



Food Safety Service Plan 2024-2025

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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 Analyst Scientific Services i54 Business Park Valiant Way Wolverhampton. WV9 5GB
- (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. It is a statutory service and is principally centred on the delivery of Official Controls such as inspections and audits in compliance with national 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.

In certain circumstances the service works in association with the UK Health Security Agency (UKHSA), 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 protection and public health obligations.

2.4 Demands on the Food Service

As at April 2024 there were 589 food premises in the Borough, of these 438 were restaurants, cafes, canteens or other caterers, and 121 were retailers. The remainder are made up of small scale producers and distributors. 133 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 Law Code of Practice. There are 122 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.

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.

3.0 Service Delivery

3.1 Food Premises Inspections

The service has the aim of carrying out interventions in line with the Food Law Code of Practice (England) issued by the Secretary of State.

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, Retained EU Regulation 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.

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

As at the date of this plan, the retention and deployment of qualified officers, together with competing demands on their time remains a challenge to the degree that the Council will be unable to meet the full requirements of the Food Law Code of Practice. This is because of the service demands placed on the team from outside the immediate area of food hygiene are impacting negatively on the ability to carry out routine official controls.

Specifically the increased volume and complexity of general service requests, including that from the private sector housing statutory area, undertaken by the same team as food official controls, are absorbing a disproportionate amount of resource.

Historically a level of 1.2 FTE has been shown to be sufficient to deliver the requirements of the Food Law Code of Practice. However, owing to the above factors and the departure of the Principal Environmental Health Officer in July of 2024, the amount of staff resource available is 0.3 FTE with an additional 0.55 FTE from a temporary contractor. This is insufficient to deliver the requirements of the Code and has prompted an enquiry from the Food Standards Agency and an internal review from which a plan has been formulated.

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 10 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.

Beginning in April 2024, a suite of KPIs has been developed to allow senior staff and Councillors to track the performance against plans.

6.0 Reviewing the 2023-2024 year

6.1 Interventions in 2023-2024

The service was unable to meet the full extent of the Food Law Code of Practice in terms of the requirements of the timings and numbers of official controls. This was particularly because of the high demand for service elsewhere in the team's responsibilities such as an extensive noise nuisance investigation and an outbreak of e coli at a children's attraction. However the fundamental and underlying issue that the resource available for the discharge of the statutory responsibilities in the food hygiene area is in competition with other environmental health based statutory duties. This combined with the growth in volume and complexity service requests in all areas of responsibility has resulted in under performance in the food area.

The service responded to these challenges by adding a part time consultant, utilising limited short term funding from elsewhere in the service area. This partly compensated for the under achievement of inspection targets.

Performance of the service was directly monitored by the Principal Environmental Health Officer in their role as Lead Officer for Food.

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 2023-2024 76 complaints and other service requests 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 together with enquiries from food businesses. Where valid, these complaints were investigated and action taken.

6.4 Sampling

The service took no food or environmental samples in 2023-2024.

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

Two hygiene improvement notices and 66 written warnings were issued in 2023-2024. Separately, following the discovery of a cockroach infestation, a voluntary closure of a business was undertaken.

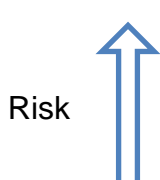
6.9 Alternative Enforcement Strategy (AES)

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.

7.0 Plan for 2024-2025

7.1 Programmed inspections 2024-2025

In 2024-2025 185 premises interventions are due broken down as follows.



Category	Number Due
A	2
B	17
C	43
D	64
E	20

Owing to the reasons outlined elsewhere in this plan, as at 1 April there are an additional 57 inspections outstanding from the 2023-2024 year comprising category C to E. The service will aim to deliver these alongside the due inspections from the 2024-2025 year.

There are a further 122 businesses registered over the past 1-2 years who are awaiting their first inspections. Businesses are not required to have an inspection prior to opening, however the Food Law Code of Practice normally requires inspection to take place within 28 days of registration and there are some barriers to becoming established on food delivery aggregators (Just Eat, Deliveroo, Uber Eats) for businesses who do not have a current Food Hygiene Rating.

