

Appendix 1
Brighton & Hove City Council Official Feed and Food Controls Service
Plan 2019/2020

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 staff within the Safer Communities Service of the Neighbourhoods, Communities & Housing Directorate. The Head of Safer Communities reports direct to the Executive Director of Neighbourhoods, Communities & Housing.
- 1.1.2 The strategic aim of the Directorate being to put communities at the heart of our services. To this end the Directorate consolidates Environmental Health and Trading Standards food enforcement teams in one service.
- 1.1.3 The service is primarily concerned with protecting and improving public health 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.
- 1.1.4 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.
- 1.1.5 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 and businesses, by means of advice, information, education and enforcement.

The core aims being to ensure: -

- Accurate food information for consumers.
- That compositional standard of food is maintained.
- Prevent food fraud
- That food and feed are free from unsafe contaminants

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 for 2015-19 is to provide strong civic leadership for the wellbeing and aspiration of Brighton and Hove. The Council will be successful if it is judged to have delivered:

- **A good life** – ensuring a city for all ages, inclusive of everyone and protecting the most vulnerable
- **A well run city** – keeping the city safe, clean, moving and connected
- **A vibrant economy** – promoting a world class economy with a local workforce to match
- **A modern council** – providing open civic leadership and effective public services

1.2.2 The Official Feed and Food Control Service Plan has strong links with all of these aims.

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

1.2.4 The service continually monitors business opinion through satisfaction surveys. 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 Demographic information is available from online Brighton & Hove Connected <http://www.bhconnected.org.uk/>. There were 289,229 residents according to the Office for National Statistics latest mid-year population estimate (2016).

Resident Population by Ethnic Group 2011 Census

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

2.1.3 Tourism plays a major part in the local economy. Tourism South East estimated that total expenditure by visitors to Brighton & Hove is estimated to have been in the region of £885.9 million in 2016.

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 delegated to the Environment Transport & 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;
- Promoting healthy catering initiatives within local food businesses.

2.3.2 The food standards and feed hygiene functions are carried out by competent Trading Standards Food and Feed Officers. The work of the team includes the following: -

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

2.3.3 Food Standards and Feed Hygiene work is undertaken in conjunction with work on other areas of Trading Standards law. For instance, a programmed food visit will also include inspecting and giving advice about other matters such as product safety, counterfeit, age restricted products, prices, business names and weights and measures. In this way, a comprehensive visit is undertaken, 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 products 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. Trading Standards have responsibility for the enforcement of regulations pertaining to allergen information relating to food.

2.4 Demands on the Feed and Food Service

Food Safety

2.4.1 As at December 2018 there were 3254 food businesses registered. These premises are broken down into the following profile:-

6	Primary Producers
56	Manufacturers/Processors
4	Packers
10	Importers/Exporters
30	Distributors/Transporters
594	Retailers
2551	Restaurants and other Caterers
3	Manufacturers Selling Mainly by Retail
3254	TOTAL

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

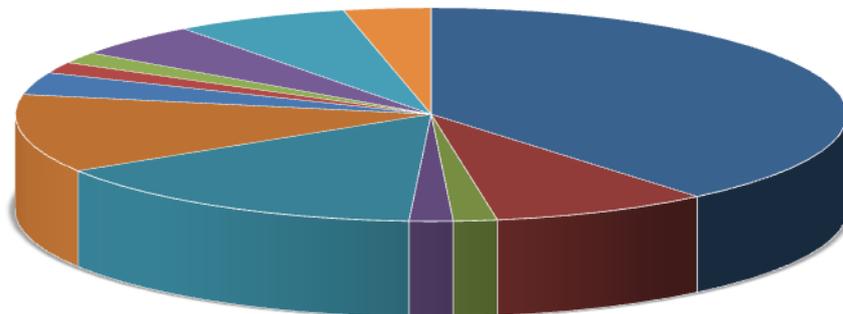
2.4.3 The nature of the city results in a considerable seasonal variation in the department's workload. Some businesses only open during spring, summer or school holidays. The intervention programme has to be tailored to meet these service needs. There is a dramatic increase in the number of visitors in the spring and summer, 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.

