



Food Safety Service Plan 2024-2025

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I. Introduction

The Food Health and Safety service operate as Publica Group Ltd, providing a shared service to Cotswold District Council (CDC), the Forest of Dean DC (FODDC) & West Oxfordshire DC. The Food Health and Safety Service (FHS) operates within the Resident Services department.

This Service Plan is an expression of the FHS commitment to the further development of its food safety service to ensure the safety and wellbeing of those who live within the districts of the Forest of Dean District Council, Cotswold District Council and West Oxfordshire District Council. The plan covers the key areas of food safety regulation, the relevant management arrangements, and service delivery targets.

It has been written in accordance with the guidance issued by the Food Standards Agency (FSA) and includes the information required by the Framework Agreement on Local Authority Food Law Enforcement.

Most of the staff are employed by Publica Group Ltd. The Service Leader has a dual contract with Publica and the 3 local authorities.

I. Background

The three local authorities forming Publica's Food Health and Safety team are based within Oxfordshire and Gloucestershire. A map is included as Appendix I. Each authority is predominately rural.

Key facts:	CDC	FODDC	WODC
Area KM²	1164	526	714
Population*	91,311	87,927	116,300
Main towns	Cirencester Stow on the Wold Tetbury Moreton in Marsh Fairford	Coleford Cinderford Lydney Newent	Witney Carterton Burford Chipping Norton Eynsham Woodstock

*Office of National Statistics – June 2022

A recent Publica Review was undertaken and determined that some services should be reviewed, including whether they should be brought back in-house. It recommended that the commissioner/provider relationship between Publica and the councils be re-considered. Following this, the councils commissioned an independent strategic review of Publica services to provide options for the future of service delivery. The outcome of this was that it recommended that most services would benefit from being brought back in-house.

The FHS will continue to operate business as usual and work with the transformation team to ensure that any changes are implemented with minimal disruption to the service. The timeframe for transition is still to be confirmed. Whether the FHS team remain a shared service is also to be determined.

2. Service Aims and Objectives

The Publica Business Plan 2022 to 2025 sets out the direction of the company.

<https://publicagroup.uk/media/vmkgjb5b/publica-business-plan-2022-to-2025.pdf>

Each Council's vision is contained in the corporate plan

- Our Cotswolds Our Plan 2024-2028

<https://www.cotswold.gov.uk/media/r1rdwcm/our-cotswolds-our-plan-2024-to-2028.pdf>

- Council Plan for the Forest of Dean District Council 2024-2028

<https://www.cotswold.gov.uk/media/r1rdwcm/our-cotswolds-our-plan-2024-to-2028.pdf>

- WODC – Council Plan 2023 – 27

<https://www.westoxon.gov.uk/media/fv5foehk/west-oxfordshire-council-plan-2023-to-2027.pdf>

The FHS service incorporates the following priorities from the Council plans.

- Responding to the climate emergency by increasing digital services and reducing mileage.
- Providing technical information and support to existing and startup businesses.
- Promoting food and health and safety training to improve the skills of the district's workforce.
- Support the transition to bring council services back in house.

In line with Publica's Business Plan targets have also been set to address

- Planet – how we tackle the climate change.
- People – how we engage with our staff.
- Place – how we provide great services to residents and businesses.

The FHS service is committed to improving food safety outcomes and using available resources to deliver its priorities and interventions in support of these plans.

This will be achieved through developing our confidence in the management of food businesses and a mixture of education, programmed interventions, the investigation of complaints and sampling enforcement initiatives. We will work efficiently to reduce our impact on the environment.

A high level of confidence currently exists in relation to the general standard of food premises in the districts. Most food businesses are broadly compliant and have a history of being so.

Percentage of Food Businesses that are Broadly Compliant:

	CDC	FODDC	WODC
1 April 2024	94	94	96
1 April 2023	95	97	95
1 April 2022	91	97	91

Most businesses within the 3 districts have been found to be run professionally with responsible management, supported by our comprehensive interventions. Improving standards is often driven by the FSA's Food Hygiene Rating Scheme. Businesses that are not broadly compliant are revisited and if necessary, action is taken to ensure standards improve to be generally satisfactory.

4. Organisational Structure

The food team has officers based in Cirencester, Coleford and Witney. Most staff choose to work from home, most of the time, when not undertaking work on the district. All officers are authorised to work across the 3 LA areas. The team work flexible hours generally between 08:00 and 1900 Monday to Friday. Other hours are worked as necessary to complete food hygiene interventions during business operating hours. The Service leader reports to the Business Manager. An organisational chart is attached as Appendix II.

