

## **1. Service Aims and Objectives**

### **1.1 Aims and Objectives**

- 1.1.1 The food service function of Brighton & Hove City Council is enforced by Environmental Health and Trading Standards staff within Regulatory Services under the Head of Planning and Public Protection who reports to the Executive Director of Environment, Development & Housing.
- 1.1.2 Environmental Health & Licensing staff are primarily concerned with protecting and improving public health and the environment across the City. Within this service food safety officers work to ensure that food prepared and sold from local establishments is safe. This is achieved by carrying out a programme of interventions at food businesses, sampling and responding to service requests. Wherever practicable links are formed with the business community and all relevant professional groups with the objective of increasing and promoting food safety awareness.
- 1.1.3 The overall objective of the service is to provide a comprehensive food safety service to benefit consumers and the business community, with a considered balance between enforcement, investigation, advice and education.
- 1.1.4 Trading Standards officers aim to provide a comprehensive range of enforcement and advisory services to the community within a statutory framework. Its goal is to contribute, in conjunction with other agencies, to the development of a safe, fair and equitable trading environment for all consumers, by means of advice, information, education and enforcement.

The core aims being to ensure: -

- Accurate and informative labelling of food; and
- That compositional standard of food is maintained.

The objectives being: -

- To carry out risk-based and intelligence led activities;
- To undertake screen testing and food sampling to reflect identified areas of concern;
- To respond appropriately to food complaints and initiate proportionate action;
- Respond to trader requests in a timely manner; and
- To educate the public on compositional and labelling issues to improve eating habits.

## **1.2 Links to Corporate Objectives and Plans**

1.2.1 Brighton & Hove City Council's Corporate Plan 2011-2015 is structured according to its four priorities of:-

- Tackling inequalities
- Creating a more sustainable city
- Engaging people who live and work in the city
- Responsible and empowering employer

1.2.2 The service has strong links with these priorities. In particular the outcome to reduce health inequalities and long standing public health issues as part of the priority of tackling inequalities. This includes the desire to continue with high profile enforcement of food safety standards and maintaining an excellent record of environmental health improvements.

1.2.3 The Official Feed and Food Control Service Plan is part of the corporate annual planning and development process.

1.2.4 The service has a published Enforcement Policy. This policy is a cornerstone for fair and open enforcement.

1.2.5 The service continually monitors business opinion through satisfaction surveys. This fits in with the priority of engaging people who work in the city. The findings help to ensure that the service meets the requirements of local businesses, residents and visitors and provides a service the city deserves.

## **2. Background**

### **2.1 Profile of the Local Authority**

2.1.1 Brighton & Hove is a unitary authority on the south coast of England. It is approximately 50 miles from London. Bounded by the English Channel to the south and the South Downs to the north, it covers an eight-mile stretch of seafront and extends inland for approximately five miles.

2.1.2 The total resident population of Brighton & Hove as at the 2011 Census was 273,369. Demographic information is available from online Brighton & Hove Local Information Service <http://www.bhlis.org/> .

#### **Resident Population by Ethnic Group 2011 Census**

White British, Irish, mixed and other	243,512
Asian or Asian British	11,278
Black or Black British	4,188

2.1.3 Tourism plays a major part in the local economy. Figures from the VisitBrighton Strategic Partnership 2010 estimate that 15% to 20% of jobs in the city are tourism related and eight million visitors bring £400 million into the local economy. The city boasts 4293 bedrooms, offering a bed stock of approximately 10,000. There is a large variety of hotels, food retailers and over 400 restaurants serving cuisine from around the world. The VisitBrighton Visitor Survey 2007 identified that 70% of visitors put going to a restaurant or place to eat as one of the most popular activities to do in Brighton & Hove.

## **2.2 Organisational Structure**

2.2.1 Brighton & Hove City Council is a unitary authority that operates a committee system model. Responsibility for the food safety and standards services is delegates to the Environment & Sustainability Committee.

## **2.3 Scope of the Feed and Food Service**

2.3.1 A specialist Food Safety Team within Environmental Health carries out the food safety function. The work of the team includes:-

- Inspecting food premises:-
- The investigation of food safety complaints;
- Food poisoning investigations when linked to a premises;
- Investigating infectious disease notifications;
- Microbiological food sampling;
- Food safety training;
- Responding to requests for advice;
- Initiatives relating to working with the community and businesses;
- Taking appropriate steps to publicise and act upon national food alerts;
- Publicising the food hygiene standards of local businesses.

2.3.2 The food standards function is carried out by Trading Standards Officers in the Business Support Team. The work of the team includes the following: -

- Risk based enforcement activity;
- Complaint investigation;
- Food analysis and investigation;
- Service Requests from businesses;
- Education programmes;
- Reacting to Food Alerts.

2.3.3 Food Standards work is undertaken in conjunction with work on other areas of Trading Standards law. For instance, a programmed food visit will also include giving advice about other matters such as prices, business names and weights and measures. In this way, a comprehensive visit is under taken so as to minimise any inconvenience caused to the general day-to-day running of the business.

2.3.4 Both Trading Standards and Environmental Health officers have responsibility for enforcing relevant legislation in respect of imported product of animal origin and non animal origin, The food safety team deal with microbiological issues and Trading standards, compositional standards and also contaminants which includes mycotoxins and chemicals.

