



Reading
Borough Council

Working better with you

Food Service Plan 2026-2027

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 Food Hygiene Rating Scheme.
- To encourage 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 Council Plan 2025-2028. The delivery of the Food Service plan links to the following priorities:

Priority	How will we work toward this?
Promote more equal communities in Reading	Providing advice to existing and potential food businesses. Investigation of food safety, labelling and composition complaints Investigation of allegations of food borne illness and outbreak management. Management of the Food Hygiene Rating Scheme and encouraging higher food hygiene ratings through the re-rating process.
Secure Reading's economic and cultural success	Providing advice to existing and potential food businesses. Providing a paid advice service for complex and bespoke business needs.
Deliver a sustainable and healthy environment and reduce Reading's carbon footprint	Undertaking food hygiene and standards inspections, revisits to non-compliant premises and enforcement action where necessary. Investigation of food safety, labelling and composition complaints Investigation of allegations of food borne illness and outbreak management. Management of the Food Hygiene Rating Scheme and encouraging higher food hygiene ratings through the re-rating process. Providing advice to existing and potential food businesses Encouraging the adoption of good hygiene practices at all stages of the food chain
Safeguard and support the health and wellbeing of	Undertaking food hygiene and standards inspections, revisits to non-compliant

Reading's adults and children	premises and enforcement action where necessary. Investigation of food safety, labelling and composition complaints Investigation of allegations of food borne illness and outbreak management. Management of the Food Hygiene Rating Scheme and encouraging higher food hygiene ratings through the re-rating process. Providing advice to existing and potential food businesses Encouraging the adoption of good hygiene practices at all stages of the food chain
Ensure Reading Borough Council is fit for the future	Developing our social media and web presence to ensure our services are accessible to all.

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) 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 as far as practicable.
- 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 and Trading Standards teams for 2026-2027:

- 100% of Food Hygiene Premises rated A due before 31 March 27 to be completed.
- 100% of Food Hygiene Premises rated B due before 31 March 27 to be completed.

- 75% of new registrations (those awaiting inspection) to be completed before 31 March 27.
- 100% of Food Standards Premises due a priority intervention (1-6 months) before 31 March 27 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 2026 – March 2027.

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 3.5% (ONS 2024) within the town, lower than the national average of 3.7% (ONS 2024). 77 languages are spoken across Reading. Reading is classed as the 3rd most unequal city in terms of wealth and 12 of our neighbourhoods are within the 20% 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 is one large manufacturer within the borough.

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 new Elizabeth line (between Reading and London Paddington). 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 has three Farmers' market where producers from the surrounding locality sell their own produce. There are also two weekly street food markets as well as annual and specialist food festivals. 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://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 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 continue to provide assured business advice and support in Food Standards matters through the Primary Authority Partnership Scheme and currently supports 10 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 continued to experience significant recruitment and resourcing challenges throughout 2025-2026. Following a further resignation the team advertised and successfully recruited to four officer posts and one apprenticeship post in September 2025. All officers recruited were unqualified and officers in post are continuing to undergo training to meet competency requirements. The team is currently fully resourced.
- 2.3.5 The Trading Standards team were notified of the pending retirement of their Senior Consumer Protection Officer in May 2026 who carried out the majority of food standards work within that team. This post is currently frozen and other officers within the team are still undergoing training and qualification in food standards matters.
- 2.3.6 The service is based at:

Public Protection
Floor 2 South Front
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 (Food Hygiene)	Number of Premises
Primary Producer	0

Manufacturer/Packer	13
Food Importer/Exporter	8
Food Distributor/Transporter	30
Supermarket/Hypermarket	56
Small Retailer	232
Retailer Other	97
Restaurant, Café, Canteen	313
Hotel, Guest House	29
Pub, Club	108
Takeaway	192
Caring Establishment	146
Schools, Colleges	85
Mobile Unit	51
Restaurant, Caterer Other	251
Total	1611

N.B. Our establishment profile is dated 12 November 2024. It is not possible to run an up-to-date establishment profile for April 2026 due to ongoing data migration and input issues with our new MIS. We currently expect that our total number of premises sits at 1650-1700.

- 2.4.2 There are currently 6 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, dairy products, animal greaves and cold store/rewrapping activities. These premises are inspected in line with their risk rating.
- 2.4.3 There are a number of outdoor events per year, mainly during May to September, occurring 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. The Food & Safety Team will be increasing visits to these events in 2026-2027.
- 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

monitor food hygiene and safety inspections, respond to complaints, and conduct sampling in addition to other safety checks.

- 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. The service has seen increases in requests for FHRS re-rating inspections to enable premises to resume trading with online aggregators.
- 2.4.8 The service has continued to see 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. A large number of these premises are also being found to operate under separate food business operators which has increased the number of registrations received and inspections required.

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.

