

Harlow Council
Environmental Health
Food Service Plan
2020/2021

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0.0 Introduction	<p>The Council is designated as a Food Authority under the Food Safety Act 1990 and as such has a statutory duty to enforce the Act.</p> <p>The Food Service Plan is dedicated solely to the food safety enforcement function. It covers all elements of food safety and hygiene for which Harlow Council has enforcement responsibility.</p> <p>This Service Plan has been produced in response to a requirement by the Food Standards Agency (FSA) in its <i>Framework Agreement on Official Feed and Food Controls by Local Authorities</i>. The FSA was established in April 2000 as an independent monitoring and advisory body in response to widespread public concern over a number of food safety issues. One aim of the FSA is to make food law enforcement more effective, efficient and accountable.</p> <p>The Service Plan sets out how Harlow Council will deliver the food safety enforcement function in accordance with current guidelines for the period 2020 to 2021. This document sets out the following:</p> <ul style="list-style-type: none">• food safety objectives detailing the Council’s responsibilities as set out in legislation, associated statutory code of practice and national Guidelines;• the current work programme within the Service;• the Council’s policy on food safety, sampling, provision of information to business, investigation of complaints and allegations of Food Poisoning, response to Food Safety Alerts and infectious disease control.
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<p>1.0 Service Aims and Objectives</p>	<p>The Environmental Health Service is committed to protecting the public by ensuring a safe trading environment in Harlow.</p> <p>To achieve this, priorities are established by using a risk assessment approach. Activities relating to a wide range of food safety legislation include: inspections; sampling programmes; response to complaints; education/promotional campaigns and the provision of specialist advice to traders.</p>
<p>1.1 Aim and Objectives</p>	<p>Aim:</p> <ul style="list-style-type: none"> • To ensure that food and drink intended for sale for human consumption, which is supplied, manufactured, produced, stored, distributed, handled or consumed within Harlow complies with the law, is free from contamination and is without risk to the health of consumers (people who work, live or visit Harlow). • The Environmental Health Service is committed to ensuring that satisfactory standards of food hygiene are practised and maintained. <p>Primary Objectives:</p> <ul style="list-style-type: none"> • To ensure the health and well-being of the public by promoting and enforcing safe standards of hygiene and food safety in the preparation, manufacture, storage, distribution, handling and sale of food in all relevant food premises in Harlow in accordance with the requirements of the Food Safety Act 1990, The European Communities Act 1972 and all regulations, orders, byelaws or other subsidiary legislation made there under. • To undertake an effective and planned programme of quality risk based food safety inspections of food premises (by qualified and suitably trained officers), to ensure compliance

	<p>with food law and to minimise risks to health and safety;</p> <ul style="list-style-type: none">• To take appropriate enforcement action proportional to the risks involved and in accordance with the Council's Food Safety Enforcement Policy with due regard being given to the Primary Authority Scheme and guidance from relevant external bodies;• To monitor foodstuffs manufactured, imported, stored or on display for sale in Harlow, through a planned yearly sampling programme which includes imported foods. To carry out reactive sampling for microbiological examination;• To promote effective communication with consumers and businesses on food safety matters within Harlow;• To encourage, assist, and support food businesses/residents of Harlow by providing information, education, training and advice including allergen advice in accordance with the Food Information Regulations 2014;• To investigate all relevant complaints regarding premises, practices and food items in accordance with service customer care standards;• To investigate and control outbreaks of food poisoning and other food borne disease within Harlow and take appropriate action to prevent any recurrence;• To complete and submit timely, accurate statistical returns to the Food Standards Agency
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<p>1.2 Links to Corporate Objectives and Plans</p>	<p>requirements;</p> <ul style="list-style-type: none"> • To actively support Essex Food Liaison Group and its sub groups; • To carry out the activities in this Service Plan with an educative approach where possible, dependant on available resources. <p>The Food Service along with all other Council services is included within the corporate planning process. This includes Corporate Plan 2020-2021, the Environment and Planning Service Plan and Individual Personal Performance Plans.</p> <p>For the purposes of the Food Standards Agency this document is referred to as the 'Food Service Plan'. Within the organisation of Harlow Council this plan would be referred to as a 'Team Plan'. The corporate hierarchy places this Team Plan between the Environment and Planning Service Plan and Personal Plans.</p> <p>Team Plans are used to develop the Council's Personal Performance Plans to assist in identifying key objectives for staff in the forthcoming year.</p> <p>All Service Heads as part of this process are required to produce an Annual Service Plan, which is presented to the Corporate Management Team. Performance indicator returns (both national and local) are reviewed annually.</p> <p>The Council has an agreed Corporate Plan that sets out how the Council is going to tackle local people's priorities and improve services.</p> <p>The Corporate Plan Priorities 2020-2021 are:</p>
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- More and better housing;
- Regeneration and a thriving economy;
- Wellbeing and social inclusion;
- A clean and green environment;
- Successful children and young people.

