

Brighton & Hove City Council Official Feed and Food Controls Service
Plan 2020/2021

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 Housing, Neighbourhoods & Communities Directorate. The Head of Safer Communities reports to the Executive Director of Housing, Neighbourhoods & Communities.
- 1.1.2 The strategic aim of the directorate being to put communities at the heart of the 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 Draft Corporate Plan 2020-23 'A Fairer City, A Sustainable Future' identifies six outcomes:

- **A city to call home;**
- **A city working for all;**
- **A stronger city;**
- **A growing and learning city;**
- **A sustainable city; and**
- **A healthy and caring city.**

1.2.2 The food safety and standards service has particularly strong links with; **a city working for all** through the assistance and support given to small businesses; **a stronger city** based on fair engagement with all businesses, residents and visitors and; **a healthy and caring city** from the core aim of protecting public health.

1.2.3 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. It is 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 reported in the Corporate Plan gives a population of 290,395 (2017). One in five residents, or 19.5%, are from a Black or Minority Ethnic groups and the population profile is younger than the national with 62% being 20 to 59 years old against the average across England of 53%.

2.1.3 Tourism plays a major part in the local economy supporting over 21,000 jobs in the area.

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 January 2020 there were 3229 food businesses registered. These premises are broken down into the following profile:

6	Primary Producers
41	Manufacturers/Processors
7	Packers
8	Importers/Exporters
33	Distributors/Transporters
598	Retailers
2533	Restaurants and other Caterers
3	Manufacturers Selling Mainly by Retail
3229	TOTAL

2.4.2 Four 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.

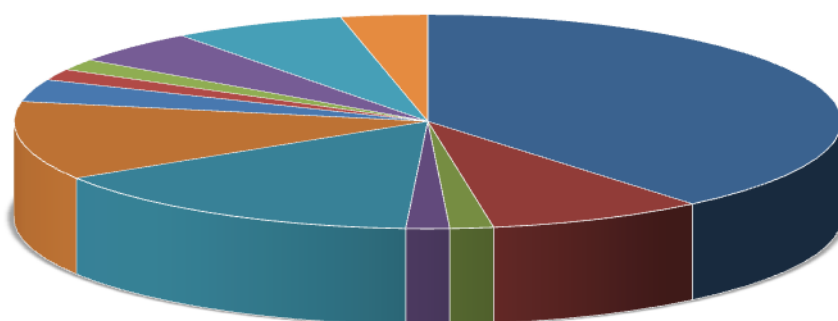
2.4.4 Premises data is captured on the Uniform database and therefore the premises profile is similar to the LGR scheme. However, the risks for Trading Standards matters differ to those for the Food Safety function with individual premises having different inspection frequency. As of January 2020, 3312 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.

2.4.5 At the time of preparing this plan the effect of BREXIT on the service and local food business are not fully known. Impacts will depend on the level of divergence from the EU legislative framework and the terms agreed between the EU and UK.

Access to services

2.4.6 Up to January 2017 businesses were 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 | ■ 3.5% Asian or Asian British - Bangladeshi |
| ■ 0.7% Asian or Asian British - Indian | ■ 0.7% Asian or Asian British - Pakistani |
| ■ 6.3% Any other Asian Background - Chinese | ■ 4.9% Any other Asian Background |
| ■ 1.4% Mixed - Asian & White | ■ 0.7% Mixed - Black African & White |
| ■ 0.7% Mixed - Black Caribbean & White | ■ 2.1% Any other mixed background |
| ■ 2.8% Arab | ■ 1.4% Any other ethnic group |

2.4.7 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.

2.4.8 Access to the service is provided by:

- Visiting either the Brighton or Hove Customer Services Centre, open hours 9:00am to 4:30pm weekdays;
- 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.

2.4.9 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.

2.4.10 The food safety team operates an advice line during office hours where businesses and consumers can obtain immediate advice from a food safety officer. Senior food competent staff provide cover for an out of hour's service to respond to food safety emergencies and incidents.