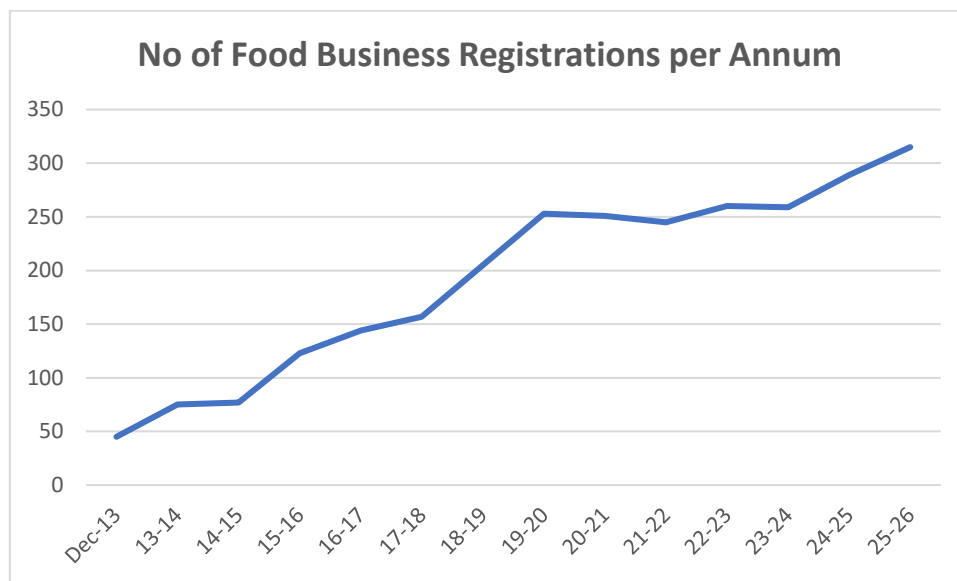
3. SERVICE DELIVERY

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, where officer competency permits, 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 The service continued to appoint contractors in 2025-2026 in order to address the backlog of overdue and due food hygiene official controls. In doing so the service has dramatically reduced the number of overdue/due inspections and has completed (INSERT %) official controls that were due before the end of 31 March 2026. The service has continued to experience a large number of issues with its MIS and has only been able to keep track of due and completed inspections manually since November 2024. Due to this, and following improvements made to the MIS in April 2026, a small number of premises that were previously not on our list of known due official controls have been missed. This was to be expected when resuming recording on the MIS and we are continuing to work through checking the validity of these official controls and completing any that are required. In relation to these ongoing issues the Council has continued to liaise with the FSA's Performance Management Team and has worked hard to meet their expectations.
- 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. There was a further 9% increase on new business registrations in 2025-2026 from the previous year. This figure is increasing the number of inspections due each year. 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 moving over to the new Food Standards Risk Rating Model and has implemented this scoring mechanism from 1 April 2025. At present it remains unable to fully transition to the new risk rating model due to errors in its MIS. This transition will be completed once the MIS has been checked and corrected for issues with food hygiene premises.
- 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 The following targets for food premises inspections due to be visited in 2026-2027 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
Category A	100%
Category B	100%
Category C	N/A
Category D	N/A
Category E	N/A
Category Unrated	75%

	Food Standards
Priority Intervention High (1-6 months)	100%
Priority Intervention Medium (12-36 Months)	N/A
Priority Intervention Low (48 –120 Months)	N/A
Category Unrated	N/A

- 3.1.10 There are also a number of food hygiene and food standards premises that are considered to be 'outside of scope' and not subject to regular inspections. 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 and inspections that are carried out at outdoor events where the trader is registered outside of the Borough. A policy on determination of 'outside of scope' premises was set in 2025-2026 and existing premises identified as 'outside of scope' that had not received an intervention in the past three years have been reviewed and where necessary inspected. The borough currently still has a large number of 'outside of scope' premises listed for Food Standards which appears disproportionate compared to those listed for Food Hygiene. This review remains ongoing.

- 3.1.11 Category E food hygiene inspections can be carried out via an alternative enforcement strategy (AES) or using an official control such as inspection, partial inspection or audit. Work continued on our AES programme for food hygiene in 2025-2026 and following recruitment of further officers a number of these were used for inspection training purposes and so received a full inspection. AES work for food hygiene premises is continuing for 2026-2027 as we modernise our methods for contacting businesses and utilise available methods to complete an AES.
- 3.1.12 We continue to review the requirements under the new Food Standards risk rating model as to how we can apply AES and other official control measures. Due to issues with our MIS we are yet to move our full establishment profile fully over to the new model and are currently unable to have full picture of our food standards inspections due. We have currently not implemented fully the triage process for newly registered food standards premises.
- 3.1.13 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.
- 3.1.14 The resource requirements for allocated work are detailed in section 4 below.

Food hygiene

- 3.1.15 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 2026-2027, including those overdue from previous years is:

Category/ Frequency	Number of inspections Due 2026/2027
A / at least every 6 months ¹	8
B / at least every 1 year	68
C / at least every 18 months	217

D / at least every 2 years	352
E / Alternative Enforcement Strategy	54
Outside of scope (excl. Reading Festival) ³	Unknown
Unrated ²	113
Total	699

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.

³ The current number of outside of scope premises due for inspection in year is unknown. Data on out of scope premises was not correctly transferred from old MIS to new MIS and a new policy on outside of scope premises has been implemented. We are still reviewing premises to identify those which are outside of scope and updating their profile within the MIS.

N.B. the number of inspections due is approximate. Due to ongoing issues with our MIS we are currently not assured that the number of inspections due across each category is accurate and are working on correcting and improving and data anomalies which have come out between our manual data and MIS draft returns.

Food Standards – labelling and composition

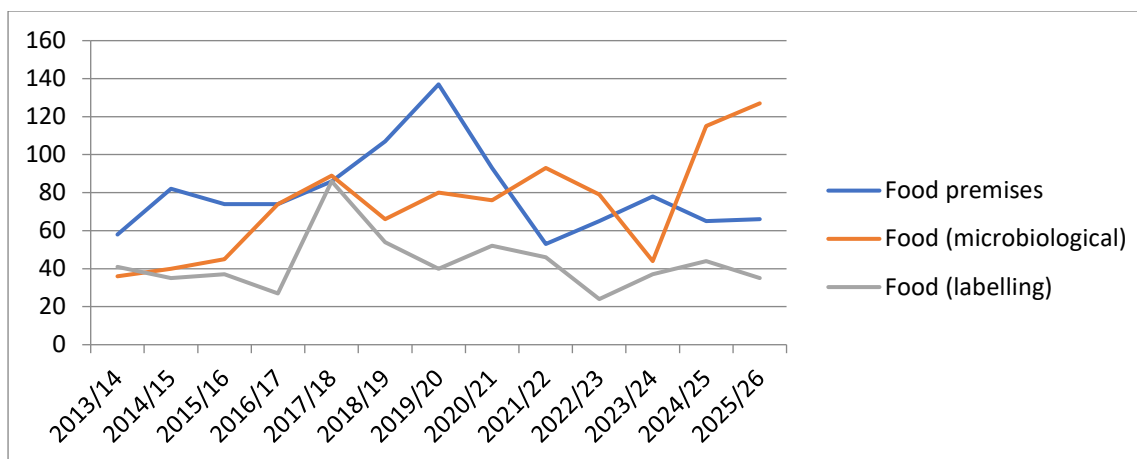
3.1.15 The frequency of food standards inspections is determined by the risk rating system stipulated in the Code of Practice. We are currently unable to provide detail of the number of inspections due in 2026-2027 through either the new or old risk rating model. Inspections since April 2025 have been carried out under the new risk rating model however our remaining premises are still awaiting conversion to the new risk rating model. We therefore do not have a complete data set under which to provide an establishment profile. Of those inspections carried out under the new risk rating model since April 2025 the following inspections are due as high priority interventions within the year 2026-2027 however this does not take into consideration other interventions due:

Category/ Frequency	Number of Inspections due 2026/2027
1 month (High priority)	0
3 months (High priority)	0
6 months (High priority)	3
12 months (Medium Priority)	28

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 The data shows that we are continuing to see an increase in complaints regarding food products which includes complaints about alleged food poisoning and contamination of food. There has been a decline in complaints about food standards/labelling of products and provision of information. These changes may in part be due to changes in our categorisation of complaints following publication of new online forms and alterations to recording on our

MIS. We are expecting to continue to see an increase in food complaints moving forward.

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 Our MIS setup does not differentiate between requests for advice between food hygiene and food standards unless bespoke paid advice is requested. Frequently we find that requests for advice from businesses span multiple areas and they are not easily divisible into one specific category. In 2025-2026 the following requests for advice were made and provision of further advice (including during inspections) was given:

Category	2025-2026
Requests for general advice from the service	33
Request for bespoke Food Hygiene advice	6
Request for bespoke Food Standards advice	0
Provision of Food Hygiene advice	54
Provision of Food Standards advice	0

N.B. It is expected that the numbers for provision of advice are an under-representation of advice provided. This is due to bulk upload of inspections to our MIS that could not take into account every action that would have been completed at an inspection and due to ongoing training and familiarity with the new MIS.