## **2.4 Demands on the Feed and Food Service**

### **Food Safety**

2.4.1 As at January 2014, there are 3285 food businesses registered. These premises are broken down into the following profile:-

3	Primary Producers
43	Manufacturers/Processors
1	Packers
4	Importers/Exporters
29	Distributors/Transporters
626	Retailers
2577	Restaurants and other Caterers
2	Manufacturers Selling Mainly by Retail
3285	TOTAL

2.4.2 Three food businesses are approved under Regulation (EC) 853/2004 for specific dairy, fish and meat products processing.

2.4.3 The nature of the city causes a considerable seasonal variation in the department's workload. Some businesses only open during spring, summer or school holidays, the intervention programme has to be tailored to meet these service needs. There is a dramatic increase in the number of visitors in the spring and summer and this increases the volume of requests for service, enquiries and other reactive work. Outdoor events such as music events, festivals, specialist markets, farmers' markets, open-air concerts and funfairs also add to the seasonality of the workload.

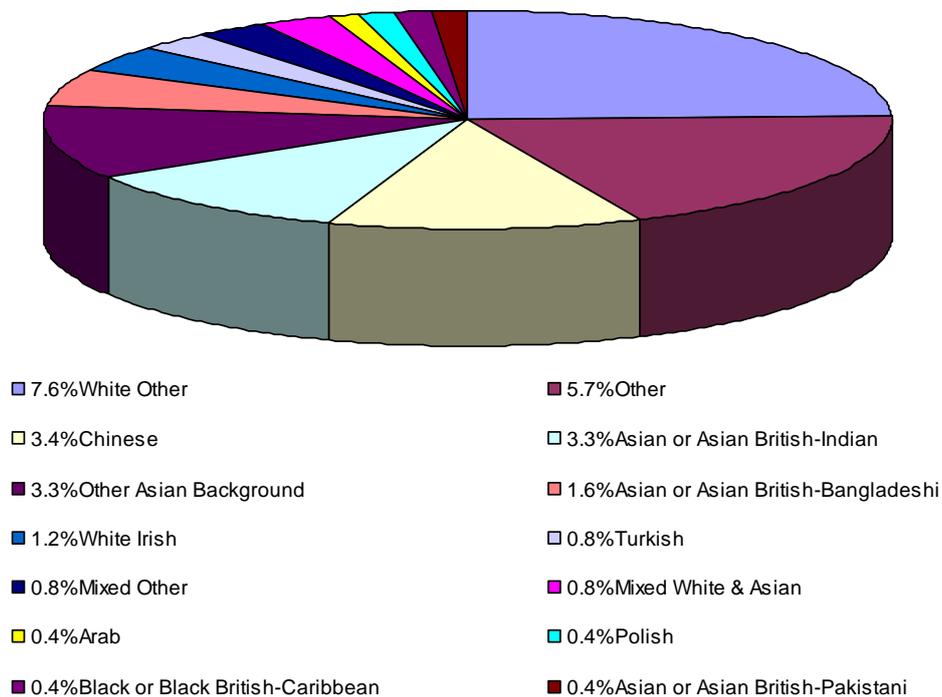
### **Food Standards**

2.4.4 Premises data is captured on Uniform and therefore the premises profile is the same but as the risk assessment is based on the LGR scheme the individual premises have a different inspection frequency for Food Standards. As of the 8 January 2014, 2363 premises were considered to have an 'inspectable risk' for Food Standards work. It has been noted that there is a high turnover of new premises requiring food standards advice.

## Access to services

2.4.5 As part of the drive for continued improvement and dialogue with businesses, all establishments are requested to complete feedback questionnaires following inspections. The questionnaires request information on the ethnic origins of the business owners. Of the questionnaires returned between April 2012 and March 2013 69.8% of the respondents identified themselves as White British. The ethnicity of the remaining was as below.

**Ethnicity of Food Businesses Where Notified  
2012/2013**



2.4.6 In addition to having a number of key food safety advice leaflets in a variety of languages, the service has the capacity to have any leaflet, letter or other document translated as required. Wherever possible, opportunities are taken to provide information about services to ethnic communities. Where necessary, interpreters accompany officers on planned interventions. Where necessary, officers can access The Big Word On-Call Language Service by telephone when carrying out visits.

2.4.7 Access to the service is provided by:

- Visiting either Bartholomew House or Hove Town Hall Customer Services Centres, opening hours 8:45am to 4:30pm on weekdays;
- Self-help points across the city including all the main council offices, libraries, leisure centres and some schools;

- General telephone calls to the Call Contact Centre on (01273) 292161;
- Advice can also be accessed via the council's website, [www.brighton-hove.gov.uk](http://www.brighton-hove.gov.uk);
- Email to [ehl.food@brighton-hove.gov.uk](mailto:ehl.food@brighton-hove.gov.uk).

2.4.8 Food Standards complaints are initially received by Citizens Advice Consumer Service. There is a referral protocol regarding food issues requiring enquiries to be sent to Trading Standards within 24 hours.

2.4.9 The food safety team operates a hotline where businesses and consumers can obtain immediate advice from a food safety officer, during office hours. Senior food competent environmental health staff provide cover for an out of hour's service to respond to food safety emergencies and incidents.

2.4.10 New food businesses registering with the service are provided with access to a wide range of online documents hard copies can be provided on request to assist compliance with food safety legislation.

## **2.5 Regulation Policy**

2.5.1 The Council has a Corporate Enforcement Policy in line with the national Regulators Compliance Code for Enforcers. The enforcement policy is grounded in better regulation principles of proportionality, accountability, consistency, transparency and targeting.

