



IPSWICH
BOROUGH COUNCIL

Food Law Enforcement Service Plan

Statutory Official Food Controls

April 2015 - March 2017

1. Service aims and objectives

Our aims and objectives are:

- To work in cooperation with the Food Standards Agency (FSA) as the national food safety regulator by following the requirements of the national Framework Agreement.
- To ensure food business operators run successful businesses, fully compliant with food hygiene law and incorporating good practice, but not tied up in 'red-tape'.
- To participate in the national Food Hygiene Rating Scheme (FHRS) in order to enable members of the public to make informed choices about where they eat or purchase food.
- To participate in the Eat Out Eat Well – Healthy Food Award initiative in Suffolk which encourages businesses to provide healthy options to consumers.
- To educate the community as a whole, both business and public, to ensure safe and healthy food contributes to the health and well-being of the community.
- To prevent spread of infectious diseases in homes, workplaces and schools.
- To ensure food placed on the market complies with food safety requirements.

The Food Safety Team has an important role to play in ensuring food premises are hygienic, food is safe and infectious disease is kept under control. The food industry is a major employer and is governed by numerous legislative requirements. Many Ipswich businesses are small to medium sized enterprises, which have particular difficulty in coping with all these requirements. The Food Safety Team plays a key role in keeping the businesses which wish to receive help up to date and ensuring those that don't or can't keep up to date, do abide by the law, thereby creating a level playing field for all. By participating in the national Food Hygiene Rating Scheme (FHRS) and the Eat Out Eat Well – Healthy Food Award initiative in Suffolk, businesses are encouraged to improve the standard of their offering and customers are informed of those standards and given the choice of purchasing safe and healthy foods.

The food safety service has links to 'Building A Better Ipswich: The Council's Corporate Plan':

- Underlying Principle 1: A Fairer Ipswich
- Underlying Principle 2: Value for Money
- Theme 1: A Stronger Ipswich Economy
- Theme 2: A Safer and Healthier Ipswich

Theme 6: A more Enjoyable Ipswich

2. Background

Profile of the Local Authority:

Ipswich is the county town of Suffolk. The population of the Borough is 133,000 and a third of a million people live within 15 miles of the town centre. There are a huge variety of restaurants and bars, there are theatres and a cinema as well as a summer arts festival, maritime spectacular and many other outdoor events. Ipswich also has three museums including Christchurch Mansion and a number of beautiful parks. Ipswich is a financial services centre and many people are employed in various public sector organisations based here. There are a number of industrial and retail parks as well as the Port of Ipswich. Ipswich is the home of University Campus Suffolk. Ipswich enjoys excellent transport links with London and the rest of the country, is surrounded by unspoilt countryside and is close to the Suffolk coast.

Organisational Structure:

Ipswich Borough Council employs more than 1,000 people delivering a wide range of quality services to the people of the town.

The Council has 48 elected councillors, representing 16 wards, with a Leader and Executive committee model, together with 'scrutiny' and other committees and panels.

The organisational structure for the Food Safety Team is:

Head of Housing and Community Services

Operations Manager Environmental Health

Principal Environmental Health Officer Food Safety

Food Safety Officers

The Council uses the Public Health England Food, Water and Environmental Microbiology Laboratory, 61 Colindale Avenue London NW9 5EQ for microbiological sampling. We use Eurofins Laboratories, 28-32 Brunel Road, Acton, London W3 7XR as our Public Analyst.

3. Scope of the Food Service

The service undertakes the following food safety functions:

- Inspections of food premises and food
- Advising businesses of regulatory requirements and changes
- Sampling of food from food businesses
- Enforcement of food safety law
- Education of food handlers
- Investigating and controlling outbreaks of food poisoning and infectious diseases
- Responding to food alerts

- Investigating complaints about food and food businesses
- Dealing with unfit food
- Inspection and clearance of imported food
- Ship sanitation certification
- Testing of water supplies

The core food safety service is provided by Ipswich employees but specialist contractors may be used for short-term projects or where capacity is an issue.