Two career development roles were incorporated within the FHS during 2022/23. Both of these officers completed their professional qualifications during 2023 and are both now registered with the Chartered Institute of Environmental Health.

During 2023 the admin role within the food team was moved to a different team within the same service, the Resource Services Group, who now provide this service to the team.

The Officers within FHS together with the specific tasks that are allocated is shown below.

Officer	Designation	Responsibility
Ruth Levett (0.8 FTE)	Service Leader	Development of policy and service planning. Overall operational management of the service and monitoring of performance. Involvement with specialist matters in relation to food safety. Lead Food Officer.
Eileen Pengelly (0.2 FTE)	Service Leader (1 day per week)	Management of Official Controls and overall operational management in the absence of Ruth Levett.
Rob Akers (0.6 FTE) Eileen Pengelly (0.8 FTE) Dennis Fettis (1 FTE) Beth Pritchard (1 FTE) Sue Ponting (1 FTE)	Senior Officers	Inspection and approval of premises including complex cases. Investigation of complaints & infectious diseases. Food sampling. Taking the lead in legal cases. Provision of technical and legal advice. Enforcement action. Mentoring and training.
Mike Irvine (1 FTE) Liz Walters (1 FTE) Vacant (1 FTE)	Officers	Inspection of food premises. Investigation of complaints & infectious diseases. Food sampling. Provision of technical and legal advice. Enforcement action. Assessment and verification of completed food business questionnaires. Project work.

Caroline Woodward (0.6 FTE)	Regulatory Support Officers	Triage service requests; processing and assessment of category E questionnaires; processing response to infectious disease notifications; project work; supporting food officers and admin.
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Customer Services provide additional support as the first point of contact for external calls. Scripts are provided to customer services to enable them to process enquiries such as new food business registrations and the purchase of Safer Food Better Business packs.

5. Scope of the Food Service

The FHS service is responsible for the delivery of statutory duties covering enforcement and promotion in the areas of:

- Food Safety and Hygiene
- Workplace health and safety and
- Prevention and control of infectious diseases

The service prioritises work in line with the food safety risk and the FHS key performance indicators. It is otherwise driven by statute, codes of practice and additional guidance provided by the Food Standards Agency.

The Service carries out the following functions.

- Information and advice/guidance to local businesses to assist them in complying with their legal responsibilities and promote good practice. Some charges for this service may apply.
- Planning interventions to food premises in accordance with risk to ensure they comply with food safety legislation.
- Ensuring that manufacturers which require approval under Assimilated Regulation 853/2004 (meat products, dairy products, fish products) are compliant with such legislation.
- Undertaking sampling and analysis of foods to check the compliance with safety requirements.
- Investigating alleged contraventions in relation to the sale of food and unlawful operation of a food business.
- Investigating complaints in relation to food and food businesses.
- Investigating, preventing, and controlling outbreaks and incidents of food poisoning and food borne disease.
- Responding to Food Alerts (issued by the Food Standards Agency).
- Carrying out formal enforcement if necessary, including the seizure and detention of food, service of notices, closure of premises and prohibition of food business operators.
- Educating and training business staff in food hygiene matters.
- Maintaining the register of food businesses operating within the district.
- Responding to notifications of illegally imported food
- Provision of health certificates for manufacturers to export food.

The service also provides the following additional functions:

- Health and safety interventions and enforcement in commercial premises including food businesses.

- Investigation of reportable accidents, occupational diseases, and dangerous occurrences.
- The investigation of alleged contraventions in relation to workplace health and safety in businesses enforced by the local authority.
- Consultation with external agencies and internal services i.e., licensing, trading standards, planning.
- Miscellaneous projects as they arise e.g. Visits to Funeral Directors (MoJ DLUHC)

6. Demands on the Food Service

At present there are 3265 food premises registered within the 3 districts that require inspections. There has been an increase of 174 businesses across the 3 districts, since last year, the majority falling within the retail, restaurants and caterers’ category of business. Most of the businesses are small with limited internal technical support and therefore often seek advice during our inspections.

