

Service Plan For Food Law Enforcement 2022/23



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Introduction	4
Section 1:0 Aims and Objectives	5
1.2 Links to Corporate Vision and Themes	5
1.2.1 Food Safety Service Key aims	5
1.2.2 Food Safety Service key objectives	
Section 2:0 Background	6
2.1 Local Authority profile	6
2.2 Organisational structure	7
2.3 Scope of food law enforcement services	7
2.4 Demands on the food control service	8
2.5 Regulation policy	9
Section 3:0 Service Delivery	10
3.1 Food safety service delivery/work plan	10
3.2 Feed/Food-related complaints	11
3.3 Home Authority/ Primary Authority Principle	11
3.4 Advice to businesses	12
3.5 Food sampling	12
3.6 Control and investigation of outbreaks and food related infectious disease	13
3.7 Food safety incidents	13
3.8 Liaison with other organisations	13
Section 4:0 Resources	14
4.1 Financial allocation Food Health and Safety Team	14
4.2 Staffing allocation	14
4.3 Staff development plan	15
Section 5:0 Quality Assessment	15
5.1 Monitoring arrangements	15
Section 6.0 Service Performance and Review	16
6.1 Update on Phased Recovery of Inspections	16
6.2 Premises Awaiting their first inspection	18
6.3 Revisits and Formal Enforcement	19
6.4 Future Workplan	19

Appendices

Appendix 1 Risk rating profiles

Appendix 2 Premises profile (business types across Hillingdon)

Appendix 3 Work Plan 2022- 2023

Appendix 4 Sampling program

Appendix 5 Food complaints

INTRODUCTION

This service plan meets the expectations of the Food Standards Agency (FSA) to document an approved service plan for recovery of inland food official controls following the disruption to Councils Food Safety activities caused by the coronavirus pandemic.

The FSA have produced 'COVID 19 Local Authority Recovery Plan Guidance and Advice to Local Authorities for the period from the 1st of July 2021 to 2023/24' This provides the framework around which the plan is based.

This service plan details the arrangements in the Food Health and Safety Team to deliver food official food controls and related activities referenced within the Recovery Plan Guidance.

In line with The FSA's COVID 19 Local Authority Recovery Plan Q & A General and Business Guidance advice Version 3 the plan seeks appropriate approval to help with ensuring that the recovery programme is adequately resourced.

A briefing giving an outline of this plan has been given to Cabinet Member for Public Safety and Transport Councillor Riley. Performance against the plan will be reviewed quarterly by the Head of Service.

It is the intention to produce a new plan to be approved every year to accommodate changes as part of the FSA led change program ABC Achieving Business Compliance as well as accommodating regulatory changes emerging out of Brexit.

This service plan for 2022/23 does not consider the arrangements within the Imported Food Office to deliver Food official controls at the Border Control Post at Heathrow

SECTION 1 : FOOD CONTROL SERVICE AIMS AND OBJECTIVES

1.1 AIMS AND OBJECTIVES

1.2 Links to Corporate Vision and Themes

The Food Safety Service works to several objectives set annually in a Team Plan. This continues to make several strategic links to the council's vision and themes

- Our People.

"Putting our residents first and at the heart of all that we do, promoting civic pride."

- Our Built Environment.

"We will continue to improve our buildings, roads and footways and ensure that new buildings fit with the surrounding environment."

- Financial Management.

"Maintain the solid approach to financial management that has delivered our success to-date and which will be vital going forward"

1.2.1 Food Safety Service - key aims

- To protect residents and consumers alike by providing a risk-based approach that responds to potential public health hazards and focuses on preventative measures to reduce the likelihood of ill health.
- Operate within an agreed and published enforcement policy;
- Provide advice, information, support and guidance to local food businesses on their legal responsibilities in respect of food, and feed with due consideration to the Regulators Code, so as to secure better regulatory outcomes.
- Manage a cost-conscious Food Safety Service that achieves measurable and successful enforcement outcomes;
- Maintain and improve the levels of public information provided on compliance with food legislation, in a way that is clear and easy to understand, based on the national FSA Food Hygiene Rating Scheme.
- Form partnerships with the FSA and other services and agencies in promoting and operating a high quality, active and responsive service that meets joint targets and expectations;

1.2.2. Food Safety Service key objectives are:

- The main objective of the service in carrying out its functions is to protect public health from risks which may arise in connection with the consumption of food (including risks caused by the way in which it is produced or supplied) and otherwise to protect the interests of consumers in relation to food.

- Securing legal compliance, having regard to Codes of Practice and Food Standards Agency guidance; using a flexible risk-based interventions programme enabling resources to be targeted at non-compliant, high-risk premises.
- Providing opportunities for businesses that want to comply, by providing easily understandable advice and food hygiene ratings.
- Providing the opportunities for businesses to comply, but escalating actions for repeated noncompliance in the areas of greatest risk.
- Taking reasonable steps to ensure that food is "fit" and free from extraneous matter.
- Providing advice to and inspecting all new food businesses in the borough.
- Maintaining an accurate register of food businesses within the borough.
- Increasing the knowledge of food handlers about the principles and practices of good food hygiene and food standards.
- Dealing with food hazards in accordance with Food Standards Agency guidance.
- Investigating all relevant notified cases of food-borne disease and taking effective action to control the spread of infection.
- Ensure all food businesses manufacturing food of animal origin subject to specific rules are approved for operation.

SECTION 2.0 : BACKGROUND

2.1 Local Authority Profile

- 2.1.1 The Office for National Statistics (ONS) sub-national population projections estimate that in 2020 there are 309,300 people living in Hillingdon. Hillingdon is an ethnically diverse borough with 49.5 percent of residents from black and minority ethnic groups. Neighbouring boroughs are South Bucks, Three Rivers, Hounslow, Ealing, Harrow, Slough and Spelthorne.
- 2.1.2. Over half of the borough is rural countryside and parkland. The south of the borough is home to London Heathrow Airport.
- 2.1.3 There are just over 2400 registered food businesses, including retailers, restaurants and caterers. There are a number of areas with high concentrations of food businesses, most notably London Heathrow Airport, Uxbridge Town Centre, Ruislip Town Centre, Ruislip Manor, Hayes Town Centre and Eastcote.