2.4.4 Premises data is captured on Uniform and therefore the premises profile is similar but as the risk assessment is based on the LGR scheme and risks for Trading Standards matters differ to those for the Food Hygiene function, the individual premises have a different inspection frequency for Food Standards. As of the January 2019, 3099 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. The last data available being for the eleven months to January 2017 58.7% of those who gave an answer identified themselves as White British. The ethnicity of the remaining businesses identified as below.

Ethnicity of Food Businesses Where Notified 2016/2017



- 16.1% Any other White background
- 0.7% Asian or Asian British - Indian
- 6.3% Any other Asian Background - Chinese
- 1.4% Mixed - Asian & White
- 0.7% Mixed - Black Caribbean & White
- 2.8% Arab
- 3.5% Asian or Asian British - Bangladeshi
- 0.7% Asian or Asian British - Pakistani
- 4.9% Any other Asian Background
- 0.7% Mixed - Black African & White
- 2.1% Any other mixed background
- 1.4% Any other ethnic group

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.

2.4.7 Access to the service is provided by:

- Visiting either Bartholomew House Customer Services Centre, open hours 8:45am to 4:30pm weekdays or Hove Town Hall, opening hours 10:00am to 4:30pm;
- 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;

- Email to ehl.food@brighton-hove.gov.uk.

2.4.8 Food Standards complaints are usually 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. Complaints and referrals are also received via the food safety team.

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 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 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

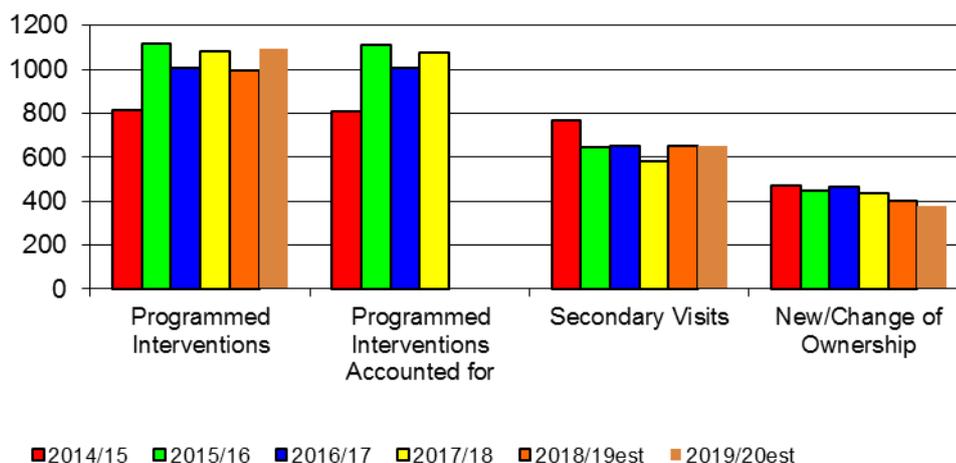
3.1 Interventions at Food and Feedingstuffs Establishments

Food Safety

3.1.1 This section details the planned risk based food safety intervention programme for 2019/2020. The level of achievement in food safety intervention based activity over the past four years is shown in the chart below and Table 3.1.1 along with estimates for completion of the current year and 2019/2020.

3.1.2 Inspection intervals are calculated on a risk-based approach. The service sets a current target of 98% compliance with the annual programme. 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.

Chart of Intervention-Based Activity 2014-2020



See tables 3.1.1 and 3.1.3 for further details.

Year	14/15	15/16	16/17	17/18	18/19est	19/20est
Programmed Interventions	815	1116	1008	1079	1009	1096
Accounted for	811	1113	1004	1077		
Target %	98 A-D	98 A-D	98 A-D	98 A-D	98 A-D	98 A-D
Achieved%	99.5 A-D	99.7%	99.6%	99.8%		

Table 3.1.1 Achievement of Planned Food Safety Inspection/Intervention Programme 2014-20.