Food premises by type April 2024	Number In CDC	Number in FODDC	Number in WODC
Primary Producers	4	12	9
Manufacturers/Packers	133	68	168
Importers/Exporters	8	1	4
Distributors/Transporters	17	10	16
Retailers	245	175	211
Restaurants and other Caterers	762	568	807
Total	3265	881	1215

There are 43 approved premises producing a range of products of animal origin including dairy, fish, meat, and egg products. Approved premises are businesses that produce food that is not supplied directly to the final consumer. These businesses must meet additional hygiene and safety requirements and demand additional officer scrutiny. Approved premises must seek prior approval before they can start to operate. There are some exemptions to the requirement for approved premises. They are generally high-risk premises that require additional scrutiny regarding their operating practices.

7. Service Delivery

7.1 Food Premises Profile & Interventions

The FHS service follows the guidance given in The Food Safety Act 1990 Code of Practice in relation to food premises interventions. Consistency exercises are undertaken by all officers annually and during joint inspections. Food businesses are categorised after each intervention according to the food safety risk. The categories range from A to E with E being low risk. New businesses which have not yet been inspected are ‘unrated’ until the initial inspection has been completed. An assessment of risk of each new business is carried out at the time of registration and high-risk premises are prioritised for inspection. Some food businesses are registered in the district but do not require inspection because no food is stored or processed by that business within the district e.g.: mobile food vehicles operating in neighbouring districts.

Table: Risk profile of food business April 2024:

Premises Risk profile	Risk Category	Minimum Frequency of Intervention (Months)	Number of Premises at 1 Apr 2024 at CDC	Number Of premises at 1 Apr 2024 at FODDC	Number Of premises at 1 Apr 2024 at WODC
High Risk	A	6 months	6	1	0
	B	12 months	46	8	25
Medium Risk	C	18 months	193	84	140
	D	2 years	399	307	426
Low Risk	E	3 years	463	435	581
Other	Not Rated		50	45	43
	Food Premises outside programme		12	4	49
Total		3330	1181	885	1264

Food businesses are inspected at a frequency determined by the Food Law Code of Practice according to the risk category.

Table: Intervention programme for 2024-25

(Including any overdue from 2023-24)

Interventions due in 2022-23	Inspection/ Intervention Frequency	Number In CDC	Number In FODDC	Number In WODC
Category A	Twice a year	5	0	0
Category B	Annually	46	7	25
Category C	Every eighteen months	134	51	97
Category D	Every two years	194	192	245
Category E	Alternative enforcement strategy every 3 years	95	97	135
Unrated (estimated)	To be rated	172	114	195
Revisits (estimated)	As required	18	3	5
	Total 1830	664	464	702

7.2 Intervention programme

The food intervention programme is carried out in the following manner:

All new food businesses require an inspection and are then rated according to their risk.

A, B & C rated premises require inspections at the allocated frequency as determined by the Code of Practice.

D rated premises required inspections until the business is broadly compliant. An alternative intervention to inspections may be used in broadly compliant premises.

E-rated premises: 95% of these will be subject to an alternative enforcement strategy. A questionnaire will be sent to these businesses. The remaining 5% of premises will receive an inspection to verify the questionnaire process. Any non-responders to the questionnaire will be followed up until an intervention is completed.

The above approach is in line with the Code of Practice and attempts to improve efficiency and provide best value of existing resources.

We aim to undertake all category A-C interventions within 28 days of the due dates and complete all the due interventions by the end of the year.

7.3 Enforcement

Enforcement action is undertaken in accordance with each local authorities Enforcement Policy, which follows a graduated approach, unless immediate action is necessary to protect public health.

During 2023/24 the following enforcement action was taken.

Type of action	CDC	FODDC	WODC
Written Warning	289	79	162
Improvement Notice	1	0	2
Hygiene Emergency Prohibition Notice	1	0	0

Staff are assessed for competence and work is allocated accordingly. The team is small, and the Senior Officers require a wide range of knowledge. The Counter Fraud Team and Legal Services support cases involving formal action. Senior Officer lead on enforcement cases and Officers must be supervised during any enforcement action.

7.4 Food Service Requests & Advice

Requests for service are dealt with by the team. The nature of service requests varies and includes businesses seeking advice and complaints about poor practices or unfit food. Responses are risk based and proportional.

Food service requests 2023-2024:

	CDC	FODDC	WODC
Food complaints	26	29	33
Hygiene of premises	28	20	41
Other food related issues	112	118	142
Total	166	167	216

Advisory visits to businesses are only carried out when deemed necessary. Advice is limited to interpretation of the law in relation to the business and does not extend to detailed design advice.

The Council provides a range of advisory materials on the Council's website. The website also includes links to external sites that are of interest to food business operators.

To assist minority ethnic groups a range of material is available in languages other than English and facilities for translation are available.