2.4.11 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 and is published on the Council's website. 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

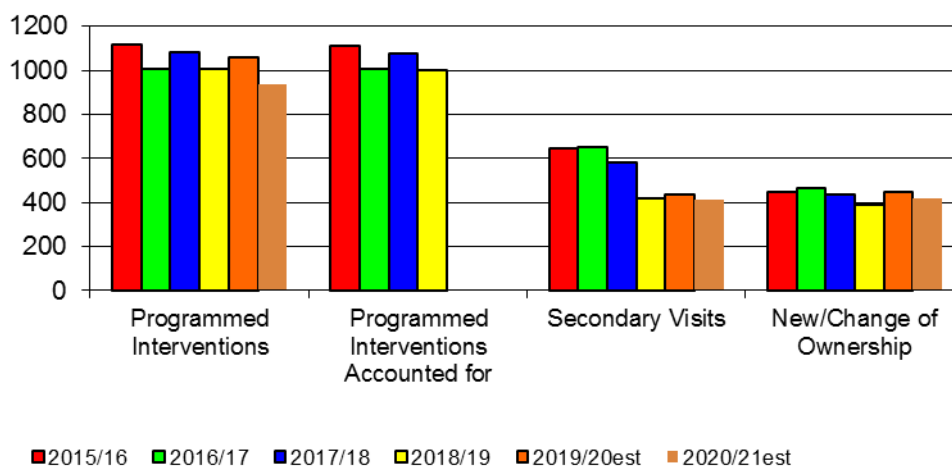
3.1 Interventions at Food and Feedingstuffs Establishments

Food Safety

3.1.1 The Food Safety Team undertakes the planned food safety intervention programme. 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 2020/2021.

3.1.2 Inspection intervals are calculated on a risk-based approach. The service has a key performance indicator of achieving 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 home caterers.

Chart of Intervention-Based Activity 2015-2021



See tables 3.1.1 and 3.1.3 for further details.

Year	15/16	16/17	17/18	18/19	19/20	20/21est
Programmed Interventions	1116	1008	1079	1004	1058	939
Accounted for	1113	1004	1077	1001		
Target %	98 A-D	98 A-D	98 A-D	98 A-D	98 A-D	98 A-D
Achieved%	99.7%	99.6%	99.8%	99.7%		

Table 3.1.1 Achievement of Planned Food Safety Inspection/Intervention Programme 2015-21.

3.1.3 The national 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. Category A premises are the highest risk and E the lowest.

3.1.4 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 2015 and estimates for 2019/20 and 2020/21 can be seen in table 3.1.2.

3.1.5 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	15/16	16/17	17/18	18/19	19/20est	20/21est
Questionnaires	255	132	133	39	200	250
Visit	40	2	49	2	30	40

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

3.1.6 Planned food safety interventions programme for the year 2020/2021 as estimated at 1st January 2020 being:-

Risk Category of Premises	Number of Interventions Due
A	2
B	71
C	322
D	544
Total	939
Low-risk premises due for intervention	272

3.1.7 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.

3.1.8 As at January 2020 the level of broadly compliant establishments rated in the FHRS scheme stood at 97%. This is in line with the average across all English Unitary Authorities.

3.1.9 **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.

3.1.10 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.

3.1.11 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.

3.1.12 In late 2016 the service introduced a charge for those businesses who requested a rescore visit. From the introduction of the charging scheme to December 2019 152 businesses pursued this option.

3.1.13 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.

3.1.14 **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.

3.1.15 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 420 new businesses or changes of ownership in 2020/2021.

3.1.16 **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	15/16	16/17	17/18	18/19	19/20est	20/21est
Secondary inspections	647	654	580	416	438	410
New Premises or Change in Ownership	450	467	435	391	450	420

Table 3.1.3 Estimate for 2019/2020 and 2020/21 based on data since 2015.

3.1.17 It is estimated that the number of staff required to carry out the programme of inspections plus other visits is 6.4 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 Food Hygiene

3.1.18 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 421 high risk, 50% of the 1080 medium risk and 20% of the 1811 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; due to the FSA's Regulating Our Future programme, there will be a major change to the risk rating of Food Premises; whilst these changes are not expected until 2022/23, a decision has been made not to move to the current FSA system; in addition the Service has applied to join the pilot of the new risk rating scheme scheduled to start April 2020, the decision as to whether we will be participating in the pilot is currently awaited.

