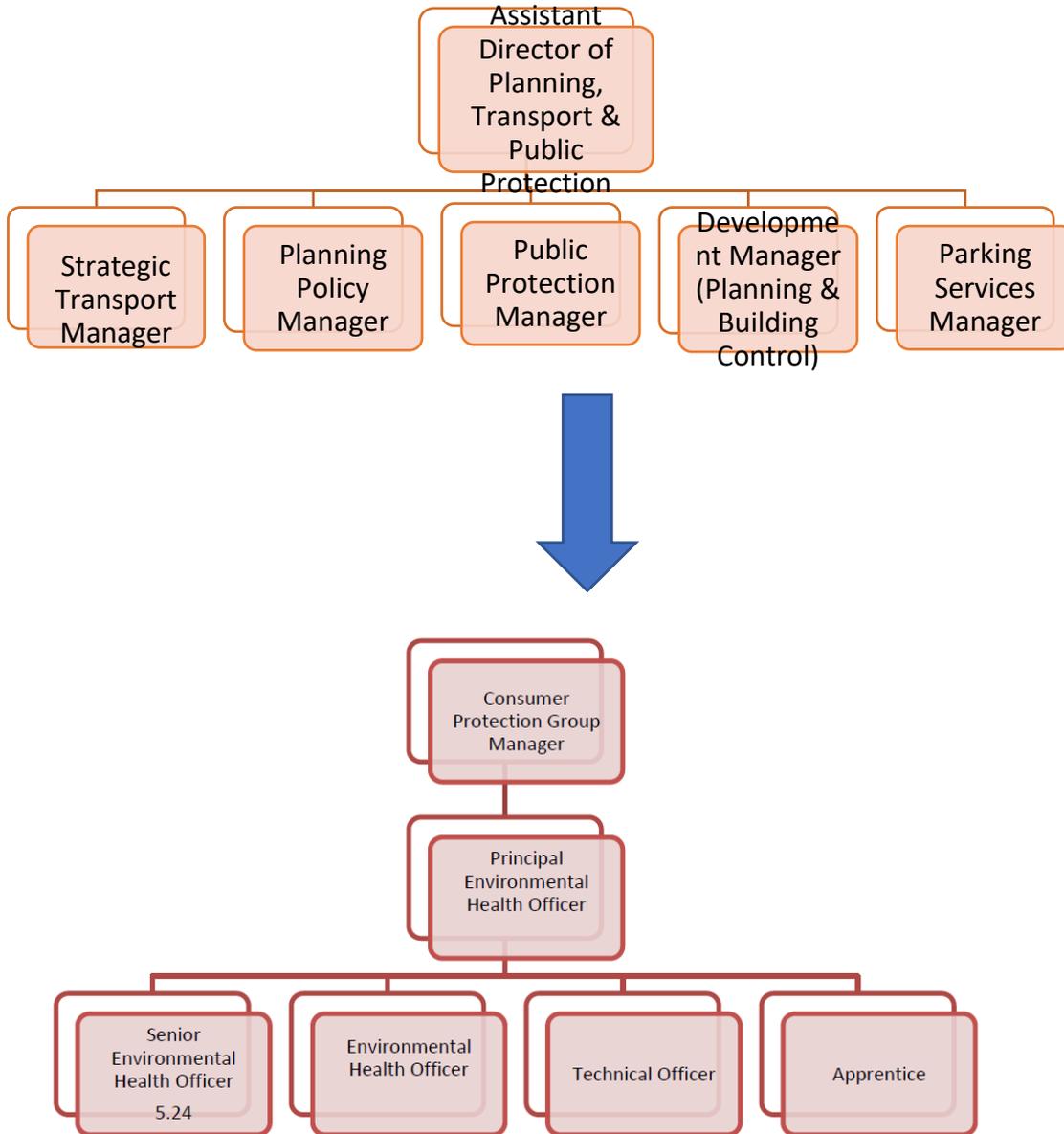
6.6.3 An area of improvement which is underway is to review and update authorisations for officers to exercise their powers. Coinciding with this a review and update of the Council's Enforcement Policy (Appendix 2) and the Food Enforcement Policy (Appendix 3) is underway.

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 23 - Mar 24 - 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 2024. Premises inspected in accordance with FSA Guidance on Service return No of premises due/overdue inspection for this year = 1207</p> <p>New registered premises per year = c. 255</p> <p>Total 1462 inspections due.</p>	<p><i>Requirement of Food Law COP.</i></p> <p><i>Service Plan Priority / Target</i></p>	<p><i>Premises subject to hygiene requirements inspected and compliant to ensure safe food.</i></p> <p><i>Education of local businesses</i></p>	<p><i>Aim:</i> 100% A premises 80% B Premises 70% Unrated premises inspected</p>	<p>A total of 525 proactive inspections were carried out:</p> <p>A - 100% B - 89% Unrated - 57%</p> <p>263 premises registered during the year.</p>
S	<p>Food Hygiene Revisits and subsequent 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 and</p>	<p><i>Food Law COP</i></p>	<p><i>Staged enforcement action in line with the Corporate Enforcement policy to improve food hygiene standards and ensure safe food.</i></p>	<p><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.</i></p> <p><i>Premises revisited on time in accordance with notice expiry date.</i></p> <p><i>Any court proceedings to be brought within time limit.</i></p>	<p>57 recorded food hygiene revisits have been carried out.</p> <p>The number of estimated non-broadly compliant premises has not been met. The current level of non-broadly compliant premises is 4%.</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
	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. Approx 25 per annum	<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 expiry date. Any court proceedings to be brought within time limit.</i>	There has been a decline in the number of food hygiene enforcement notices served this year. 15 were served across the year.
S	Approval of Premises Process applications for new approval activities. Inspect and review existing approved premises.	<i>Food Law COP</i>	<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>	One premises has been granted full approval this year.
S	Food Hygiene Re-Rating visits (FHRS) for premises not overdue/due inspection Avg 35 requests received per year	<i>FHRS Brand Standard</i>	<i>Increase in FHRS and improved compliance with FH requirements. Increased consumer confidence in premises</i>	<i>All inspections carried out within 3 months. Applications for premises that are overdue/due inspection will be refunded to business.</i>	32 applications for a food hygiene re-rating visit have been received this year. The majority of these have been completed within the specified 3 months however a small number did fall short of this.
S	Respond to FHRS Appeals Estimate 5 per annum	<i>FHRS Brand Standard</i>	<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>	The authority has not received any formal appeals of the food hygiene rating this year.

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	Food Standards Inspection Programme Until 31 March 2024. No of due and overdue inspections = 1050 New registered premises per annum approx. 255 Total Inspections due - 1305	<i>Food Law COP.</i> <i>Service Plan Priority / Target</i>	<i>Premises subject to standards requirements inspected and compliant to ensure safe, correctly labelled food which does not mislead the consumer.</i> <i>Education of local businesses</i>	Aim: 100% A premises	A total of 379 proactive inspections have been carried out this year: A - 100%
S	Food Standard Revisits. Estimate 10% of premises required revisits following decline in standards and new legislation. Approx. 130	<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>	Food Standards Revisits have been recorded at 2 premises, far short of the estimated requirement and not in accordance with the number of non-broadly compliant premises identified within the borough. Revisits are not being carried out in line with the Code of Practice.
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.</i> <i>Reduction in incidence of food borne illness.</i>	<i>Unsatisfactory samples followed up with further intervention and re-sampling where necessary.</i>	The Council has completed 132 microbiological samples this year and participated in a number of nationwide studies.
S	Food Standards Sampling	<i>Food Law COP Sampling Plan</i>	<i>Ensuring food offered for sale is correctly labelled, safe and</i>	<i>Unsatisfactory samples followed up with further</i>	The Council has carried out 12 samples in this

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
	Estimate 50 samples per annum	<i>Local/National sampling programme</i>	<i>does not mislead the consumer. Reduction in food complaints and referrals.</i>	<i>intervention and re-sampling where necessary.</i>	<i>category, fewer than estimated.</i>
N S	National Food Hygiene Rating Scheme (FHRS) Administration	<i>Discretionary function to take part in scheme. All LA's in England participate. Expectation of Customers.</i>	<i>Enabling consumer to assess food hygiene and safety. Provide consumer confidence in Reading businesses</i>	<i>Premises details uploaded to FHRS website fortnightly. Display of correct premises information</i>	The scheme has continued to be administered with updates to the FHRS website being provided fortnightly.
S	Annual FSA Return (LAEMS) Temperature check returns	<i>Food Law COP</i>	<i>Transparent Food Hygiene and Standards performance.</i>	<i>LAEMS Return or equivalent accurately completed within time limit</i>	The Council has completed all required returns to the FSA and has engaged with the FSA regarding these reports.
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 • Official food controls and other activities • Enforcement 	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.	No progress has been made with the updating of policies and procedures as detailed within the Code of Practice.