All service requests are entered onto the service request module, on the Uniform database system, and are allocated to an officer. Officers are required to respond within 2 days and resolve service requests within 21 days. 83% of service requests were responded to within 2 days and 87% resolved within 21 days during 2023/24. This is below our target of 90% and is therefore an improvement planned for 2024/25. Officers will prioritise responses according to the risk.

7.5 Primary Authority Agreement

The Regulatory and Enforcement Sanctions Act 2008 established Primary Authority as a statutory scheme for businesses trading across local authority boundaries. Businesses can enter into a formal agreement with a local authority which then acts as its Primary Authority.

The primary authority has responsibility for providing regulatory advice, may issue statutory advice to other local authorities and produce an inspection plan to which all enforcing authorities must have regard. If other enforcing authorities have concerns in respect of the business, they should be discussed with the primary authority at an early stage. Enforcement considerations should be referred to ensure consistency with previous advice.

WODC has a primary authority agreement with Daylesford Organics Ltd who currently have premises in Oxfordshire, Gloucestershire, and London. The service aims to work with the company to keep pace with developments and advise accordingly. An Inspection Plan is in place for Daylesford Organic. The plan directs the scope of other Local authority inspections at Daylesford Organic premises. There are resource implications for the Primary Authority work. Any work that is beyond a basic service may be charged to the business.

Last year the Forest of Dean set up a Primary Authority agreement for food safety with Jones Food Company. The agreement covers food safety within the packing area.

The BRDO list of Primary Authorities is used by officers in relation to interventions and the consideration of appropriate enforcement action. Reference is made to Primary Authorities for any businesses, in an agreement, prior to action and enforcement, and due regard paid to advice provided by the Primary Authority and any inspection plans where these have been adopted.

There are several producers of foodstuffs across the districts including Suntori (Lucozade), Pizza Express and Severn & Wye Smokery. Each LA acts as a home or originating authority speaking to other Local Authorities regarding these businesses should incidents arise outside our district.

7.6 Export Health Certificates

Although not a legal requirement the team support local food businesses exporting product by producing

- Attestation certificates to indicate the businesses are inspected against legal standards and are operating in accordance with the food legislation and
- Export Health certificates to indicate the requirements of the receiving country.

During 2023 – 24 the service issued 241 export health certificates to businesses for the purpose of export to third countries which now includes Europe. Since the UK left Europe, the process for issuing export certificates has changed and this has resulted in Officers requiring additional training to meet the competency level required to prepare the relevant certificates.

No. of health certificates issued in 2023-24:

CDC	FODC	WODC	Total
9	224	8	241

7.7 Imported Food

From 31 January 2024 the requirements for animal products and high-risk food not of animal origin that are imported into Great Britain changed. The Border Target Operating Model was implemented. The changes require additional notifications, paperwork and checks to be made at the border. If the correct procedures are not followed the product will be considered an illegal import and, in some cases, it will be inland before this determination is made.

We have been involved in a small number of illegal imports and queriers about exports relating to the changes. We do not anticipate that the demand on the team will be great from this new area of work, but it is our intention to monitor it during 2024/25. To date all enquiries have been time consuming as the team must work through the new requirements for each case.

7.8 Events

Licensed and unlicensed events, including festivals, car shows, equestrian events, etc are held in the district primarily during the spring and summer months. Safety Advisory Groups are attended, and advice given to event organisers via this forum. The food team determine which events they wish to have further input into based upon several factors including the expected number of attendees, the risk, the history of the event and local intelligence. Liaison with some event organisers occurs prior to events, to ensure food safety. Officers may inspect food businesses during events to ensure food safety is being implemented. Some events, particularly the new events, require a significant input from officers to ensure adequate provision is made for food safety.

7.9 Sampling

The sampling plan for 2024/25 includes taking part in a coordinated sampling programme coordinated by the United Kingdom Health Security Agency (UKHSA) as well as sampling from approved premises. Samples may be taken as part of routine interventions, investigations and to support small businesses to establish the shelf life of their products. The Council's sampling

programme is agreed by and forms part of the Gloucestershire Food Liaison Group’s programme of work.

Samples may provide evidence in cases where legal action is being considered.

A minimum of 10 food samples will be submitted from each LA. In addition to food samples environmental samples may also be obtained. When sample results do not meet the microbiological standard, risks are assessed, and the business is informed. Following appropriate action by the business resamples are taken until satisfactory results are obtained.