3.1.2 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 undertaken; number of customers; vulnerability of the customers to food-borne illness; standards of hygiene; condition of the structure and confidence in management. Scoring all of these factors gives an overall risk rating of A to E is arrived at. Category A premises are the highest risk and E the lowest.

3.1.3 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. Data on the number of interventions undertaken since 2014 and estimates for 2018/19 and 2019/20 can be seen in table 3.1.2.

3.1.4 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.

Year	14/15	15/16	16/17	17/18	18/19est	19/20est
Questionnaires	201	255	132	133	200	150
Visit	37	40	2	49	25	40

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

3.1.5 Planned food safety interventions programme for the year 2019/2020 as estimated at 1st January 2019 being:-

Risk Category of Premises	Number of Interventions Due
A	4
B	80
C	386
D	262
Total	1096
Low-risk premises due for intervention	250

3.1.6 A further target is to ensure that at least 95% of food establishments are 'broadly compliant', with a Food Hygiene Rating Score (FHRS) of three or more.

3.1.7 As at December 2018 the level of broadly compliant establishments rated in the FHRS scheme stood at 96.35%. This level of compliance protects public health, the local economy and reputation of the council as a responsible regulator.

3.1.8 **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.

3.1.9 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.

3.1.10 Safeguard measures associated with the FHRS permits any food business that does not attain the top rating to request a rescore once any necessary issues have been resolved. Any revisit is unannounced.

3.1.11 In late 2016 the service introduced a charge for those businesses who requested a rescore visit. Between September 2016, when the charge was introduced, and December 2018 97 businesses pursued this option.

3.1.12 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.

3.1.13 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.

3.1.14 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 380 new businesses or changes of ownership in 2019/2020.

3.1.15 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	14/15	15/16	16/17	17/18	18/19est	19/20est
Secondary inspections	766	647	654	580	650	650
New Premises or Change in Ownership	470	450	467	435	400	380

Table 3.1.3 Estimate for 2018/2019 and 2019/20 based on data since 2014.

3.1.16 It is estimated that the number of staff required to carry out the programme of inspections plus other visits is 7.25 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 and Feed Hygiene

3.1.17 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 362 high risk, 50% of the 994 medium risk and 20% of the 1793 low risk premises should be visited each year. The service was proposing to move to the FSA risk rating scheme at the start of 2018/19, but due to IT problems with the service provider, this was not possible; it is anticipated that the move will occur in 2019/20 which may result in a variation of figures going forward. This scheme will align us with Food safety colleagues and allow us to have an accurate risk rating for feed premises.

- 3.1.18 The target for 2018-19 was to visit 221 high-risk and 476 medium risk premises liable to inspection. Due to work undertaken on compliance with allergen information, the risk profile of a number of premises have changed to high or medium instead of low risk. Due to the additional work required to ensure compliance with allergen information in poorly performing businesses, the target for 2019-20 is to visit 100% of High Risk premises and 33% of Medium Risk premises, with priority given to Medium Risk premises with poor allergen compliance.
- 3.1.19 There is no commitment to visit low risk premises but in 2018-19, 185 low risk premises were visited up to 24th Jan 2019, as a result of project work, referrals, complaints and other routine inspections.
- 3.1.20 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.
- 3.1.21 One full time and one part time posts make up the Food Standards Team. This equates to 1.6 FTE. About 95% of their time is spent on the food and feed function.
- 3.1.22 **New Businesses** – Trading Standards Officers aim to assess new food businesses within 56 days.
- 3.1.23 **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.
- 3.1.24 **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 and misdescribed goat meat. Poor compliance with allergen information with the corresponding risk to the safety of food is an emerging threat.
- 3.1.25 **Medium Risk Premises** -These premises will receive an intervention at three yearly intervals. These interventions will alternate between comprehensive inspections, and a mix of sampling visits, complaint visits or other monitoring or surveillance. At least 33% of the premises liable to an inspection will be subject to a comprehensive visit. Where medium risk rated premises have a Primary authority relationship with a local TS service, or if they are part of a national or regional chain, these premises will be re rated to low risk. This will allow officers more time to support independent and new businesses.