2.5.2 Any breaches of food law noted in businesses where Brighton & Hove City Council has an interest, either as proprietor or responsibility for structural repair, are brought to the attention of the Chief Executive without delay.

## **3 Service Delivery**

### **3.1 Interventions at Food and Feedingstuffs Establishments**

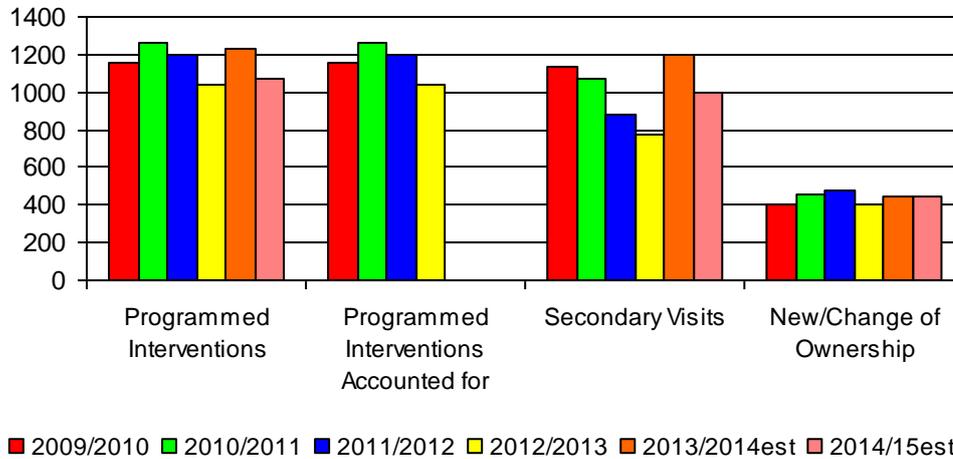
#### **Food Safety**

3.1.1 This section details the planned risk based food safety intervention programme for 2014/2015. The level of achievement in food safety intervention based activity over the past four years is shown in the chart below along with estimates for completion of the current year and 2014/2015.

3.1.2 Inspection intervals are calculated on a risk-based approach. The service sets a target of 98% compliance with the annual programme. Table 3.1.1 estimates the number of planned interventions for the current year and 2014/2015. The target takes account of possible service or operational problems such as a turnover of staff at the end of

the year, emergencies or difficulties contacting seasonal businesses or home caterers. In reality, achievement approaches 100%.

**Chart of Intervention-Based Activity 2009-2015**



See tables 3.1.1 and 3.1.3 for further details.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Programmed Interventions	1159	1262	1197	1043	1232	1073
Accounted for	1156	1262	1197	1043		
Target %	98 A-D	98 A-D	98 A-D	98 A-D	98 A-D	
Achieved%	99.7 A-D	100 A-D	100 A-D	100 A-D		

Table 3.1.1 Achievement of Planned Food Safety Inspection/Intervention Programme 2009-15.

3.1.3 The Food Safety Code of Practice contains a mechanism for risk rating each businesses based on factors such as:- if unwrapped high risk-food is handled, prepared or cooked; size of the business; any high-risk operations are undertaken; number of customers; vulnerability of the customers to food-borne illness; standards of hygiene; condition of the structure and confidence in management. By scoring all of these factors, an overall risk rating of A to E is arrived at. Category A premises are the highest risk and E the lowest.

3.1.4 Category E businesses present a minimal risk due to the limited types of food they handle and/or they cater for a limited number of people. The service operates an alternative enforcement strategy to maintain surveillance of these low risk businesses. This strategy enables the service to provide greater focus on higher risk category A to D establishments. Migration to the national Food Hygiene Rating Scheme (FHRS) for publishing food hygiene standards in March 2012 required an increase in validation inspections of category E businesses.

3.1.5 The alternative surveillance of low-risk businesses follows a structured documented procedure: postal questionnaires, sample inspections to check the validity of the information gained and follow up inspections.

3.1.6 Migration to FHRS has resulted in the need for a greater level of surveillance. The service therefore proposes to alternate between a questionnaire and intervention on the usual frequency for category E establishments. An estimate of the number of interventions for 2013/14 and 2014/15 has been included into table 3.1.2.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Questionnaires	188	277	175	66	296	354
Interventions	-	-	-	77	30	70

Table 3.1.2.Premises dealt with under alternative strategy or inspected.

3.1.7 Planned food safety interventions programme for the year 2014/2015 as at January 2014 is:-

Risk Category of Premises	Number of Interventions Due
A	3
B	68
C	695
D	307
Total	1073
Low-risk premises due for intervention	354

3.1.8 The target is to achieve a minimum of 98% of the annual inspection programme. The three product-specific premises approved under Regulation (EC) 853/2004 will receive interventions within the risk rated programme as necessary.

3.1.9 The Food Safety Code of Practice encourages food enforcement services to provide greater focus on the outcomes of activities rather than the traditional approach of reporting on activity alone. Local authority performance is monitored by the Food Standards Agency through the Local Authority Enforcement Monitoring System (LAEMS).

3.1.10 A further target is to ensure that at least 85% of food establishments are 'broadly compliant'.

3.1.11 As at December 2013 the level of broadly compliant establishments rated in the FHRS scheme stood at 92.6%. This level of compliance protects public health, the local economy and reputation of the council as a responsible regulator.