2024/25 Sampling Plan

	Approved Premises	National Surveys	Other
CDC FODDC WODC	Samples will be taken from approved premises during every other scheduled inspection.	Each LA will take part in at least one national Survey per year.	Environmental swabs and food samples will be undertaken proactively and reactively when deemed appropriate as part of routine work.

Food Samples sent to Public Health Laboratory 2023/24

	CDC	FODDC	WODC
No. of food samples submitted	14	22	10
No. of environmental swabs submitted	38	46	0
No. of unsatisfactory microbiological results	7	18	0

Private water supplies are sampled by the Technical Pollution Service. If a sample fails in a commercial food premises the Food and Safety team are informed and appropriate follow up action is taken to ensure food safety.

The Service uses either Hampshire Scientific Service or the Public Analyst Scientific Services in Wolverhampton as its Public Analyst. The Public Analyst will analyse the content of food and also identify foreign bodies found in food. Analytical services for clinical and microbiological food samples are provided by the UKHSA Food, Water & Environmental Microbiology Laboratory.

7.10 Control & Investigation of Outbreaks and Infectious Disease

The Council is notified of cases of communicable diseases as required by legislation. Most of the notifications that are received are food poisoning and associated with food consumption. Each case is investigated in accordance with the single case protocols of UKHSA Southeast and UKHSA Southwest regions. The response ranges according to the nature of the pathogen and any action UKHSA has already taken. For example, we send letters and information to individuals who are infected with campylobacter, and we contact those infected with salmonella or E. coli to gather information about their potential exposure. Information gathered is used to try to identify the source of infection to prevent further infection and to stop the spread of that disease. Outbreaks (two or more associated cases) are investigated in accordance with the Outbreak Control Plan for each region. These investigations are carried out in consultation with the Consultant in Communicable Disease Control based at UKHSA and other relevant bodies. Investigation of these cases may involve contacting many people and collecting samples. If there is a common potential

source, such as a wedding venue or restaurant, an investigation into food safety practices will be carried out.

Some pathogenic disease and outbreaks are categorised as ‘high risk notifications’ and as such are responded to on the day of receipt.

During 2023/24 the food team were notified of 511 cases of infectious disease. The most common cause of illness that was notified was campylobacter.

	CDC	FODDC	WODC	Total
No. of cases reported	169	137	243	511

7.11 Food Safety Incidents/Food Alerts

Food safety alerts are issued by the Food Standards Agency. They are issued when a food safety incident requires intervention by a business to prevent an actual or suspected threat to safety. The food products are often recalled and withdrawn from the market. They are dealt with in accordance with the Food Safety Act 1990 Code of Practice. During 2023/24, 60 food alerts relating to food safety were received. In most cases there is no action required by the local authority when a food alert is received. Additional food alerts were issued relating to food labelling errors which in the most cases relate to inaccurate labelling of allergens which are followed up by Trading Standards.

Depending on the severity of the food alert and the advice given by the Food Standards Agency action may involve direct contact with affected businesses. Where necessary there is liaison on coordinated action through the County Food Group, and action may involve both Environmental Health and Trading Standards officers.

When an incident arises in one of our 3 local authorities’ action must be taken in accordance with the Food Law code of practice (England). This can involve officers working with the food business and the FSA to ensure food is recalled from the market, withdrawn from sale and the public notified of the food risk.

During 2023 Officers were involved in an incident relating to biscuits containing moth larvae which made these products unsafe to eat.

<https://www.food.gov.uk/news-alerts/alert/fsa-prin-03-2024>

7.12 Liaison with Other Organisations

There is a formally constituted Thames Valley and Gloucestershire Food Liaison Group which both meet quarterly with representation from each food authority, UKHSA, Trading Standards and the FSA. The group discusses topical issues, enforcement action, consistency and organises training events.

There is a close working relationship managerially and operationally between adjoining authorities and where necessary with other County groups. Joined up work is often linked to outbreaks of foodborne illness which occur and mobile food vendors who operate across district boundaries. Inter authority audits are arranged through the County groups. During 2024/25 Gloucestershire will undertake an inter authority audit in relation to authorisations, service plans and inspection forms.

Many queries are resolved through discussion at these groups. Other controlling bodies or government inspectors are consulted on specific issues as relevant eg: Defra, APHA and the egg inspectors.

If matters can not be resolved at the county food groups matters are escalated to the Food Hygiene Focus Group led by the FSA.

The team is represented and a contributor to the Food Hygiene Delivery Model Local Authority / Food Standards Agency Working Group which is part of the ongoing process to review how the work of Food Teams will be undertaken from April 2025.