3.1.26 **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.

3.1.27 **Feed Hygiene** – The service participates in the National Trading Standards feed programme. We will undertake inspections of premises identified by the national team as requiring a visit. This equates to approximately 12 visits per annum.

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	13/14	14/15	15/16	16/17	17/18
Within target %	95.4	96.8	97.2	96.6	97.1

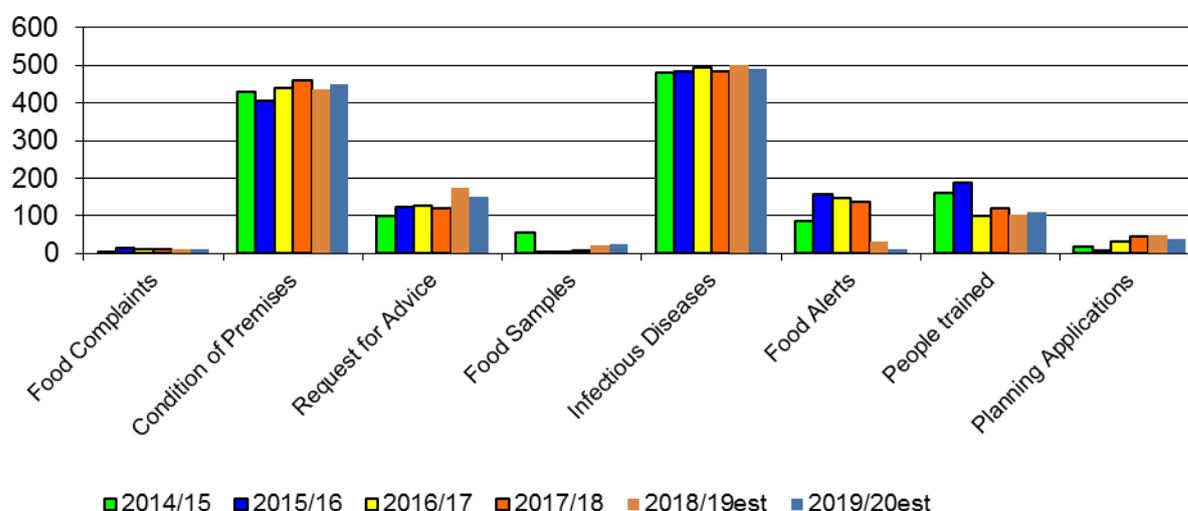
Table 3.2 Percentage of Demand Driven Work within Target Response Time

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 2014 and estimates for the current year and 2019/2020. The source figures for this chart are contained in tables within the relevant part of the plan.

Year	14/15	15/16	16/17	17/18	18/19est	19/20est
Food Complaints	2	14	11	10	12	12
Condition of Premises	430	406	440	461	435	450

Table 3.2.1 Estimate of complaints for current year and 2019/2020 based on data from 2014 onwards.

Chart of Demand Driven Work 2014-2020



See tables 3.2.1, 3.4.1, 3.5.0, 3.5.1, 3.6 and 3.8 for the source of data.

3.2.3 It is estimated that 1.65 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 2018/19 as the report is generated before the end of the calculated year.

Year	14/15	15/16	16/17	17/18	18/19 est
Number of Complaints	106	133	125	130	140

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 8 informal arrangements with businesses whose operational activity extends outside of the city. Currently there are no primary authority partnerships in the city.

3.4 Advice to Businesses

Food Safety

3.4.1 Advice is given during inspections, by hotline, website and an e-newsletter. Group emails can also be sent from the food establishment database to over 2000 businesses who have supplied email addresses.

3.4.2 Table 3.4.1 gives the number of planning applications viewed by food safety officers and the number of requests for advice from businesses. Such focussed guidance includes advice on the construction, development and structural alterations to food establishments.

Year	14/15	15/16	16/17	17/18	18/19est	19/20est
No of Requests	98	125	128	119	175	150
Planning Applications	19	7	31	45	50	40

Table3.4.1 Requests received since 2014 and estimates for the current year and 2019/2020

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

Food Standards

3.4.4 The level of requests for advice has remained reasonably consistent over several years. The following figures show an estimate for 2018/19 as the report is generated before the end of the calculated year. There has been an increase in requests following an improved system of referrals for business advice on allergens via the Food Safety Team.