- 3.3.4 The data above shows a decline in the number of requests for advice across the service. This is likely due to changes in categorisation of service request types on our new MIS as opposed to a reduction in requests for advice. The Council continue 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 2026-2027 the food sampling budget for microbiological analysis is £8,705.31 which is held on account by UKHSA. This is an increase in budget from previous years.
- 3.4.9 We will continue to participate in proactive national and regional sampling programmes which align with our premises and priorities. No target for proactive microbiological sampling has been set for this year. Reactive samples will be carried out on a risk basis.
- 3.4.10 Following a loss of resource in April 2025 the service reduced their participation in sampling studies in 2025-2026 due to available resource. Training for new officers on sampling was delivered towards the end of 2025-2026 to enable this to be resumed as we move into 2026-2027.

Food Standards Quality and Compositional Sampling

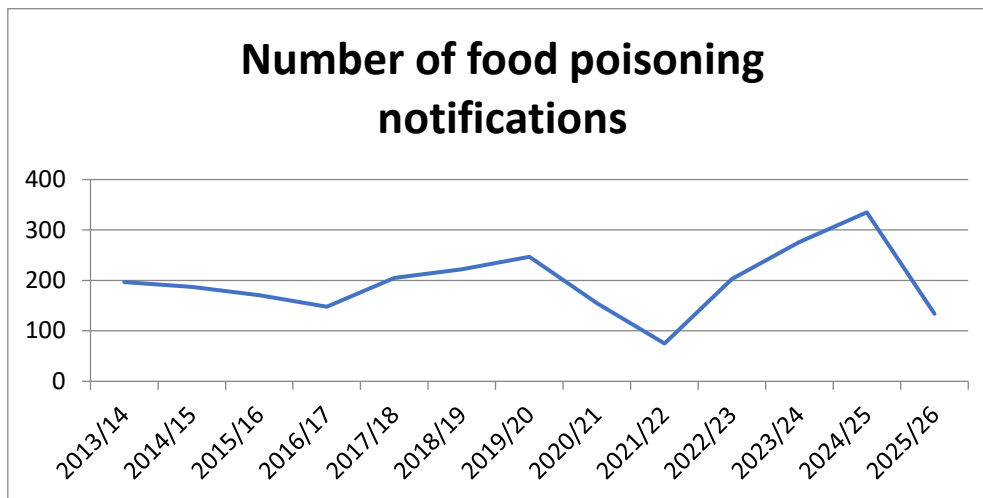
- 3.4.11 Trading Standards manages a coordinated annual sampling programme through Trading Standards Southeast Group (TSSE) and a local sampling programme. Any local sampling is shared with TSSE and other members of the group are invited to also take part in the sampling.
- 3.4.12 There is no set budget 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. Reactive samples will be carried out on a risk basis. Participation in available grants, either directly through the FSA or in conjunction with TSSE will be subject to available resources.

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 a substantial reduction in the number of notifications of infectious disease in 2025-2026. Across the region it was agreed that Local Authorities would no longer be notified of incidents of campylobacter unless part of an outbreak, this is because there was no expected action from Local authorities being taken for single cases of Campylobacter. The reduction in reported notifications is likely due to this matter.

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. This group was not active in 2025-2026.
- 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 joined the national Food Hygiene Rating Scheme (FHRS) run by the FSA in 2011. We publish our ratings fortnightly. The information is uploaded to the website approximately once every 2 weeks. The authority charges for re-rating inspections under this scheme and delivers them within the 3-month required period.
- 3.8.2 The authority received and processed 47 re-rating inspections in 2025-2026. This dataset has not been reported on previously and due to transfer of data to our new MIS we cannot be assured that the number of requests for re-rating inspections previously is correct. However there appears to have been an 8% increase on the number of re-rating applications received from the previous year.

- 3.8.3 The authority received 6 appeals in 2025-2026, all of these were dismissed with the original issued food hygiene rating score being considered correct.

Food Hygiene Education

- 3.8.4 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.
- 3.8.5 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.

3.9 Challenges

Management Information System (MIS)

- 3.9.1 The authority went live on a new MIS in November 2024 however we have been experiencing a number of issues with functionality and transfer of data. Following ongoing monitoring from the FSA throughout 2025-2026 and submission of incomplete returns the authority agreed to and submitted to the FSA an action plan to resolve the outstanding critical issues in relation to our food hygiene and food standards data. The action plan was committed to be completed by end of March 2026. The Food & Safety team have worked tirelessly with the MIS project team and IT to resolve the outstanding issues with the MIS. Historic food hygiene and food standards data has now been remapped to the MIS. Inspections carried out between November 2024 and March 2026 have been processed and bulk uploaded to the database. The timescale for this experienced some delays and the authority was afforded an extension to submission of returns to enable full returns to be completed. Despite works being carried out the authority was not able to submit a complete data set for its April returns. Whilst data has been uploaded, comparison of expected returns with that reported from the new MIS do not correlate and the divergence is considered too substantial to be accurate. The authority are therefore working through all food hygiene risk ratings for 2025-2026 to review and where necessary correct discrepancies to enable them to provide a full establishment profile. Due to these ongoing issues the authority has not yet fully converted to the new risk rating model for Food Standards this is primarily because there is inadequate resource to resolve any issues identified whilst food hygiene data continues to be worked through. Further to this there are other areas of the action plan that remain undelivered, this includes set up and review of returns proformas, finalisation of the new food business registration form and missing processes to allow recording of approval processes. Issues across the MIS are widespread across the Council and all teams on this MIS are affected. We are currently awaiting further information as to how all issues across the Council will be prioritised and where resource will be allocated. This will likely impact further progress on fixes affecting the Food & Safety team.

Food Standards Delivery Model

- 3.9.2 The authority has been unable to fully implement the new Food Standards Model in 2025-2026 this is due to ongoing issues with its MIS, as detailed in section 3.9.1 above. As of 1 April 2025 the authority has completed all new inspections using the new risk rating model however our historic premises remain on the old risk rating model. It is not possible to correlate the two at present to operate one risk rating model and provide a full establishment profile or full list of due inspections. Furthermore the authority has not as yet implemented triaging, as detailed in the Code of Practice, for new businesses or existing unrated premises.

Food Standards – Unrated and Outside of Scope Premises

- 3.9.3 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 authority is still yet to complete this work but is reducing the backlog of unrated inspections in catering premises as food hygiene inspections are being conducted.