A representative of the local authority also attends the following meetings:

- the Specialist Cheesemakers Association to increase our knowledge within this field.
- the SE and SW Primary Authority Regional Group.
- The SW Regional Environmental Health Practitioners and UKHSA Network.
- The South East and South West Zoonoses Network Meeting.

7.13 Food Safety Promotion

The Council will promote awareness of food safety issues through direct contact with food businesses during interventions. FSA campaign toolkits are forwarded to our Communication team for publication. The FHS team undertook a project during 2023/24 to improve digital relationships with food businesses. During 2024/25 a programme of communication is planned to commence regular contact with food businesses to promote food safety and better digital relationships.

Communication Plan 2024/25

Objective: To send at least three educational emails to food businesses during the year.

7.14 Food Standards Agency Food Hygiene Rating System

The Food Hygiene Rating System provides informed choice for consumers and is a strong incentive for businesses to improve standards of hygiene and hence improve their rating. The scheme involves rating food premises, following inspection, issuing window stickers and publishing ratings on the FSA website. Not all types of registered food businesses are included within the scope of the scheme.

The Food Hygiene Rating of premises in the districts is shown below.

Food Hygiene Rating (April 2024)	CDC		FODDC		WODC	
	No.	%	No.	%	No.	%
0 -Urgent Improvement necessary	0	0	0	0	0	0
1 – Major Improvement necessary	12	1	1	0	4	0.5
2-Improvement necessary	8	1	1	0	3	0.5
3-Generally satisfactory	34	3	5	1	7	1
4-Good	76	8	48	7	98	9
5-Very good	852	87	629	92	933	89
Total included in scheme 2711	982		684		1045	

Businesses are awarded a food hygiene rating following a food inspection. Businesses can request revisits to be rescored and awarded a new rating once they have carried out any necessary improvements. There is a fee for a rescoring revisit, this is in accordance with the FSA guidelines. A business may also appeal their rating within 21 days of inspection for which there is no charge.

No of FHRS revisits and appeals completed during 2023/24

Request Type	No. at CDC	No. at FODDC	No. at WODC
Revisits	25	1	3
Appeals	0	0	0

8 Resources

Resources are focussed on the FSA Food Law Code of Practice and the Council's corporate aims.

Financial Allocation

The financial allocation for the Food and Safety Service is £470,940 for employment cost and direct expenditure. There has been no reduction in the staffing budget from last year.

Staffing Allocation

The team is made of Food and Health and Safety Officers. The team consists of 9.2 full time equivalent permanent staff authorised for food and health and safety work. During 2023/24 two officers completed their professional qualifications to become registered with the Chartered Institute of Environmental Health. The team are allocated work according to their level of competence.

9.0 Quality of Service

9.1 Staff Competence and Development Plan

It is the intention of the Council to ensure that all staff receive adequate training to satisfy the requirements of the Food Safety Act 1990 Code of Practice and Chartered Institute of Environmental Health membership.

All staff who undertake interventions must receive a minimum of 10 hours core food training per year. This is provided by external and internal training. All training is recorded on individual officer training records. CIEH members must complete 20 or 30 hours of training depending upon their level of membership.

Competency is assessed in accordance with the Code of practice and training is reviewed as part of Publica's Performance & Development Review process and during monthly 1:1 meeting.

9.2 Quality Assessment

An Internal Monitoring procedure is in place to assess the quality of food interventions. The system ensures that officers are consistent in their approach during inspections and operating to a satisfactory standard.

Monitoring and verification checks are undertaken in respect of interventions by officers and comprise of an accompanied inspection with the Service Leader at least every 12 months. During these joint visits the officers are assessed in their inspection techniques and follow up action. Each Officer will also undertake at least 2 peer review visits with other officers. Annual consistency exercises are undertaken within the team. Any decision to reduce the frequency of inspections is verified post inspection by the Service Leader after scrutinising the officer's decision. The discussion of issues arising in the course of day-to-day work is encouraged within the team, at catch up meetings, team meetings and training days. Each Officer also has a monthly one to one and annual appraisal with the Service Leader.

Officers complete a competency assessment prior to authorisation or upon return to work after an absence of 6 months. Officer's authorisations are based on their level of competence.