Year	14/15	15/16	16/17	17/18	18/19 est
No of Requests	149	190	146	150	224

3.5 Feed and Food Sampling

Food Safety

3.5.1 A formal arrangement is in place with Public Health England's (PHE) 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 PHE and regional sampling programmes across Hampshire, Kent, Surrey and Sussex. 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 The three national food sampling programmes for 2018/2019 were:-

- Study 64 – sweet and savoury ready to eat pastry products. Thirteen samples were taken from establishments across the city. No results gave cause for concern
- Study 65 – Swabbing of contact surfaces and cleaning cloths. Samples were taken from seven establishments. Samples from five of the establishments required follow up action.
- Study 66 - Frozen fruit and vegetables from retail and catering premises. This study was scheduled to take place after preparation of this plan, results to be reported as part of the 2020/21 plan.

Year	14/15	15/16	16/17	17/18	18/19est	19/20est
No. of samples	57	6	3	9	20	24

Table 3.5.0 Food Safety Samples Submitted 2014-2018 & estimate for the current year and 2019/2020.

3.5.4 Arrangements are in place with the PHE laboratory at Porton Down for the analysis of samples that require microbiological examination.

Food standards

3.5.5 The Public Analyst contract was awarded to Kent Scientific Services in 2017. For the year 2018/19 a budget allocation of £5,000 was made for sampling analysis. It is envisaged that a similar amount will be allocated for the 2019/20. The focus of the contract remains composition, allergens labelling and chemical contamination. .

3.5.6 Inspections, investigations and advice for 2018/19 equated to approximately 1.6FTE.

3.5.7 In 2017 the FSA withdrew all funding for National and Regional Sampling. Sampling programmes locally have therefore been based on TSSE regional programmes. In 2017/18 some funding for sampling

was provided via TSSE in order for local authorities to participate in Regional Sampling programmes; this funding continued in 2018/19 and it is anticipated that this funding will continue in 2019/20. It is intended that in 2019/20 further sampling will be undertaken locally focusing on meat species and also sampling for allergens; it is anticipated that this will tie in with TSSE led projects.

Food Sampling Work undertaken in 2018/19

	PROJECT
	Wine and Spirit sampling
	Meat species *
	Allergens including Gluten Free *
	Complaints and investigations

* Denotes TSSE led project

3.5.8 The FSA has withdrawn all funding for National initiatives. The cost for the regional and local projects will be set to allow for contingencies, such as complaints and reacting to food alerts.

3.5.9 During 2018/19 Trading standards have also carried out work funded by the FSA via NTSB (National Trading Standards Board) on animal feed which ties in to the Official Feed and Food Controls. This work will be funded again in 2019-20 but funding is likely to be reduced.

3.5.10 New regulations governing the labelling of food and whether they contain allergens, came into force in 2014. Officers have undertaken work to inform and educate businesses of their obligations under these regulations; compliance with the requirement to provide allergen information still remains an issue and therefore this work will continue in 2019/20 prioritising advice and support to small independent traders.

3.5.11 **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 2014 to 2018 and an estimate of the numbers expected for the current year and 2019/2020. Investigations of outbreaks must commence as soon as practical. In individual notifications, the investigation has to commence within 5 days. It is estimated that 0.6 FTE officer will be required to meet this level of complaints.

Year	14/15	15/16	16/17	17/18	18/19est	19/20est
No. of reports	480	485	494	485	500	490

Table 3.5.1 Notifications for 2018/2019 & 2019/2020 based on data from 2014 onwards.

3.5.12 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.

Year	14/15	15/16	16/17	17/18	18/19est	19/20est
Campylobacter	293	267	253	294	300	300
Salmonella	11	20	24	19	25	20

Table 3.5.2 Estimate of Number of specific notifications for 2018/2019 & 2019/2020

3.5.13 Food-borne illness can be contracted as a result of a number of reasons including poor food handling in the home or foreign travel. Usually 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 Food Safety team manager and senior staff 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 if required.