3.1.12 **Secondary Interventions** - The main purpose of secondary interventions is to monitor food businesses that fail to comply with significant statutory food safety requirements, or where directly required by Regulation. Failure could include:-

- Failure to comply with a single requirement that compromises food safety, public health or prejudices consumers;
- Failure to comply with a number of requirements that, taken together, indicate ineffective management; or
- Service of a Hygiene Emergency Prohibition Notice or Order.

3.1.13 When considering both the need for and timing of a secondary intervention, consideration is given to the seriousness of any failing, history of the business, confidence in management and the likely effectiveness of this action when compared to any other enforcement option.

3.1.14 Safeguard measures associated with the FHRs permits any food business that does not attain the top rating of five to request a rescore once any necessary issues have been resolved. The revisit must be unannounced and made no sooner than three months after the initial intervention and within three months of the request being made.

3.1.15 Other secondary interventions are categorised as those that are not primary interventions but include:-

- Additional interventions of establishments that are subject to product-specific food hygiene regulations;
- Sampling visits;
- Visits to check on the progress of measures required after a previous intervention;
- Visits to investigate food and food premises complaints;
- Visits to discuss implementation of Hazard Analysis of Critical Control Points based system;
- Visits involving training of food handlers;
- Inspections of premises to assess a licence.

3.1.16 **Interventions at New Businesses/Change of Ownership** - Where the service becomes aware that ownership of a food business has changed or a new business has commenced, it aims to undertake an intervention within 28 days of the business starting trading.

3.1.17 The purpose of the intervention is to establish the scope of the business, gather and record information, determine if food sampling or swabbing is necessary, identify food safety breaches, determine relevant enforcement action to be taken by the food service, communicate this to the business and determine a risk rating score. Based on the last five years' data, it is predicted that there will be 450 new businesses or changes of ownership in 2014/2015.

3.1.18 **Monitoring of Vacant Premises** – The service aims to inspect all new food businesses within 28 days of opening. Food safety law does not require prior approval.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Secondary inspections	1131	1072	885	777	1200	1000
New Premises or Change in Ownership	398	461	475	389	450	450

Table 3.1.3 Estimate for 2014/2015 based on data since 2009.

3.1.19 It is estimated that the number of staff required to carry out the programme of inspections plus other visits is 8.5 full time equivalents.

Resources required to undertake secondary visits generated by complaints, enquiries or to undertake sampling are included in the appropriate part of this plan.

### **Food Standards**

- 3.1.20 The LGR system requires high-risk premises to be visited each year, medium risk every two years and the low risk every five years. This means that all 60 high risk, 50% of the 866 medium risk and 20% of the 1437 low risk premises should be visited each year
- 3.1.21 The target for 2013-14 was to visit 60 high-risk and 433 medium risk premises liable to inspection. Similar targets will remain in place for 2014/15.
- 3.1.22 There is no commitment to visit low risk premises but in 2013-14, 185 low risk premises were visited up to 8th Jan 2014 as a result of project work, complaints and other routine inspections.
- 3.1.23 Approximately 5% of inspections require a follow-up visit. Officers do not work exclusively on the food function. Follow up visits will be made to all premises when a non-compliance is detected and formal action is contemplated.
- 3.1.24 One full time and currently two part time posts make up the Food Team. This equates to 1.6 FTE. About 80% of their time is spent on the food function.
- 3.1.25 **New Businesses** – Trading Standards Officers aim to assess new food businesses within 56 days.
- 3.1.26 **High Risk Premises** - Premises with good management control, no history of contraventions or complaints will be subject to a minimum intervention approach and will only be inspected if they change their product range or complaints are received.
- 3.1.27 **Poorer performing High Risk Premises** -These premises will be inspected every year but may be the subject of additional interventions depending on their compliance. Nationally and locally most food fraud has concerned misdescribed alcoholic drink of unknown provenance.
- 3.1.28 **Medium Risk Premises** - These premises will receive an intervention at two yearly intervals. These interventions will alternate between comprehensive inspections, and a mix of sampling visits, complaint visits or other monitoring or surveillance. At least 50% of the premises liable to an inspection will be subject to a comprehensive visit.
- 3.1.29 **Low Risk Premises** - A programme of interventions will be based on the intelligence received about the individual premises or where the business requests support/advice.

## 3.2 Feed and Food Complaints

### Food Safety

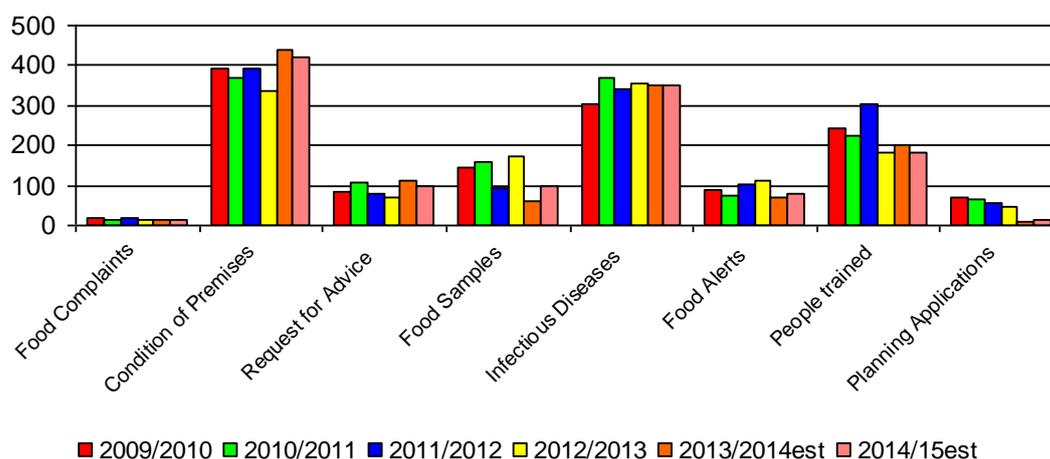
3.2.1 It is the policy of this authority to respond promptly to all requests for advice from business. It is the target of the service to respond to 90% of planning application consultations within 10 working days, and all other demand driven work within 5 days.