The service has entered into a joint warranting arrangement with the other Suffolk District Councils so that in emergencies, regulatory staff are authorised to operate across council boundaries.

The Port Health function is provided through an agreement with Suffolk Coastal Port Health Authority.

4. Demands on the Food Service

Food premises are subject to interventions at intervals determined by risk rating, in accordance with the inspection rating system within the Food Standards Agency Code of Practice. The frequency of intervention is dependent on the rating score and this determines the category for each premises. The number of premises within each category fluctuates to some extent as businesses close and new ones open. The current figures are as follows:

Category	Intervention interval	Total number of premises
A	6 monthly	3
B	12 monthly	54
C	18 monthly	239
D	24 monthly	428
E	36 monthly	479
Unrated	Within 28 days of opening	35
Total		1238

The Food Safety Team is currently able to carry out 480 planned interventions per year. This equates to 16 interventions per fte field officer per month. Businesses are prioritised for inspection in category order. Currently category E businesses are not inspected at all as resources do not allow the necessary numbers of interventions to be completed. The Food Law Code of Practice makes it clear that Local Authorities should prioritise the inspection of higher risk businesses over lower risk businesses where scarce resources make this necessary (a one-off project is being undertaken in early 2016 to inspect as many category E businesses as possible). Other interventions that become due in the year include revisits to poorer performing businesses and re-rating request visits where businesses have made improvements and request Officers to give a new food hygiene rating. Visits are also undertaken to advise new business owners, to carry out sampling and to investigate complaints received. Drainage and pest control issues can also lead to visits to a number of premises at the same time. A number of businesses only trade at night or weekends and these have to be considered when planning the inspection programme.

There are 1,255 food premises recorded on the Ipswich database at any one time; 1,238 of which are in the inspection programme. There is currently one business approved under EC

Regulation 853/2004. In addition to food businesses that are based in Ipswich, there are a variety of events that involve visiting food businesses where the Food Safety Team need to provide food safety assurance. These include the market on Cornhill and a number of events especially in the parks and at the Waterfront (i.e. Maritime Festival, MELA, Music Day and Fireworks in Christchurch Park). Ipswich is also a Primary Authority Partner to two large organisations – East of England Co-operative Society (142 food premises in the East of England) and 'eats' (providing school meals to 34,000 children every day, as well as a number of other commercial food outlets).

Of the 1238 food businesses approximately 110 are of ethnic background. Of the 1128 non-ethnic businesses, 62 (5.5%) are not broadly compliant (i.e. do not achieve a score of at least 10 for each of hygiene/structure/confidence in management. This is the lowest level which the FSA considers satisfactory). Of the 110 ethnic businesses 54 (49%) are not broadly compliant. This reflects the fact that many ethnic businesses are small businesses which naturally find it harder to comply with all the requirements of food law, coupled with the obvious language difficulties for such businesses.

The Food Safety Team is located at Grafton House, the main office block for Ipswich Borough Council. The Council Offices are open between 8:30am and 5pm Monday to Friday.

5. Regulation Policy

The Council has an Enforcement Policy dated June 2003. This document is to be reviewed as soon as possible following the completion of the Environmental Health Transformation Review in 2016.

6. Interventions at Food Establishments

The Council is committed to carrying out inspections at a frequency that is determined by the Food Law Code of Practice. The service will carry out approximately 480 routine or initial food safety interventions from the period 1 April 2015 to the 31 March 2016 plus revisits and re-rating visits where necessary. At the time of writing a similar number of interventions are predicted for 2016/17. These interventions are targeted at Category A-D businesses. Category E businesses will be reviewed as a one-off project prior to March 2016.