3.6.4 Introduction of the Smarter Communication platform from by the FSA means that all food officers receive food hazard alerts by email. As the majority of these concern food allergy alerts from 2020 onwards only those requiring action will be reported.

Year	14/15	15/16	16/17	17/18	18/19est	19/20est
Food Alerts	86	158	147	138	30	10

Table 3.6 Food Alerts for the current year and 2019/20 based on data from 2014 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 Food Safety team sends a representative to 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.

- An officer attends the regular liaison meetings with Children's Services and school caterers.
- 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.

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

Food Standards

3.7.2 The team works closely with 19 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, 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. Officers also use this forum to receive advice and intelligence regarding the feed function. In 2018/19 the Food Standards Team have also provided assistance to the National Food Crime Unit with 2 investigations and have provided advice and assistance to the Early Years and Child Care Team on allergen information and the provision of free from foods

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 promotes healthy menu options via the Healthy Choice Award in a diverse range of settings targeting health inequality: nurseries, breakfast clubs and after-school clubs.
- 3.8.2 From 1st April 2018 BeeZees has taken over the provision of the majority of Weight Management services with breakfast clubs and nurseries being administered from within the food safety team.

- 3.8.3 A Project Officer works within the Food Safety Team to develop and co-ordinate the Healthy Choice Award. The award prioritises the preparation of meals using fresh ingredients, the use of healthier ingredients and cooking methods and adequate opportunities for customers to make healthier choices if they wish. As at January 2019 115 food outlets have gained the award with a further 23 working towards accreditation.
- 3.8.4 The programme also supports the Public Health Sugar Smart City campaign. Sugar Smart City aims to motivate settings such as schools, food outlets and retailers to take action and help residents reduce their sugar intake. Food outlets are being asked to make 'Sugar Smart Commitments' such as to promote free tap water for customers, offer a range of low and no sugar soft drinks, or to develop lower sugar dessert or children's menu options.
- 3.8.5 The programme also supports national healthy eating campaigns such as Peas Please which encourages producers, suppliers, retailers and other actors across the food supply chain to make it easier for everyone to eat more vegetables. This project initiated a partnership research project with the retailer LIDL and the University of Brighton.
- 3.8.6 Between September 2015 and November 2018 several healthier catering workshops have been staged for food outlets. Topics including oil maintenance and general good practices, types of oils and their properties, allergy and health, financial and environmental implications being covered. 139 chefs, managers, front of house staff and business owners have attended these sessions. In 2017 Brighton and Hove pledged to become a pioneer Veg City, running catering workshops to increase vegetables in meals for public and private caterers. In partnership with the Brighton and Hove Food Partnership a series of three workshops across different settings such as early years, secondary schools and food outlets have been planned for 2018/2019. The first workshop, for early years has been delivered and included a nutrition as well as cookery session.
- 3.8.7 The food safety training activity by number of people trained on the CIEH Level 2 Award Food Safety in Catering course is given below in table 3.8. This is a full day course aimed at food handlers.
- 3.8.8 The service offers eight courses a year. The numbers of food handlers trained since 2014 being detailed below.

Year	2014/15	2015/16	2016/17	2017/18	2018/19est	2019/20est
Trained	160	187	100	119	104	110

Table 3.8 Total Training Undertaken since 2014

- 3.8.9 The service took part in Food Safety Week 2018 by organising displays in both Brighton and Hove Town Halls and taking part in national social media campaigns organised by the FSA. The themes being 'The

People Who Protect Your Plate', raising awareness of local authority and FSA work, and food safety in the home during Christmas.

3.8.10 It is estimated that this promotional work will be covered within resources plus the addition of a fulltime project officer to manage and co-ordinate food nutrition work.

4. Resources

4.1 Financial Allocation

Food Safety

4.1.1 The net budget for the Food Safety Service for 2018/19 was £562,000. The budget for 2019/20 has yet to be set. As with all other services provided by Brighton & Hove City Council, Safer Communities are subject to delivering savings. One proposal being to make a saving of 1 full-time Environmental Health Officer post from the Food Safety team. This is currently under review also see 4.2.3 below.