- 3.1.19 The target for 2019-20 was to visit 421 high-risk and 458 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 2020-21 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.
- 3.1.20 There is no commitment to visit low risk premises but in 2019-20, 246 low risk premises were visited up to 24th Jan 2020, as a result of project work, referrals, complaints and other routine inspections.
- 3.1.21 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.
- 3.1.22 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.
- 3.1.23 **New Businesses** – Trading Standards Officers aim to assess new food businesses within 56 days.
- 3.1.24 **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.
- 3.1.25 **Poorer performing High Risk Premises** -These premises will be inspected every year but may be the subject of additional interventions depending on their compliance. Poor compliance with allergen information with the corresponding risk to the safety of food is a continuing threat.
- 3.1.26 **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, together with those businesses with a history of poor compliance.
- 3.1.27 **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.

3.1.28 **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	14/15	15/16	16/17	17/18	18/19
Within target %	96.8	97.2	96.6	97.1	94

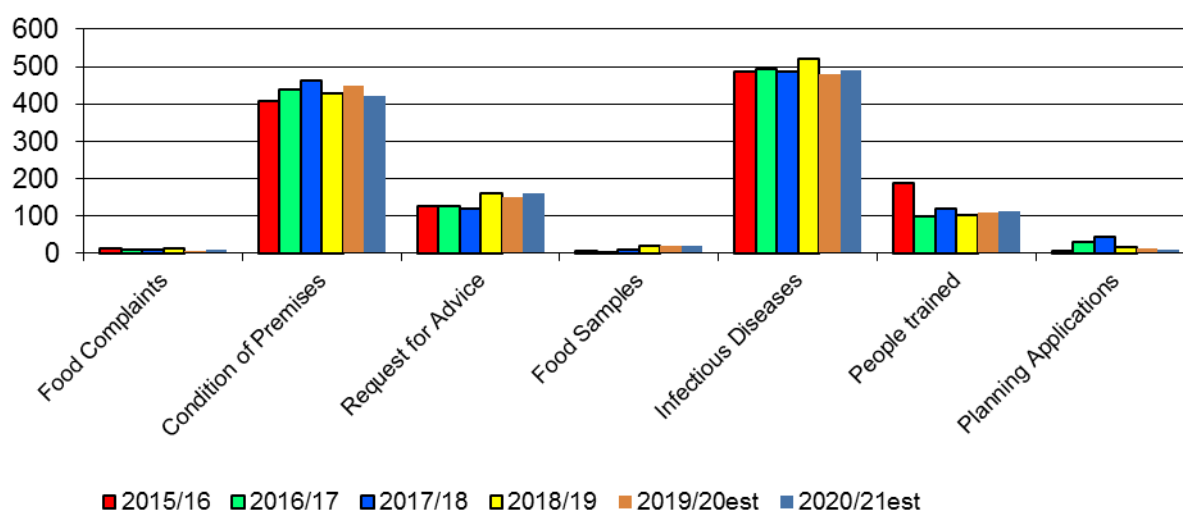
Table 3.2 Percentage of Demand Driven Work within Target Response Time

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 2015 and estimates for the current year and 2020/2021. The source figures for this chart are contained in tables within the relevant part of the plan.

Year	15/16	16/17	17/18	18/19	19/20est	20/21est
Food Complaints	14	11	10	14	6	10
Condition of Premises	406	440	461	429	450	420

Table 3.2.1 Estimate of complaints for current year and 2020/2021 based on data from 2015 onwards.

Chart of Demand Driven Work 2015-2021



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

3.2.3 It is estimated that 1.8 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	15/16	16/17	17/18	18/19	19/20 est
Number of Complaints	133	125	130	125	152

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	15/16	16/17	17/18	18/19	19/20est	20/21est
No of Requests	125	128	119	160	150	160
Planning Applications	7	31	45	17	12	10

Table3.4.1 Requests received since 2015 and estimates for the current year and 2020/2021

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 2019/20 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.