Year	08/09	09/10	10/11	11/12	12/13
Within target %	96.6	97.7	98.8	97.3	96.2

Table 3.2 Percentage of Demand Driven Work within Target Response Time

3.2.2 All food complaints received are investigated in accordance with the council's Enforcement Policy and documented procedures. See below for a chart showing the pattern of demand driven work since April 2009 and estimates for the current year and 2014/2015. The source figures for this chart are contained in tables within the relevant part of the plan.

**Chart of Demand Driven Work 2009-2015**



See tables 3.2.1, 3.4.1, 3.4.3, 3.5.1, 3.6 and 3.8 for the source of data.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Food Complaints	20	12	20	15	13	12
Condition of Premises	394	371	394	338	440	420

Table 3.2.1 Number of complaints for current year and 2014/2015 based on data from 2009 onwards.

3.2.3 It is estimated that 1.5 Full Time Equivalent officers will be required to meet this level of service requests.

### Food Standards

3.2.4 It is the policy of this authority to respond promptly to all food complaints and to carry out enquiries in accordance with the complaints procedure. The following figures show a final estimate for 2013/14 as the report is generated before the end of the calculated year.

Year	08/09	09/10	10/11	11/12	12/13	13/14 est
Number of Complaints	295	279	185	104	130	121

### 3.3 Home Authority Principle and Primary Authority Principle

3.3.1 Brighton & Hove City Council fully supports the Home Authority principle, and has entered into six formal and 22 informal arrangements with businesses whose operational activity extends outside of the city. Currently there are no primary authority food businesses in the city.

### 3.4 Advice to Businesses

#### Food Safety

3.4.1 Advice is given during inspections, by hotline, website, newsletter and as part of the planning application process.

Year	09/10	10/11	11/12	12/13	13/14 est	14/15est
No of Requests	82	109	79	68	114	100
Planning Applications	70	64	56	48	9	12

Table3.4.1 Requests received since 2009 and estimates for the current year and 2014/2015

3.4.2 It is estimated that 0.5 Full Time Equivalent Officer is required to meet this estimated demand.

#### Food Standards

3.4.3 The level of requests for advice has remained reasonably consistent over several years. The following figures show a final estimate for 2013/14 as the report is generated before the end of the calculated year.

Level of Service Requests					
08/09	09/10	09/11	10/12	11/13	13/14 est
192	151	188	158	137	152

### 3.5 Feed and Food Sampling

#### Food Safety

3.5.1 A formal arrangement is in place with the Health Protection Agency's Food Water & Environment laboratory based at Porton Down for the analysis of samples that require microbiological examination.

3.5.2 The service participates in national microbiological sampling initiatives coordinated by the Public Health England (PHE), countywide programmes co-ordinated by the Chartered Institute of Environmental Health (CIEH) Sussex Food Liaison Group and locally devised surveys. Samples of food and swabs of food-contact surfaces may also taken as part of routine work and when investigating specific issues at food premises.

3.5.3 During 2013/2014, the service took part in national food sampling programmes:-

- Study 50 – Soda water study: Plain soda from soda gun or fixed dispensing point.
- Study 51 – Pre-packed sandwiches.
- Study 52 – Fresh ready to eat herbs.

3.5.4 In addition to these nationally agreed programmes, the service took part in Sussex-wide microbiological sampling programme monitoring cleanliness in catering establishments. To identify potential issues with cleaning in premises where there is a low confidence in management. The project to be used to reinforce required standards and educate catering staff.

3.5.5 Sampling is also carried out during routine food hygiene inspections to aid officers in the assessment of practices carried out within commercial kitchens and identify any issues. Where any unsatisfactory results were found, corrective action was put in place to ensure the quality of food products.

3.5.6 As at January 2014 national and the CIEH Sussex Food Liaison Group sampling plans had yet to be finalised.

3.5.7 An Environmental Health Officer within the Food Safety Team is responsible for organising and co-ordinating food safety sampling. It is estimated 0.25 Full Time Equivalent officer will be required for this service.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
No. of samples	146	160	94	175	60	100

Table 3.4.3 Food Safety Samples Submitted 2009-2013 & estimate for the current year and 2014/2015.

3.5.8 Arrangements are in place with the Health Protection Agency laboratory at Porton Down for the analysis of samples that require microbiological examination. The allotted cost for sampling for the financial year 2013/2014 was £11,429.

3.5.9 As at January 2014, the allocation for the year 2014/2015 had not been confirmed.

### **Food standards**

3.5.10 The Public Analyst contract was awarded to Public Analyst Scientific Services (PASS) in 2013. The current allocation of budget for sampling analysis is £4,500. The focus of the contract remains composition, labelling and chemical contamination.

3.5.11 Inspections, investigations and advice for 2013/14 equated to approximately 1.6FTE.

3.5.12 A budget of £ 4,500 was allocated in 13/14 to facilitate the contract with the appointed Public Analyst for the purposes of food analysis. Sampling programmes are informed by FSA initiatives, TSSE regional and local intelligence.