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"> • Control and investigation of outbreaks and food related infectious disease • Information • Registration • Conflict of Interest • Sampling Policy • Enforcement Policy • Complaints Policy • Contingency Plan 			
N S	<p>Inspection of notified cooling towers and evaporative condensers for the prevention and control of Legionella spp. Est. 1 premises per annum</p> <p>Development, maintenance and implementation of SOPs</p>	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>No Cooling Towers have registered with the authority this year.</p> <p>There has been no progress made on SOPs.</p>
S	<p>Inspection and certification of registering special treatment premises. New registrations Operator and/or premises) per year = Approx. 20 Backlog of existing premises = 60</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>16 inspections of Special Treatment premises have been carried out this year in response to applications for new premises/treatments.</p> <p>No progress has been made on the backlog of premises unless these premises have</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
					registered for a further treatment.
S	Special Treatment Revisits. Approx 5% 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	No revisits have been recorded for special treatment premises this year.
N S	Review and replacement of Byelaws for Special Treatments	Byelaws do not conform with national guidance and template. RBC does not have a full copy of the signed byelaws.	Up to date byelaws adhering to national templates. Reduced burden for low risk activities.	New byelaws in place.	A review of the current Byelaws has not been carried out.
S	Investigation of Infectious diseases and outbreaks including: Food borne illness & Legionnaire's disease. (Excl. Covid 19) Estimate 225 cases per year Outbreaks: Estimate 1 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.	276 cases have been notified to the authority this year.
S	Statutory H&S return to HSE	National Enforcer requirement for the compilation of statistics and interventions with poor performing authorities	Contribute to national enforcement statistics. Inform and develop future interventions and national policy	Return completed accurately and by deadline.	The statutory return was completed and submitted within the deadline.
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.	The annual audit was completed, the Council was rated low-risk and three actions were

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
				Actions addressed and completed within timeframe.	identified for completion by 01/07/24 - Monitoring of Building Control involvement - Developing resistance in sports ground safety - Provide administrative support to the SAG.
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.	Three matches have been inspected in the recent football season. Follow up reports have been provided however these have not been provided within the identified timeframe.
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.	The Safety Certificate was reviewed and issued in August 24 with a partial review of Operations Manual documents as agreed.
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.	This work has not been carried out.
S	SAG attendance Reading FC	Statutory requirement Safety at Sports Ground Act 1975 and associated legislation	Structurally safe and well managed sports ground	Quarterly meetings carried out with wide attendance. TOR in place.	All SAG meetings for Reading FC have been attended. The TOR have

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
				Meetings Minuted and actions taken within timeframe.	been reviewed and meetings have been 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 has been made with this area of work.
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.	Licence consultations are reviewed and responded to. Specified timeframes are not all met across the team. All SAGs have been attended.
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	This work has not been completed.
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 have been received. No work has been carried out on drafting relevant SOPs. This work item will be removed for 24/25.

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	Imported Food (Official Controls)	Food Law COP	Food products offered for sale will be legally compliant, properly labelled and safe to eat.	Service requests actioned within timeframe. Targetted sampling	Service requests relating to Imported Food have been actioned.
S	Reactive food & Safety work (service requests) <ul style="list-style-type: none"> • Dirty food premises • Microbiological, chemical & labelling • Allergens • Health, safety & Welfare • Business advice • Accident investigation <p>Approximately 1050 per annum.</p>	Food Law COP and FSA guidance on service return. HSWA/EAR	<p>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.</p>	<p>All Service requests responded to.</p>	<p>Excluding licensing consultations and food business registrations which are accounted for elsewhere the service has received 512 requests this year. 18 of these have not been responded to. 92 % of all service requests have been responded to within the specified response time.</p> <p>A further 71 accidents have been reported to the authority.</p>
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	1 recorded paid for advice visit has been carried out this year.
N S	Food Standards and bespoke labelling advice (paid)	Improve food standard compliance of businesses.	Improved standards and compliance of labelling and consumer information.	Requests for business advice carried out within 28 days.	No requests for bespoke food standards advice

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
	Approximately 5 requests per annum (subject to promotion)	Provision of support and advice to local businesses Income generation	Reduction in further interventions.	Premises subject to paid advice will be broadly compliant or better after next inspection. Premises subject to paid advice will require less enforcement action.	have been received this year.
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.	Work to improve our website and social media presence has not been carried out as identified. Specific workstreams have continued to be publicised in conjunction with the Comms team.
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	This work has not been progressed.
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	This work has not been progressed.

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	<p>Servicing of PAPs (Food Standards Only) - Annual work plan, meetings, response to queries & enforcement, review of policies/procedures, issue of assured advice, review and update of published out of date advice</p> <p>Issue of PAP export Certificates</p>		Well managed PAP service compliant with statutory guidance	<p>necessary powers and authority</p> <p>Level of service aligns with requirement of statutory guidance. PAP advice up to date and reviewed within timeframe. Enquiries and enforcement actions responded to within timeframe.</p>	These PAPs have continued to be serviced as per partnership requirements.
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	<p>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</p>	The team carried out inspections at all identified high risk premises at the festival site (137) and carried out an additional 14 revisits to non-compliant premises. All SAG meetings were attended. Onsite training was carried out. Review of Special Effects proposals and safety documentation were carried out before the festival with further

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
					onsite inspections completed. All on site update meetings were attended.
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.	This work has not been progressed.
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.	This work has not been progressed.
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.	The Food Service Plan was completed and presented at Committee in June 23.
S	Officer Training to ensure competency in all relevant areas of work	Requirement for professional status. Requirement under FLCOP	Competent and knowledgeable officer	Minimum requirements for CDP met.	Officers have continued to work on training requirements and have been provided access to

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
					training to meet their CPD requirements. Some areas of identified development have not prioritised as intended.
NS	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 (0-2 rated) businesses in Reading.	Increase in Food Hygiene Rating following proactive project intervention.	This work has not been progressed.
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	All allocated FOIs have been responded to and within the specified timeframe.
NS	Arcus Project - Support to testing and implementation of Arcus MIS for Food Hygiene, Food Standards, Health and Safety and Special Treatments	New MIS being implemented across Service	N/A	Tested and fully functioning MIS.	The Team has continued to support delivery of this project. The team has had to provide further FTE to the secondment and further staff have been called upon to assist with set up and testing of the system. The required resource is greater than that estimated.
S	Accident Investigation. Full investigation off and bringing of appropriate legal action following serious health and safety accident and local wholesaler.	HSWA74 - Investigation of accidents	Safer businesses	Regular Case reviews, authorisation to proceed, Work carried out in line with specified time frame for internal/external legal representatives.	Significant progress has been made with this case however the amount of required resource was greater than estimated. This has further impacted the delivery of other official

S / N S	Action, [what are going to change deliver or improve]	Reason	Outcome [what difference will this make]	Success Measures [how will know we have delivered]	End of Year Update
					controls in order to complete identified pieces of work, e.g. CCTV review.

APPENDIX 5

Food & Safety Work Plan Apr 2024 - Mar 25

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 / NS	Action, [what are going to change or improve]	Reason		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]
		Outcome [what difference will this make]										
S	Food Hygiene Inspection Programme Until 31 March 2025. Premises inspected in accordance with	Requirement of Food Law COP.	Premises subject to hygiene requirements inspected and compli	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	Induction training of new officers in line with Food Law COP. All officers to maintain Food CPD through	01/04/24	31/03/25	PEHO	1	Healthy Environment	A

S / N S	Action, [what are going to change deliver or improve]	Reason			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]	Success Measures [how will know we have delivered]									
	FSA Guidance on Service return No of A-D premises due/over due inspection for this year = 818 New registered premises per year = c. 266 Total 1084 inspections due.		ant to ensure safe food. Education of local businesses		(0.08 FTE) Inspections (avg 3 hours incl officer administration) = 3252 Hours (1.91 FTE)							
S	Alternative Enforcement	Requirement of Food	Premises subject	Aim: All E premises contacted	Management of AES		01/ 04/ 24	31/ 03/ 25	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]										
	ent Strategy for E premises Managed project undertaki ng desk- based assessment of E premises. 391 Premises. Estimated 20% on site follow up required - 79 premises.	Law COP. Service Plan Priority / Target FSA Improv ement Plan require ment	t to hygien e requir ement s inspec ted and compli ant to ensure safe food. Educat ion of local busines ses	to verify current level of compliance and confirm FHRS remains appropriat e. Premises indicating changes in condition will be followed up by an onsite full/partia l inspection	project including training and supervisi on - 10 days Contact and remote assessment of all premises, 30 min per premises = 195.5 Hours Onsite follow up at 1.5 hours per premises = 118.5 Hours							

