

Food Safety Service Plan 2023-2024

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1.0 Service Aim, Objectives, Key Tasks and Targets

1.1 Objective, Aims and Key Tasks

- To meet statutory responsibilities in respect of national requirements concerning official controls of food in a cost effective and responsible manner in accordance with statutory guidance.
- To encourage best practice and publish advice on Food Safety to businesses and voluntary groups.
- To discharge food safety inspection and enforcement responsibilities in accordance with the Food Law Code of Practice, Regulators Code and the Epsom & Ewell enforcement policy.
- To implement national and local food sampling programmes and to promote Food Safety.

1.2 Links to Corporate Objectives and Targets

The food inspection service is relevant to several of the current key priorities.

Opportunity and Prosperity

By ensuring a level playing field through appropriate and proportional regulatory interventions, holding to account the worst offenders and supporting business by providing a degree of trusted technical advice.

Safe and Well

By ensuring a minimum standard of hygiene in business to reduce the occurrence of ill health through food borne disease and by promoting good hygiene practice in the home.

Effective Council

By discharging our duties in the most time and cost effective way.

2.0 Background

2.1 Profile of the Local Authority

The Borough of Epsom & Ewell is situated in the North East of Surrey, with an area of 3,411 hectares, of which over half is open space, particularly to the South and West. The Borough has a population of approximately 81,000 predominantly in suburban areas. There are in the region of 31,320 households in the Borough and the average household size is 2.58 people.

2.2 Organisational Structure

A chart is attached showing the structure of the Council's Public Protection Service and with the elements involved in food hygiene delivery highlighted.

Specialist services, when required, are provided as follows

- (i) Public Analyst: Public Analysis Scientific Services, 28-32 Brunel Road, Westway Estate, Acton, W3 7XR
- (ii) Microbiological testing: UK Health Security Agency, Food, Water and Environmental Laboratory, Manor Farm Road, Porton Down Salisbury Wiltshire SP4 0JG

2.3 Scope of the Food Service

The Food Safety Service exists to ensure that all food produced, purchased, stored or distributed in the Borough meets statutory requirements under conditions which are hygienic. Delivery of the service is principally centred on the delivery of Official Controls such as inspections and audits in compliance with statutory requirements followed by appropriate enforcement action as necessary. By providing this service, the Council actively contributes to the maintenance of high standards of hygiene in processes of production, preparation and sale of food throughout the Borough. Advice is given to food businesses and handlers to ensure they meet legal requirements and observe best practice designed to protect public health.

The Service also undertakes occasional food sampling, a service which complements and reinforces the overall objective of protecting public health. Sampling exercises are typically carried out as part of national surveillance projects or in response to a local incident or complaint.

The service, in certain circumstances, works in association with the UK Health Security Agency in relation to the investigation of notifications of infectious disease and food poisoning.

In addition to programmed and demand driven food hygiene inspections, and the investigation of complaints related to food and food premises, other services are delivered in commercial business premises. These include health and safety interventions, infectious disease investigations and pollution emanating from premises where food is prepared, processed or sold. The full range of the environmental health service includes the varied elements of pollution control, conditions in private sector housing and other public health and public protection obligations.

2.4 Demands on the Food Service

As at April 2023 there were 555 food premises in the Borough, of these 440 were restaurants, cafes, canteens or other caterers, and 99 were retailers. The remainder are made up of small scale producers and distributors. 150 premises fall into the higher risk categories of A to C. Category A requires inspection at 6 month intervals, category B at 12 month intervals and category C at 18 month intervals in accordance with Food Safety Code of Practice issued by the Food Standards Agency. There are 41 unrated businesses where the Council has received a registration but has yet to inspect. These mainly consist of low risk home caterers combined with recently established conventional catering premises. Presently there are no approved establishments operating within the Borough. The service advises and inspects the in-house and external catering provision at the Epsom Racecourse, particularly at the time of the Derby.

Environmental Health Services is based at the Town Hall, and the service is available from 9am to 5pm Monday to Friday although a substantial proportion of premises now only open in the evening necessitating out of hours visits. In the event of a major incident or an outbreak of food poisoning, there are arrangements for contacting senior officers outside of normal office hours.