### **Food Sampling Work undertaken in 2013/2014**

<u>MONTH</u>	<u>PROJECT</u>
April-July	Traceability of meat products FSA initiative
July-Sept	Foreign labelling
September	Meat and Fish Species
Nov- Jan	DNP body building supplements
Year long	Spirits Sampling as a part of the inspection programme
Year long	Home Authority Sampling
Year long	Complaints/Officer initiative

3.5.13 The national initiative is fully funded and takes account of potential problems requiring further investigation. The cost for the regional and local projects will be set to allow for contingencies, such as complaints and reacting to food alerts.

3.5.14 During 2012/13 large quantities of illicit alcohol were found in the City. Whilst some of this was smuggled and non duty paid alcohol, a quantity had been found that was not of the nature substance or quality demanded. As this was deemed to be an emerging potential food fraud, officers gave this priority in 2013/14 and the sampling programme took this into account. However the threat does appear to have been reduced. Following the national horsemeat crisis officers were asked to undertake sampling work investigating the traceability of meat products in the City. No major issues were found.

3.5.15 During 2013/14 Trading standards have also carried out work funded by the FSA on animal feed which ties in to the Official Feed and Food Controls. The FSA following the lead of the European Food Standards Agency and the Food and Veterinary Office are also pushing controls on imported food and are asking coastal Local authorities to check what is coming in through marinas and small ports.

3.5.16 **Control and Investigation of Outbreaks and Food-related Infectious Disease** - Specific infectious diseases are notifiable to the local authority. The department investigates these cases in an attempt to identify the cause of illness and any practical measures to control potential outbreaks. See below for the number of cases investigated from 2009 to 2013 and an estimate of the numbers expected for the current year and 2014/2015. Investigations of outbreaks must commence as soon as practical. In individual notifications, the investigation has to commence within 5 days. It is estimated that 0.5 FTE officer will be required to meet this level of complaints.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
No. of reports	304	369	339	357	350	350

Table 3.5.1 Notifications for 2013/2014 & 2014/2015 based on data from 2009 onwards.

3.5.17 The number of notifications included in table 3.5.1 has been corrected to discount those illnesses not associated with food such as mumps, measles and hepatitis. The estimate of the total notifications for the current year has been increased due to the effect of an increase in *Shigella flexneri* cases.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Campylobacter	125	222	198	174	180	180
Salmonella	60	33	35	29	35	35

Table 3.5.2 Estimate of Number of specific notifications for 2013/2014 & 2014/2015

3.5.18 Food-borne illness can be contracted as a result of a number of reasons including poor food handling in the home or foreign travel. It is therefore difficult to attribute any increase or reduction to one source.

### 3.6 Feed/Food Safety Incidents

3.6.1 An out of hours emergency service is staffed by senior staff who are suitably authorised to carry out the full range of food safety functions including responding to emergency food safety incidents.

3.6.2 Information regarding national food safety alerts, such as product recalls from the FSA, is received during office hours via the national alert system.

3.6.3 The Environmental Health Manager (Food Safety) and senior staff within the Food Safety Team are registered on the rapid alert system to receive food alerts through a text message scheme direct to their mobile phones. The information contained in the food incidents is distributed and acted on as deemed necessary.

Year	09/10	10/11	11/12	12/13	13/14est	14/15est
Food Alerts	88	76	102	113	70	80

Table 3.6 Food Alerts for the current year and 2014/15 based on data from 2009 onwards.

### 3.7 Liaison with Other Organisations

#### Food Safety

3.7.1 There are a number of arrangements in place with other professions and local authorities to promote consistency, provide joint projects and develop services: -

- The Environmental Health Manager attends the Sussex Food Liaison Group which develops common approaches to regulation across Sussex.

- An Environmental Health Officer attends the Chartered Institute of Environmental Health's Sussex Food Study Group which develops joint procedures and practices.
- Regular liaison meetings with Children's Services and school caterers.
- The Health Development team develops initiatives such as promoting breastfeeding or making it easier for mothers to breastfeed their babies while in restaurants.
- Unfortunately, the Brighton & Hove Food Partnership have had to withdraw from administering the local Healthy Choice Award initiative to promote healthy menu options in commercial catering settings. The scheme will continue to run in relation to children's breakfast clubs and nurseries.
- District Control of Infection Committee, Community Consultant in Disease Control reviews procedures and agrees communicable disease outbreak and food poisoning control measures.
- The authority is a member of the Brighton & Hove Food Partnership. The partnership includes representatives from local businesses and community groups, community workers and members of the Sustainability Commission. The Partnership raises awareness of food producers in supporting health, the economy and the environment increasing access to nutritious, safe, affordable food and providing a network for information exchange.
- A liaison arrangement is in place with Sussex Career Services and local schools to enable teachers and students from Brighton & Hove to gain work experience.
- Head of Regulatory Services sits on the Healthy Weight programme board

This work is accounted for in the reactive work estimate of resources required.

### **Food Standards**

3.7.2 The team works closely with 18 other Trading Standards Services in the southeast that together make up Trading Standards South East (TSSE). Activities include liaison on all trading standards issues, co-ordinated activities, sampling and advice projects and sharing of information via the TSSE intranet. As well as this officers use the national knowledge hub which allows access to trading standards services nationally. The team also work directly with the FSA and receive food alerts which identify problem products which we can move quickly to remove from the food chain at a local level.