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	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						0.23 FTE							
S	Food Hygiene Revisits and subsequent enforcement of non-compliant premises . Approximately 4% of premises are being found to be non-compliant. Estimate 44 premises. Ongoing non-	<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 expiry date. Any court proceeding</i>	PEHO - Consultation/Review of notices - 5 days (0.02 FTE) Inspecting Officers (1 day per premises avg) = 319 Hours (0.19 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	01/04/24	31/03/25	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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
						Start	Finish	Lead				
	compliance will require issue of formal notices and potentially lead to prosecution.		s to be brought within time limit.									
S	Ongoing Enforcement including issue of notices. Resulting from ongoing or immediate non-compliance where a risk to public health	<i>Food Law COP</i>	<i>Staged enforcement action in line with the Corporate Enforcement policy to improve food hygiene</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.</i>	Officers (incl review by second officer) 1.5 Days per Notice/Premises 0.1 FTE	All officers to maintain Food CPD through ABC online training and available courses. Introduction and shadowing for new officers	01/04/24	31/03/25	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				Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]					Start	Finish	Lead			
	and safety is presented . Average 16 per annum		standards and ensure safe food.	Premises revisited on time in accordance with notice expiry date. Any court proceedings to be brought within time limit.		prior to authorisation. Refresher training for existing						
S	Approval of Premises Process applications for new approval activities . Inspect and review existing	Food Law COP	Approval activities authorised and published. Food products accurately	Applications and inspections carried out within SOP timeframe . Full approval awarded after max 6 months or removed.	Average 2 new premises a year (min 5 days for each new premises) Inspection to existing premises (7) at 1 day each.	Induction training of new officers in line with Food Law COP. All officers to maintain Food CPD through ABC	01/ 04/ 24	31/ 03/ 25	PEHO	1	Healthy Environment	A

S / N S	Reason		Resources	Training Needs	Start	Finish	Lead	Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]			
	Action, [what are going to change deliver or improve]	Outcome [what difference will this make]									Success Measures [how will we know we have delivered]		
	approved premises .		labelled and traceable.										
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 requirement s. Increased consumer confidence in premises	All inspections carried out within 3 months. Applications for premises that are overdue/ due inspection will be refunded to business.	Total 17 days / 126 Hours (0.07 FTE)	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	01/04/24	31/03/25	PEHO	2	Healthy Environment Thriving Community	A

S / N S	Action, [what are going to change deliver or improve]	Reason			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]	Success Measures [how will know we have delivered]	Start			Finish	Lead				
S	Respond to FHRS Appeals Estimate 5 per annum	FHRS Brand Standard	Appeals handled in accordance with Brand Standard. Maintain confidence in Food Hygiene Inspections	Appeals responded to within timeframe. Appeals resolved without moving to Corporate Complaint.	PEHO - 1 day per appeal (5 days) Officer time - 0.5 day per appeal (2.5 days) = 54 Hours (0.03 FTE)	Familiarisation with updated Brand Standard.	01/04/24	31/03/25	PEHO	1	Healthy Environment Thriving Community	A
S	Food Standards Inspection Programme Until	Food Law COP. Service Plan Priority	Premises subject to standards requirement	Aim: 100% A premises	EH/TS Officers - 1.5 hours per inspection (including officer	Training to all officers in new PPDS and calorie labelling	01/04/24	31/03/25	PEHO PTSO	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				Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
						Start	Finish	Lead				
	<p>31 March 2025. No of due and overdue inspections = 1028</p> <p>New registered premises per annum approx. 266</p> <p>Total Inspections due - 1294</p>	/ Target	<p>s inspected and compliant to ensure safe, correctly labelled food which does not mislead the consumer. Education of local businesses</p>	<p>administration) Total officer hours - 1958 Hours (1.14 FTE)</p>	<p>requirements. Training for all unauthorised/new officers in Food Standards inspections</p>							
S	Food Standard Revisits.	Food Law COP	Staged enforcement action	Increase in compliance and confidence	(EH/TS) 0.5 days per	Training to all officers in	01/4/24	31/03/25	PEHO PTSO	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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	Approximately 8% of premises have found to be non-compliant. Estimate approximately 104 premises will require revisits and follow up enforcement action due to non-compliance in line with the current	<i>in line with the Corporate Enforcement policy to improve the level of information provided to consumers and ensure they can make an informed</i>	<i>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</i>	inspections. = 1377 Hours (0.22 FTE)	FIRIN Notices						

S / N S	Reason		Resources	Training Needs	Start	Finish	Lead	Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
	Action, [what are going to change deliver or improve]	Outcome [what difference will this make]									Success Measures [how will we know we have delivered]
	risk rating.		choice .	complied with. Any court proceedings to be brought within time limit.							
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</i>	<i>Unsatisfactory samples followed up with further intervention and re-sampling where necessary.</i>	S/EHO's - 25 days preparation and sampling = 185.5 Hours SEHO - Quarterly Meetings attended. (0.5 days) = 14.84 Hours PEHO - Allocation and monitoring	Practical training and authorisation for new officers. All officers to undertake sampling to maintain competence	01/04/24	31/03/25	PEHO	2 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			
			incidence of food borne illness .	g (3 days) = 22.26 Hours Total = 222.6 Hours (0.13 FTE)							
S	Food Standards Sampling Estimate 50 samples per annum	Food Law COP Sampling Plan Local/National sampling programme	Ensuring food offered for sale is correctly labelled, safe and does not mislead the consumer. Reduction in	Unsatisfactory samples followed up with further intervention and re-sampling where necessary. SCPO - 20 days preparation and sampling = 148.4 Hours PEHO - 2 days monitoring = 14.84 Hours Total = 163 Hours (0.1 FTE)	Practical training and authorisation for new officers. All officers to undertake sampling to maintain competence	01/04/24	31/03/25	PEHO PTSO SCPO	2	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			
			food complaints and referrals.								
NS	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	01/04/24	31/03/25	PEHO Business Support Manager	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]	Outcome [what difference will this make]									
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	PEHO - Housekeeping & reporting (10 days) = 74 Hours (0.04 FTE)	Training on Civica App and LAEMS required for PEHO and Business Support	01/ 04/ 24	31/ 03/ 25	PEHO	1	Healthy Environment Thriving Community	A
S	Drafting, Implementation and maintenance of Policies and Procedures, plus ongoing annual review. Following update and reissue of	Food Law COP requires each LA to have written policies and procedures in place for the following:	Enabling staff to efficiently, fairly and transparently conduct their role and respond	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/ 24	31/ 03/ 25	PEHO	2	Healthy Environment Thriving Community Inclusive Economy	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Resources	Training Needs	Timeline			Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]	Success Measures [how will know we have delivered]			Start	Finish	Lead			
	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.	<ul style="list-style-type: none"> • Approval • Food Business Establishment Database • Food Incidents and Alerts • Authorisation • Control Verification • Corporate Complaints 	d to service requests and complaints. 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]	Resource s	Training Needs	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	<ul style="list-style-type: none"> • Food Complaints • Sampling • Equipment • Official food controls and other activities • Enforcement • Control and investigation of outbreaks and 										

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]	Resource s	Training Needs	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	food related infectious disease <ul style="list-style-type: none"> • Information • Registration • Conflict of Interest • Sampling Policy • Enforcement Policy • Complaints 										

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]										
		Policy • Contingency Plan										
NS	Inspection of notified cooling towers and evaporative condensers for the prevention and control of Legionella spp. Est. 1 premises per annum	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.	01/04/24	31/03/25	PEHO/SEHO	2	Healthy Environment	A

S / N S	Action, [what are going to change deliver or improve]	Reason			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]	Success Measures [how will know we have delivered]									
	Developm ent, maintena nce and implemen tation of SOPs											
S	Inspection and certification of registering special treatment premises . An average of 28 premises and 66 further operators are registerin	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. Inspecting officers - 1 hour per additional operator Business Support - 1 hour per application 396 Hours	Training of new officers in special treatment inspection including shadowed visits.	01/04/24	31/03/25	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A

S / N S	Action, [what are going to change deliver or improve]	Reason			Resources	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]	Success Measures [how will know we have delivered]									
	g per year. Backlog of existing premises requiring inspection= 60				0.23 FTE							
S	Special Treatment Revisits. Approx 5% of premises are found to be non- compliant requiring further attention and enforcement action.	Local Govt Miscella neous Provisio ns Act Health and Safety at Work Etc Act 1974	Compli ant premis es. Reduc ed incide nce of blood borne infecti on.	Revisits carried out within timeframe. Legal notices complied with in accordance	1 day per premises. 33 Hours 0.02 FTE	Training and refreshme nt of authorised and new officers in appropriat e notices	01/ 04/ 24	31/ 03/ 25	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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
NS	Review and replacement of Byelaws for Special Treatments	Byelaws do not conform with national guidance and template. RBC does not have a full copy of the signed byelaws.	Up to date byelaws adhering to national templates. Reduced burden for low risk activities.	PEHO/SEHO - Legal process to implement new byelaws Committee adoption. Estimate 30 days (222Hours) (0.14FTE)	N/A	01/04/24	31/03/25	PEHO/SEHO	3	Healthy Environment Thriving Community Inclusive Economy	O
S	Investigation of Infectious diseases and outbreaks	National and Local Policy	Reduced incidence of infectious disease and	Cases investigated in line with internal SOPs and Thames Valley S/EHO - 1 Hour per case 340 Hours Outbreak - PEHO/SE	New officers trained in internal and local SOPs.	01/04/24	31/03/25	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	Star t	Fini sh	Lead	Ser vic e Pla n Pri ori ty (1- 3)	Corporate Plan Priority	Annua l Requir ement [A]/ One off projec t [O]
		Outco me [what differ ence will this make]										
	including : Food borne illness & Legionna ire's disease. (Excl. Covid 19) Estimate 340 cases per year Outbreak s: Estimate 1 per year		outbre aks includi ng food borne illness	single case protocol. Outbreaks investigate d in line with National Guidance. Service requests responded to within internal standards.	HO x 2 at 10 days each = 148 Hours (0.29 FTE)	ABC training available to all officers.						
S	Statutory H&S return to HSE	Nationa l Enforce r require ment for the compila tion of	Contri bute to nation al enforc ement statisti cs.	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/ 24	31/ 03/ 25	PHO	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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
						Start	Finish	Lead				
		statistics and interventions with poor performing authorities	Inform and develop future 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.	Service Manager - 0.5 days PEHO - 3 days Total - 0.02 FTE	Familiarisation of new staff with relevant SOPs.	01/04/24	31/03/25	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A