The Food Service contributes directly to the Corporate aims in the following ways:

- Food is a prerequisite of health. The safety, quality, and wholesomeness of food plays a key role together with nutritional issues, in maintaining and improving health;
- The Service focuses on protecting the public and promotes good quality food production in Harlow;
- By helping to create economic prosperity and sustainability ensuring a prosperous economic future for local business that can compete on a level playing field;
- By working in partnership with other agencies and services aimed at improving the quality of life, health, safety and well being of the citizens of Harlow;
- Providing life-long learning through, where resources are available, advice to business and dissemination of information to consumers, enabling everyone to make informed choices about the products they choose to buy;
- Reducing crime through the investigation of service requests and proactive inspection;
- The Service proactively aims to deliver health information and education to the community

	<p>where resource permits;</p> <ul style="list-style-type: none">• Food Business Operators are consulted and involved concerning inspection of their properties. The Service continually strives to keep businesses and industry updated on the issues that act as interfaces between the Council and themselves, through statutory promotions and specific mail shots.• A risk based approach to enforcement results in a lean service which thus ensures value for money in meeting statutory requirements.
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<p>2. Background 2.1 Profile of Harlow</p>	<p>Harlow is almost entirely an urban area surrounded by rural areas controlled by Epping Forest District Council and East Hertfordshire District Council.</p>
<p>2.2 Organisational structure</p>	<p>As a new Town, the majority of its buildings and infrastructure are post 1947. There are a few small pockets of older development most notably the area known as Old Harlow. The 2011 Census of England and Wales confirmed that Harlow's population was 81,944. The town's population is estimated to rise to 89,720 by 2021. Harlow is a multi-cultural community with one of the highest percentages of ethnic minorities in Essex.</p> <p>The town is segregated into residential and commercial/industrial areas. The industrial areas employ large numbers of people, a significant number of whom travel from outside Harlow. The London to Cambridge railway line and M11 motorway both pass through the district, providing good communication links with London, M25 and Stansted Airport.</p> <p>The Food Service forms part of the Environmental Health Service that is managed by the Environmental Health Manager, who in turn reports to the Environment & Licensing Manager. The Environmental Health Service is part of Environment and Planning. (Environmental Health, Licensing, Streetscene, Energy and Emergency Planning, Planning and Building Control, Properties and Estates)</p> <p>The management structure is available on the following link:</p> <p>https://www.harlow.gov.uk/your-council/council-structure</p> <p>The Food Service is a function of the Environmental Health Commercial Team which consists of: 1 Environmental Health Manager, a small proportion of whose time is undertaking Commercial duties, 1 P.T Principal Environmental Health Officer (PEHO), 1 full time Senior Environmental Health Officer (SEHO), 1 P.T SEHO's, (and 1 vacant post SEHO) and 1 PT Administration / Technical Support Officer (TSO). The PEHO provides technical advice and support in complex cases, undertakes co-ordination, inspections of high risk premises and carries out monitoring on behalf of the Environmental Health Manager. The S/EHOs undertake the planned programmed inspection of food premises within Harlow; investigate a wide variety of complaints and service requests; provide advice</p>