2.2 Organisational Structure

- 2.2.1. The Food Health and Safety Team Manger reports to the Head of Trading Standards Environmental Health Licensing and ASBET, who reports to the Director of Place. The team consists of 1 Team Manager also an Environmental Health Officer (EHO) 1 Principal EHO, 2 Senior EHOS, 1 EHO, 1 Food Safety Officer (vacant) 1 Regulatory Compliance Officer, 1 trainee EHO 1 apprentice (vacant.)
- 2.2.2 Nonofficial food control including surveillance work, data returns, and systems administration is supported by a Regulatory Compliance Officer and Trainee Environmental Health Officer
- 2.2.3. Through the Council's Scheme of Delegations, the Food Health and Safety Team have delegated responsibility for food safety enforcement, and authority to instigate legal proceedings in consultation with the Head of Legal Services. The food enforcement function falls within the remit of Cabinet Member for Public Safety and Transport
- 2.2.4. Specialist support services are provided for, through appointment of a Consultant in Communicable Disease Control (CCDC) at Public Health England. The CCDC is appointed as the 'Proper Officer' for Hillingdon. The Proper Officer carries out various functions under public health legislation including the National Assistance Act 1948; the Public Health (Control of Disease) Act 1984 and the Public Health (Infectious Diseases) Regulations 1988. The CCDC has executive responsibility for the surveillance, prevention, and control of communicable disease.

2.3 Scope of the Council's Food Law Enforcement Services

2.3.1 Food Health and Safety Team

- Provision of advice and guidance to promote good practice and encourage legal compliance.
- Planned inspection of high risk and other risk food and feed businesses to ensure compliance.
- Planned sampling and analysis of foodstuffs to check compliance with safety, compositional and labelling standards.
- Investigation of alleged contraventions of legislation.
- Prevention, investigation and control of outbreaks or incidences of food borne disease.
- Responding to FSA food alerts as they relate to the borough.
- Instruction of food handlers.
- Identifying premises needing approval under European Commission (EC) regulations, and processing applications for approval.
- Issue of export (health) certificates.
- Promoting health and food safety initiatives.
- Undertaking enforcement action.
- Tackling illegal importation of food and monitoring the composition and labelling of imported foods to ensure compliance with food safety legislation.

2.3.2 Food Health and Safety Team Additional Responsibilities

- Provision of advice and guidance for local businesses to promote good practice and assist with legal compliance in relation to health and safety and "smoke free" legislation.
- Planned risk-based inspections of non-food businesses to ensure compliance with health and safety and smoke free legislation.
- Public Health Surveillance at Heathrow (Mosquito Vector Control, General Health Declaration checks and water sampling.)
- Coronavirus Working Safely Guidance
- Private waters risk assessment and sampling.
- Investigation and prevention of accidents in the workplace.
- Entertainment events advice and guidance.
- Planning and licensing consultations.
- Licensing reviews.
- Safety advice within Safety Advisory Group Meetings.
- Environmental Health IT systems administration.
- Feed enforcement.

2.4 Demands on the Food Control Service

Food Health and Safety Team

- 2.4.1 Returning after the pandemic the service is building a new picture of levels of non-compliance, these appear more complex and dispersed than previously identified with premises which have not been inspected for some time where standards may have fallen. There are varying demands related to the five terminals at London Heathrow including liaison with the airport operator, ground handling companies, terminal managers, airlines and airline handling agents. It follows within a business where compliance with food safety requirements is low, then other non-food related compliance issues are often identified, creating additional unplanned work.
- 2.4.2 The cost of living is presently high and rising with most economists and commentators predicting this will continue to increase for at least the next 12 months – towards the 10% mark. Gas and electricity prices have seen a sharp increase along with the price of petrol and diesel. In addition, there are supply pressures with for example the availability and price of vegetable cooking oil and a general commodity price increase. It is anticipated that this will play out with pressures on local businesses who may seek to reduce opening hours and or defer investments into the business including those that improve the health safety and hygiene of a premises. This will be challenging to the team when weighing up against the obligations of businesses to meet food and health and safety law and targeting the best possible regulatory outcomes.
- 2.4.3 The percentage of people speaking English as their first language is lower than the national average. Main languages spoken include Punjabi, Tamal, Somali, Polish, and Urdu. Challenges exist around language and food culture in a number of wards.

2.4.4 All local authorities have responsibility for imported food controls. Through port health authorities at sea and airports and international rail links and Border Control Posts, the UK has effective imported food controls at point of entry. However, despite effective border controls, illegal imports will still arrive at point of sale due to international smuggling of illegal goods or failure to declare items due to lack of knowledge on behalf of the importer. It is, therefore, important that inland controls are also in place. The identification of food not of animal origin and products of animal origin that have not been physically checked at point of entry or have been illegally imported, and any subsequent enforcement will normally be made during routine food hygiene inspections.

Food Law Inspections

2.4.5 The authority has approximately 2400 food premises recorded which are subject to programmed food law interventions. The profile of risk categories and types of food premises are shown in Appendix 1 and 2. The number of new registrations each month continue to apply an additional demand on the service.

Approved Premises

2.4.6 The authority is required to inspect and approve any premises producing products of animal origin such as meat, dairy, egg or fish product under EC derived legislation. The authority currently has 30 approved food premises.

The Food Hygiene Rating Scheme

2.4.7 The Food Health and Safety Team implemented the Food Standards Agency's national Food Hygiene Rating Scheme. The scheme includes restaurants, takeaways, pubs offering food, sandwich shops, cafes, mobile catering vehicles, schools, nurseries, retail shops, care homes, home caterers. Businesses receive a sticker awarding them a score of between 0 and 5, the display of which remains voluntary. Safeguards exist to enable businesses to request a revisit to re-score, to appeal the score and/or publish a 'right to reply'.