A significant proportion of catering establishments are operated by people whose first language is not English. In rare circumstances arrangements are in place for professional translation of necessary documentation and use of interpreters.

2.5 Enforcement Policy

The Environmental Health Enforcement Policy was revised in 2014 to reflect the national Regulators Code and is programmed to be reviewed in the 2023-2024 year.

3.0 Service Delivery

3.1 Food Premises Inspections

Food premises are inspected in accordance with the Food Law Code of Practice (England) published by the Food Standards Agency.

Other premises e.g. childminders are not routinely inspected other than at their request or by referral from OFSTED. The Council, in line with other Surrey local authorities have reached an agreement with OFSTED whereby any food hygiene concerns from OFSTED inspectors will be referred to the local authority for follow up.

Additional to programmed inspections, the service also carries out a proportion of revisits during the same period. These are necessary to check whether informal action has been successful, where compliance with notices needs to be assessed and where a formal request has been made by a food business operator as part of the Food Hygiene Rating Scheme.

Any significant increase in the numbers of food related complaints or incidents would place additional demands on the service. Without additional resources this demand could only be met at the expense of the premises inspection programme and/or other areas of environmental health.

3.2 Food Complaints and requests for service

Procedures exist to deal with food complaints which allows for working with Buckinghamshire and Surrey Trading Standards when necessary.

Enforcement of food safety is undertaken in accordance with the Food Safety Act 1990, EU Regulations 852/2004, the Food Safety and Hygiene (England) Regulations 2013 and associated legislation. Enforcement decisions and decisions to bring legal proceedings in appropriate cases are made in accordance with the Service's Enforcement Policy and the Scheme of Delegated Authority to Officers.

3.3 Primary Authority

The Council is committed to the Primary Authority principle whereby, in order to ensure consistency of enforcement, a business can form a partnership with a local authority, often, but not always the authority where its head office exists and enforcement issues can be moderated by that authority.

Epsom & Ewell have no formal partnerships with any food business at this time.

3.4 Advice to Business

Businesses are encouraged to consult the Council's website in the first instance or else the advice displayed on the website of the Food Standards Agency. Enquiries of a specific and/or technically complex nature will normally be dealt with by telephone. However officers frequently advise business during programmed inspections and other food hygiene interventions such as complaints or sampling visits.

3.5 Food Sampling

The authority undertakes occasional planned food sampling in coordination with the UK Health Security Agency (UKHSA) and local initiatives.

Samples may also be submitted to the UKHSA laboratory or to the Public Analyst in support of food complaint investigations.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

In respect of an outbreak of food poisoning or infectious disease, procedures are set out in the Surrey Outbreak Control Plan and the Environmental Health Service will act in conjunction with UKHSA under the guidance of the Consultant in Communicable Disease Control (CCDC).

Typically Environmental Health Service receives around 150 notifications of infectious disease including food poisoning, actual or suspected and some notable instances of Hepatitis, Ecoli and legionnaire's disease which require careful handling and which require priority over the majority of other areas of work.

3.7 Food Safety Incidents

Food Alerts are part of a national system of letting local authorities and consumers know about problems associated with food and, in some cases, provide details of specific action to be taken.

Where necessary a media release or high priority visits to premises are arranged.

Out of hours contact arrangements are in place whereby the Public Protection Manager can be contacted by national authorities via the Mole Valley out of hours call centre.

The resource implications are very much dependent on the category of any given alert 'For Action' alerts can potentially involve a considerable amount of work contacting and inspecting food outlets, whilst 'For information' may involve less response. To date, all work relating to food alerts has been undertaken by Environmental Health Officers and resources are considered adequate. In the event of a large-scale warning, support staff will be drawn from other areas of the Council as required.

3.8 Liaison with Other Organisations

The authority has in place various arrangements to ensure that enforcement action taken in its area is consistent with that in neighbouring local authorities.

Epsom & Ewell is represented on the Surrey Food Liaison and Study Group that includes the other Surrey local authorities, Buckinghamshire and Surrey Trading Standards, UK Health Security Agency and the Food Standards Agency.