Level of Service Requests

Year	15/16	16/17	17/18	18/19	19/20 est
No of Requests	190	146	150	136	150

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 2019/2020 were:-

Study 66 - Frozen fruit and vegetables from retail and catering premises. This study was undertaken in the spring of 2019 with the aim of providing microbiological quality data on frozen fruit and vegetables from retail and catering premises, with a focus on Listeria. All samples collected across the city were satisfactory.

Study 67 - Vacuum/Modified atmosphere packed ready to eat (RTE) food. The study aims to provide microbiological quality data on RTE vacuum packed foods and the hygiene of vacuum packing machines. Of the 22 samples reported at the time of preparing this plan all but 4 were satisfactory. Where unsatisfactory results were obtained corrective action has been agreed.

Study 68 - Raw milk cheeses. The study aims to ascertain microbiological safety and quality for raw milk cheese at retail sale, with particular emphasis on a particular form of E.Coli. All of the 6 samples reported so far as part of this study were satisfactory.

Year	15/16	16/17	17/18	18/19	19/20est	20/21est
No. of samples	6	3	9	19	20	20

Table 3.5.0 Food Safety Sampling visits 2015-2019 & estimate for the current year and 2020/2021.

Food standards

- 3.5.5 The Public Analyst contract was awarded to Kent Scientific Services in 2017. For the year 2019/20 a budget allocation of £5,000 was made for sampling analysis. It is envisaged that a similar amount will be allocated for 2020/21. The focus of the contract remains composition, allergens labelling and chemical contamination. .
- 3.5.6 Inspections, investigations and advice for 2019/20 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 has continued and it is anticipated that this funding may continue in 2020/21. It is intended that in 2020/21 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 2019/20

	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. It is understood that the FSA as part of the Regulating Our Future programme of work will be providing some funding for intelligence led risk based food sampling at some point in 2020/21; it is currently unknown whether this will be administered regionally or if Local Authorities will have to bid for funding.

3.5.9 During 2019/20 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 2020/21 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 2020/21 prioritising advice and support to small independent traders. In addition new labelling requirements will come into force in October 2021 for pre-packed for direct sale foods and amended labelling will also be required as a result of EU Exit.

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 2015 to 2019 and an estimate of the numbers expected for the current year and 2020/2021. Investigations of outbreaks must

commence as soon as practical. In individual notifications, the investigation has to commence within 5 days. It is estimated that 0.3 FTE officer will be required to meet this level of complaints.

Year	15/16	16/17	17/18	18/19	19/20est	20/21est
No. of reports	485	494	485	521	480	490

Table 3.5.1 Notifications for 2019/2020 & 2020/2021 based on data from 2015 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	15/16	16/17	17/18	18/19	19/20est	20/21est
Campylobacter	267	253	294	313	300	290
Salmonella	20	24	19	27	20	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 by the FSA means that all food officers receive food hazard alerts by email. As the majority of these concern food allergy alerts and are for information only from 2020 only those requiring action will be reported.

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.
- Public Health England's local Community Consultant in Disease Control reviews procedures and agrees communicable disease outbreak and food poisoning control measures across the south east of England.
- 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 2019/20 the Food Standards Team have also participated in a National Food Crime Unit project and have provided advice and assistance to the Early Years and Child Care Team as well as the Families, Children and Learning on allergen information and the provision of allergy free 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. This strategy includes promotion of healthy weight and good nutrition. A project officer works

within the Food Safety Team to develop and co-ordinate a number of programmes in line with this strategy.

- 3.8.2 The city's Healthy Choice Award is one such programme. The award prioritises the preparation of meals using fresh healthier ingredients and cooking methods. As at January 2020 127 food outlets have gained the award with a further 12 working towards accreditation.
- 3.8.3 Two school catering cookery events with families took place in 2019 with Healthy Choice Awards caterers demonstrating easy healthy and budget friendly meals to parents. Further work to increase vegetable consumption in schools is planned for 2020.
- 3.8.4 Another programme supports the Sugar Smart City campaign. This aims to motivate settings such as schools, food outlets and retailers to take action and help residents reduce their sugar intake. Food outlets 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 Between September 2015 and November 2019 several healthier catering workshops have been staged for food outlets. Topics including healthier cooking techniques, cooking oil maintenance and general good practices, types of oils and their properties, allergy and health, financial and environmental implications. 164 chefs, managers, front of house staff and business owners have attended these sessions.
- 3.8.6 A further programme supports national healthy eating campaigns such as Peas Please and Veg Power which encourages producers, suppliers, retailers and other actors across the food supply chain and schools 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.
- 3.8.7 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. During 2019/20, in partnership with the Brighton and Hove Food Partnership a series workshops across different settings such as early years, secondary schools and food outlets were delivered as a cookery competition. Caterers were asked to create an innovative grab-and-go meal that was packed with vegetables. The winning recipe is to be championed and trialled in various secondary schools across the city early 2020 and shared with local and national networks.
- 3.8.8 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. The service offers seven courses a year.