S / N S	Action, [what are going to change deliver or improve]	Reason			Resources	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]	Success Measures [how will know we have delivered]									
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 .	Service Manager - 1.5 day PEHO - 6 days SEHO - 6 days Technical Officer - 6 Days Inspection, pre & post admin. Total 145 Hours (0.08 FTE)	Familiarisation of new staff with relevant SOPs. Shadowed visits to be completed . New staff to undertake LCB Safety at Sports Ground training.	01/ 04/ 24	31/ 03/ 25	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A
S	Annual review and issue of Safety Certificate for Reading FC	Statutory requirement Safety at Sports Ground	Structurally safe and well managed	Annual issue of Safety Certificate . Annual review of updated	PEHO/SE HO 5 days Each = 74 Hours (0.04 FTE)	New staff to undertake LCB Safety at Sports Ground training.	01/ 04/ 24	31/ 03/ 25	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	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	Start	Finish	Lead	Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Act 1975 and associated legislation	sports ground	Operations Manual.									
S	Review of Operations Manual and Issue of new Safety Certificate for Palmer Park Regulated Standard Plus initial engagement and sent up of SAG meetings	Statutory requirement Safety at Sports Ground Act 1975 and associated legislation	Structurally safe and well managed sports ground	Established SAG Meeting schedule Clear and consistent lines of communication. Issue of new Safety Certificate .	PEHO/SEHO 121 Hours (17 days) for first review Follow up reviews and amendments - 7.5 days. SAGs - 20 hours per annum. Engagement 2 days		New staff to undertake LCB Safety at Sports Ground training.	01/04/24	31/03/25	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A/O

S / N S	Action, [what are going to change deliver or improve]	Reason			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]	Success Measures [how will know we have delivered]									
					Total = 0.13 FTE							
S	SAG attendance Reading FC	Statutory requirement Safety at Sports Ground Act 1975 and associated legislation	Structurally safe and well managed sports ground	Quarterly meetings carried out with wide attendance . TOR in place. Meetings Minuted and actions taken within timeframe.	PEHO & SEHO - attendance, pre and post admin incl. action review and minutes. Est. 74 Hours per annum (0.04 FTE)	New staff to undertake LCB Safety at Sports Ground training. Safety Advisory Group Training for allocated officers.	01/ 04/ 24	31/ 03/ 25	PEHO	1	Healthy Environment Thriving Community Inclusive Economy	A
S	Drafting, implementation and maintenance of SOPs for Sports	Requirement of SGSA and sports ground safety	Improved performance at annual SGSA audit.	Documented procedures for sports ground safety work.	PEHO/SE HO - Est. 20 days (research , drafting, implementation)	New staff to undertake LCB Safety at Sports Ground training.	01/ 04/ 24	31/ 03/ 25	PEHO	2	Healthy Environment Thriving Community Inclusive Economy	A/O

S / N S	Action, [what are going to change deliver or improve]	Reason			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]	Success Measures [how will know we have delivered]									
	Ground Safety	regulation. Identified requirement of annual SGSA audit	Officer consistency will improve customer service		tation, review). 0.09 FTE							
S	Review and respond to Licensing consultations concerning premises licences, events and street trading. Including attendan	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	PEHO/SE HO - attendance at monthly SAG - 9 days, incl. preparation. 27 days = 261 Hours All officers - review and respond		01/ 04/ 24	31/ 03/ 25	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				Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	ce at SAG. Approx 140 consults per annum		where deemed necessary.	to consultations (1 hour each) = 140 Hours Total = 401 Hours (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	Improved customer service through officer consistency. Contribution to Public Safety.	PEHO/SEHO - 5 days. (0.02 FTE) New SOP implemented Database actions reflect new SOP	Familiarisation of all staff on new SOPs	01/04/24	31/03/25	PEHO	1	Healthy Environment Thriving Community	O

S / N S	Action, [what are going to change deliver or improve]	Reason			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]	Success Measures [how will know we have delivered]									
		reviews										
S	Imported Food (Official Controls)	Food Law COP	Food products offered for sale will be legally compliant, properly labelled and safe to eat.	Service requests actioned within timeframe. Targetted sampling	Resourcing for individual cases included in inspections & SRs above. PEHO/SE HO - Draft and implementation of Procedures - included above.		01/ 04/ 24	31/ 03/ 25	PEHO	1	Healthy Environment Thriving Community	A
S	Reactive food & Safety work (service requests)	Food Law COP and FSA guidance on	Ensure food on sale is safe to eat, product	All Service requests responded to.	All officers - 2 hour per SR on average. 1000 Hours	Familiarisation of new officers with SOPs New officers	01/ 04/ 24	31/ 03/ 25	PEHO	1	Thriving Community Inclusive Economy Services Building Relationships	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			
	<ul style="list-style-type: none"> • Dirty food premises • Microbiological, chemical & labelling • Allergens • Health, safety & Welfare • Business advice <p>This excludes licence consultations and food business registrations which are</p>	service return. HSWA/ EAR	ed hygienically, correctly labelled and does not mislead the consumer. Ensure premises are safe to work in and visit.		(0.59 FTE)	shadow/s shadowed visits to complex complaints.						

S / N S	Action, [what are going to change deliver or improve]	Reason			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]	Success Measures [how will know we have delivered]	Start			Finish	Lead				
	covered elsewhere in this plan. Approximately 500 per annum.											
N S	Paid advice visits - Food Hygiene. Approx 5 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) 0.01 FTE	N/A	01/04/24	31/03/25	PEHO	2	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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
						Start	Finish	Lead				
NS	Food Standards and bespoke labelling advice (paid) Approximately 5 requests per annum (subject to promotion)	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.	SCPO -5 days per annum 0.02 FTE	N/A	01/04/24	31/03/25	PEHO	2	Thriving Community Inclusive Economy	A
NS	Improve Food Hygiene & Health	Modernise and improve	Improved communication	Develop H&S page on RBC webpage.	PEHO - initiation, review and	Nominate d officer(s) require	01/04/24	31/03/25	PEHO /SEHO	1	Healthy Environment Thriving Community	A

S / N S	Action, [what are going to change deliver or improve]	Reason			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]	Success Measures [how will know we have delivered]	Start			Finish	Lead				
	& Safety presence on RBC website and social media	communications with customer. Enhance transparency and accessibility of service.	ons to and accessibility of service to customers. Reduction in service requests and enquiries. Improved compliance of food businesses.	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.	implementation - 10 days SEHO/SC PO - 15 days 0.1 FTE	familiarisation with corporate standards for publications and website						
S	Ensure all officers	Food Law COP.	Service wide review	Competent /authorised/ skilled	PEHO - 20 days / 740 Hours	PEHO review of	01/04/24	31/03/25	PEHO	1	N/A Legal requirement	O / 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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]	
						Start	Finish	Lead				
	appropriately authorised and competent. Full review of all staff competency required and new training scheme to be implemented.	of officer authorisations and delegations Review of officer competencies and skills in line with FSA new competency framework	and knowledgeable staff	Officers - 5 days per officer (x10) = 370 Hours 0.65 FTE	new COP standards PEHO to attend FSA webinar(s) regarding new competency requirements.							
S	Authorisation and Enforcement Policy	Food Law COP / HSWA	Review the delegations register	Delegations register is up to date	PEHO - 10 days SEHO - 10 days	N/A	01/04/24	31/03/25	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				Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]					Start	Finish	Lead			
	Review including implementation of new authorisation system for staff	Delegations Register. Service Plan Priority	r and ensure officer authorisations are up to date - as part of the corporate review of the constitution and delegations register	There are clear lines of delegated authority for officers to have the necessary powers and authority	0.09 FTE							
N S	Servicing of PAPs (Food Standards Only) - Annual		Well managed PAP service compli	Level of service aligns with requirement of	Food Standards Officer (SCPO) - 0.1 FTE	Inexperienced officers to complete OPSS training	01/04/24	31/03/25	PTSO /SCPO	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				Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	work plan, meetings, 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	ant with statutory guidance	statutory guidance. PAP advice up to date and reviewed within timeframe. Enquiries and enforcement actions responded to within timeframe.		and familiarisation. Officer handovers for PAP changes						