Joint working with, in particular, Trading Standards will continue and where possible, inspections will be coordinated as will action on food alerts.

Epsom & Ewell is also represented on the Surrey Infection and Environmental Control Group, which is chaired by UKHSA.

The service responds to planning consultations involving new food premises or alterations to existing premises.

Applications received by the Borough's Licensing Service that includes food preparation or sales are individually screened for likely public risk on health grounds.

3.9 Food Safety Promotion

Resource constraints are such that food safety promotion is largely confined to the point of service delivery and mostly at the time of food premises inspection.

The service will seek to publicise any enforcement action which results in a fine or other sanction issued by the courts.

4.0 Resources

4.1 Staffing Allocation

The number of staff working on food law enforcement and related matters (including infectious diseases) is 1.2 officer full time equivalent. There are no dedicated administrative support staff and all officers carrying out official controls also have responsibilities in other fields of environmental health.

All Environmental Health qualified staff are authorised in all aspects of Food Safety Enforcement with appropriate supervision as necessary. The service operates a competency verification procedure utilising document review and occasional shadowed visits.

4.2 Staff Development Plan

The Council operates a system of developmental one to one meetings with staff members and their manager. From this, learning needs are identified and provision made to fulfil them. The Food Law Code of Practice requires at least 20 hours of continuing professional development per authorised officer.

5.0 Quality Assessment

In line with the Food Law Code of Practice, monitoring measures are in place to assess performance of food officers and adherence to standard working methodology.

Any newly recruited officer will be assessed in accordance with the team monitoring procedure involving shadowed visits and follow up. This also applies periodically for food officers already in post and for consultancy members of staff. Team meetings address consistency issues within the team and food service matters are discussed.

6.0 Reviewing the 2020-2023 years

6.1 COVID-19

During the peaks of the COVID-19 pandemic, the service was entirely suspended both in response to the suspension of the majority of the hospitality sector and owing to the Environmental Health staff being required to concentrate on COVID-19 operations such as contact tracing and enforcement. This led to extensive backlogs of food hygiene inspections which became overdue and a larger than normal business churn rate as certain businesses ceased trading and were replaced. It was also notable for the quantity of new businesses, many operating from home who started during the various lock down periods.

The 2020-2021 year was also challenging owing to long term vacancies within the team necessitating temporary consultancy staff being used to fulfil the entire food inspection programme for 2022-2023. This situation had its origins prior to COVID-19 when a position became vacant in April 2019 and despite various attempts, was only filled in February 2023.