<p>2.3 The Scope of the Food Service</p>	<p>to consumers/businesses, enforcement activities and food sampling. The TSO provides technical and administrative support to the Team. A significant proportion of each officer's time is allocated to other functions such as health and safety enforcement, investigation of accidents, statutory nuisances and licensing issues. Further details on staff resource are available in section 4 of this Service Plan.</p> <p>The Service will:</p> <p>2.3.1 Maintain an up to date register of all food premises in Harlow;</p> <p>2.3.2 Inspect all registered food premises on a risk based, rolling programme in accordance with Food Safety Act 1990, The European Communities Act 1972, Statutory Code of Practice (issued March 2017) and take enforcement action as necessary;</p> <p>2.3.3 Carry out visits to, and food safety inspections of food premises as necessary within the plan period, including re-visits and investigative visits. (Note–Food Standards and Feedstuffs are the responsibility of the Essex County Council, Trading Standards Service);</p> <p>2.3.4 Investigate food complaints and complaints about food premises (service requests);</p> <p>2.3.5 Provide, where resources permit, advice and assistance to businesses and consumers on food related issues;</p> <p>2.3.6 Receive and act on all Food Alerts / withdrawals and recalls issued by the Food Standards Agency;</p> <p>2.3.7 Investigate all food within the district that might be contaminated and take necessary action. Seize, detain and arrange disposal, as necessary, unfit food;</p> <p>2.3.8 Monitor the movement of unfit food into and out of Harlow;</p> <p>2.3.9 Take action to close food premises found to present an imminent risk to health;</p> <p>2.3.10 Identify and inspect premises processing, handling and storing meat products and preparations, and</p>
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	prepare them for approval under the regulations;
2.3.11	Identify and inspect premises processing, handling and storing dairy, fish and / or egg products and prepare them for approval under the regulations;
2.3.12	Undertake a food sampling programme that takes account of current food issues. Participate in national and regional coordinated sampling programmes including imported foods;
2.3.13	Comment, where resources permit, on proposed food legislation, codes of practice and other official documents as necessary;
2.3.14	Provide appropriate export certification as requested by food companies in the District;
2.3.15	Investigate all statutory infectious disease notifications and allegations of foodborne disease to establish any links with local food businesses or foodstuffs;
2.3.16	Maintain an up to date and effective outbreak control plan;
2.3.17	Provide advice, where resources permit, to the general public and local businesses on all aspects of food safety law and good practice, as required;
2.3.18	The Food Service is also responsible in the majority of food premises for the enforcement of health and safety law, animal welfare and special treatment legislation. This is subject to a separate National intervention priority programme.
2.4 Demands on the Food Service	As at 1 April 2020 the Environmental Health Service's database identifies that it is responsible for enforcing Food Safety in 713 food premises within Harlow. According to the Code of Practice risk categories, these premises are broken down as follows;

<u>Risk Category</u>	<u>Number of premises</u>	<u>Inspection Frequency</u>
A	2	6 Months
B	9	12 Months
C	100	18 Months
D	248	2 Years
E	339	AES / 3 Years
New Premises not yet rated: 15		
As at 1 April 2020, food premises categories were:		
Number identified as Catering premises are	:	539
Number identified as Retail premises are	:	140
Number identified as Warehousing/Distribution are	:	23
Number identified as Manufacturing / packers/importers premises are	:	8
TOTAL	:	713
As at 1 April 2020 the number of approved premises are: 11		
Meat Products Premises - 1		
Minced Meat & Meat Preparations Premises – 2		
Cold Stores – 7		
Dairy ~Products- 1		
<p>There are a number of mobile food businesses operating in the town, which comprise mainly ice cream and burger vans. In addition there are a number of food traders operating on Harlow Market that is open on Tuesday, Thursday, Friday and Saturday each week and a Car Boot Sale which usually occurs on Sundays during the summer period.</p>		
<p>The Environmental Health Service is based on the 3rd Floor, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG. The service can be accessed via:</p>		

- The internet
- Telephone (9am to 4.45pm Monday to Friday)
- Direct call/inspection/in person at the office or on site
- E-Mail/letters/correspondence.

The Service has an out of hours answer phone that directs callers to the Council's 24hour Central Control number in the event of emergencies. Control has arrangements for contacting Environmental Health staff 24 hours a day, 52 weeks of the year.

Details of the services provided and how to contact us are also provided on the Council's web site.

There are two languages other than English identified as being significant among food handlers and food business operators within the district. These are Bengali and Cantonese. The majority of food business operators are however, able to communicate in English or have somebody present at the premises that can interpret or translate. In any cases where there may be language difficulties the Service has the use of "Applied Language", a telephone translation service to which the Council subscribes.

A number of advice notes and leaflets on food safety are also available in different languages from the Food Service / FSA.

The Environmental Health Service has adopted the Central and Local Government Enforcement Concordat and is compliant with the Regulators Code.

Harlow Council adopted a Food Safety Enforcement Policy in 2002, which has been agreed by Members based on the approved framework to ensure consistency across the UK. This policy is built on the principles of the European Concordat on enforcement, and gives priority to those principles.

The Service operates according to its documented Enforcement Policy which is available at the Environmental Health Service Offices and on The Environmental Health Services website. Any departure from the policy will be documented.

All food law enforcement is carried out in accordance with relevant Food Safety Codes of Practice and other Official Guidance produced by the FSA and the Department for Business, Energy and Industrial Strategy (BEIS).

Food business operators and the public are given the opportunity of consulting on our policies at any reasonable time.