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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	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.	01/04/24	31/03/25	PPM/CPGM/PEHO	1	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				
			and during event. H&S hazards referred to Licensing									
NS	Undertake SR review, including response time, and review 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	01/04/24	31/03/25	PEHO	2	Healthy Environment Thriving Community Inclusive Economy	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	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 . 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>	01/04/24	31/03/25	PEHO	2	Healthy Environment Thriving Community	O/A

S / N S	Action, [what are going to change deliver or improve]	Reason			Resource s	Training Needs				Ser vic e Pla n Pri ori ty (1- 3)	Corporate Plan Priority	Annua l Requir ement [A]/ One off projec t [O]
		Outco me [what differ ence will this make]	Success Measures [how will know we have delivered]	Start			Fin ish	Lead				
		business knowledge and skills and required more focused work in health and safety.			Total estimate 90 days Total 140 days / 1036 Hours 0.61 FTE							
S	Food Service Plan	Food Law Code of Practice Service Plan priority	Plan to demon strate how the council will deliver its functions to protect the health	Plan drafted and agreed through committee	Review of previous years performance. Target setting for upcoming year and assessment of resources	Further training in Civica (or replacement) to run appropriate reports.	01/ 04/ 24	30/ 06/ 25	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				Service Plan Priority (1- 3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
		Outcome [what difference will this make]					Start	Finish	Lead			
			of residents, visitors and those working in the town through the efficient and effective enforcement of food safety laws in the Borough		PEHO - 10 days 0.045 FTE per annum							
S	Officer Training to ensure	Requirement for	Competent and	Minimum requireme	10 Officers - Minimum		01/ 04/ 24	31/ 03/ 25	PEHO	1	N/A - Competency Requirement	0

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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	competency in all relevant areas of work	professional status. Requirement under FLCOP	knowledgeable officer	nts for CDP met. 30 Hours per officer per annum. 0.18 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. Project Management - 10 days Estimate 6 hours per premises. Estimate 30 premises to be prioritised. = 180 Hours / 0.15 FTE	Project familiarisation	01/04/24	31/03/25	CPGM / PEHO / SEHO	2	Healthy Environment Thriving Community	A

S / N S	Action, [what are going to change deliver or improve]	Reason		Resources	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]	Success Measures [how will know we have delivered]								
			(0-2 rated) busine sses in Readin g.								
S	Respond to FOI Request	Statuto ry functio n - Freedo m of Informa tion Act 2000	Custo mer servic e Legall y compli ant Counci l	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 familiarisa tion with the updated corporate system.	01/ 04/ 24	31/ 03/ 25	PEHO	1	Inclusive Economy	A
N S	Arcus Project - Support to testing and implemen tation of Arcus MIS for Food Hygiene, Food	New MIS being implem ented across Service	N/A	Tested and fully functioning MIS. PEHO - 45 days Officers - Technical Officer - form testing 20 days General officers	All officers will require training on new system	01/ 04/ 23	09/ 07/ 24 (ten tative)	AD - PTPP	1	N/A - Directorate Requirement	O

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				
	Standards, Health and Safety and Special Treatments. This excludes the secondment of 1 x Food & Safety Team officer.			10 days each (x 7) = 999 Hours 0.59 FTE								
S	Accident Investigation. Full investigation off and bringing of appropriate legal action	HSWA74 - Investigation of accidents	Safer businesses	Regular Case reviews, authorisation to proceed, Work carried out in line with specified time frame	Estimate work hours across team is currently 1274 Hours for remainder of year.	Training in disclosure requirements and refresher on legal & enforcement procedure	Ongoing		PEHO/SEHO	1	Healthy Environment	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]										
	following serious health and safety accident and local wholesaler.			for internal/external legal representatives.	0.75 FTE	where required						
N S	Staff completion of Corporate Mandatory training and attendance at corporate updates	Mandatory corporate requirement	Compliance with corporate procedures	Training courses up to date and completed within deadline	10 officers / 3 days per officer = 30 days 0.13 FTE		01/04/24	31/03/25	CPGM	1	Corporate Requirement	A
N S	Development of internal health and safety policies and	Corporate requirement	Compliance with corporate procedures	Suitable, sufficient and up to date risk assessments with accompanying	PEHO - 10 days to further draft and review relevant documents.		01/04/24	31/03/25	PEHO	1	Corporate Requirement	O

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	Timeline			Service Plan Priority (1-3)	Corporate Plan Priority	Annual Requirement [A]/ One off project [O]
						Start	Finish	Lead			
	procedures including risk assessments. Training of team on new policies and procedures		procedures in place and implemented	1 day per officer to review (9 officers) 0.08 FTE							
N S	Internal training of non-authorised officers to meet standards for authorisation	The team has appointed unqualified officers who do not currently meet code of practice	Development of staff into authorised officer to carry out a wider remit of work	Appointed officers will be authorised to carry out a greater remit of work in line with the Food Law Code of Practice Supervising/shadowing officers: 48 days 0.56 FTE	Officers subject to training (x 2): 80 days Team specific training development plans	01/04/24	31/12/25	PEHO	1	Service Requirement	O

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			
		requirements for delivered of official control									
NS	Internal training of apprentice	The apprentice does not currently meet the requirements of an authorised officer and require development. Requirement of apprentice	Development of staff into authorised officer to carry out a wider remit of work	Appointed officers will be authorised to carry out a greater remit of work in line with the Food Law Code of Practice 0.4 FTE	Minimum equivalent of one day training and supervision per week of Apprentice and supervisors: 92 days per year	01/04/24	31/03/25	PEHO	1	Service Requirement National scheme requirement	0

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]		
						Start	Finish	Lead				
		iceship scheme .										
S	Attendance at regional Food and health and safety liaison meetings. RBC are appointed as secretary for this year.	Good practice, sharing and learning of practices and procedures. Collaboration and networking with neighbouring authorities.	Information sharing, regional and national consistency.	3 Meetings per annum at 4 Hours Secretarial responsibilities. 3 hours per meeting. 0.01 FTE	Representation and feedback from each meeting.	01/04/24	31/03/25	PEHO	2	Healthy Environment	A	
N S	Line Management of staff	Corporate and Team	Monitored and improv	Supported, competent staff	PEHO - 0.22 FTE	Completion of corporate training	01/04/24	31/03/25	CPGM /PEHO	1	Corporate Requirement	A

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	Timeline			Ser vic e Pla n Pri ori ty (1-3)	Corporate Plan Priority	Annua l Requir ement [A]/ One off projec t [O]
						Star t	Fini sh	Lead			
		requirement	ed staff/team performance		requirements						

Required Resource	Available Resource
Resource required for Food Hygiene Delivery: 5.16 FTE Resource required for Food Standards Delivery: 1.56 FTE Resource required for Health & Safety Delivery: 2.43 FTE Resource required for other Delivery: 3.28 FTE Total Resource Required: 12.4 FTE	Expected in post resource 24/25: 8.58 FTE Resource in post as at 01/04/24: 5.48 FTE Total allocated resource for 24/25: 9.34 FTE Shortfall of resource for 24/25 against expected FTE in post: 3.82 FTE

Due to a deficit in resources the following work, is considered not essential and will not be prioritised for completion:

Item	Reason	Impact	FTE Saving
Review and replacement of Byelaws for Special Treatments	There are existing byelaws in place that currently apply to premises falling under this legislation.	There will be no significant impact in the short term however there remains discrepancies between requirements for different premises and a further scheme is expected to be introduced for other treatment types.	0.14
Backlog of special treatment premises inspections	There are a number of longstanding premises that have been uninspected. The team are broadly able to keep on top of new premises registering with the authority. Where new registrations are received for treatments or operators at existing premises an inspection is being carried out where necessary.	Not undertaking a review of the existing premise means that there are potentially some on our register that no longer trade. Premises that have not received an inspection will not have had their premises or processes reviewed to ascertain whether they comply with general infection control procedures or health and safety law.	0.11
Development, Implementation and Maintenance of Health and Safety SOPs.	Some SOPs have historically been in place for health and safety. Some areas of health and safety work is carried out infrequently.	The SOPs in place are out of date and have not been reviewed for some time, they may not align with current legislation or guidance and may not be consistent with any overarching changes to the way the team or authority works. They	0.61

		provide limited assistance to the team to carry out certain areas of work when they arise.	
Drafting and implementing Sports ground safety procedures	There are general processes in place for carrying out this area of work due to PEHO familiarity with the requirements.	There are no valid written procedures in place for this area of work. The team is training two further officers in this area which would be benefitted by the present of procedures. In the event of substantial staffing changes knowledge in this area would be lost. There is lack of resilience for business continuity in this area.	0.09
		Total FTE Saving	0.95 FTE