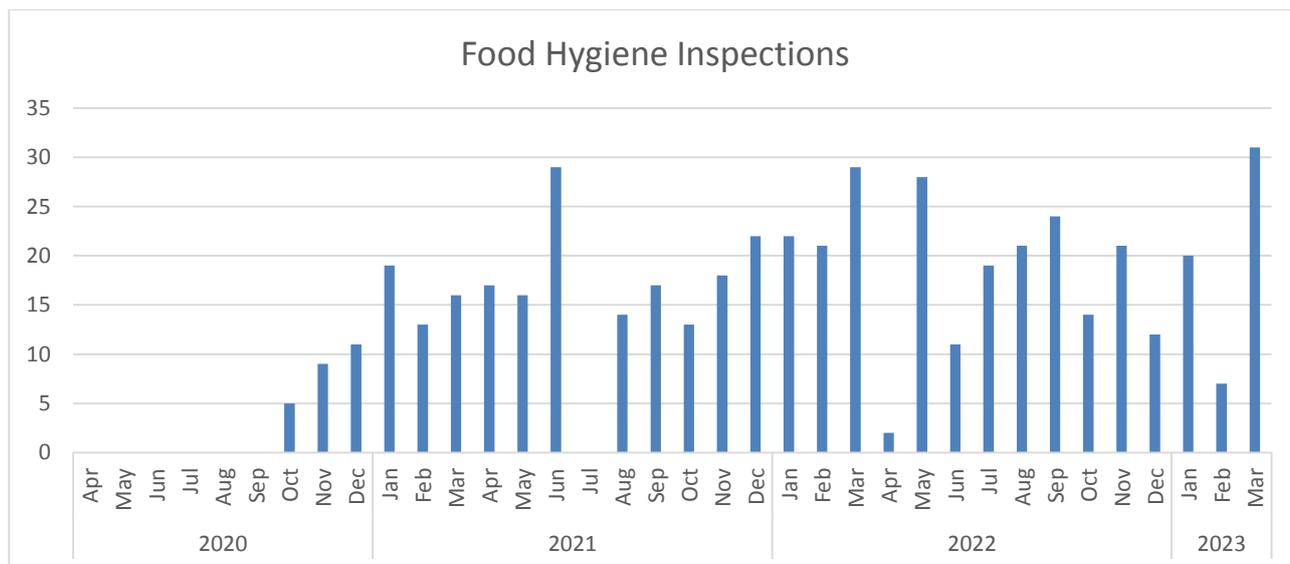
6.2 COVID-19 Recovery Plan

Utilising Contain Outbreak Management Funds (COMF), the service was able to adhere to the Food Standards Agency milestones for recovery and received a positive implementation assessment from the Agency in summer 2022. As at April 2023 food official controls have been brought back in house and there are no vacancies although two new members of staff are still in a probationary period with their food competencies still to be fully assessed.

During the earlier stages of recovery, the service experimented with remote inspections via telephone and WhatsApp. This was discontinued when it became practical to resume in person physical inspections.

6.2 Interventions in 2020-2023

Owing to the effects of COVID-19, the food inspection programme was significantly disrupted. Consistent with the recovery plan, the service prioritised higher risk inspections and interventions where monitoring and surveillance showed an increased level of risk. The following chart shows those inspections which were achieved.



Performance of the service was directly monitored by the Environmental Health and Community Safety Manager and when that position was abolished as part of the Council's restructure, by the Principal Environmental Health Officer.

6.2 Food Hygiene Rating Scheme

Official food hygiene ratings appear on a national website available for public information at www.food.gov.uk/ratings as well as various mobile device apps. Where a business wishes to improve their score but not wait for the programmed inspection, they may pay a fee to the Council for an additional visit which will be unannounced within a three month window of making that request.

6.3 Complaints

For 2022-2023 48 complaints were received and investigated concerning both concerns about food and of food businesses. These ranged from allegations of food poisoning, complaints about foreign bodies in food, unfitness of food and hygiene of premises. Where valid, these complaints were investigated and action taken.

6.4 Sampling

Owing to the pressing priorities relating to COVID-19, the service has not taken any food or environmental samples since 2020.

The financial allocation set aside for Epsom & Ewell by UKHSA is in the region of £2800 per year and this is considered to be adequate. This allocation facilitates bacteriological and qualitative sampling and analysis of food, water and environmental monitoring.

6.5 Education and information

The service does provide a degree of free advice to business who either make contact independently or request advice during inspections. Environmental Health staff are also in the position to be able to refer potential new businesses to the local Growth Hub and for Epsom – the Business Improvement District.

6.6 Partnership working

Representation was made on the Surrey Food Liaison Group which includes trading standards officers to develop joint working relationships such as sampling initiatives and procedural guidance.

6.7 Document review

The majority of documentation now exists on the internet and the service no longer carries hard copies of leaflets. The Council's website contains information for businesses and the consumer whilst the Food Standards Agency website contains more technical information for those involved in food production and catering.

6.8 Enforcement

204 written warnings were issued and a voluntary part closure of a business was undertaken in 2022-2023.

6.9 Alternative Enforcement Strategy (AES)

The service has an alternative enforcement policy in place for low risk food premises involving a self assessment process. The aim of this strategy is to enable the Council to focus attention on those businesses which present the greatest risk to consumer safety and/or who are failing to meet their statutory obligations whilst relieving low risk businesses from a proportion of formal inspection. During the period of time affected by COVID-19, it was not possible to operate this policy resulting in a backlog of outstanding low risk premises interventions.

7.0 Plan for 2023-2024

7.1 Programmed inspections 2023-2024

In 2023-2024 185 premises interventions are due broken down as follows.