Service Contact Details

2.4.8 Food, Health and Safety Team:

- Telephone 01895 250190;
- Emergency (out of hours) 01895 250380
- Hours: 9am – 5pm Monday to Friday (voicemail operates at other times)
- Email on foodhealthandsafety@hillingdon.gov.uk

Hillingdon Council, Food and Safety Regulation, High Street, Uxbridge, Middlesex, UB8 1UW.

2.5 Regulation Policy

2.5.1 The Food Safety Service is bound by the Hillingdon Council Enforcement Policy adopted by Cabinet in October 2021. The key principles of this are as follows;

- Proportionality.
- Accountability.
- Consistency.
- Transparency.
- Targeting

SECTION 3.0 SERVICE DELIVERY

3.1 Food Safety Service Delivery Work Plan 2022/2023

3.1.1 The work plan for food safety along with performance measures is included in Appendix 3. There are both national and local (corporate) drivers for service delivery. Nationally, the obligations on food law enforcement authorities arise from the Food Law Code of Practice and Guidance including Recovery Planning guidance.

3.1.2 It is the Food Health and Safety Teams objective that the food programme is operated in accordance with the Food Safety Act 1990, The Food Safety and Hygiene (England) Regulations 2013 and the Food Law Code of Practice.

Officers will utilize the prescribed code of practice intervention frequency intervals to inspect high risk food establishments and work toward recovering the expected intervals for hygiene inspections of all Category C food premises in line with the COVID 19 Local Authority Recovery Plan Guidance and Advice by March 31st 2023.

3.1.3 Newly registered businesses will be inspected in addition to those businesses identified in the risk-based intervention programme.

Code of Practice Inspection intervals

Risk Category A poses the greatest risk

Risk Category A, every 6 months

Risk Category B, every 12 months

Risk Category C every 18 months

Risk Category D every 24 months

Following an audit/inspection of a food business, an inspection report is provided to the food business, clearly detailing any contraventions found and what action is required by the proprietor to meet the requirements of the law.

Verbal advice is also given on matters of best practice. Each premise is assigned a risk category, based on the type of business and the type of food handled as well as the conditions found at the premises at the time of inspection.

- 3.1.4 In all the work carried out by the Food Safety Team, priority is given to food hygiene interventions programme. Officers will, as far as reasonably practicable, combine food hygiene interventions along with food standards and health and safety interventions.
- 3.1.5 Inland food sampling is undertaken throughout the year. Priorities are set out within a sampling programme see Appendix 4 outside of these activities will increasingly be informed by local intelligence.
- 3.1.6 All officers undertaking inspections, investigating complaints, giving advice, and taking samples, will be authorised in accordance with the requirements relating to qualifications and experience laid down in the Food Law Code of Practice.
- 3.1.7 There are several factors which can have a significant impact on the service delivery and resources of the Food Health & Safety Team. This is in the form of unpredictable and unplanned work usually involving investigations and reactive enforcement. Some examples of unplanned service demands includes;
- Investigation of infectious diseases.
 - Working safely with Coronavirus.
 - Health and safety enforcement.
 - Port Health functions.
 - Animal disease and animal health.
 - Licensing.
 - Fluctuations in demand from service users (consumer and resident complaints).

3.2 Feed and Food Related Complaints

- 3.2.1 Trends in previous years are highlighted in Appendix 5, along with an estimation of complaints going forward.

Categories of food complaints included are as follows;

- Out of Date Food.
 - Labelling.
 - Cooking /Storage.
 - Foreign Matter.
 - Tainted Food (microbiological, chemical).
 - Allergens.
- 3.2.2 The Projection going forward includes service requests pertaining to all food poisoning and suspect food poisoning cases.

3.2.3 Service requests are investigated in accordance with established procedures and policies. It is our aim for an officer to respond to complaints within no more than 10 working days. Food complaints relating to food sold in the borough but manufactured either abroad or elsewhere in the UK will be directed to home/primary authorities and/or the company concerned to avoid lengthy investigations and inconsistent enforcement decisions. The service will generally seek to resolve these types of complaints informally having due regard to the Council's Enforcement Policy.

3.3 Home/Primary Authority Principle

3.3.1 The Home Authority principle is governed by a Joint Statement of Commitment (JSoC) signed in June 2011 by the BRDO which became part of the Regulatory Delivery Office, and now replaced by the Office for Product Safety and Standards (OPS) Chartered Trading Standards Institute (CTSI) and the Chartered Institute of Environmental Health (CIEH).

3.3.2 The service will adopt the home authority principle only where it is identified that there is a clear need for coordinated regulatory activity in connection with a business. It is expected in such a case the business within Hillingdon will normally produce or distribute food from within the borough and supply consumers in at least several other boroughs where the company may be subject to official controls.

3.3.3 In determining interventions at food premises, officers shall have regard to primary authority partnerships, these are statutory partnerships between companies and other Local Authorities where regulatory advice and guidance are agreed. Routine checks of a primary authority advice will be conducted. The service will consider inspection plans and consult with a primary authority over any planned enforcements.

3.4 Advice to Businesses

3.4.1 The service will work with businesses to help them comply with the law and to encourage the use of best practice. This is achieved through a range of activities, including:-

- Advice given during inspections and other visits.
- Signposting to government Food Standards agency and other relevant information online
- Responding to enquiries.
- Provision of food business hygiene awareness training.
- Provision of information on Hillingdon.gov.uk.

3.5 Food Sampling

Routine Sampling

- 3.5.1 Routine surveillance for inland functions is detailed in a sampling program.
- 3.5.2 In particular, food and environmental samples will be taken from the following types of business:
- Those engaged in the handling or preparation of high-risk foods.
 - Those selling food identified for sampling as part of national or regional sampling program or as agreed at the local food liaison group, with priority for imported foods.
 - Premises selling food subject to consumer complaints.
- 3.5.3 All sampling undertaken by officers is taken in accordance with the relevant legislation and with all due consideration to the services food sampling policy. In preparing its sampling program, the service allows for the participation in relevant sampling initiatives devised and coordinated by the following:
- London Food Coordinating Group.
 - North West London Food Liaison Group.
 - United Kingdom Health Security Agency.
 - Food Standards Agency.
- 3.5.4 The service aims to take a minimum number of programmed samples requested of each local authority in microbiological survey program, subject to having sufficient suitably qualified and trained staff available. Analysis of food may also be considered because of a food complaint. The food sampling program is updated on an annual basis to reflect local priorities.