### **3.8 Feed and Food Safety and Standards Promotional Work, and Other Non-Official Controls Interventions**

3.8.1 The city Health and Wellbeing Board's strategy focuses on priority areas where it can make the greatest impact. The strategy includes healthy weight and good nutrition. The Food Safety Team work with

Brighton & Hove Food partnership on the Healthy Choice Award promotes healthy menu options in a diverse range of settings targeting health inequality: nurseries, breakfast clubs and after-school clubs and care homes.

3.8.2 The service organises a number of food hygiene training courses per year. The food safety training activity April 2012 to March 2013 and total numbers of people trained are given below. The CIEH Level 2 Award Food Safety in Catering course is a full day course aimed at food handlers.

3.8.3 During 2012/13 184 people were trained on the Level 2 course.

Year	2009/2010	2010/2011	2011/2012	2012/13	2013/14est	2014/15est
Trained	245	225	303	184	200	180

**Table3.8 Total Training Undertaken Since 2009**

3.8.4 13 Level 2 Awards in Food Safety in Catering courses have already been scheduled for 2014/15. The service also offers the CIEH Level 3.

3.8.5 The service took part in Food Safety Week during June 2013 by organising displays in Customer Service Centres at Bartholomew House, Hove Town Hall, Brighton Town Hall and Hove Library.

3.8.6 In September 2013 the Food Safety Team organised the fourth annual Curry Chef of the Year competition.

## **4. Resources**

### **4.1 Financial Allocation**

#### **Food Safety**

4.1.1 The proposed 2014/15 budget for the Food Safety service is £581k, which is subject to approval as part of the budget proposals to Budget Council on 27<sup>th</sup> February 2014.

#### **Food Standards**

4.1.2 It is difficult to detail the time spent on the food standards function as it is carried out during a comprehensive inspection. Time monitoring is not currently used to apportion time to the food function. Cost of the food standards function in 2013/14 was as follows based on the percentage of time officers spend on the food function outlined above and below:

Staffing Inspection, complaints and advice

Management/Support	£ 3,200
Food Team	£42,170
<b>Total</b>	<b>£45,370</b>

Purchases	£ 500
Analysis	£ 4,500
Total	£ 5,000
<b>Total</b>	<b>£ 56,370</b>

The budget has not yet been set for 2014/15 but similar funding levels are envisaged as 2013/14.

## 4.2 Staffing Allocation

### Food Safety

4.2.1 Establishment of the Food Safety Team for the year 2014/2015 is 11.45 full time equivalent field officers plus two full time equivalent administrative support staff and management, broken down as follows:-

- 1 x Environmental Health Manager
- 2 x Senior Environmental Health Officers
- 3.85 x Environmental Health Officers
- 4.6 x Senior Technical Officers

4.2.2 All enforcement staff comply with strict guidelines governing qualifications and competencies before they are permitted to undertake food safety duties. All Senior Technical Officers hold Higher Certificates in Food Premises Inspection and are able to inspect all risk categories of food businesses. All Environmental Health Officers are qualified to undertake inspections of all risk categories of food businesses.

4.2.3 Six officers within the other Environmental Health & Licensing Teams retain competencies to undertake food safety inspections. All food competent officers must undergo a minimum of 10 hours food safety training per year to retain their authorisation to undertake food safety inspections. In addition to the competencies and qualifications required by the Food Safety Code of Practice, officers engaged in food safety inspections must have undergone additional 'Food Hygiene Rating Scheme' consistency training.

### Food Standards

4.2.4 The Inspection and Sampling Team is responsible for Food Standards Inspection. The proportion of time allocated to this function in 2013/14 was estimated as follows:-

Support	0.05
Management	0.05
Food Staff	1.6
Total	1.7 FTE

### **4.3 Staff Development Plan**

- 4.3.1 The Authority has a structured appraisal and development system. During staff appraisals, individual training needs and any gaps in competence are identified. The information is used to produce individual training and development plans for each officer for the coming year.
- 4.3.2 Through this system, the service ensures that all food competent officers receive sufficient good quality focused food safety training to comply with relevant Codes of Practice and professional membership schemes.
- 4.3.3 The service currently has three staff undergoing part time or distance learning to become Environmental Health Officers.

## **5.0 Quality Assessment**

### **5.1 Quality Assessment and Internal Monitoring**

#### **Food Safety**

- 5.1.1 The service has a documented procedure relating to food safety duties. Internal audits are carried out to ensure compliance with these procedures. The service is accredited to ISO 9001 and externally audited by the British Standards Institute.
- 5.1.2 The service actively seeks the views of businesses by giving out post-inspection questionnaires to traders inspected. In 2012/2013, 265 questionnaires were returned. The key findings of these returns were:-
- 96.1% of respondents were either very satisfied or satisfied that Brighton & Hove City Council had done all that it could to help deal with their premises inspection.
  - 98.5% of respondents understood the purpose of the visit to their premises.
  - 97.7% found the information given to them by the visiting officer easy or very easy to understand.

Similar high levels of satisfaction were recorded from questionnaires returned in the previous six years.

#### **Food Standards**

- 5.1.3 We aim to continually improve the level of service provided. Procedures are implemented and reviewed where necessary to incorporate identified improvements.