Category	Number
A	1
B	23
C	80
D	74
E	7 (AES)

It should be noted that addition to the due inspection programme additional inspections are also required for new food premises and business premises that close and re-opened as a different category operation and those that change management. This number is largely unpredictable as is the number of business who request a re-inspection as part of the safe guards employed under the Food Hygiene Rating Scheme.

7.2 Accuracy of database

The accuracy of the commercial premises database will be ensured by the following means:

- A periodic cross check against web based directories for changes to businesses in the Borough
- Updating of details via intelligence gathered during other Council visits and reported to the Environmental Health team.
- Use of local knowledge

7.3 Sampling

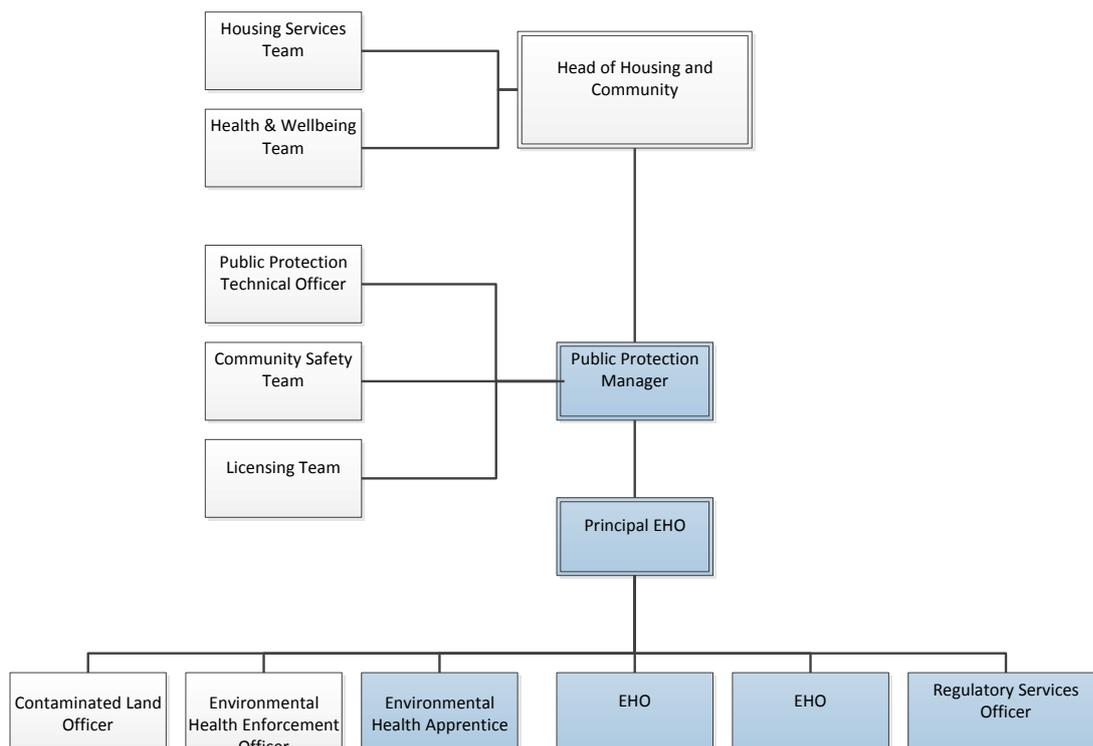
A budget of £300 has been allocated for chemical sampling of food and water. Where this is insufficient, underspends will be looked for to supplement the budget. An allocation of around £2,800 is expected from UKHSA for the routine microbiological sampling of food and water.

7.4 Complaints

Complaints and enquiries from members of the public will be assessed and priority given to situations representing immediate or urgent public health risks. In some circumstances it will be appropriate to follow the matter up at the next routine inspection.

7.6 Publicity

The Service will seek to publicise successful initiatives which are of benefit and interest to the public. In particular the service will utilise the Council's social media channels to inform, advise and alert the public to issues pertaining to food safety. It will also publicise any prosecutions and sentencing of businesses who have broken the law and been taken to court by the Council.



1.2 Full Time Equivalents spread over positions highlighted in blue

Structure of Housing and Community Services