FSA Improvement Plan

- 3.9.4 The Council has continued to liaise with the FSA throughout 2025-2026 and committed to a renewed improvement plan at the end of 2024-2025. The Council has worked hard to complete all due and overdue official controls and has made substantial strides towards completing this. However, due to the issues with the MIS the council was working from manual recorded spreadsheets of inspections both completed and due, this has unfortunately led to some missed inspections when this data has been uploaded to the MIS. We are currently working through all risk ratings of inspections completed/due in 2025-2026 to identify any anomalies, including missed inspections. The majority of anomalies are being found to be due to premises being incorrectly closed on either the old or new MIS, minor discrepancies between risk ratings at time of upload and duplication or missing processes on the new MIS. The Council continue to work with the FSA's Performance Management Team and are continuing to work through issues identified with their MIS. Further details of the FSA's correspondence with the Council and the Councils response, including improvement plans, are available on request.

Other Priorities

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

4. RESOURCES

4.1 Financial Allocation

The budget for Food & Safety in 2026-2027 is £552,000. This excludes some Food Standards inspection and complaint work which falls under the Trading Standards budget. 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 8.86 FTE (including management), there are no vacancies. The Trading Standards Team has an allocation of 6.04 FTE (including management) of which 1 FTE is currently vacant. As at 01/04/25 there were 5.48 FTE allocated to carry out Food Hygiene Work and 2.4 FTE allocated to carry out Food Standards work. Of these allocations, as at 01/04/2025 there were 5.48 FTE filled and undertaking food hygiene work and 1.9 FTE filled carrying out food standards work. The authority appointed a number of training/qualifying officers in September 2025, these officers are still undergoing training and are not fully authorised to carry out food hygiene or standards official controls. Of the filled posts, 3.2 FTE is not fully qualified for food hygiene and 1.2 FTE is not fully qualified for food standards.
- 4.2.2 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.
- 4.2.3 The estimated need for 2026-2027 for the delivery of food hygiene and food standards is 5.005 FTE and 1.215 FTE respectively. Please see Appendix 5 for further detail on the Food & Safety Teams work priorities and resource requirements.

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. For 2026-2027 training will continue to be focussed on upskilling our new officers to enable them to be deemed competent to carry out a wider range of our work. All requests for training from staff are considered and where suitable budget is available and relevant to the current work of the team is typically honoured.
- 4.3.4 Further development on enforcement is required across the team to support an increase in enforcement work being carried out.
- 4.3.5 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.
- 4.3.6 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. Training logs for new officers were implemented prior to release of the updated FSA competency framework. At present the service is working from their existing training plans and will review the requirements of the updated competency framework when the procedure is next reviewed.

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.

- 5.3 The council operates internal auditing processes. The Food & Safety team are due for a partial internal audit in 2026-2027.

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 has continued to struggle with resourcing and whilst now fully resourced it has appointed unqualified officers that require ongoing training and support. The Council has continued to be impacted by the deployment of the new MIS. Overall it has made substantial improvement in realigning with the Code of Practice and requirement to deliver Official Controls but has unfortunately been able to complete this fully across all categories of risk rating.
- 6.3 The data below details the performance that was achieved in 2026-2027.

6.4 Number of Inspections

- 6.4.1 A summary of completed inspections can be seen below:

6.4.2 Food Hygiene

- The authority carried out 873 food hygiene inspections during 2025-2026.
- 9 'A' premises were due for inspection throughout the year. 8 of these were inspected and at the end of March 2026 1 premises was under a formal closure and was not able to be inspected.
- 68 'B' premises were due for inspection. 67 of these inspections have been completed or premises have found to be no longer trading. 1 premises was temporarily closed at the end of March 2026 and could not be inspected. A further 3 premises were found to have been B's that were not included on our manual lists throughout the year, these have now been inspected.
- 198 'C' premises were due for inspection. All but 1 of these premises were inspected, 1 premises was not trading within the final quarter and could not be inspected. A further 6 premises have been identified as missing from our inspection lists, 5 of these have now been inspected. MIS and returns data is still being checked for this category.
- 239 'D' premises were due for inspection in 2025-2026. The authority completed all but 2 'D' premises due. 1 of these premises was not found to be trading and available for inspection throughout quarter 4. This category of premises has not been fully checked between our MIS and returns data at present.
- 207 'E' premises were due for inspection in 2025-2026. All but two of these were subject to an inspection or AES inspection. Ongoing review of the MIS and returns which is incomplete for this category has so far identified a further

11 premises that did not receive an intervention, however a proportion of these are expected to be closed.

- The authority received 47 applications for FHRS re-rating visits throughout the year, a number of these were carried out to premises that had already received their statutory inspection within the year.
- The authority believes that it was up to date with all unrated premises at the end of March 26 and had inspected all premises that were actively trading. A number of registrations had been received for premises that were found not to be trading within the period and remain allocated for inspection. Review of the MIS and returns has currently identified a further 2 unrated premises that did not receive an inspection and were trading within this time. Analysis of this data is not complete.
- The authority completed 50 revisits to premises for matters of non-compliance and a further 3 visits to assess compliance with enforcement notices.
- Throughout the year a number of premises closed or changed hands and re-registered with the borough. 315 new business registrations were received during the year.
- The authority has not met its KPIs with respect to B and unrated premises set internally.
- The authority has not met the requirements of the Code of Practice across its establishment profile but has made significant progress in doing so. Had we been able to utilise the MIS fully we view that this would have been fully met across A-E premises.

6.4.3 Food Standards

- The authority carried out 511 food standards inspections during 2025-2026.
- There was 1 'A' premises due for inspection which was completed.
- 139 of 287 due 'B' premises inspections were completed.
- 266 of 360 due 'C' premises inspections were completed.
- 272 of 490 unrated premises (not including further registrations received) were inspected.
- 34 of 103 premises marked as outside of scope have been checked and inspected, reducing the number requiring review to 69.
- The authority completed 1 visit to assess compliance with an enforcement notice.
- Throughout the year a number of premises closed or changed hands and re-registered with the borough. 315 new business registrations were received during the year.
- The authority met its KPIs with respect to A premises set internally.

- The authority did not meet the requirements of the Code of Practice with respect to B, C or unrated/newly registered premises and has not fully moved over to the new risk rating model.

6.4.4 Formal Actions

During the period 2019-2020 to 2024-2025 the authority took the following enforcement action:

Enforcement Type	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2026/27
Voluntary closure	0	1	1	2	4	7	3
Seizure, detention & surrender of food	2	0	1	2	0	4	1
Suspension/revocation of approval or licence	0	0	1	0	0	0	0
Hygiene Emergency prohibition notice	3	0	0	2	2	8	6
Prohibition order	3	0	0	1	0	0	0
Simple caution	0	0	0	0	0	0	0
No of premises where Improvement notices served	11	0	2	5	3	4	12
No of Hygiene Improvement notices served	21	0	7	12	4	8	16
No of FIR Improvement notices served	1	0	0	0	0	0	1
Remedial action & detention notices	1	0	0	0	0	0	0

Written warnings (Food Hygiene)	910	129	381	621	527	918	1,007
Written warnings (Food Standards)	75	35	84	117	101	234	108
Prosecutions concluded	1	0	0	0	0	0	2
Prosecutions initiated	0	0	0	0	0	1	1

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 2017-2018 through 2024-2025.