3.6 Control and Investigation of Outbreaks and Food-related Infectious Disease

- 3.6.1 The FHST team will investigate food-related infectious disease notifications in accordance with procedures agreed with the Consultant in Communicable Disease Control (CCDC). These notifications of illness will be responded to within 3 working days. Any unusual illness activity that indicates a possible outbreak will be reported to the CCDC without delay and may be notified to the Food Standards Agency Incidents Team. Investigation of outbreaks will be in accordance with the CCDC Outbreak Control Plan.
- 3.6.2 In the event of an outbreak, the allocation of staffing resources will be higher due to the intensive staffing demands in controlling the spread of infection in the community, identifying the source and investigating potential offences.

3.7 Food Safety Incidents

- 3.7.1 The FHST team will, on receipt of any FSA food alert for action 'FAFA' or Product Recall/Withdrawal Information Notices respond as appropriate and in consideration of any special instruction from the FSA. On receipt of any local or regional outbreak related to food, respond as agreed within the Outbreak Control Team.
- 3.7.2 Emergency cover is provided out of hours throughout the year by officers who are contactable through the Council's emergency call-out service.
- 3.7.3 Priority is given to any emerging food incidents in preference to any programmed work. Up to 5 permanent FTE competent and qualified EHO's are available within the Food Health and Safety Team with a minimum skeleton staff of two during holidays during normal office hours. Resilience is provided for out of hours through duty EHO's and through the imported food office, which is open during weekends, evenings, and Bank Holidays.

3.8 Liaison with Other Organisations

- 3.8.1 The Council is committed to ensuring its enforcement approach is consistent with other local authorities. Accordingly, regular dialogue on food enforcement matters takes place through the following forums:
- North West London Food Liaison Group (NWLFG);
 - Association of London Environmental Health Managers Forum (ALEHM); (representing a forum for regional feed arrangements);
 - Health and Safety Executive.
 - National Health Service (NHS) through the Director in Public Health.
 - UKHSA (in relation to foodborne outbreaks);
 - Department for Environment, Food and Rural Affairs (DEFRA) and Animal and Plant Health Agency (APHA).
 - HMRC.
 - London Approvals Group.

4.0 RESOURCES

4.1 Financial Allocation

Food Health and Safety Team

- 4.1.1 The budget for 2022/2023 is shown below. For comparison, the previous financial year is also provided. Part of the budget for Food, Health and Safety is required for other (non-food related) functions of the wider team.
- 4.1.2 Administrative staff are not included in this salary budget. Additional staffing of a minimum of 1 FTE in addition to existing would be required until November to cover competency developments within the team

2021/22	Food, Health & Safety	2022/23	Food, Health & Safety
	(actual)		
CC	51500	CC	51500
Staffing	620,694	Staffing	551,700
Non-Staffing	17,628	Non-Staffing	21,000
Income	17,645	Income	9000
Net Budget	604,988	Net Budget	563,700

Food Health and Safety Team Cost Centre 51500

- 4.1.3 All enforcement officers have access to a laptop computer (containing database, e-mail and word processing and spreadsheet packages. All PCs in the FHST team have internet access. Inspectors have access to the Knowledge Hub as well as food policies and procedures document managed using an online 3rd party supplier.
- 4.1.4 In the event of legal proceedings arising from food safety issues, costs are met from within the cost centre and assistance from legal services will be sought to recover costs via the courts and collections service.

4.2 Staffing Allocation

- 4.2.1 All food law enforcement activities enquiries and data management is administered by Regulatory Compliance Officer supported by a shared administrative officer.
- 4.2.2 All officers carrying out food safety enforcement duties are appropriately authorised taking into consideration qualifications and competencies as laid out by the Food Law Code of Practice.
- 4.2.3 Four EHOS are authorized without restrictions, one EHO is presently restricted to lower risk inspections and on pathway to registration as Chartered Practitioner, a Trainee EHO is restricted (scheduled graduation October 2023) Regulatory Compliance Officer is restricted to unofficial controls.

4.3 Staff Development Plan

- 4.3.1 The service will ensure that Food Safety Service officers are appropriately qualified and receive regular development to maintain and improve appropriate levels of competency.
- 4.3.2 Staff shall refer to the FSA competency framework for Food Law Enforcement Officers in determining their development objectives for the year.
- 4.3.3 Staff are encouraged to maintain an equivalent of at least 20 hours of CPD per year split into 10 hours on core food matters and 10 hours on other professional

matters. This will be achieved through a combination of activities, including training, where this is available and shall be met within existing budgets.

4.3.4 The staff development approach comprises of:

- The employment of competent enforcement officers capable of food law enforcement.
- The employment and development of experienced environmental health officers including officers wishing to return to food law enforcement.
- Evidence of formal qualification (sight of qualification certificates prior to commencement of work);
- In-house and external competency-based training, including online training.
- Identification of training needs through the Council's appraisal process (PADA) and ongoing performance monitoring at 1-1 supervision meetings.

SECTION 5.0: QUALITY ASSESSMENT

5.1 Monitoring Arrangements

We aim to have the following monitoring arrangements in place, to maintain service standards within the Food Health and Safety Team:

- Carrying out 9 documentary checks of records completed following on from food official control visits each month
- 2 Peer Reviewed inspections per officer per year
- Monitoring of 100% notices before sending.
- Audit of FSA /LAEMS (Local Authority Enforcement Monitoring System) statistics, and back office checks.
- Validation of hygiene rating score by cross checking recorded compliance scores.
- 1-1 supervision meetings, 6 monthly appraisals and annual appraisals.
- Controlled document management of policy and procedure documents.
- Team Meetings.
- All statutory returns are checked and verified by a Team Manager before submission.