9.3 Performance Management

The performance of the team against the Food Law Code of Practice, key performance indicators and the Service Plan is managed through:

- Fortnightly updates with the Business Manager
- Monthly review of data with the Business Manager
- Monthly Team meeting to feedback on the performance and put in place actions.
- Quarterly review of the following key performance indicators
- Six monthly returns to the FSA is also used as a check on data quality and performance
Routine uploads of data to the FSA FHRS website also serve as an opportunity for data quality and performance

	Key performance indicator
1	To respond to high-risk notifications on the same day eg: outbreaks of food poisoning and high-risk infectious diseases. (KPI)
2	To revisit food businesses that are less than satisfactory (Food hygiene rating 0-2) to ensure improvement are made to become broadly compliant within 4 months
3	To undertake interventions at category A and B food premises within 28 days of the date they are scheduled for a routine inspection.

If a review of performance indicates that targets might not be achieved, then the premises presenting the highest risk are targeted for priority action.

The Service Plan is a statement of the Council’s commitment to the delivery of its food safety function. It is important that the plan recognises the need for public confidence in local food safety. It is felt that the most important perceived contribution to food safety is through regular interventions at food premises. Efforts will be made to ensure that premises are correctly risk-rated and receive interventions in accordance with the Code of Practice.

10. Review of Performance against targets set for 2023 – 24

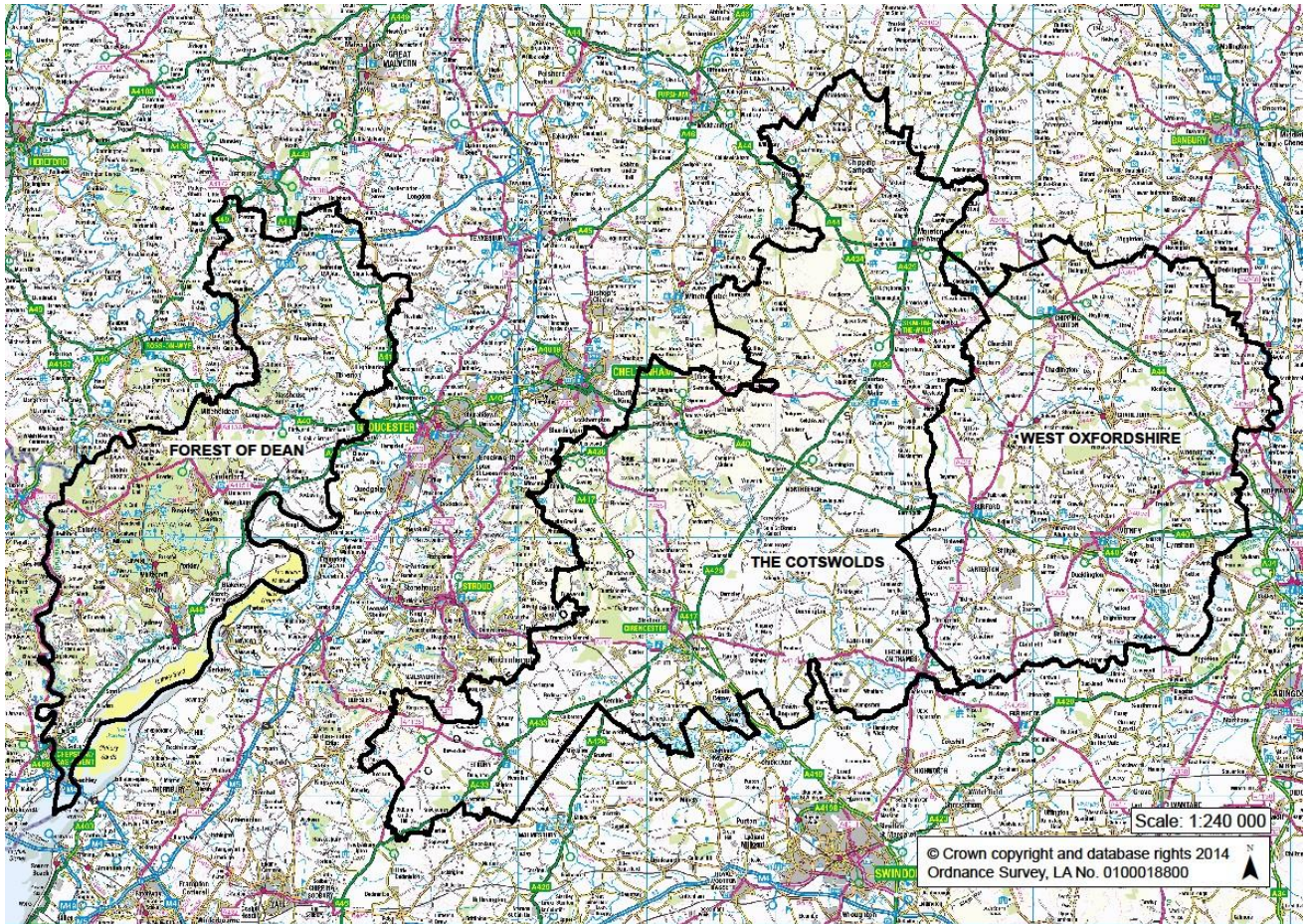
	Objective	Measure of Achievement	Outcome
1	To reduce our carbon footprint by replacing paperwork with digital devices.	Move from paperwork to digital devices by April 2024.	Not achieved. We continue to create paper records and issue paper reports.
2	To respond to high-risk notifications on the same day eg: outbreaks of food poisoning and high-risk infectious diseases. (KPI)	100%	100%
3	To revisit food businesses that are less than satisfactory (Food hygiene rating 0-2) to ensure improvement within 4 months. (KPI)	Businesses improve to a satisfactory standard within 4 months or officers continue to take action to rectify non-compliance.	100%
4	To make an initial response to all complaints and requests for service within target timescale. (Service standard).	90% of complaints completed within target. (2 days response time & 21 days completion). Response Total 83% CDC 84% FODDC 95% WODC 70% Resolution Total 87% CDC 85% FODDC 86% WODC 89%	Not achieved. Improvement on this performance will be a target for 2024/25.
5	To carry out interventions in premises in accordance with the Food	Complete all category A-C interventions and 90% of category D. FODDC and WODC missed 1 category C inspection and CDC missed 2 category C	Category A-C 99% inspected. Target of 100% was not achieved. Category D Target was achieved.