	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
2024/25	91	17 (3 unknown)	4	3
2025/26	26	0	0	N/A

6.5 Variations from the Service Plan

6.5.1 The following items were not met from the 2025-26 service plan and remain outstanding:

- The Council has been unable to achieve the full requirements of official controls detailed within the Code of practice, with outstanding inspections in B-E premises for food hygiene.
- The Council has not fully migrated to the new risk rating model for food standards.
- The Council has not met 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 did not complete a review of nor update authorisations for officers. No progress was made with a review or update of the Council's Enforcement Policy or the Food Enforcement Policy.
- The Council has been unable to submit full returns information to the FSA throughout 2025-2026.

6.6 Areas of Improvement

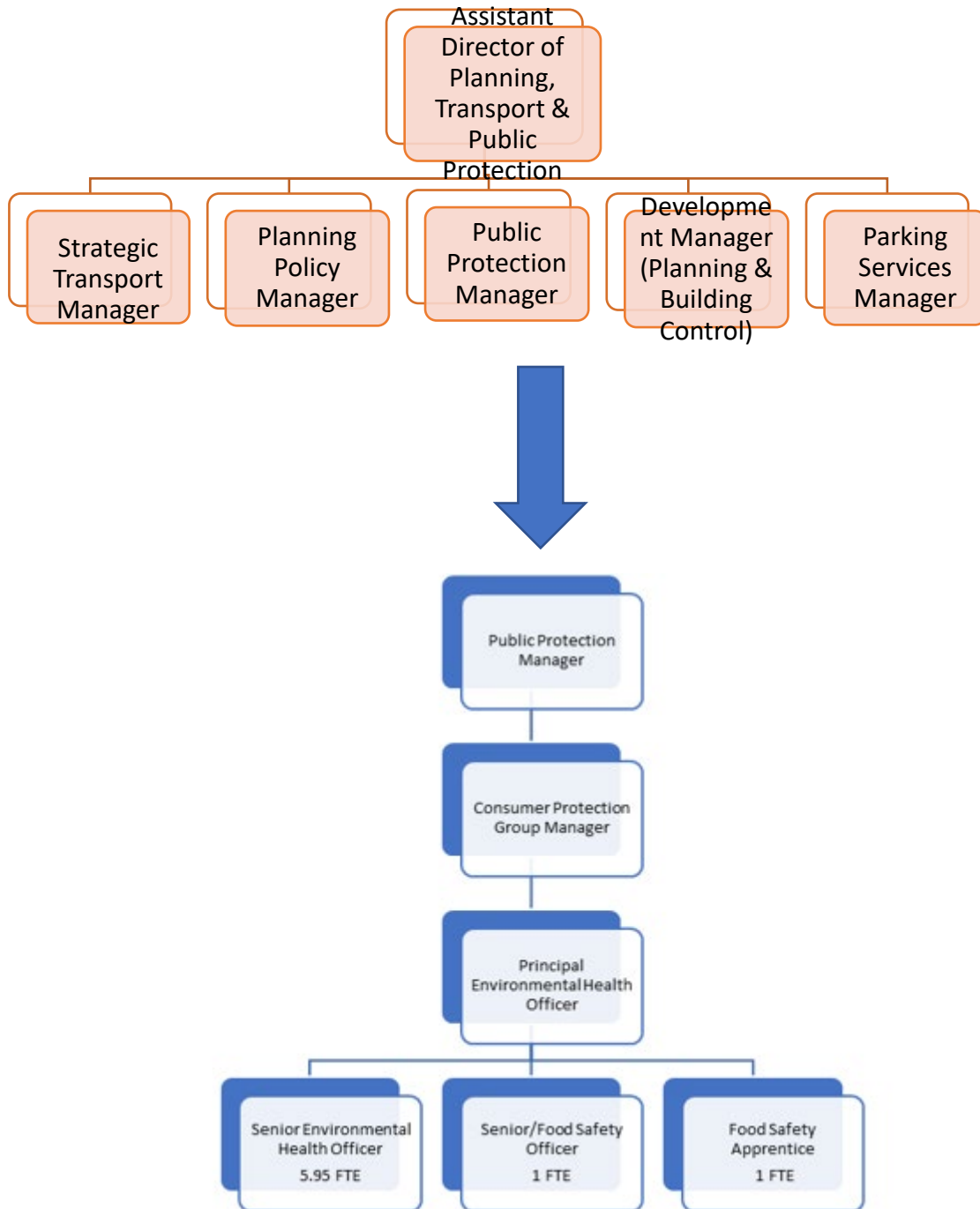
- 6.6.1 As identified above we continue to have deficiencies in the status of policies and procedures in comparison to the Food Law Code of Practice. This is an area where improvement is required, including ensuring that the correct policies and procedures are in place and that those in place are up to date. An ambitious programme of review has been put in place for 2026-2027.
- 6.6.2 Further improvement is required in the implementation of internal monitoring procedures to ensure that the council is able to meet the requirements of its protocols and to ensure that officers are appropriately monitored.
- 6.6.3 Further improvement continues to be required to review and update authorisations for officers to exercise their powers. Review and update of the Council's Enforcement Policy (Appendix 2) and the Food Enforcement Policy (Appendix 3) is still required.

7.0 Approval

- 7.1 This plan, including its appendices, has been agreed by the Acting Public Protection Manager(s) and Acting 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 Manager and Principal EHO (Food)) will monitor the performance of authorised officers.

5.1.2 Monitoring the implementation of the policy

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

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

6. ENFORCEMENT PROCEDURE

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

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

6.2 INFORMAL ACTION

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

6.2.1 No action

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

6.2.2 Verbal Advice

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

6.2.3 Written Warning and advice

- (a) During or on completion of an inspection the authorised officer will discuss as far as possible with the operator of the business, any problems that are identified and will explain what is necessary to rectify the problem.
- (b) After all visits to food businesses an inspection report form will be left with the person in charge of the business at the time of the visit. The inspection report form will detail the main findings and make a clear distinction between legal requirements and recommendations. The form will contain details of areas inspected, person seen at the premises, visiting authorised officer, their contact details, date/ time of the visit and clear contact details regarding an Officers manager to allow a food business operator to take a matter further if they are not happy with the response of an officer.