Risk Log

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

	Risk	Likely Impact
1.	National Shortage of EHOs	Unable to attract and recruit qualified and competent staff to future vacancies. Unable to locate qualified/competent agency personnel
2.	Part-Time Staff	The Food & safety team comprises predominantly part time staff, this has led to a loss of FTE within the team and has reduced the amount of out of hours working, e.g. to inspect businesses trading at evenings and weekends, visit and inspect events and undertake sports ground safety work, that can be achieved. The Council's current overtime payment policy also acts as a barrier to attracting part time staff to carry out out of hours work.
3.	Arcus Project	The Arcus project to replace our existing MIS is a corporate priority and will impact the amount of statutory and other work can be completed. The Food & Safety team has lost 0.48 FTE which has been seconded to this project. Whilst backfill monies are available this may not result in appropriate recruitment due to point 2 above and facilities to fill this were not available in line with the project start date.
4.	Ongoing Workforce Review	The workforce review remains ongoing, turning now to posts below the principal level. The workforce review creates uncertainty and instability within the team.
5.	Serious H&S investigation	The Food & Safety Team is investigating a serious health and safety accident involving a local wholesaler. This accident has led to life threatening injuries of an

		employee and the local authority has a duty to investigate this incidents. Following triaging it is considered priority to fully investigate this accident and take the necessary enforcement action where approved to do so. This investigation takes resource from carrying out other statutory work actions.
6.	Appointment of non fully qualified officers	In order to fill vacancies within the team and in the absence of fully qualified officers wishing to take on these posts the service have appointed officers that have not completed their full qualifications and require further development. Whilst officers are achieving their qualifications they cannot be fully authorised and are unable to undertake official control work. They will not be able to contribute to the delivery of all the authority's food hygiene and standard inspection requirements. Additionally the training of these officers will redirect authorised officers to assist in their training and development.



PERFORMANCE REPORT OF LOCAL AUTHORITY FOOD LAW ENFORCEMENT
(ENGLAND)

Reading Borough Council Date of issue: 15

March 2024

Introduction

1. The power to set standards and monitor food law enforcement services is conferred on the Food Standards Agency (FSA) by the Food Standards Act 1999 and the Official Feed and Food Controls (England) Regulations 2009. The same regulations provide for the FSA to make a report of local authority food law performance.
2. This is a report following the FSA’s monitoring, engagement, and meeting with Reading Borough Council's Food & Safety team on 12th January 2024, focussing on the delivery of the intervention programme and resources for delivery.

Scope of the performance monitoring

3. Assurance is being sought that the authority has effective and efficient arrangements in place to ensure official controls are performed on all food businesses as required by assimilated Regulation (EC) 625/2017 and the food law code of practice (the code).
4. Engagement was limited to a review of the arrangements to meet the requirements of the Code’s intervention rating scheme. No other areas of service delivery were reviewed or covered by the engagement and nothing in this report shall be construed as implying compliance or otherwise with the LAs duties under law.

Performance monitoring

5. The FSA routinely monitors local authority performance through data submitted in twice yearly returns. The authority had submitted the mid-year return for 2023/24, which had been confirmed as accurate by the appropriate officer and is set out in Annex A.
6. The return also highlighted that the authority took a number of food samples as well as various enforcement actions, as shown in the table below, all of which are important to a well-balanced service.

Enforcement	Number up to October 2023
Revisits	49
Written Warnings	203
Voluntary Closures	5
Hygiene Improvement Notices	1
Hygiene Emergency Prohibition Notices	1

7. We discussed the authority’s return for food standards, which was encouraging to see that the service had delivered all category A’s that were due, as well as delivering interventions at a proportion of the B, C and unrated that are due.

Performance concerns

8. The authority’s return reports that there appears to be a gap in the resources required to deliver the service, along with potential pressure points at category D and E premises in delivering the food hygiene intervention programme, as shown in the table below.

Risk category	Due up to October 2023	Completed as of October 2023
A	7	6
B	14	24
C	106	65
D	487	45
E	322	7
Unrated	71	61

Engagement with the local authority

9. In response to the data contained in the October 2023 return, the Agency contacted Reading Borough Council raising its concerns and requesting a copy of its food service plan and data from its premises database.
10. Further to this, a virtual meeting was arranged and attended by representatives of both the FSA and Reading Borough Council on 12th January 2024. The meeting was attended by:

Michael Bluff, OFFC Performance Manager, FSA. Madalina Vancea, OFFC Performance Manager, FSA. Hardeep Kang, Senior Delivery Manager, FSA.

Katie Heath, Principal Environmental Health Officer, Reading BC. Rob Abell, Consumer Protection Group Manager, Reading BC.
11. During the meeting, the background to the engagement was discussed as was the agency’s functions of monitoring the performance of local authority delivery of food law official controls. The main topic of the meeting was a discussion around the delivery of the intervention programmes for hygiene and standards, along with the resources required to deliver the service plan.

Service Plan

12. The authority had put in place a Food Service Plan for 2023/24 which was well written and generally in accordance with the guidance set out in the FLCoP and associated Food Law Practice Guidance (PG). The background information, particularly the scope of the service is useful, highlighting the wide range and competing priorities that the team are responsible for. It also provides useful information on recruitment and resource challenges.
13. Generally, the demands on the service are communicated in the service plan, and it generally covers all official control delivery. It was encouraging to see that the service plan sets out the significant number of approved premises, highlighting the significant variety of product types, and the demands that these place on the team resources. It was also good to see that the significant demand that events place on the service is also set out in the service plan. The service plan also highlights the demand that the change in compliance levels is having on the resources.
14. The service plan highlights that the service is not currently meeting its statutory duties in relation to the delivery of food hygiene and food standards official controls.

Intervention programme

15. We discussed the authority's intervention programme, the approach to delivery and shortfalls in delivery, with the service plan setting out 1377 premises that are due an intervention in 2023/24, including those overdue from previous years.
16. The service plan highlights that following Covid-19 and the loss of team resources, the team continue to face substantial challenges and has been unable to complete all tasks required by the COVID-19 LA Recovery Plan. There remains a backlog of overdue and awaiting inspections.
17. The service plan sets out that the team are unable to carry out all interventions required by the statutory FLCoP and sets out the authority's approach to focus its resources on high-risk, unrated/new registrations and premises subject to ongoing enforcement action in the delivery of the intervention programme.

18. Performance targets are set within the service plan that although they deviate from statutory requirements, focus the available resources on the highest risk:

Risk Category	Food Hygiene	Food Standards
A	100%	100%
B	80%	N/A
C	N/A	N/A
D	N/A	-
E	N/A	-
Unrated	70%	N/A

19. Despite the challenges faced in the delivery of the intervention programme, it is encouraging that the authority expects to deliver 100% of category A interventions for both hygiene and standards and to deliver more than the targets for other categories set out in the service plan. The authority expects that 100% of interventions for category B premises for hygiene will be delivered, along with a proportion of the C, D and E categories that are due. Considering the limited resources available, delivery surpassing the targets is due to hard work and commitment by all involved. This will however still leave significant shortfalls in the delivery of the 2023/24 intervention programme, leaving 63% of the programme overdue, consisting of 35% of the Cs, 54% of the Ds and 96% of the Es overdue by year-end. The authority highlighted that this would involve prioritising a number of Category Ds over Category C premises, due to the length of time they have been overdue.
20. The Agency analysed data provided by the authority from its food premises database, which indicated that there were 721 premises that were overdue an intervention as of 12 January 2024:

Risk Category	Number of Years Overdue						Grand Total
	0-1	1-2	2-3	3-4	4-5	8-9	
A	2	0	0	0	0	0	2
B	4	0	0	0	0	0	4
C	23	3	9	2	0	0	37
D	61	76	172	44	4	0	357
E	37	108	70	104	1	1	321
Grand Total	127	187	251	150	5	1	721

21. Further analysis of the data highlights that 84% of the category D overdue an intervention as of 12 January 2024 are involved in the preparation of high-risk foods with the authority risk rating the premises a score of 30 for type of food:

Risk Category	Type of Food score	Number of Years Overdue					Grand Total
		0-1	1-2	2-3	3-4	4-5	
D	5	0	2	1	0	0	3
	10	17	16	16	7	0	56
	30	44	58	155	37	4	298
Total		61	76	172	44	4	357

22. We discussed the intervention flexibilities afforded by the FLCoP. You highlighted that the authority had previously used AES at category E premises and officers are given the flexibility to use partial inspections when appropriate. The authority is encouraged to review its approach to the delivery of its intervention programme and explore whether the use of flexibilities outlined in the FLCoP would assist with ensuring efficient and effective use of its resources.

Resources

23. The service plan included a comprehensive assessment of the resources required to deliver the service, with 8.03 FTE required for food hygiene. It was encouraging to see how detailed this assessment had been, which included activities such as approved premises which are generally complex in nature and more resource intensive than a typical food premises and internal monitoring. It's excellent to see internal monitoring included in this assessment to ensure the service is delivered efficiently and effectively and complies with Article 12 of assimilated Regulation 625/2017.
24. The plan sets out that there are 4.9 FTE allocated to Food Hygiene work, 2.3 FTE for Food Standards, and a further 0.5 FTE provided by the Trading Standards team for Food Standards work. We discussed the resources allocated and occupied to the food safety service includes non-food work such as health and safety work.
25. Due to several issues including vacancies, staff redeployed to implement a new MIS which is a priority piece of work for the directorate, a substantial health and safety investigation and staff working to become fully qualified and competent, the authority has reported 1.04 FTE available to deliver food hygiene official controls.