<p>3.0 Service Delivery</p> <p>3.1 Interventions / Inspection Programme</p> <p>3.1.1 Inspections achieved</p>	<p>The Food Service inspects, where resources permit, food premises for compliance with Food regulations according to risk as set out in the FSA approved Code of Practice. There are specified procedures and forms to be used by staff when enforcing legislation. In particular, the Code of Practice specifies a risk assessment scheme to be used to assess the risk associated with each food business and its priority for inspection.</p> <p>The use of the risk assessment scheme ensures that the highest priority is given to food manufacturers, caterers where there is significant non-compliance and premises that cater for vulnerable groups (children’s nurseries, hospitals and residential/nursing homes).</p> <p>The Food service would normally aim to achieve 100% programmed interventions. However, following advice from the Food Standards Agency in response to the COVID-19 (SARS-CoV-2) pandemic, inspections are only being carried out on a risk rated basis in order of priority including urgent reactive work, following up on non-compliance and A, B and non-broadly compliant C rated premises.</p> <p>Contractors have been employed to inspect approximately 200 inspections, however the number of food complaints has increased and applications for registration of new food businesses has doubled in the 6 month period from April to September 2020 compared to the same period in 2019. The commercial team are responsible for COVID advice and enforcement in commercial businesses and for any COVID outbreaks in workplaces, therefore the team are under significant pressure, in an under staffed team.</p> <p>The number of interventions / inspections achieved for the period 1 April 2019 to the 31 March 2020 = 310</p>
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	<p>The number of Food Hygiene Interventions / inspections (risk categories A to E) carried over from the last financial Year (2018/2019) is = 0</p> <p>Therefore, a high figure of 79.28% of all interventions / inspections due was achieved.</p> <p>The number of unprogrammed inspections (i.e. new premises / new operators) not inspected in the period 1 April 2019 to the 31 March 2020= 81</p>
3.1.2 Broadly compliant	<p>On the 1 April 2008, the Government introduced a new National Indicator: Food establishments which are broadly compliant with food law. Three of the six factors assessed within the risk assessment process during a food inspection are used to measure whether a business is “broadly compliant”. If an establishment scores 10 points or less in each of the level of compliance with hygiene requirements, structure and confidence in management, it is “broadly compliant”. As at 1 April 2020, the percentage of premises “broadly compliant” is 95.37%. Premises with a food hygiene rating of 3 or more are broadly compliant.</p>
3.1.3 Inspections programmed	<p>The number of programmed food hygiene inspections for the period 1 April 2019 to 31 March 2020 = 310</p> <p>Including the carry over (not inspected and new premises) from 2018/2019 the total due for 2019/2020 is 310.</p>
3.1.4 Enforcement	<p>In addition to the 310 inspections there will also be unprogrammed inspections (i.e new premises / new operators). The exact number is difficult to predict but the number of registrations received in the 6 month period from April to September 2020 had doubled in comparison to the same period in 2019. We estimate this figure to be around 120 premises. Therefore, total number of inspections to be achieved for 2020/2021 is 420.</p> <p>The Food Service endeavours wherever possible to use informal means to achieve compliance with the law. Where there is imminent risk, flagrant breaches of the law, or persistent failure to maintain standards, the Service does not hesitate to use its full statutory powers in accordance with its</p>

3.2 Complaints

Enforcement Policy.

During the year 2019/2020 the following actions were carried out:

Warning letters	114
Improvement Notices	3
Simple Cautions	0
Prosecutions instigated	1
Prosecutions concluded	1
Food seizures	1
Voluntary surrender	1
Remedial Action Notice	1
Formal closures	0
Voluntary closures / prohibition	4

Officers in the food team have been allocated responsibility for specific functions and responsibilities. Inspections of food premises requiring specialist input or knowledge are specifically allocated to these

One premises was prosecuted in 2019-2020. Agora Café Limited pleaded guilty to multiple food hygiene offences. The sentencing hearing has been adjourned twice and has been scheduled for October 2020.

The Food Service investigates complaints regarding premises, practices and food items, in accordance with the relevant BEIS / FSA / Code of Practice / Guidance and the internal approved food complaints procedure.

Investigations into food complaints can give an indication of where the food supply chain has broken down. Such breakdowns may be one-offs or can indicate a problem, which, if left unattended, could have serious consequences. Food complaints are normally responded to within 5 working days or on the day of receipt in cases of significant risks to health.

For the period 2019/2020 the food service received **110** complaints/cases.