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

6.2.4 Follow up visits

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

6.3 FORMAL ACTION

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

6.3.2 Improvement Notices & Hygiene Improvement Notices

- (a) An authorised Officer may consider the use of an Improvement Notice or Hygiene Improvement Notice as appropriate in any of the following or combination of the following situations:
 - (i) where there is a history of non-compliance or delay in compliance of food safety legislation;
 - (ii) where formal action is proportionate to the risk to public health; or
 - (iii) where it is believed that for an informal approach is not likely to be effective.
- (b) A Hygiene Improvement Notice gives the food business operator on whom the notice is to be served a minimum of 14 days in which to make a representation in respect of works improvement required. An Improvement Notice sets no minimum time for compliance with the notice and is designed to be used with the Food Information Regulations 2014

- (c) An Improvement Notice or Hygiene Improvement Notice will clearly detail which regulations have been contravened and what remedial action is necessary. Information will be sent explaining the recipient's right to appeal. The notice will specify the time within which compliance is required. The time allotted will be dependent on the nature of the problem, the public health risks involved and the availability of the solution.
- (d) An authorised officer serving an Improvement Notice or Hygiene Improvement Notice must be satisfied that they have adequate evidence to successfully prosecute for non-compliance should the situation arise.
- (e) The authorised officer will visit as soon as is reasonably practicable following expiry of the time allowed for compliance to check whether the contraventions of food safety legislation have been remedied. If they have not, an offence has been committed and the investigating officer shall prepare a report for the Head of Planning, Development and Regulatory Services.
- (f) The Head of Planning, Development and Regulatory Services will decide whether it is necessary and appropriate to instigate prosecution proceedings in respect of the food business operator subject to the Head of Legal Services being satisfied as to the available evidence.

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

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

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

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

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

6.3.5 Inspection, Detention and Seizure of Suspect Food

- (a) Any food that fails to meet food safety requirements or has not been produced, processed or distributed in compliance with the hygiene regulations may be detained to allow further time for investigation or seized. When food has been detained or seized the food business operator will be provided with written notice as soon as is reasonably practicable.
- (b) The food will be presented to a JP as soon as possible but within two days, when a decision on further action will be made. This two day period may be extended if necessary to ensure that parties attend and be represented if they choose.
- (c) A food condemnation notification will be given to the person in charge of the food when the officer intends to have the food dealt with by a Justice of the Peace (JP).

6.3.6 Suspension/withdrawal of approval or conditional approval

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

6.3.7 Remedial Action Notice

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

6.3.8 Prosecution

- (a) Food handlers and the owners of food businesses found to be contravening food safety and food standards legislation will be given reasonable opportunity to comply. However, in some situations the seriousness of the offence may be such that prosecution is appropriate. The following circumstances may result in prosecution proceedings being brought:
 - (i) The alleged offence involve a serious breach of the law such that public health, safety or wellbeing is or has been put at risk;
 - (ii) The alleged offence involves a failure to correct a serious potential risk 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 4Food & Safety Team Work Plan Apr 2025 - Mar 2026 - 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	Food Hygiene Inspection Programme Until 31 March 2026. Premises inspected in accordance with FSA Guidance on Service return No of A-D premises due/overdue inspection for this year = 510 New registered premises per year = c. 290 Total 800 inspections due.	Requirement of Food Law COP. Service Plan Priority / Target	Premises subject to hygiene requirements inspected and compliant to ensure safe food. Education of local businesses	Aim: 100% A premises 100% B Premises 70% Unrated premises inspected	A total of 873 proactive inspections were carried out: A - 100% inspected B - 94% inspected Unrated - 100% inspected 315 premises registered during the year. The number of inspections due at the beginning of the year has been exceeded and the authority was able to bring forward some inspections from 2026-2027 to utilise additional contracting resource in place however, due to recording issues associated with the MIS a small number of premises that were due in 2025-2026 were missed.
S	Alternative Enforcement Strategy for E premises and premises outside of scope Managed project undertaking desk-	Requirement of Food Law COP. Service Plan Priority / Target FSA Improvement Plan requirement	Premises subject to hygiene requirements inspected and compliant to ensure safe food. Education of local businesses	Aim: All E premises contacted to verify current level of compliance and confirm FHRS remains appropriate. Premises indicating changes in condition will be followed	205 of 207 E premises have been inspected or gave received an Alternative Enforcement Strategy intervention. A further 11 premises have been identified as part of a review of returns carried out through

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
	based assessment of E premises. 244 Premises. Estimated 20% on site follow up required - 49 premises.			up by an onsite full/partial inspection	Arcus, this review is ongoing and this category of premises has not been completed at present.
S	Food Hygiene Revisits and subsequent enforcement of non-compliant premises. Approximately 4% of premises are being found to be non-compliant. Estimate 64 premises across the borough. Ongoing non-compliance will require issue of formal notices and potentially lead to prosecution.	Food Law COP	Staged enforcement action in line with the Corporate Enforcement policy to improve food hygiene standards and ensure safe food.	Increase in FHRS at re-rate or next inspection. NC premises will be noted as Compliant on database and Notices will be complied with. Premises revisited on time in accordance with notice expiry date. Any court proceedings to be brought within time limit.	50 premises have been revisited within the year. The full number of premises identified for revisit at the beginning of the year has not been completed. 118 premises were inspected within the year that were not compliant and required a revisit. Approximately 42% of revisits generated within the year were completed.
S	Ongoing Enforcement including issue of notices. Resulting from ongoing or immediate non-compliance where a risk to public health and safety is presented.	Food Law COP	Staged enforcement action in line with the Corporate Enforcement policy to improve food hygiene standards and ensure safe food.	Increase in FHRS at re-rate or next inspection. NC premises will be noted as Compliant on database and Notices will be complied with. Premises revisited on time in accordance with notice expiry date.	27 enforcement notices were issued within the year, this is below the number expected and does not accord with the amount of non-compliance found within inspections.

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
	Average 60 per annum			Any court proceedings to be brought within time limit.	
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>	2 applications for approval came in within 2025-2026, these premises have now been fully approved.
S	Food Hygiene Re-Rating visits (FHRS) for premises not overdue/due inspection Avg 40 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.</i> <i>Applications for premises that are overdue/due inspection will be refunded to business.</i>	47 FHRS re-rating requests have been received, an increase of 8% on the number expected.
S	Respond to FHRS Appeals Estimate 3 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>	6 FHRS appeals have been received, twice the number anticipated.
S	Food Standards Inspection Programme Until 31 March 2026. No of due and overdue inspections = 772 New registered premises per annum approx. 290	<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. Education of local businesses</i>	<i>Aim: 100% A premises</i>	511 food standards inspections were carried out. 315 new premises registrations were received.