A primary aim of the inspection process is to achieve measurable year on year improvements in inspection outcomes. Our key performance indicator has been to improve 50% of businesses previously rated 0,1,2 to at least a rating of 3. This target was exceeded in 2014/15 (actually 82%).

Regulations relating to customer information on allergens came into force in December 2014. Information was sent by the Food Safety Team to all relevant businesses in the weeks prior to the legislation coming into force. Allergen awareness has also formed an important component of food hygiene visits since then. This is work which we are doing in partnership with the Trading Standards service and it will continue through 2015/17.

During the period September 2015 to March 2016 a contractor will be employed to carry out a project to increase the display of food hygiene rating stickers across the town. This work has attracted a grant from Food Standards Agency as part of their commitment to ensure greater display occurs across England as a whole and also to inform their plans for asking the Government to create legislation for compulsory display, as is currently the case in Wales and Northern Ireland.

7. Food Complaints

The Food Safety Team investigates all complaints it receives relating to food where it is the enforcement authority and will liaise with the Home, Primary and Originating Authority where appropriate. In 2014/2015 there were 26 food complaints and 85 food premises complaints. The Food Safety Team aims to make a first response to this type of complaint within 48 working hours.

8. Home Authority Principle and Primary Authority Scheme

The Council supports the Home Authority Principle and will provide advice to businesses where they act as the Home or Originating Authority. Officers have regard to information that they receive from any liaison with Home/Organising Authorities and where advice has been received, the relevant Authority will be kept informed of actions taken by this Council.

The Council acknowledges the Primary Authority Partnership system and appropriate adjustments are made to the way in which interventions are undertaken when businesses have a primary authority arrangement with another Local Authority.

As previously mentioned Ipswich Borough Council acts as Primary Authority Partner for two major food businesses and charges each business on an hourly-rate basis for the time it is involved in advising them. The Primary Authority Officer has regular liaison with other Local Authorities who require information regarding the businesses. This is not charged as it is recognised Ipswich officers benefit from the same arrangement with other Primary Authority Partnerships.

9. Advice to Business

Officers are committed to building positive working relationships with food business operators and work with them to help them comply with the law and to improve food safety standards. The two Primary Authority Partnerships we run are ground-breaking in Suffolk – no other Suffolk Local Authority has been involved in a partnership, even though they are self-funding.

Increasingly officers will direct businesses to web-based resources, particularly those produced by the FSA although, as with the change in regulations relating to allergens, when appropriate, printed information is supplied. Both new and existing businesses are encouraged to contact the service for advice. In 2014/2015 there were 131 food advice requests. Most of the requests continue to relate to the starting up of small independent businesses.

10. Food Sampling

Food sampling is carried out to establish whether foodstuffs are safe to eat and primarily considers microbiological content (Trading Standards have responsibility for sampling for allergens, false labelling etc.).

Food samples are taken either in response to complaints or as part of the Council's proactive surveillance procedures for ensuring that food produced and/or sold in Ipswich is safe to eat. The Council participates in a regional sampling programme, coordinated by the Eastern Region Coordinated Food Sampling Liaison Group and a national sampling programme coordinated by Public Health England. Both provide intelligence that can identify what the

focus of food safety visits to businesses should be. During 2014/15 50 food samples have been taken from a variety of businesses.

11. Control and Investigation of Outbreaks and Food Related Infectious Disease

Notifiable infectious diseases are reported to us by Public Health England (PHE). Some reported illness requires investigation by local authorities to both establish the cause and to try and limit spread. All food poisoning or suspected food poisoning notifications, other than single-case *Campylobacter* (see below), are responded to and the aim is to do this within 24 hours of receipt. Investigation and control of major outbreaks is undertaken in conjunction with the Consultants in Communicable Disease Control at Public Health England. Investigation of outbreaks, the establishment of an Outbreak Control Team and control measures are all implemented in accordance with the Norfolk, Suffolk and Cambridgeshire Joint Communicable Disease Incident/ Outbreak Management Plan April 2015. This plan is subject to annual review and was devised with input from the Suffolk Environmental Health services.