<p>3.3 Primary Authority Principle</p>	<p>It is estimated that approximately 130 complaints/referrals will be investigated during 2020/2021.</p> <p>The Primary Authority principle is supported by the Environmental Health Service, which undertakes its role in this respect in accordance with the guidance issued by the FSA and BEIS. In particular. The Food Service will:</p> <ul style="list-style-type: none"> • Have regard to any inspection plans or advice it has received from any liaison with primary, home and/or originating authorities; • Having initiated liaison with any primary, home and/or originating authority, notify that authority of the outcome. <p>There are currently no formal Primary Authority Agreements set up for the businesses in Harlow.</p> <p>Primary Authority gives companies the right to form a statutory partnership with a single local authority, which then provides robust and reliable advice for other councils to take into account when carrying out inspections or dealing with non-compliance. It is the gateway to simpler, more successful local regulation.</p>
<p>3.4 Advice to Business</p>	<p>Whilst the Environmental Health Service utilises its powers to enforce the food legislation, it recognises that, where food businesses break the law, it may be due to ignorance rather than intent. As a consequence, it is the Food Service's policy to provide, where resources permit, advice to businesses in a number of different ways, including:</p> <ul style="list-style-type: none"> • Advice is provided to existing or proposed food businesses, members of the public and other Council services on a reactive and proactive basis; • Advice is provided routinely during visits / inspections, but may also result from phone

<p>3.5 Food Sampling</p>	<p>enquiries or emails and letters received;</p> <ul style="list-style-type: none"> • Inspection reports contain a concluding section of advisory matters, which although not relating to specific legal requirements, contain advice on good management practice. Statutory requirements listed in the main body of the report are wherever possible supported with advice on how compliance can best be achieved; • The Food Service as part of the Environmental Health Service uses the Council’s website as a resource for the provision of information to businesses and the general public. Further information can be obtained from the Food Standards Agency website; • Officers aim to give advice in accordance with recognised guidance and codes of practice. <p>The Environmental Health Service regards food sampling as an important area of work. Food sampling at point-of-sale can provide useful information about the microbiological fitness of food for sale within Harlow</p> <p>A food sampling programme has been devised for 2019/2020 but is also based on the Eastern Region / FSA / Essex Food Liaison group requirements. Local priorities have been included in this programme. It is anticipated that this programme may not take place this year, or at a reduced number due to the reallocation of officer time to the COVID response.</p> <p>Food sampling will be conducted where appropriate and in particular;</p> <ul style="list-style-type: none"> • Priority is given to sampling at food manufacturers/high risk premises based in Harlow; • During the approval process of establishments and intermediaries; • In response to complaints;
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<p>3.6 Infectious Disease</p>	<ul style="list-style-type: none"> • For identified planned internal, regional and national projects. <p>The Service has been allocated a sampling budget by Public Health England (PHE) the 2018/2019 period; this includes the full cost of laboratory analysis. Arrangements are in place with the PHE at Colindale to carry out the microbiological examination of samples.</p> <p>The number of samples taken for the year 2019/2020 was 134. This includes food samples, water samples, swabs and cleaning cloths. Of the 134 sampled a total of 12 were classified by the PHE laboratory to be of a borderline or unsatisfactory microbiological standard. Food classified as borderline or unsatisfactory are rarely considered to be unsafe to consume. Follow up work and further sampling is undertaken where results are not of a satisfactory standard.</p> <p>Three regional studies were carried out in the sampling programme, studies on school dinner plates and trays, food containers and salad garnishes.</p> <p>Food composition and labelling are the remit of Essex County Council’s Trading Standards Department.</p> <p>The above two specialist services are represented on the Essex Food Liaison Group.</p> <p>The measures to be taken to control the spread of infectious diseases are contained in various Acts of Parliament and their associated regulations. This legislation includes the control of food poisoning and food and water-borne diseases.</p> <p>During 2019/2020 the Service received 43 formal notifications of infectious disease, mostly food-borne. Notifications can include Salmonella, Cryptosporidium, Giardia, E coli O157 and Legionella. The source of these infections is often unknown for a variety of reasons. Some are attributed to travel abroad and many may have been acquired in their own home.</p> <p>In addition to the formally notified infectious disease cases the Service also investigates allegations of food poisoning. It is widely acknowledged that the majority of cases go unreported. However, a</p>
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	<p>single case may lead to the discovery of an outbreak if the person concerned is a food handler.</p> <p>The Food Service, in conjunction with Public Health England has a documented infectious disease Joint Plan that also includes the outbreak plan, which includes a detailed written procedure supported by reference material. The service also maintains a field case, which contain supplies of documents and sampling equipment necessary to investigate an outbreak.</p> <p>The resource requirement for this function for 2020/2021 is impossible to quantify. Outbreaks of this nature are infrequent, individual events. Should the need arise, staff from all disciplines within the Environmental Health Service would be expected to assist with an investigation. Lower priority work would be cancelled or postponed. The overall Service Plan acknowledges the need for the team to be flexible to accommodate the scale of any outbreak encountered.</p>
<p>3.7 Food Safety Alerts / recalls / withdrawals</p>	<p>This function is carried out in accordance with Food Safety Act 1990, Code of Practice and internal procedures to:</p> <ul style="list-style-type: none"> • Identify and report food hazards/incidents; • Respond to Food Safety Incidents/Food Safety Alerts issued by the FSA. <p>The FSA communicates any alerts via the FSA smart communication platform.</p> <p>Food Safety Alerts 'for action' received are always printed off, actioned immediately by the PEHO and circulated to all food officers, and subsequently filed. Any action taken is recorded.</p> <p>When appropriate a Food Alert for action is given absolute priority. In some cases this will require visiting multiple premises where the relevant food is likely to be stored.</p> <p>The Food Standards Agency hold details of emergency telephone numbers on which responsible officers may be contacted outside the Authority's normal working hours. This is linked to the Environmental Health Service out of hours scheme.</p> <p>The Environmental Health Service supports the work of the Chartered Institute of Environmental</p>