26. We discussed the challenges the authority had faced over recent years in recruiting to the vacant officer positions. A number of innovative ways were highlighted, to resolve the recruitment/resource challenges, including offering a market supplement, a relocation package and engaging with various universities to encourage graduates to the authority. It was encouraging to hear details of your engagement with the universities, with the provision of support and coaching for applying for roles.
27. The authority has utilised temporary options to provide short-term support with the resource gap, including overtime offered to in-house staff to boost resources available to support the delivery of the intervention programme. The authority also highlighted that they have used contractors intermittently, with some success, but it typically exceeds the cost of a full-time post.
28. The authority explained that it currently had a recruitment campaign live for 3 authorised officers, it was encouraging to hear that various improvements had been made to the campaign to ensure it is as successful as possible, as it's important that the authority remains competitive in the recruitment market.
29. We discussed that once the three vacancies have been filled and the redeployed resources have returned to the team, there will still be a shortfall of resources allocated compared to what is required for the service to deliver its statutory responsibilities. As a competent authority, the authority is required to have a sufficient number of suitably qualified and experienced staff so that official controls can be performed efficiently and effectively.
30. We discussed the opportunities of apprenticeships to recruit, build and retain a highly skilled workforce. It was encouraging to hear that the authority has already shown initiative in responding to the recruitment challenge by appointing an apprentice, to 'grow your own' authorised officers. We discussed the various advantages of this approach, in that it provides the authority with a degree of succession planning, the officers can be authorised as Regulatory Support Officers (RSOs) and be authorised to deliver certain interventions that can support quite a significant amount of the intervention programme. It also ensures that the authorities have a plan in place to comply with their statutory duty to appoint a sufficient number of suitably qualified and competent officers so that official food controls and other official activities can be performed efficiently and effectively. However, we acknowledge the impact the approach has on the limited resources available in the team to support and coach apprentices.
31. You highlighted that the service now operates with a centralised business support and administrative team, the resources of which have been impacted by an ongoing customer experience programme. With that team having to prioritise workloads, it has had knock-on effects with authorised officers

spending time on admin tasks and taking time away from on-the-ground official

control delivery work. You highlighted that you expect the new MIS system to lead to efficiency improvements once it is implemented.

Conclusion and actions required

32. The Authority was delivering a range of official controls in accordance with the statutory obligations placed on the Authority. However, the Authority needed to make some improvements to meet the requirements of the Official Control Regulations, Retained EC Regulation 625/2017 and the Food Law Code of Practice (FLCoP).
33. The Agency has identified potential improvements that need to be made to improve the current level of performance. Clearly there is a gap in resources to deliver the service plan. Although a great deal of innovative work is attempting to improve on the resource shortfall, even when this is delivered and the team is fully staffed to its allocated levels, there will still be a shortfall in the resources required to deliver the service.
34. The authority must provide a **timebound action plan** (how and by when) that shows how you intend to address any shortfall in the resources required to deliver your service plan and re-align to the Code.
35. An example action plan template is included in annex 2

Annex A

Name of local authority	Reading Borough Council
Name	Katie Heath
Email Address	katie.heath@reading.gov.uk
Phone number	07976166259
Are you submitting on behalf of another LA as a joint return?	No
Joint LAs	
More than three submissions	

Staffing Details	
3. How much FTE resource has been identified in the local authority's service plan as considered necessary to deliver the service for food hygiene controls in accordance with the FLCoP?	7.40
4.1 Authorised officers FTE	2.84
4.2 Regulatory support officers FTE	0.00
4.3 Trainee officers working towards a suitable qualification FTE	0.40
5.1 Authorised officers FTE	1.04
5.2 Regulatory support officers FTE	0.00
5.3 Trainee officers working towards a suitable qualification FTE	0.40
6. Has the local authority used Contractors/Agency staff in the last six months?*	Yes
7. How much food hygiene FTE resource was fully redeployed/diverted to undertake non-food related duties on 30 September 2023?	0.00

Delivery of FLCoP	
8.1 Reactive enforcement in all cases of non-compliance in accordance with the FLCoP and in line with the local authority's enforcement policy	Yes
8.2 Reactive management of all food incidents and food hazards in accordance with the FLCoP	Yes
8.3 Managing and where necessary investigating food hygiene and hygiene of premises complaints in accordance with the FLCoP	Yes
8.4 Does the Authority have and follow a documented procedure to ensure its database of food business establishments is accurate, reliable and up to date?	Yes
8.5 Does the local authority have a sampling plan?	Yes

Interventions	
9.1 A-rated	7
9.2 B-rated	14
9.3 C-rated	106
9.4 D-rated	487
9.5 E-rated	322
9.6 Unrated	71
9.7 Outside the programme	47
10.1 A-rated	6
10.2 B-rated	24
10.3 C-rated	65
10.4 D-rated	45
10.5 E-rated	7
10.6 Unrated	61
10.7 Outside the programme	140
11.1 Inspections and audits	253
11.2 Verification and surveillance	49
11.3 Sampling visits	12
11.4 Advice and Education	0
11.5 Information/intelligence gathering	3
12. During the last six months how many revisits were carried out following an inspection to premises to check that food hygiene non-compliances have been remedied?	49

New registrations	
13. How many new businesses were registered by the local authority in the last six months?	160
14. Does the local authority consider new food business registrations based on risk and prioritise inspections accordingly?*	Yes
15. How many new businesses were approved by the local authority in the last six months? Please enter '0' if none	0

Establishments profile

16.1.1 A-rated	4
16.1.2 B- rated	41
16.1.3 C-rated	283
16.1.4 D-rated	707
16.1.5 E-rated	492
16.1.6 Unrated	86
16.1.7 Outside the programme	47
16.2.1 Primary Producers	
16.2.2 Manufacturers & Packers	
16.2.3 Importers & Exporters	
16.2.4 Distributors & Transporters	
16.2.5 Retailers	
16.2.6 Restaurants & Caterers	
16.2.7 Establishments producing food contact materials	

Enforcement action

17.1 Written warning	203
17.2 Hygiene Improvement notice	
17.3 Remedial action and detention notice	0
17.4 Seizure, detention and surrender of food	0
17.5 Voluntary closure	5
17.6 Hygiene emergency prohibition notice	
17.7 Suspension/revocation of approval or licence	0
17.8 Imported food notice	0
17.9 Simple caution	0
17.10 Prosecution instigated	0
17.11 Prohibition order	0

Complaints and Samples

18.1 For food	30
18.2 For hygiene of premises	35
19. Please provide the total number of official samples taken in the last six months?	71

Educational Campaigns

20.1 Any food hygiene education campaigns in last six months? No

20.2 More details

Additional Information

21. Local authority's delivery of food hygiene controls

The authority has lost a further member of staff in the Food & Safety Team and is currently carrying 3 vacant posts. We are actively trying to recruit to these posts and are currently out to advert. We have tried to appoint to some of these vacancies previously but these were unsuccessful.

The team is currently investigating a serious health and safety accident which has required several members of the team to be diverted to undertake work in relation to that.

The team has a member of staff seconded to working on implementation of a new MIS.

The team has been unsuccessful in appointing a backfill to replace the secondee.

The team has appointed contract workers. For the period covered and in line with the question raised above there was no contractor in place at 30th September. The authority has struggled to retain contractors for the duration of the agreed contract and to place suitable contractors for the available contracts. The authority currently has a 2 month contract in place which is filled and commenced on 4th October.

22. Confirm Head of Service or Lead Officer has checked accuracy true

Annex B

Action Plan for [insert name of Local Authority]

Date:

Actions must be specific, measurable and time bound.

What - issue to be addressed	How - Planned action to secure improvement	By whom (name)	By when (date)	completed

APPENDIX 7 - RBC Improvement Plan

Date of Issue: 1 May 2024

No.	What - issue to be addressed	How - Planned action to secure improvement	Constraints	By whom (name)	By when (date)	Food Hygiene Delivery Contribution	Updates	Completed
1.	Resolve shortfall of resources	<p>Complete current round of recruitment to fill 3 vacant posts within the Food & Safety Team. Where possible fill posts with up to 3 full time qualified officers.</p> <p>Consideration will be given to candidates that may meet a lower standard of qualification and whether they can be utilised in the team as a Regulatory Support Officer or Technical Officer (below Senior).</p>		Katie Heath / Rob Abell	11/03/2024	Appointment of 3 qualified EHOs who can undertake the full remit of work will result in a further 432 food hygiene interventions to A-D & Unrated premises per annum.	09/04/2024 - 3 posts have been offered and accepted. These are due to start in May 24. One qualified EHO has been appointed and two junior Technical Officers who will be able to work in the capacity of RSOs have been appointed.	
2.	Resolve shortfall of resources	In the event that the current round of recruitment is unsuccessful the service will	A rapid turnaround of permissions from various levels will be	Katie Heath / Rob Abell	01/04/2024	Creation of an Environmental Health	N/A	N/A - posts filled.