The total numbers of infectious disease notifications for 2014/15 was 289. None of these required investigation as an 'outbreak'. 25 of these notifications were investigated in accordance with the agreed protocol 'Norfolk, Suffolk and Cambridgeshire Public Health Response to Notifiable Gastrointestinal Infections and Legionnaires' disease'. Many of the notifications are of single cases of *Campylobacter* infection, which does not warrant investigation as it is such a wide-spread organism and with only single cases there is no evidence to point towards a particular cause.

12. Food Safety Incidents

The Council receives electronic notifications of all Food Alerts issued by the Food Standards Agency. Officers respond to such notifications in accordance with the requirements of the Food Law Code of Practice.

Around 35 Food Alerts were received from the FSA in 2014/2015. None were found to have major implications for Ipswich.

13. Liaison with Other Organisations

Officers represent the Council at the following food safety related meetings:

- Suffolk Food Liaison Group (Ipswich Principal EHO chairs this group)
- FSA food leads regional meetings

The Suffolk Food Liaison Group is comprised of lead officers from Suffolk Food Safety teams, Suffolk Trading Standards, FWEM laboratory Colindale, Public Health England, Food Standards Agency, and Field Veterinary Officers.

FSA food leads regional meetings are comprised of chairs and secretaries from Eastern Region Liaison Groups together with regional representatives from Food Standards Agency.

These Groups offer the opportunity to share information, organise low cost training for our food safety officers and help to ensure consistent enforcement and consistent food hygiene ratings. They also enable our professional officers to have access to regional and national food safety forums. With the general reduction in resources available to Suffolk environmental health services in recent years, resilience has been adversely affected. An

initiative taken to counter the likely problems that would occur if there were a major problem has been the development of an authorisation agreement between the seven district and borough councils so that competent, authorised officers can work in other districts, in relation to food safety and health and safety, should the need arise. This agreement also encompasses the Suffolk County Council Trading Standards service. The type of event where this arrangement could be beneficial includes a major food poisoning outbreak or a significant investigation where many witness statements are needed. The agreement was signed off by all of the Suffolk Councils in 2014.

In England, an increased responsibility for catering businesses to provide consumers with information about allergens was introduced with new regulations coming into effect in December 2014. The Food Safety teams across Suffolk worked closely with the Suffolk Trading Standards service to provide advance information to businesses. To some extent these new regulations changed the emphasis of many of the routine inspection visits made during 2014 and are likely to through 2015/17. The District Councils have powers to enforce the new regulations whilst the County Council have a duty to enforce.

In 2015 the Liaison Group agreed a set of joint procedures in accordance with the Framework Agreement and Food Law Code of Practice. This will allow the Group to regularly review and share joint procedures, cutting down on the amount of time each Local Authority has to spend on such tasks. It also helps to ensure consistency of approach across the County wherever this is possible.

The Primary Authority Lead Officer has regular liaison with the Better Regulation Delivery Office (BRDO) which oversees the Primary Authority Partnership scheme.

The Principal Environmental Health Officer responsible for the Port Health contract has regular liaison with Suffolk Coastal Port Health Authority who provide the service at Ipswich Port.

14. Food Safety promotional work and other non-official controls interventions

Food safety promotional work will be undertaken where resources and work programmes allow.

15. Resources

Financial:

Staffing costs are the most significant element of food safety work (approximately 90%).

Staffing allocation:

For 2015/16 the Food Safety service establishment is:

- 1.5fte Principal Environmental Health Officers, Grade 11
- 1.0fte Technical Officer, Grade 8
- 1.5fte Environmental Health Officers, Grade 10
- 1.0fte vacant Environmental Health Officer, Grade 10

For 2016/17 the service establishment may change following the outcome of the Transformation Review currently being undertaken and due for completion by the middle of 2016.