6.0 SERVICE PERFORMANCE AND REVIEW

6.1 Update on Phased Recovery of Inspections

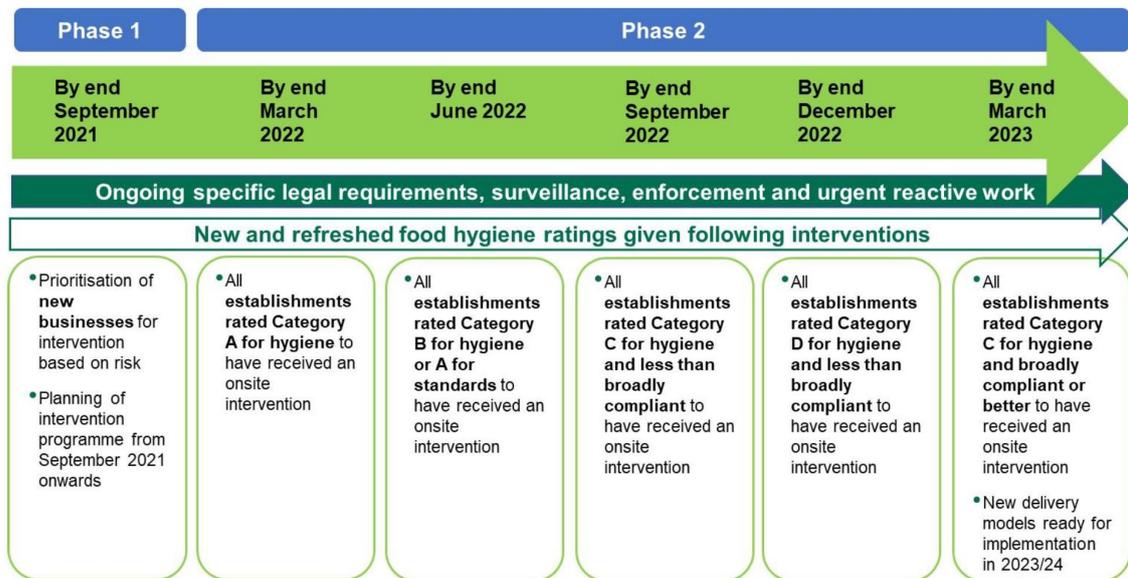
Following the disruption to the service during the Covid Pandemic much of the focus is on returning to a food inspections service based around the current priorities set by Food Standards Agency within COVID 19 Local Authority Recovery Plan, Guidance and Advice to Local Authorities for the period from the 1st of July 2021 to 2023/24'_A summary of our current position compared to planned phases within the FSA recovery program and our own additional commitments are highlighted in the tables below.

6.1.1 In line with FSA priorities (see below) Food Health and Safety Team have prioritised Cat A and B for Hygiene and Cat A for food standards. Moving more quickly the team also targeted completing Food Standards Bs and Cat C's and Cat D's that were non broadly compliant or 'less than generally satisfactory' by March 31st 2022.

Table 1 Food Standards Agency Guidance to Local Authorities on Phased Recovery

**Food Standards Agency
Board Meeting – 26 May 2021**

FSA 21-05-02



6.1.2 In total **952*** hygiene inspections were successfully completed in 2021/2022, during each visit food standards would have also been considered.

6.1.3 The remaining priority inspections taking into consideration the phased recovery are highlighted in the table 2 and table 3 below along with additional planned priorities. Completion of highest risk inspections last year has allowed us to revert to normal inspection frequencies of higher risk premises in line with the Food Standards Agency Food Law Code of Practice.

Table 2 Priority Food Hygiene Inspections left to be completed in line with FSA Guidance on phased Recovery and our own ongoing planned priorities

Inspection	By March 31st 2022	By 31st March 2023
Category A	0	6
Category B	1	75
C' D's (which were less than generally satisfactory)	0	10
C's	(No target)	231
D	(No target)	100
Unrated awaiting first inspection	Triaged and high risk inspected	300
	Total	722

6.1.4 There are currently 541 broadly compliant category D inspections in total that would need an inspection before March 31st, 2023 to realign the programme of inspections with expected intervention frequency within the current Food Law Code of Practice. Programmed category D hygiene inspections have started with priorities focused on schools, colleges, residential care homes, lunch clubs, dining centres and the hospitals. Other D's that have been awaiting a programmed inspection for the longest period may also be visited subject to other unplanned work such as required revisits and more formal enforcement. Category D premises will also be inspected at the same time as high-risk food standards inspections

6.1.5 Whilst the service will continue to work towards realigning our programme for category D's, this years workplan will work within existing budgets to target priorities in 6.1.4 which will in turn allow some progress toward reducing the total number of D's to within the region of 441.

Table 3 Priority Standards Inspections left to be completed in line with FSA Guidance on Phased Recovery and ongoing planned priorities

Inspection	By March 31st 2022	By 31st March 2023
Standards A	3	52
Standards Category B	19	79

6.2 Premises awaiting their first inspection

- 6.2.1 Each month on average 20 – 30 new food registrations are received within the team these will be triaged if they are operating from a residential address before being marked unrated (ready for inspection) If they do not open within 3 months of the registration date they will not be processed further. Commercial addresses are marked unrated /ready for inspection immediately.

Table 4 below shows the number of unrated inspections completed in 2021/2022 and the current number that are unrated/ ready to inspect.

Table 4 Unrated inspections in 2021/2022 and total awaiting their first inspection

First Inspection	Completed 2021/2022	Outstanding May 2022
Unrated	330	95

6.3 Revisits and more formal enforcement

- 6.1.9 Expectations from the FSA during the 'recovery phase' include taking appropriate enforcement action where necessary to secure compliance, Table 5 below illustrates more formal enforcement in 2021.

Table 5 enforcement action

Intervention	Completed 2021/2022
Written Warnings	787
Revisits	76
Hygiene Improvement Notice	34
Other Notices	7
Formal/ informal Closures	9
Prosecutions concluded	1
Simple Cautions	6

6.4 Future Work planning

- 6.4.1 Targeting of a future workplan will be influenced by the outcome of consultation with Local Authorities and agreement by the Food Standards Agency Board on the new modernised hygiene delivery model referred to in table 1. Views and insights on plans will be gathered via online events commencing June 2022. across England Wales and Northern Ireland.