<p>3.8 Liaison</p>	<p>Health (CIEH). The Food Service undertakes its food safety functions in accordance with FSA guidance and statutory codes of practice in order to promote co-ordination, consistency, and good regulation amongst all local authorities.</p> <p>A number of arrangements have been made to improve consistency of enforcement with neighbouring authorities, health services and other agencies:</p> <ul style="list-style-type: none"> • The Service attends and actively supports the Essex Food Liaison Group, the functions of which include: liaison with Public Health England (PHE) including preparation of the annual coordinated sampling plan; coordination of enforcement approach between authorities; peer review exercises and benchmarking exercises; and liaison with Essex County Council Trading Standards. • Investigation of suspected food poisoning outbreaks is carried out jointly or in close contact with Public Health England (PHE). An EHO also attends the quarterly meetings of the PHE Regional Liaison Group. <p>The Service also advises and liaises on the following:</p> <ul style="list-style-type: none"> • Public Health England, Essex Trading Standards, OFSTED; • The Service will continue to maintain the arrangements for liaison with other services within the Council, including: Building Control, Licensing, Waste, Planning and Estates; • The service is routinely consulted on planning applications involving food businesses. In addition lists of all planning applications received by the authority are routinely reviewed by the Environmental Health Service. Comments and suggested conditions or informatives are returned wherever appropriate.
<p>3.9 Food Safety Promotion</p>	<p>The Environmental Health Service's education and promotion activities can have a direct impact on food safety. It is therefore committed to providing advice and information both to business and the public where resource permits, including:</p>

- **Food Standards Agency campaigns** – This includes food safety week in June each year and other national campaigns such as promotion of the food hygiene rating scheme.
- **Tuck In pledge** - Harlow Council is participating in an Essex wide campaign in support of takeaway food establishments that take steps to improve the nutritional quality of their food. The campaign is based on the Department of Health responsibility deal initiative and is fully funded by Essex County Council. A total of 110 takeaway premises, all of which will have achieved a food hygiene rating score of 3 or more, have been offered the opportunity to participate in this pledge. As of October 2020 a total of 24 businesses have met the Tuck In and hygiene criteria.

The project has been branded as;



Businesses who sign-up to take the TUCK IN pledge will take steps to reduce the salt, sugar and fat content of the takeaway food served. As part of the TUCK IN pledge the business will receive free online Level 1 or Level 2 Nutrition training. Nutrition training helps staff to fully understand why reducing the salt, sugar and fat content of the food they serve is so important. Good training also encourages staff to go further with the healthy catering practices, which can support the growing demands of customers for alternative, healthier options.

Takeaway food businesses who have taken the TUCK IN pledge can display the TUCK IN logo on their premises.

In order to take the pledge a business must commit to making a continuous effort to reduce the salt,

3.10 National Food Hygiene Rating Scheme

sugar and fat content of the food it serves. This includes:

- reducing fats in fried food by using the correct frying temperature;
- shaking excess fat from food after frying;
- keeping oil fresh and using healthier oils for frying such as rapeseed or sunflower oil;
- reducing the amount of sugar and salt used in cooking;
- ensuring water and low/no sugar drinks are available;
- offering grilled foods instead of fried;
- increasing the amount of vegetables and fruit available on the menu;
- providing packets of salt instead of free-running salt cellars;
- always making sure smaller portion sizes are on offer.

Businesses that meet the above criteria and sign up to the pledge will receive promotional materials and will be promoted on the Tuck In website.

- **Ongoing Education** – This will take place during the planned food hygiene inspections for the period 2020/2021 and coaching visits, where resources permit, to implement Safer Food Better Business.

In September 2011 the authority joined the Food Standards Agency; ‘National Food Hygiene Rating Scheme’ (NFHRS). Since the launch of the rating schemes we have seen an increase in the number of businesses who are engaging with the Council for advice on how to improve food hygiene and in turn improve their rating.