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
	Total Inspections due - 1062				
S	Food Standard Revisits. Approximately 8% of premises have found to be non-compliant. Estimate approximately 85 premises will require revisits and follow up enforcement action due to non-compliance in line with the current risk rating.	<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>	0 revisits were carried out for food standards. A further 25 premises inspected within the year came out as non-compliant meaning approximately 55 of premises are non-compliant.
S	Food, Water & Environmental Sampling (Microbiology) Estimate 50 samples per annum (10 Premises).	<i>Food Law COP Sampling Plan Local/National sampling programme</i>	<i>Ensuring food offered for sale is microbiologically safe and does not present a risk to health. Reduction in incidence of food borne illness.</i>	<i>Unsatisfactory samples followed up with further intervention and re-sampling where necessary.</i>	26 microbiological samples were taken
S	Food Standards Sampling Estimate 20 samples per annum	<i>Food Law COP Sampling Plan Local/National sampling programme</i>	<i>Ensuring food offered for sale is correctly labelled, safe and does not mislead the consumer. Reduction in food complaints and referrals.</i>	<i>Unsatisfactory samples followed up with further intervention and re-sampling where necessary.</i>	No samples were taken for Food Standards
N S	National Food Hygiene Rating Scheme (FHRS) Administration	<i>Discretionary function to take part in scheme. All LA's in England participate.</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 continued to be administered. Fortnightly updates were provided for publication.

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
		<i>Expectation of Customers.</i>			
S	FSA Returns (bi-annually)	<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 returns were completed however these were incomplete in relation to the borough profile due to our MIS issues and manual retention of data.
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: • 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 • Control and investigation of outbreaks and food	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.	A new policy was finalised and implemented for Outside of scope premises. The wider suite of documents were not reviewed and updated as intended.

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
		related infectious disease • Information • Registration • Conflict of Interest • Sampling Policy • Enforcement Policy • Complaints Policy • Contingency Plan			
N S	Inspection of notified cooling towers and evaporative condensers for the prevention and control of Legionella spp. Est. 1 premises per annum Development, maintenance and implementation of SOPs. Inspection of existing towers in line with LAC67/2. Est. 4 premises	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.	No further cooling towers registered within the year. No inspections of existing cooling towers were carried out. Of 3 existing cooling towers 2 are rated C and not currently due an inspection. 1 has not been inspected and is overdue an inspection.
S	Inspection and certification of registering special treatment premises.	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.	11 premises inspections were carried out following applications.

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
	An average of 30 premises and 70 further operators/treatments are registering per year. Backlog of existing premises requiring inspection= 60			Backlog of commercial premises awaiting inspection removed.	16 Premises registrations were received. 75 operator registrations were received.
	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 were carried out for special treatment premises.
	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.	This work was not carried out.
	S Investigation of Infectious diseases and outbreaks including: Food borne illness & Legionnaire's disease. (Excl. Covid 19) Estimate 340 cases per year	National and Local Policy	Reduced incidence of infectious disease and outbreaks including food borne illness	Cases investigated in line with internal SOPs and Thames Valley single case protocol. Outbreaks investigated in line with National Guidance. Service requests responded to within internal standards.	134 notifications of infectious diseases were received within the year. No outbreaks were reported.

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
	Outbreaks: Estimate 1 per 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 return was completed.
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.	The audit was completed. Work to further develop and implement procedures was identified as a required action. This work has not been completed at present.
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 during match inspections were carried out in relation to the Select Car Leasing Stadium. There were delays in issuing follow up letters, these were not completed within the specified timescale.
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.	This was completed.
S	Review of Operations Manual and Issue of new Safety Certificate for Palmer Park Regulated Stand	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.	The authority engaged with a new manager in place at Palmer Park and to explain the requirements of an Operations manual. The subsequent

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
	Plus initial engagement and sent up of SAG meetings				application has not been received.
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.	All SAG meetings have been attended and 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 work has been carried out in this area.
S	Review and respond to Licensing consultations concerning premises licences, events and street trading. Including attendance at SAG. Approx 140 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.	99 licensing consultations have been received and reviewed.
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	A new process was put in place across the Food & Safety team to reflect how consultations should be processed. This has been implemented.
S	Imported Food (Official Controls)	Food Law COP	Food products offered for sale will be legally compliant, properly labelled and safe to eat.	Service requests actioned within timeframe. Targeted sampling	Service requests actioned within timeframe.

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
					Following a complaint enforcement notices were issued with respect to one premises where illegal imports of both products of animal origin and high risk products not of animal origin were found.
S	Reactive food & Safety work (service requests) • Dirty food premises • Microbiological, chemical & labelling • Allergens • Health, safety & Welfare • Business advice This excludes licence consultations and food business registrations which are covered elsewhere in this plan. Approximately 500 per annum.	Food Law COP and FSA guidance on service return. HSWA/EAR	Ensure food on sale is safe to eat, produced hygienically, correctly labelled and does not mislead the consumer. Ensure premises are safe to work in and visit.	All Service requests responded to.	442 service requests were received excluding licensing consultations, FHRS re-rate requests, FHRS appeals, paid advice requests and food business registrations (and requests to register) that are reported elsewhere. Infectious disease notifications have been removed as these are accounted for above. 75 show no response.

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	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	6 requests for bespoke food hygiene advice have been received and actioned.
N S	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.	None received
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.	A new health and safety information page has been added. Changes to Special treatments information and publication of new online forms to submit enquiries and complaints, including additional forms that were not previously in place, have taken place.
S	Ensure all officers appropriately authorised and competent. Full review of all staff competency required and new training	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	No further work has been carried out on 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
	scheme to be implemented.				
S	Authorisation and Enforcement Policy Review including implementation of new authorisation system for staff	Food Law COP / HSWA Delegations Register. Service Plan Priority	Review the delegations register and ensure officer authorisations are up to date - as part of the corporate review of the constitution and delegations register	Delegations register is up to date There are clear lines of delegated authority for officers to have the necessary powers and authority	Not completed
N S	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 Issue of PAP export Certificates		Well managed PAP service compliant with statutory guidance	Level of service aligns with requirement of statutory guidance. PAP advice up to date and reviewed within timeframe. Enquiries and enforcement actions responded to within timeframe.	33 export certificates have been issued. 92 hours of charged work has been carried out on food standards matters.
N S	Reading Festival - Audit of Food Safety Controls & inspections, response to complaints, H&S monitoring & inspection (incl. Special Effects), SAG	Service Target	Safeguarding RBC residents and visitors	100% of festival food premises inspected and scored under Alfresco rating. Gold, Silver & Bronze nominees made. Non-compliant traders revisited and referred to home authority.	Allocated work for Reading Festival was changed this year following appointment by the festival of another food inspection company. Adhoc spot checks were carried out in relation to food safety.

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 and preparation.			Food Team attendance at SAG Meetings prior to and during event. H&S hazards referred to Licensing	9 proactive inspections and revisits were carried out in relation to food safety. 121 H&S checks/inspections carried out. A spot check review of 7 pyro events was carried out with onsite inspection during demos. All SAGs attended
N S	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.	This was not carried out and not deemed necessary as a formal exercise. Officers triage requests on receipt.
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 workplaces.	Documented and implemented SOPs. Staff training records. Staff authorisation.	No work carried out.
S	Food Service Plan	Food Law Code of Practice	Plan to demonstrate how the council will deliver its functions	Plan drafted and agreed through committee.	Plan agreed through committee.