GLOSSARY

Approved Premises: Food manufacturing premises that has been approved by the local authority, within the context of specific legislation, and issued a unique identification code relevant in national and/or international trade.

Food Law Codes of Practice: Government Codes of Practice issued under Section 40 of the Food Safety Act 1990 as guidance to local authorities on the enforcement of food legislation.

Alternative Inspection Strategy: This describes the 'alternative' methods of assessing businesses; it is intended to ensure that adequate control is maintained in low-risk premises. Alternative Enforcement Strategies are used widely by most Local authorities for businesses where there is 'no inspectable risk' and provides for a reduction in officer time spent on low-risk premises.

Food Hazard Warnings: A system operated by the Food Standards Agency to alert the public and local authorities to national or regional problems concerning the safety of food.

Framework Agreement: The Framework Agreement consists of:

- Food Law Enforcement Standard.
- Service Planning Guidance.
- Monitoring Scheme.
- Audit Scheme.

The Food Law Enforcement Standard and the **Service Planning Guidance** set out the Agency's expectations on the planning and delivery of food law enforcement.

Full Time Equivalents (FTEs): A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time or may have other responsibilities within the organisation not related to food enforcement.

Home Authority: An authority where the relevant decision-making base for an enterprise is located and which has taken on the responsibility of advising that business on food safety/food standards issues. Acts as the central contact point for other enforcing authority's enquiries with regard to the enterprise's food related policies and procedures.

Primary Authority: An authority that has agreed a written statutory partnership with a business to provide authoritative advice for other councils which they must take into account when carrying out inspections or dealing with non-compliance. Effective resourcing arrangements may be set up under such an arrangement.

Auditing: A system whereby local authorities might audit each other's' food law enforcement services, (inter authority auditing) or the Food Standards Agency might audit each against an agreed quality standard.

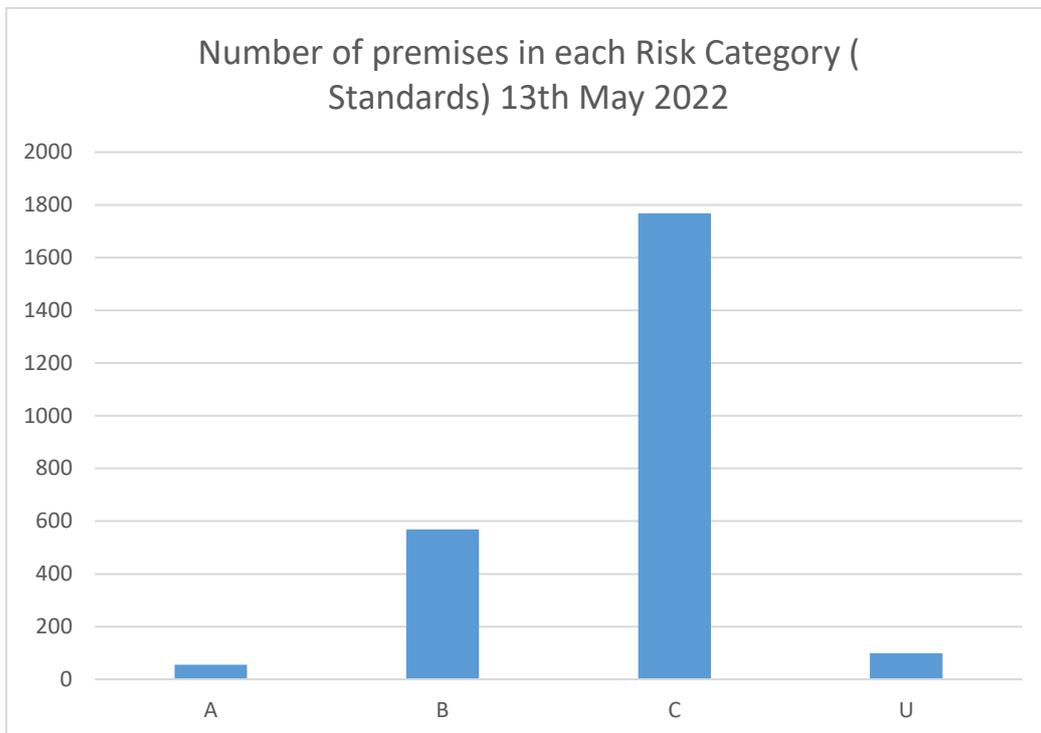
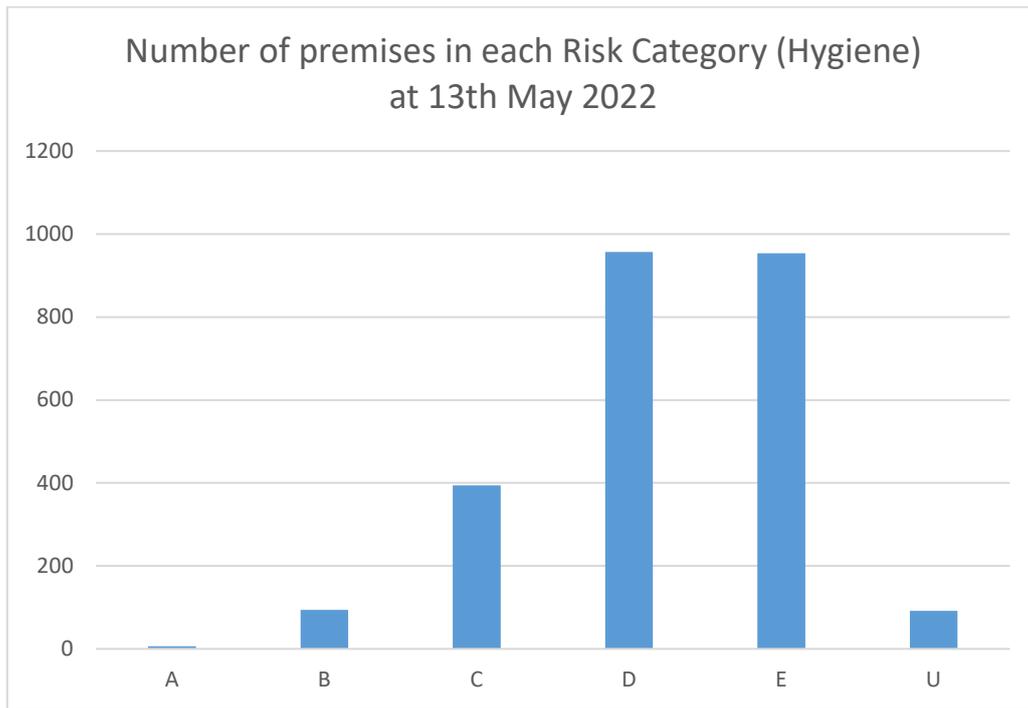
Food Liaison Group Member Forum for discussion between neighbouring local authority environmental health staff at which Members discuss arrangements for delivery of food law enforcement, and coordinate regional and local sampling surveys.