Year	2015/16	2016/17	2017/18	2018/19est	2019/20est	2020/21est
Trained	187	100	119	103	110	112

Table 3.8 Total Training Undertaken since 2015

3.8.9 The service took part in a citywide healthy schools event staffing an interactive stand to promote food safety to pupils and their teachers. A Christmas Food Safety Quiz for parents of young children was also organised at one of the council's Children's Centres

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 food safety service net revenue budget for 2019/20 is £522,970. The proposed net budget for 2020/21 is £498,860, subject to agreement by Budget Council on 27th February 2020.

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 2019/20 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	£ 7,000
Food Team	£70,000
Total	£77,000
Purchases	£ 500
Analysis	£ 4,500
Total	£ 5,000
Total	£ 87,000

4.1 Staffing Allocation

Food Safety

4.2.1 The 2019/2020 Establishment for the Food Safety Team is as below and equates to nine full time equivalent enforcement officers plus two administrative support staff, management and Food Nutrition Project Officer broken down as below:

0.25 x Regulatory Services Manager
2 x Senior Environmental Health Officers
2.8 x Environmental Health Officers
4.2 x Senior Technical Officers
1.68 x Technical Support Officers
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 9 full time equivalents are required to fulfil the given objectives plus management. This is in-line with the allocated resources.

4.2.3 In addition to the food safety responsibilities from 2018 onwards the Senior EHO's of the Food Safety Team took on additional management and supervisory duties and the team became responsible for the health & safety enforcement function. See 6.1.6.

Food Standards

4.2.4 The proportion of time allocated to this function in 2019/20 was estimated as follows:-

Support	0.05
Management	0.05
Food Staff	1.6
Total	1.7 FTE

4.2 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. 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 feed 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 they 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 Feed 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 2018/2019, 99.7% 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. 391 interventions were undertaken of new businesses or premises that had changed ownership.

- 6.1.4 At January 2020, 97% of the food businesses in the city were deemed to be 'broadly compliant', ie a FHRS of three or better.
- 6.1.5 From April 2018 to March 2019 one business was prosecuted for food hygiene offences, 11 food establishments were subject to formal enforcement actions by way of Hygiene Improvement Notices and 1017 were written to following inspections regarding non-compliances.
- 6.1.6 During 2019/20 as a result of a mixture of one member of staff being seconded to support another team, a period of extended up-paid leave for one officer and additional service pressures from the Health & Safety enforcement function it was necessary to source additional support from outside of the team to deliver the service.

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 The numbers of requests for re-score visits under the Food Hygiene Rating scheme has increased such that it is now estimated that 70 such requests will be received during 2019/20 against 35 this time last year. This is due to online takeaway delivery platforms requirement that business are deemed at least broadly compliant before they are permitted to sign up to the service.
- 6.2.2 The number of new businesses registrations has increased over the year such that it is now estimated that 450 new businesses will be inspected during the course of 2019/20 against an original estimate of 380. It is though that this is due to an above average churn of businesses ownerships as a result of more challenging trading conditions.

Food Standards

- 6.2.3 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 FHRs general food hygiene standards are continuing to improve year on year. Table 6.3 demonstrates the improvement which has been built on from 2013.

FHRs rating	January 2013	January 2020
0	3	2
1	113	38
2	92	33
3	265	194
4	589	549
5	1377	1887
Total	2624	2703

Table 6.3. Number of food businesses in each FHRs Comparing 2013 and 2020 Ratings

6.3.2 The number of Broadly Compliant businesses has continued to increase and currently stands at 97% 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