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 2018/19 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
Total	£45,370
Purchases	£ 500
Analysis	£ 4,500
Total	£ 5,000
Total	£ 54,370

The budget has not yet been set for 2019/20 but similar funding levels are envisaged.

4.2 Staffing Allocation

Food Safety

4.2.1 Establishment of the Food Safety Team for the year 2019/2020 is 10.85 full time equivalent field officers plus two full time equivalent administrative support staff, management and Food Nutrition Project Officer, broken down as follows:-

2 x Senior Environmental Health Officers
3.6 x Environmental Health Officers
2.56 x Senior Technical Officers
1.68 x Technical Officer
1 x Food Nutrition Project Officer

4.2.2 As detailed in 3.1.16, 3.2.3, 3.4.3, 3.5.11 and 3.8.10 of this plan it is estimated that 11 full time equivalents are required to fulfil the given objectives plus management. This is in-line with the allocated resources.

4.2.3 During 2018 the Safety Communities department was reorganised. This resulted in the Senior EHO's of the Food Safety Team taking on additional management and supervisory duties and the team became responsible for the health & safety enforcement function. This resulted in an additional resource pressure of 1.1 FTE which is currently being reviewed.

Food Standards

4.2.3 The proportion of time allocated to this function in 2018/19 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 All food safety field officers hold relevant qualifications to comply with the requirements of the Food Safety Code of Practice. In addition to the annual appraisal system ongoing professional development is monitored and managed through officer self assessment, management monitoring, regular 1-2-1's and the quality assurance system detailed in 5.1.1 below.

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. Staff performance is reviewed, monitored and managed through the appraisal system, monthly 1-2-1 and review by the departmental management team.

Food Standards

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

5.1.3 All food standards and food hygiene officers hold relevant qualifications to comply with the requirements of the Food and Feed Codes of Practice. In addition to the annual appraisal system ongoing professional development is monitored and managed through officer self-assessment, management monitoring, and regular 1-2-1's to ensure that maintain their competency under the Codes.

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 2017/2018, 99.8% 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. 435 interventions were undertaken of new businesses or premises that had changed ownership.

6.1.4 At January 2019, 96.7% of the food businesses in the city were deemed to be 'broadly compliant', or better ie a FHRS of three or better.

6.1.5 From April 2017 to March 2018 19 Hygiene Improvement Notices were served and one business prosecuted for food hygiene offences.

Food Standards

- 6.1.6 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.
- 6.1.7 The Service Reviews indicate that the service is on target to achieve the interventions programme.
- 6.1.8 During staff one-to-one's each officer's performance is monitored, to identify good performance and any areas of improvement.
- 6.1.9 Complaints are responded to within the stated timescales.

6.2 Identification of Any Variation from the Service Plan

Food Safety

- 6.2.1 There was no significant variation from the 2017/18 Service Plan during the year.

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 year on year. Table 6.3 demonstrates the improvement which has been built on the local Scores on the Doors scheme since migration to the national scheme in March 2012.

FHRS rating	January 2013	January 2019
0	3	1
1	113	49
2	92	41
3	265	228
4	589	594
5	1377	1846
Total	2624	2759

Table 6.3. Number of food businesses in each FHRS Comparing 2013 and 2019 Ratings

6.3.2 The number of Broadly Compliant businesses has continued to increase and currently stands at 96.7% of all food business.

Food Standards

6.3.3 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 misdescription and traceability, this work links in with the Licensing Authority function and Alcohol Project Board.
- Improvements in the provision of accurate allergen information by catering businesses.
- Increasing and maintaining the competency and professional development of food officers.
- Establishing consumer concerns and reflecting this in local activity.
- Improving our data records and risk rating
- Improving the referral system between the Food Standards and Food Safety Teams to identify and support poorly performing businesses on the provision of allergen information.
- Providing support and assistance to independent SMEs (Small and Medium Enterprises)
- Targeting Food Fraud