		request to convert one post to a second apprentice officer post to grow their own qualified officer.	required in order to appoint an apprentice for the new academic year. At present no requests for posts are being approved by the Director of DEgNS which our service sits under. Appointment of a further apprentice will increase the demand on other staff to provide training and reduce their ability to progress through food hygiene inspections and other official controls.			Assistant post will result in no contribution to completion of food hygiene interventions in A-D & unrated premises. Once competent this post would be able to act in capacity of a Regulatory Support officer and contribute to AES work and interventions at E rated premises where there is no change to the risk rating. Estimated 50 interventions in year 24-25		
3.	Resolve shortfall of resources	Put in a growth bid to increase the market supplement for officers appointed into the Food & Safety team to assist attracting and retaining staff in this area.	There are increasing budgetary pressures and freeze on requests for new posts. This will unlikely be agreed to.	Katie Heath / Rob Abell	31/07/2024	This will not result in an increase in food hygiene interventions per annum		

4.	Realign with the Code of Practice for official controls, specifically in relation to Food Hygiene Inspections	Use budget underspend to continue to offer overtime to qualified and competent officers within the service to carry out food hygiene inspections outside of normal working hours.	This has been offered already and has had very little uptake. Currently qualified and competent officers are predominantly part time staff and do not wish to work overtime	Katie Heath / Rob Abell	31/12/2024	This currently has limited update but could tentatively contribute to delivery of a further 30-60 interventions at A-D & unrated premises per annum. Based on each current working officer completing 1-2 additional inspections per month.		
5.	Realign with the Code of Practice for official controls, specifically in relation to Food Hygiene Inspections	Train other qualified staff within the service to meet the competency requirements of the COP to enable them to undertake Food Hygiene Inspections. This will require investment of existing resources from the Food & Safety team, financial resources to provide training to meet CPD requirements and require permissions from other Group/Team Managers.	This will result in an initial decline in meeting the COP requirements for official controls as existing Food & Safety officers are reassigned to train other staff. It is expected, due to the workload of other staff, that there would be low uptake of other officers wishing to carry out	Katie Heath / Rob Abell	31/12/2024	It is estimated that this will not receive desired update however could contribute to up to 180 food hygiene interventions per annum at A-D & unrated premises in the event that 4 officers consistently		

			food inspections as additional hours. Any follow-up action required by these visits will increase the workload of the Food & Safety officers as enforcement work will be necessary.			carried out 5 inspections per month from Q2 onwards.		
6.	Realign with the Code of Practice for official controls, specifically in relation to Food Hygiene Inspections	Use budget underspend to offer contract extensions to existing contractors and/or seek further contractors to support completion of food hygiene inspections until the end of July 2024.	A nominal amount of follow-up work is returned to in-house officers. It is not anticipated that this will significantly impact the delivery of food hygiene interventions.	Katie Heath / Rob Abell	31/07/2024	Extension of contracts from existing expiry to the end of July 2024 will result in a further 235 food hygiene interventions at A-D & Unrated premises being delivered.		
7.	Realign with the Code of Practice for official controls, specifically in relation to Food Hygiene Inspections	Undertake a thorough assessment of working efficiencies of the existing Food & Safety Team to ascertain if time is being used efficiently and prioritised to the most important work.		Katie Heath / Rob Abell	30/09/2024	A working efficiency assessment is anticipated to result in meeting of existing targets set for officers but is unlikely to result in a further output		

						of food hygiene interventions beyond that which is estimated.		
8.	Realign with the Code of Practice for official controls, specifically in relation to Food Hygiene Inspections	Undertake a thorough review of the Service Plan to identify any areas of work that can be de-prioritised or removed from the plan to allow further focus on food hygiene inspections and other official controls. And ensure that the service plan is prioritised.		Katie Heath / Rob Abell	30/09/2024	A preliminary review of the service plan has not identified any specific items that can be removed from the service plan. Thorough review of the Service Plan is likely to have to have a negligible impact on the number of food hygiene interventions delivered at A-D & unrated premises per annum.		
9.	Resolve shortfall of resources	Continue to train the existing apprentice to be competent as a Regulatory Support Officer and be able to	This post is subject to successful probation.	Katie Heath / Rob Abell	31/07/2024	Where deemed competent the Environmental Health		

		undertake official controls that align with this designation.				Assistant will be able to contribute to AES work and delivery of food hygiene interventions at E rated premises where there is no change to the FHRS/risk rating.		
10.	Resolve shortfall of resources	Undertake a review of administrative work allocations to Food & Safety officers and transfer administrative tasks to Business Support Officers	There is no dedicated Business Support Officer for the Food & Safety Team. A review of the Business Support function is due to be carried out in conjunction with implementation of the new MIS/ Customer Experience Programme. The new MIS seeks to automate administrative processes and utilise mobile working, freeing up time for both officers and business support.	Katie Heath / Rob Abell	30/09/2024	This is considered to have a negligible impact on the number of food hygiene interventions delivered at A-D & unrated premises per annum.		

11.	Realign with the Code of Practice for official controls, specifically in relation to Food Hygiene Inspections	Review and utilise alternative official controls measures including AES and Partial Inspections to progress through an increased number of interventions.	Officers have noted a decline in standards at premises, particularly those that are long overdue an intervention. Partial inspections may need to be converted into full inspections.	Katie Heath / Rob Abell	30/09/2024	<p>Implementation of partial inspections is considered to have a negligible impact on the number of food hygiene interventions delivered at A-D & unrated premises per annum.</p> <p>Utilisation of AES will not contribute to the delivery of food hygiene interventions at A-D & unrated premises per annum.</p> <p>Utilisation of AES will contribute to delivery of interventions at E rated premises. It is estimated that this could</p>		
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						reach approximately 250 premises per annum.		
12.	Resolve shortfall of resources	Investigate opportunities for temporary or short-term secondees from other LA's in the region.	It is anticipated that there will not be a surplus of staff within neighbouring boroughs.	Katie Heath / Rob Abell	30/06/2024	Appointment of a further competent officer from a neighbouring borough could deliver up to 144 food hygiene interventions per annum at A-D & unrated premises depending on FTE.		
13.	Resolve shortfall of resources	Explore 'improving links' with EH degree graduates from universities.	Must be in line with recruitment opportunities	Katie Heath / Rob Abell	25/02/2024	N/A - this will seek to attract further applicants to existing posts	N/A	This was completed in January 2024 and has resulted in increased applicants and two successful appointments to our recently advertised posts.

14.	Resolve shortfall of resources	Investigate opportunities to participate in local career days and attend school/college sessions to promote Environmental Health.	Recruitment timescales permitting.	Katie Heath / Rob Abell	01/08/2024	N/A - this will seek to attract further applicants to existing posts	N/A	This is not required at present. There are no suitable posts opening.
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Notable Points

In addition to the constraints noted above the following items are impacting the Food & Safety team and will impact the delivery of food hygiene inspections in 2024-25:

- Accident Investigation- The Food & Safety Team are currently investigating a serious accident that occurred within the borough. Final investigative actions are currently underway with a view to inviting the suspects to PACE interview in June. It is anticipated that the final prosecution papers will be served in August/September.
- MIS Implementation - the Council are implementing a new MIS system across regulatory services teams. This was due for implementation in Mid-March 2024 but has now been postponed until end July 2024. This will require ongoing input from officers of the Food & safety Team in order to ensure that the system is sufficiently set up and working at the date of implementation. The required level of resource is not known.
- Secondment - due to the delay in implementation of the new MIS an extension to the secondment of 0.84 FTE within the Food & Safety team has been extended until the end of July 2024.
- New posts - The posts have not been fully filled with qualified, experienced officers. One post has been filled with an EHO who has prior experience of carrying out D and E food hygiene interventions. This officer will require training and support to be able to undertake the full remit of food hygiene interventions at RBC. Two posts have been filled with Technical Officers who are due to complete their MSc in Environmental Health in December 2024. Until that degree is completed and competency demonstrated they will not be able to undertake the full remit of food hygiene interventions and will be restricted to the role of a Regulatory Support Officer (once competency is demonstrated).
- There is no dedicated Business Support Officer(s) to the Food & Safety Team. Business Support is a shared function and this team are currently under resourced to meet their own targets.

Progress Update

The following FH interventions were completed in 2023-24

Risk Rating	Number Completed
A	7
B	48
C	94
D	207
E	9
Outside of Scope	0
Unrated	120
TOTAL	485

Delivery Expectations

The required number of Food Hygiene Interventions currently required in 2024-25 is:

Risk Rating	Number Due	Notes
A	5	Further A premises may be identified during the year
B	26	The number of due B's may be further updated once end of year returns have been completed.
C	234	
D	395	
E	392	
Outside of Scope	46	
Unrated (current)	114	
Unrated (Expected)	250	Estimated
TOTAL	1462	

The expected delivery of food hygiene interventions for 2024-25 prior to implementation of the above is:

Number of FH interventions at A-D and Unrated premises - 609

Number of FH interventions at E rated premises - 100

Estimated delivery of required FH interventions 48.5%

Where all of the above elements of the improvement plan can be implemented this will theoretically permit 100% achievement of the required FH interventions due in 2024-25.