Under the NFHRS food businesses are given a rating for their hygiene, ranging from 0 (urgent improvement necessary) to 5 (very good). The table below provides a breakdown of rated premises. Correct on the 1 October 2020;

Rating	%
5 (very good)	75

3.11 Food Hygiene Training	4 (good)	17.1	<p>The scheme is a cost effective, well publicised and visible way of promoting food hygiene and empowering consumer choice by making available information to which the Public has a right to access under Freedom of Information Legislation. As well as promoting food hygiene it also gives Harlow Council a best value method for meeting public access obligations.</p> <p>The ratings are available as a link from the Councils website and direct on http://ratings.food.gov.uk and every eligible business is issued with a window sticker displaying their individual rating.</p> <p>The Service promotes the food hygiene courses offered by accredited trainers including Harlow College.</p>
	3 (generally satisfactory)	5	
	2 (improvement necessary)	1.1	
	1 (major improvement necessary)	1.1	
	0 (urgent improvement necessary)	0.4	
4.0 Resources	<p>Food safety resources are currently allocated within the overall Environmental Health budget covering food safety, occupational health & safety, pollution (noise, air, water, and contaminated land), Authorisation of premises under the Environmental Protection Act 1990, private sector housing and grants.</p> <p>A number of inspections were undertaken outside normal working hours due to the Code of Practice which requires local authorities to inspect premises during normal opening hours, which in turn will require evening and weekend inspections.</p> <p>No budget is separately allocated for prosecutions or legal action taken as a result of action under this service. Costs are requested from the court in any successful prosecutions taken, by the Council's Legal Service, who act on our behalf.</p>		

4.1 Staffing Allocation

For the plan period 2020/2021 the available staff for this Service Plan includes:

- 0.1 Environmental Health Manager
- 0.8 FTE Principal Environmental Health Officer
- 1.5 FTE Senior/Environmental Health Officer (S/EHO) - Fully competent for all food safety activities;

- Approx 200 food inspections outsourced to competent contractors;

- 0.5 FTE Technical Support Officer (TSO) - Not formally competent in food safety matters.

This staffing allocation is not solely for this Service Plan. These officers also carry out duties enforcing health and safety at work, animal welfare and other licensing provisions, and the investigation of statutory nuisances under the Environmental Protection Act 1990.

It has been estimated that the total officer time spent on the Food Service is **2.40** full time equivalent persons (FTE) on professional staff and **1.0** on administration support.

Officer	FTE
Environmental Health Manager	0.10
Principal EHO	0.50
S/EHO	1.40
Contract Staff	0.40
TSO/Administration (Not formally competent in food safety matters)	1.00
TOTAL	3.40

The PEHO and all Senior EHO's are appropriately qualified in accordance with the Code of Practice.

4.2 Competencies

The PEHO, S/EHO's, Contractor EHO's/Food safety officers, are fully competent to inspect all risk categories of premises as required by the Code of Practice and take formal food samples. The PEHO

<p>4.3 Staff Development Plan</p>	<p>, S/EHO's, EHO's, are authorised to serve Hygiene Improvement Notices, detain and seize Food and the PEHO and S/EHO's are authorised to serve Hygiene Emergency Prohibition Notices.</p> <p>The Food Service continues to identify training and development needs with regular review meetings with individual staff. In addition, Officers are assigned special responsibilities to develop a specialism within the Food Service.</p> <p>Team meetings are held with the PEHO to discuss matters and issues of consistency arising under this Service Plan area.</p> <p>All EHO's that are corporate members of the Chartered Institute of Environmental Health (CIEH) are required to undergo at least 20 hours of Continuous Professional Development (CPD) per year. In addition, the Code of Practice requires food inspectors to have undergone a minimum of 10 hours food training per annum in accordance with FSA requirements. Authorised Officers must also complete the FSA Competency framework agreement. Whilst officers are responsible for monitoring the amount of training they have done in a year, the Service recognises this need and supports staff in achieving the minimum amount required by the CPD scheme. Officers with Chartered Status must complete 30 hours of CPD per year.</p> <p>Training needs are identified by examining:</p> <ul style="list-style-type: none"> • Operational requirement arising from the Place Service Plan; • Individual needs highlighted at Personal Performance Plan review meetings; • The introduction of new legislation/Code of Practice and FSA. <p>How these needs are met may vary, but the typical sources of training include:</p>
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	<ul style="list-style-type: none"> • Day release courses; • On the job training; • In house short courses; • External short courses and seminars. <p>Training must be approved before it is undertaken and it is evaluated after the event. All training received will be documented as part of the Service's assessment competency.</p> <p>Personal Performance Plans (PPPs) are completed on a yearly basis by the PEHO with a six month review.</p> <p>It is not possible to determine training costs until the PPP process has been completed.</p>
5.0 Quality Assessment	<p>The Food Service is delivered within a documented quality system with strategies in place covering most areas of food safety. Within these strategies a documented system is in place for management monitoring of the quality, uniformity and consistency of enforcement.</p> <p>Within the framework of these documents the following activities are planned:</p> <ul style="list-style-type: none"> • Internal Audits of: <ul style="list-style-type: none"> - Food Safety Inspections <ul style="list-style-type: none"> a) Post Inspection review of case records and documentation