Originating Authority: An authority in whose area a business produces or packages goods or services and for which the Authority acts as a central contact point for other enforcing authorities; enquiries in relation to those products.

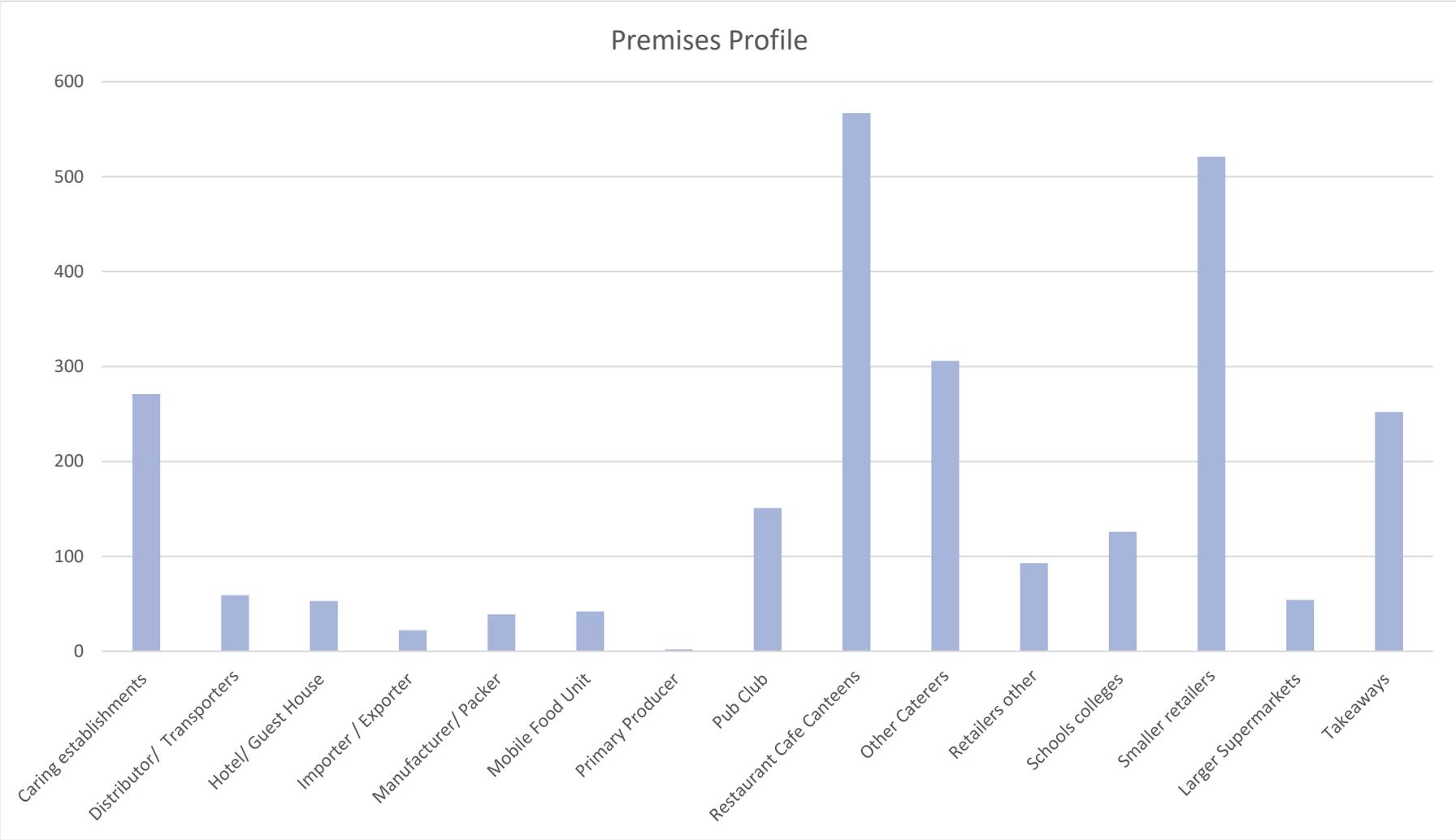
LAEMS: Local Authority Enforcement Monitoring System which is a web-based system used to report local authority food law enforcement activities to the FSA.

ALEHM - Association of London Environmental Health Officers.