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
		Service Plan priority	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		
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.	
N S	Proactive project - Identifying Hairdresser and Barber premises within borough and educating to improve hygiene standards.	Officer objective. Response to Cllr enquiries	Improved hygiene standards of hairdressers and barbers	Reduction in complaints received.	Not completed
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 FOIs received by the service were responded to. There is no formal report of all FOIs received by the team. A minimum of 13 FOIs were received directly. Other FOIs were contributed to.
N S	Arcus Project - Ongoing Implementation of MIS to working standard. Setup & refinement of processes, templates. Delivery of training across team. Set up	New MIS being implemented across Service	N/A	Tested and fully functioning MIS.	A substantial amount of work has been carried out on the database throughout the year. In April 2026 improvements were seen on food inspection data however the database is yet to be fully functioning for the Food & Safety Team.

S / N S	Action, [what are going to change deliver or improve]	Reason	Outcome [what difference will this make]	Success Measures [how will know we have delivered]	End of Year Update
	on missing processes. Form set up and testing.				
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.	89 accident notifications have been received this year. Work has continued on our significant health and safety accident from 2022 and charges against 2 defendants were laid in August 2025. Both defendants have pleaded guilty and are awaiting sentencing.
N S	Corporate mandatory training. 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	Mandatory training was fully completed by 9 of 10 permanent members of the team including 5 new starters. There were outstanding mandatory courses for 1 permanent officer. All 3 contractors completed all required mandatory training upon starting and at required intervals.
N S	Corporate Health & Safety. Development of internal health and safety policies and procedures including risk assessments.	Corporate requirement	Compliance with corporate procedures	Suitable, sufficient and up to date risk assessments with accompanying procedures in place and implemented	This work was not fully completed. A review of current H&S arrangements and risk assessments was carried out.

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 of team on new policies and procedures				Further development of new risk assessments to align with changes to Public Protection were not completed.
N S	Internal training of qualified officers to other teams to meet standards for authorisation and delivery of food hygiene official controls	To deliver improvement plan to meet FSA requirements to align with FLCOP.	Increased number of officers available to deliver food hygiene official controls.	Appointed officers will be authorised to carry out a greater remit of work in line with the Food Law Code of Practice	3 officers were identified to receive further training. 2 of 3 officers continue to receive ongoing training which is a work in progress. 1 officer will not be continuing.
N S	Internal training of apprentice	An apprentice would not meet the requirements of an authorised officer and would require development. Requirement of apprenticeship scheme.	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	A training plan has been implemented for the apprenticeship officer. 20% on the job training time is provided for dedication to learning. The officer continues to progress through practical training but has completed initial theory training for food hygiene, food standards and special treatments.
S	Attendance at regional Food and health and safety liaison meetings.	Good practice, sharing and learning of practices and procedures. Collaboration and networking with neighbouring authorities.	Information sharing, regional and national consistency.	Representation and feedback from each meeting.	All meetings have been attended. RBC are chair for food meetings in 2026.
N S	Line Management of staff	Corporate and Team requirement	Monitored and improved staff/team performance	Supported, competent staff	This work has been completed. All annual reviews completed where possible, one officer was

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
					on long term sick and this remains incomplete. Regular one to one meetings take place with all officers. Probation meetings, as scheduled, were carried out for all new officers.
S	Implementation of new Food Standards Risk Rating Delivery Model. Migrate and review existing premises. New templates required. Training of staff including consistency checks.	It is a requirement of the FLCOP for all LAS to have migrated to the new risk rating model for Food Standards by 31/03/2025		Existing premises migrated to new model on Arcus, templates in place and new FS inspections completed under new risk rating.	This work has not been fully completed. Updated templates for inspection forms were completed and implemented. All inspections carried out in 2025-2026 were carried out under the new risk rating model. The authority has not migrated all existing premises to the new risk rating model.

APPENDIX 5**Food & Safety Work Plan Apr 2026 - Mar 2027**

A detailed breakdown of the work plan for the Food & Safety Team 2026-2027 is available on request. The resource requirements for delivery of this work plan and available resource is summarised as:

Required Resource	Available Resource
Resource required for Food Hygiene Delivery: 5.005 FTE Resource required for Food Standards Delivery: 1.215 FTE Resource required for Health & Safety Delivery: 2.339 FTE Resource required for other Delivery: 1.81FTE Total Resource Required: 10.369 FTE <i>N.B. Some areas of work fall into multiple categories, e.g. response to H&S service requests, this has been included within Food Hygiene Delivery.</i> <i>Other delivery includes Arcus MIS, Response to FOIs, generic training, corporate health and safety responsibilities, line management.</i>	Permanent Resource in post as at 01/04/26 (F&S): 8.66 FTE Permanent Resource in post as at 01/04/26 (TS): 0.3 FTE Temporary Resource in post as at 01/04/2026: 0.09 FTE (contractors in place for Q1) Pending resource in post for 2026/2027 (F&S): 0 Pending resource in post for 2026/2027 (TS): 0 Total expected in post resource for 2026/2027 (F&S): 8.75 FTE Total expected in post resource for 2026/2027 (TS): 0.3 FTE Total allocated resource for 2026/2027 (F&S): 8.75 FTE Total allocated resource for 2026/2027 (TS): 0.3 FTE Shortfall of resource for 2026/2027 against expected FTE in post (F&S): 1.219 FTE Shortfall of resource for 2026/2027 against expected FTE in post (TS): 0.1 FTE
Note - FTE per activity is calculated as follows - 37 Hour week / 7.4 Hour day multiplied by 52 weeks per annum = 1924 working hours per year.	

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 MIS	The Arcus MIS is not operating sufficiently to allow appropriate and accurate recording, and subsequent reporting, of work carried out by the Food & Safety Team. The situation remains ongoing and issues with Arcus are known widely across the Council. Continuous resource is required, predominantly from the PEHO to work on ongoing fixes and improvements to the database. The time required is unquantified but has an impact on the delivery of items outlined in this plan.
4.	Appointment of non-fully qualified officers	The team currently comprises over 50% unqualified officers who are working towards qualification and competency. These officers have settled in very well and contributing to service delivery but until they have passed their qualifications they are limited in ability to carry out official controls. Ongoing training needs is also impacting the time and available resource of authorised officers.
5.	Appointment of an Environmental Health Assistant (EHA) undertaking the Environmental Health Apprenticeship	On commencement an EHA will not have suitable qualifications or experience to undertake official control work and will require training and development in order to be able to contribute to the majority of work carried out by the Food & Safety Team. There will be a substantial lead-in time before they are able to contribute to the delivery of work outlined in the workplan above. Similarly, to point 4 the training of an EHA will redirect authorised officers from carrying out work outlined within the plan.