	<p>(100% of contractors' inspections are currently checked)</p> <p>b) Accompanied inspections</p> <ul style="list-style-type: none"> - Food Complaints (service requests) <ul style="list-style-type: none"> a) food safety b) foreign bodies c) allegations of food poisoning d) food alerts <p>Formal enforcement activities, including;</p> <ul style="list-style-type: none"> - Hygiene Improvement Notices - Hygiene Emergency Prohibition Notices <ul style="list-style-type: none"> - Prosecution Files. - Detention / Seizure / Voluntary Surrender cases. <p>There are management systems which monitor the response times for complaints received (food & hygiene complaints etc.). The target response times are 5 working days.</p>
<p>6.0 Review</p> <p>6.1 Review against the Plan</p>	<ul style="list-style-type: none"> • The process of reviewing and updating the Standard Operating Procedures is underway on a priority basis. • The Authority has participated in the Essex County Council funded 'Tuck In' project to reduce

salt, fat and calories in takeaway meals. Visits to relevant businesses commenced in September 2015. Funding for this scheme (from Essex County Council) has been extended into 20/21.

- The team has participated in FSA national rating consistency exercises.
- The team has worked with Essex Trading Standards to produce an Allergens training day for food businesses at the Civic Centre.
- The team continues to work collaboratively with the hospital to encourage good hygiene practices and to ensure the implementation of FSA guidance for healthcare and social care organisations to help them reduce the risk of vulnerable people within their care contracting listeriosis through the consumption of chilled ready-to-eat food.
- Continual development of the Uniform, along with Enterprise to ensure it can meet all Service needs and to improve management systems.
- The team has utilised the FSA toolkit for the internal audit of the food hygiene rating scheme against the brand standard.

The Service Plan will be monitored to establish:

- Inspections of premises against target;
- The percentage of premises broadly compliant with food hygiene;
- Number of food samples taken against target.

In addition, the PEHO will evaluate:

- Actual resource allocation versus projected allocation;

<p>6.1.1 Performance Targets</p>	<ul style="list-style-type: none"> • Responses to complaints • Reactive work, formal actions and investigations. <p>A key aim of The Service is to continually improve the quality, efficiency and effectiveness of its Services.</p> <p>Where the review process identifies areas for improvement or development, these will be adopted in accordance with current in-house documented procedure, the FSA Framework Agreement, Statutory Code of Practice and National guidance.</p> <p>For the period 2019/20 79.28% of all programmed and unprogrammed inspections were completed. The target is to achieve 100%, as prescribed by the Food Standards Agency. For the period 2014/15 97.93%, for 2015/16 95.61% and for 2016/17 96.67%, and for 2017/2018 99.36%, and for 2018/2019 99.32%</p> <p>The percentage of premises that are broadly compliant with food hygiene has remained consistently high at 95.65% in 2015/16 to 96.23% in 2016/17 to 94.67% in 2017/18 95.94% in 2018/19 to 95.37% in 2019/20.</p> <p>The percentage of samples taken against the target number set by PHE for 2019/20 is 100% (excluding non-food swabbing). The high percentage figures represent the value this food authority places on the valuable intelligence that sampling provides.</p>
<p>6.2 Areas for development</p>	<p>The following Service developments are planned for the period 2020/21:</p>

	<ul style="list-style-type: none">• Continue the review and updating of the Standard Operating Procedures and Policies for this Service.• Continue to meet performance targets where possible, however due to difficulty in recruiting a full time SEHO post and the demands placed on the service by the COVID pandemic, aim to meet targets on a risk based priority basis.• Adapt to any changes as a result of the FSA Regulating our Future review and any implications of Brexit https://www.food.gov.uk/about-us/regulating-our-future• Follow guidance provided by FSA/APHA/DEFRA to ensure officers are competent to carry out duties such as the predicted increase in export health certificates as a result of Brexit.• Continue with participation in the public health 'Tuck In' project.• Review the existing team enforcement policy to ensure it reflects national and local policy and guidance.• Develop the Idox Uniform Enterprise IT application. The Enterprise system is a management tool which helps ensure high quality service delivery.
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