The Food Safety Team shares a team of Business Support Unit staff with the rest of Environmental Health.

Staff development is undertaken and reviewed through the Performance and Development Review process that covers all Council staff. In particular consideration is given as to how each Officer will undertake and maintain the Continuing Professional Development requirements of the Code of Practice. The latest Code of Practice has introduced a requirement for the assessment of competency and authorisation of all food officers to be completed by April 2016.

16. Quality assessment and internal monitoring

Monitoring arrangements are in place to assist in the quality assessment of the work being carried out as follows:

- Internal monitoring procedure and schedule
- Structured review of a sample of post inspection records
- Structured accompanied interventions with food safety officers
- Regular team meetings
- Individual performance review system

17. Review of performance against the Service Plan

One to one meetings are carried out every six weeks with staff to review performance against the Service Plan. The Plan includes annual targets for interventions, which are also broken down into monthly targets for easier monitoring throughout the year. Monitoring of reactive work such as complaints and infectious disease response is checked at the same time.

18. Identification of any Variation from the Service Plan

The one to one meetings allow regular review against Service Plan targets and the ability to make adjustments as required. Through 2014/15 all key targets were accomplished and the Key Performance Indicator was surpassed. The target was to improve 50% of businesses previously rated 0,1,2 to at least a rating of 3. In fact 82% of such businesses achieved that improvement.

19. Areas of Improvement

Ipswich Borough Council will continue to seek service improvement. The requirements of the Framework Agreement and Food Law Code of Practice will be fully considered as part of the process.

20. Key performance indicators

- To improve 50% of businesses previously rated 0,1,2 to at least a rating of 3 by carrying out revisits and where necessary using an appropriate hierarchy of enforcement.
- To carry out 16 food hygiene inspections of category A to D businesses per month per fte field officer.
- To make contact with a person suffering a notifiable disease within 24 hours of receiving a notification, completing the food-history questionnaire and liaising with Public Health England to decide the next steps required.

- To submit an accurate LAEMS (Local Authority Enforcement Monitoring System) return to the Food Standards Agency by 31st March 2016.

21. Key Objectives

- To undertake the Food Standards Agency funded project to increase the display of rating stickers throughout the Borough (target completion 31st December 2015).
- To undertake a project to review our category E businesses (approximately 390 businesses will be overdue for inspection by 31st March 2016).
- To undertake the officer competency assessments required by the Food Law Code of Practice – requirement for completion 6th April 2016.
- To undertake an ongoing joint-working initiative with Trading Standards to inform businesses of the new allergen information requirements. 810 letters were sent to Ipswich businesses in January 2015. This will be followed up in 2015/16 by discussing the details with 480 businesses targeted for inspection during that period.
- Initially one officer to undergo training in the Royal Society of Public Health Level 2 Award in Healthier Food and Special Diets, to be eligible to assess businesses under the Suffolk-wide Eat Out Eat Well initiative, which will be launched January 2016.
- To undertake food sampling in accordance with the co-ordinated national and regional sampling plans in order to ensure we fully use our allocated credits (every Local Authority is awarded a specific number of credits which allows samples to be tested for free).
- To maintain the two successful Primary Authority Partnerships with Vertas and East of England Co-operative Society in accordance with the agreements set up for each of those two parties, the Borough Council and the Better Regulation Delivery Office. In addition, to create a further partnership (we are currently in discussion with the proprietor of Prestige Bars and Catering Ltd, Woodbridge Road).
- Principal Environmental Health Officer to monitor quarterly activity reports, submit imported food returns and complete annual audit to ensure Suffolk Coastal Port Health Authority are adequately undertaking Port Health controls at the Port of Ipswich in compliance with the contract we have with them.
- Participate in the Suffolk Better Business For All initiative.

22. Review of Service Plan

This plan will be reviewed every two years, unless budgetary constraints or legislative changes mean a more urgent review is required.