As a consequence of an internal review and reallocation of resource, a new EHO post has been agreed, which when combined with the recruitment to the existing Principal EHO role, will allow the Council to realign with the requirements of the Code. To overcome both the backlog and the due inspections will take time and it may have a temporary adverse impact on some of the other statutory areas such as private sector housing and pollution control. However an action plan has been submitted to the Food Standards Agency and the Council continues to supply monitoring information to evidence its progress against the plan.

An overriding element of service planning is to risk assess and prioritise. The expectation is therefore that businesses with a greater risk profile will continue to be prioritised over businesses which are inherently less risky.

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 located elsewhere to supplement this budget. An allocation of around £2,800 is expected from UKHSA for the routine microbiological sampling of food and water.

7.4 Complaints

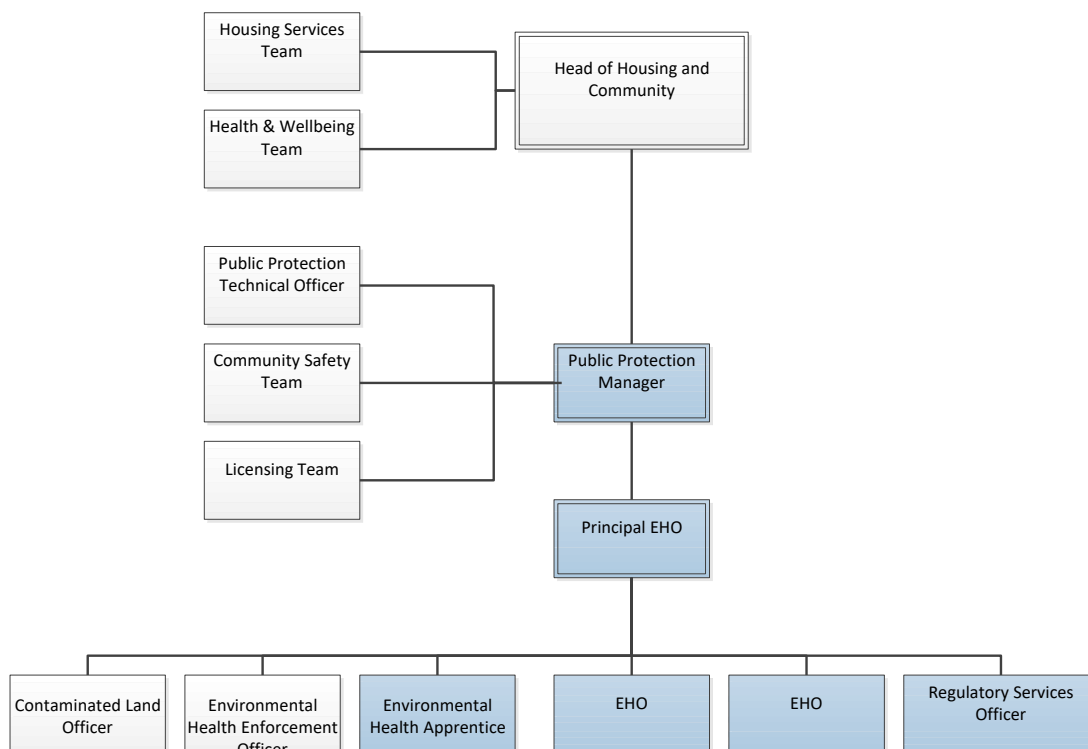
Complaints and enquiries from members of the public will be assessed and priority given to situations representing immediate or urgent public health risks. In some circumstances it will be appropriate to follow the matter up at the next routine inspection or not at all.

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.

7.7 Audit

An audit on the delivery of official food hygiene controls is scheduled for quarter 2 2024/2025, the results of which will be used to highlight and address risks.



Service Structure