Appendix 1 Risk Rating Profile of all known food businesses



Appendix 2 Profile of food business types across Hillingdon



Appendix 3 Workplan Core Activities 2022/2023

KPI	Activity	Discipline	Measure of Success	Projections to 2022/2023	Comments
1	Maintaining/improving compliance Cat A – B Hygiene Inspections	Hygiene and Standards	Complete 100% inspections due up to June 30 th by June 30 th , 2022, and maintain inspection frequency of every 6 and 12 months respectively going forward Complete revisit inspections on those premises rated less than broadly compliant/ less than generally satisfactory (in scope of FHRS.)	We will aim to complete 50 % of revisit inspections to those premises that are rated less than broadly compliant/ less than generally satisfactory Expecting some Food Standards B's which are difficult to access will remain outstanding (22 outstanding 26 th May)	Demands of unplanned work such as disease outbreak investigations, investigations of accidents and food and non-food related legal work will limit capacity of revisits. Target FHRS equivalent 0 – 1 for revisit activity T4 Heathrow closed until June, home caterers and football clubs restricted hours.
2	Category C Inspections (high risk)	Hygiene	100% by March 31 st 2023	100%	19 th May 231 outstanding in the programme with due date before March 31 st
3	Category D (lower risk)	Hygiene	Complete 100% of inspections of caterers serving foods to vulnerable groups (nurseries, care homes, schools)	To continue to make progress with inspecting category D's targeting at, targeting at least 100	There are 541 D's outstanding in the programme. Presently there is no explicit requirement within

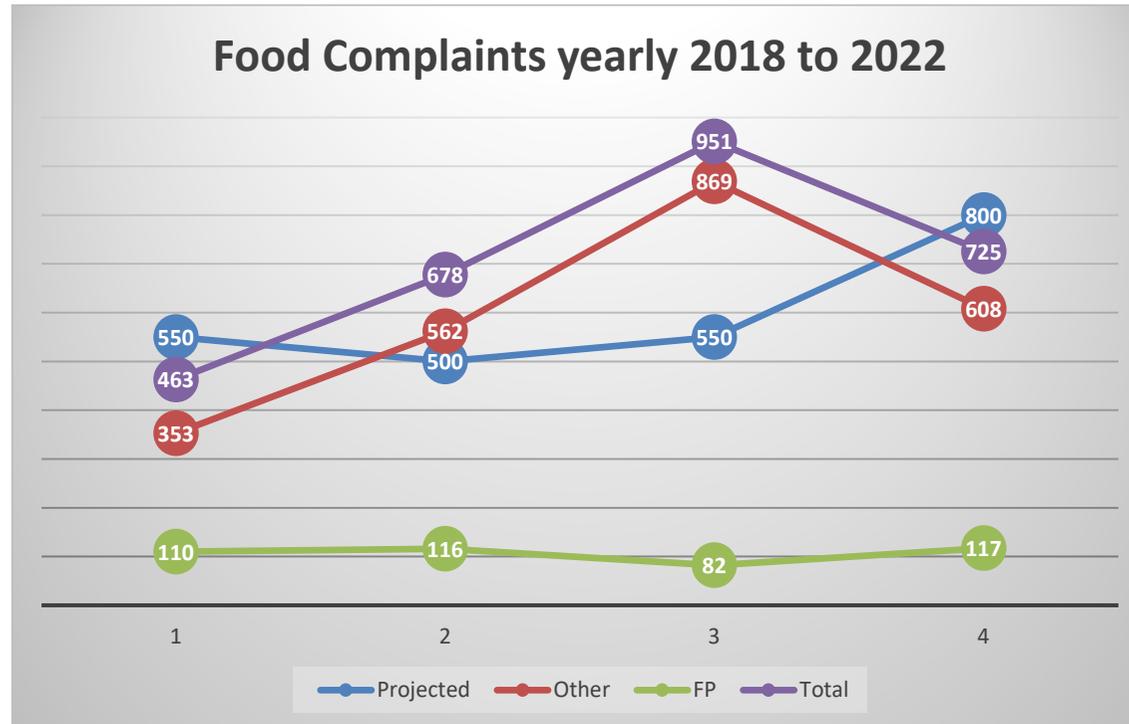
			and commence inspections of those premises within the programme that have the earliest inspection date.		<p>Phase 2 of the FSA recovery plan to complete Cat D inspections outside of those which are less than broadly compliant)</p> <p>Engage with FSA plans on new hygiene delivery model and '<i>work towards</i>' realigning programme of Cat D's to expected frequency.</p>
4	Category C (low risk)	Food Standards	-	As much as possible Food Standards C's will be programmed for an intervention to coincide with Hygiene inspections.	
5	Unrated	Hygiene and Standards	95 unrated (awaiting an inspection) in May	Triaging of home caterers and bakers and programming 'high street' premises for inspection, aim to inspect within 3 months of open and trading.	20 – 30 new registration are received each month. Levels of new premises registering with Local authorities across North West London continues be challenging.
6.	Hygiene Rating Scheme	Hygiene	Publish scores of all premises in scope of food hygiene rating	Maintain	

			scheme within 28 days of inspection		
7.	Food Law Enforcement	Hygiene and Standards	Achieving improved compliance, through a combination of revisits and formal enforcement notices.	Targeted at worst performing 0 – 1's	
8.	Food Sampling	Food Hygiene and food Standards	Complete food sampling activities in line with food sampling programme	Maintain	

Appendix 4 Sampling program 2022 / 2023

ITEM	Location/s	Analysis purpose		To be collected by: -
Lamb mince	Retail butchers throughout the borough	Speciation – evidence suggests that butchers substitute in other meats for lamb when making minced lamb - A higher percentage of substitution results in the lamb mince becoming not of the nature demanded by the customer		Autumn 2022
Cooked Chicken	Sandwich makers	Micro – ready to eat foods		Winter 2022
Salads	Sandwich makers	Micro – ready to eat foods		Winter 2022
Touch points	Sandwich makers	Micro		Winter 2022
Allergens	Premises with poor allergen awareness & Low confidence in management	Allergen contamination / cross contamination		Spring / Summer 2022
Milk	Whiteheath Dairy	Micro Phosphatase		Summer 2022
Ice Cream	Whiteheath Dairy	Micro		Summer 2022
Touch points	Whiteheath Dairy	Micro		Summer 2022
Deli meats	Polish Deli's throughout the borough	Micro – Listeria Check use by dates of deli meats on display for sale		Autumn 2022
Shakes / smoothies	Milk Bars/dessert Bars	Allergens		Summer 2022

Appendix 5 Food Complaints



Projected	550	500	550	800
Other	353	562	*869	608
FP	110	116	82	117
Total	463	678	951	725
	18/19	19/20	20/21	21/22

*Uplifted by Covid Service Requests