	Law Code of practice.	inspections. The missed inspections were completed in April/May 2024.	
6	To complete the food sampling plan.	To collect a minimum of 10 food samples in each LA.	Achieved
7	To continue to review working procedures and associated documents.	Officer Working Procedures reviewed in line with schedule.	Achieved
8	To support trainee Food Officers to complete their qualifications.	Completion of professional qualifications by 2 officers.	Achieved
9	Improve digital relationship with food businesses	Seek authorisation to use all contact email addresses for relevant communications.	Achieved
10	Review the list of food businesses deemed Out of Programme, which do not have an intervention.	Ensure the businesses on this list are categorised appropriately.	Achieved
11	Review the content of the webpages.	Content will be up to date.	Achieved
12	Undertake a project focussing on the method of food production in lunch clubs serving vulnerable people.	Provide guidance to all registered lunch clubs serving vulnerable people and assess food practices against the guidance during scheduled interventions.	Achieved

11. Targets and planned improvements for 2023/24

	Objective	Measure of Achievement
1	To reduce our carbon footprint by replacing paperwork with digital devices.	Move from paperwork to digital devices by April 2026.
2	To respond to high-risk notifications on the same day eg: outbreaks of food poisoning and high-risk infectious diseases.	100%
3	To revisit food businesses that are less than satisfactory (Food hygiene rating 0-2) to ensure improvement within 4 months	Businesses improve to a satisfactory standard within 4 months or officers continue to take action to rectify non-compliance.
4	To make an initial response to all complaints and requests for service within target timescale.	Improve the response to complaints and resolution to complaints to meets the target on 90% of occasions. (2 days response time & 21 days completion).
5	To carry out interventions in premises in accordance with the Food Law Code of practice.	Complete all category A-C interventions and 90% of category D.
6	To complete the food sampling programme.	To collect a minimum of 10 food samples in each LA.
7	To continue to review working procedures and associated documents.	Officer Working Procedures reviewed in line with schedule.
8	To support trainee Food Officers to complete their qualifications.	Completion of professional qualifications by 1 officer.
9	To improve digital relationship with food businesses	Send at least communications to food businesses with a view to engaging the audience for further messaging.
10	Continue the Lunch Club project initiated in 2023/4 focussing on the method of food production in lunch clubs serving vulnerable people.	Provide guidance to all registered lunch clubs serving vulnerable people and assess food practices against the guidance during scheduled interventions.
11	To manage data accuracy	Implement a documented procedure and periodic check of data to identify errors and gaps. Take action to rectify data errors.
12	To review our delegations, inspection form and service plan	To participate in the Gloucestershire, Inter Authority Audit and implement identified actions within our 3 LAs.

Appendix I – Map of District



.Appendix II