## **6. Review**

### **6.1 Review Against the Service Plan.**

#### **Food Safety**

- 6.1.1 In addition to the quality checks detailed in 5.1, performance is reviewed against the Service Plan by comparing the number of interventions achieved against the number programmed. Monthly statistical reports are produced so that performance can be closely monitored and managed through the year. Any problems are promptly identified and resolved through management reviews, team meetings and monthly one to ones between field staff and their line manager.
- 6.1.2 Official Food and Food Controls Service Plans are produced and reviewed on an annual basis by management review and consideration by elected members through the committee structure and Full Council.
- 6.1.3 In the year 2012/2013, 100% of the due food safety interventions were accounted for. This included interventions carried out and businesses that ceased trading before they could receive their planned intervention. 389 interventions were undertaken of new businesses or premises that had changed ownership.
- 6.1.4 At January 2014, 92.9% of the food businesses in the city were deemed to be 'broadly compliant', or better ie a Food Hygiene Rating Score of three or better.
- 6.1.5 The 2013/2014 Service Plan predicted that a total of 1232 food safety interventions would take place in this year. To the end of December 2013, 299 inspections of new businesses were undertaken and the service is on target to achieve the goal of carrying out interventions in at least 98% of the businesses due.
- 6.1.6 From April 2013 to mid January 2014, 48 Hygiene Improvement Notices were served, seven businesses voluntarily closed and undertook three successful prosecutions and a further four cases in chain.
- 6.1.7 Charts in Section 3 give a detailed breakdown of service activity from April 2009 to March 2013 and an estimation of the activity for the remainder of the current and coming year.

#### **Food Standards**

- 6.1.8 Service reviews are carried out on a monthly basis to check that the inspection programme is on target and to ensure that projects are being completed in the agreed timescale.

- 6.1.9 The Service Reviews indicate that the service is on target to achieve the interventions programme.
- 6.1.10 During staff one-to-one's each officer's performance is monitored, to identify good performance and any areas of improvement.
- 6.1.11 Complaints are responded to within the stated timescales.

## **6.2 Identification of Any Variation from the Service Plan**

### **Food Safety**

- 6.2.1 Reviewing the final outcome of 2012/2013 and the current prediction, as at January 2014, for 2013/14 against last year's Service Plan shows four probable areas of variation.
- The 2012/13 Service Plan estimated that there would be 720 secondary interventions undertaken, see 3.1.12 for a definition. It is now expected that this number will rise by 66% to 1200. It is thought that this is a result of the general improvement of standards brought about by the Food Hygiene Rating Scheme enabling staff to provide greater support to the poorer performing establishments.
  - The number of complaints received about the condition of premises has risen on the number estimated for the third year in a row. It is current estimated that for 2013/14 the number of complaints received will rise by 25% to 440. It is thought that the publicity associated with a high profile food safety prosecution in the early summer of 2013 and the public awareness of the Food Hygiene Rating scheme has raised the profile of the service.
  - The 2012/13 Service Plan estimated that there would be 80 requests from businesses for expert advice from the service. It is now expected that this will increase by 42% to 114, and this level to continue in 2014/15. It is pleasing that businesses are increasingly using the service in this way. As a result of this the number of planning applications viewed by the service has dropped from an estimated 65 to nine for this year. As the number of new businesses making a proactive approach to the service has increased there has been less requirement to use the planning application process to make businesses aware of the required standards.
  - The 2013/14 plan estimated that 300 people would attend formal food safety training with the service. This estimate has now been reduced to 200. It is thought that the increased availability of training from other organisations and on-line training packages has caused this.

## **Food Standards**

6.2.2 There was no significant variation from the plan.

### **6.3 Areas of Improvement**

#### **Food Safety**

6.3.1 As a result of publishing the food safety standards through the Food Hygiene Rating Scheme standards generally are continuing to improve. Table 6.1 demonstrates the improvement which have been built on the local Scores on the Doors scheme since migration to the national scheme in March 2012.

FHRS rating	April 2012	Jan 2013	Jan 2014
0	6	3	4
1	114	113	95
2	86	92	83
3	284	265	266
4	508	589	638
5	1311	1377	1469
<b>Total</b>	<b>2309</b>	<b>2624</b>	<b>2555</b>

**Table 6.1. Number of food businesses in each FHRS Rating**

6.3.2 During 2013 Brighton & Hove City Council took part in a pilot scheme where the FSA paid for additional free coaching to 40 of the poorest performing takeaways in the city. Hot food takeaways who achieved a score of two or less on the Food Hygiene Rating Scheme were targeted. Full analysis of the results will become clear once all businesses have received their next programmed inspection.

6.3.3 The FSA produce national performance data for local authority food services based on information received in annual returns. It is pleasing to note that Brighton & Hove City Council, which is eight largest of the 56 English Unitary authorities by number of food establishments, when compared to that group:

- Was one of only three that accounted for 100% of the planned interventions in 2012/13.
- Was above the average with 92.98% of food businesses deemed 'broadly compliant or better'.

#### **Food Standards**

6.3.4 Advancements have been made in the delivery of food law enforcement. There are many examples of joined up working and co-operation where co-ordinated sampling programmes and officer

training feature highly. However, there are still areas for improvement. They are as follows:

- Targeting beer, wines and spirits misdiscription and traceability, this work links in with the Licensing Authority function and Alcohol Project Board.
- Improved use of the Environmental Health newsletter to provide businesses with information.
- Increasing the number of voluntary contacts by businesses
- Developing the access to on-line business advice.
- Better publicity for the healthy eating education message.
- Developing links with schools
- Increasing and maintaining the competency and professional development of food officers.
- Establishing consumer concerns and reflect this in local activity.