

Appendix A

Harlow Council
Environmental Health
Food Service Plan
2024/2025

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0.0 Introduction

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.

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.

This Service Plan has been produced in response to a requirement by the Food Standards Agency (FSA) in its *Framework Agreement on Official Feed and Food Controls by Local Authorities*. 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.

The Service Plan sets out how Harlow Council will deliver the food safety enforcement function in accordance with current guidelines for the period 2024 to 2025. This document sets out the following:

1.0 Service Aims and Objectives

- 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.

1.1 Aim and Objectives

The Environmental Health Service is committed to protecting the public by ensuring a safe trading environment in Harlow.

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.

Aim:

- 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.

Primary Objectives:

- 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, and all regulations, orders, byelaws or other subsidiary legislation made there under including retained EU regulations.

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| | <ul style="list-style-type: none">• 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 with food law and to minimise risks to health and safety;• 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; |
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1.2 Links to Corporate Objectives and Plans

- To complete and submit timely, accurate statistical returns to the Food Standards Agency requirements;
- To actively support Essex Food Liaison Group and its subgroups;
- To carry out the activities in this Service Plan with an educative approach where possible, dependant on available resources.

The Food Service along with all other Council services is included within the corporate planning process. This includes the Harlow Council Corporate 2024 to 2028, Service Plans and Individual Personal Performance Plans.

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'.

Team Plans are used to develop the Council's Personal Performance Plans to assist in identifying key objectives for staff in the forthcoming year.

All service managers 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.

The Council has an agreed Corporate Strategy that sets out how the Council is going to tackle local people's priorities and improve services.

[Corporate plan 2024 to 2028.pdf \(harlow.gov.uk\)](#)

The Corporate Plan Priorities are:

- Mission 1: Transform Harlow's Housing
- Mission 2: Renew our Neighbourhoods
- Mission 3: Rebuild our Town
- Mission 4: Secure Investment for Harlow's Future
- Mission 5: Protect our Communities
- Mission 6: Deliver High-Performing Council Services

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 where resource permits;

	<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.• The plan assists in providing a high-performing and efficient service.
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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>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.</p> <p>In Harlow, the population size has increased by 13.9%, from around 81,900 in 2011 to 93,300 in 2021. This population growth is higher than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800.</p> <p>The town is segregated into residential and commercial/industrial areas. The industrial areas employ large numbers of people. 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>2.2 Organisational structure</p>	<p>The Food Service forms part of the Environmental Health Service that is managed by the Environmental Health and Corporate Safety Manager, who in turn reports to the Assistant Director for Environment & Planning. The Environmental Health Service is part of the Strategic Growth & Regeneration Directorate.</p> <p>The management structure is available on the following link:</p> <p>https://www.harlow.gov.uk/sites/default/files/documents/Harlow%20Council%20structure%20chart%20June%202024.pdf</p> <p>The Food Service is a function of the Environmental Health Commercial Team which consists of: 1 Environmental Health & Corporate Safety Manager, a small proportion of whose time is undertaking Commercial duties, 1 Commercial Services Manager, 2 full time Principal Environmental Health Officer (PEHO), (one of the current PEHO's is on a 12 month secondment, 2 casual P.T PEHO's, and 1 PT Administration / Technical Support Officer (TSO). The Commercial Services Manager 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 Principal and S/EHOs undertake the planned programmed inspection of food premises within Harlow; investigate a</p>

<p>2.3 The Scope of the Food Service</p>	<p>wide variety of complaints and service requests; provide advice 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, special treatments and animal activity licensing. 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 Statutory Code of Practice 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>
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	<p>2.3.10 Identify and inspect premises processing, handling and storing meat products and preparations, and prepare them for approval under the regulations;</p> <p>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;</p> <p>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;</p> <p>2.3.13 Comment, where resources permit, on proposed food legislation, codes of practice and other official documents as necessary;</p> <p>2.3.14 Provide appropriate export certification as requested by food companies in the District;</p> <p>2.3.15 Investigate all statutory infectious disease notifications and allegations of foodborne disease to establish any links with local food businesses or foodstuffs;</p> <p>2.3.16 Maintain an up to date and effective outbreak control plan;</p> <p>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;</p> <p>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.</p>
<p>2.4 Demands on the Food Service</p>	<p>As of 1 April 2024 the Environmental Health Service's database identifies that it is responsible for enforcing Food Safety in 771 food premises within Harlow. According to the Code of Practice risk categories, these premises are broken down as follows;</p>

<u>Risk Category</u>	<u>Number of premises</u>	<u>Inspection Frequency</u>
A	2	6 Months
B	16	12 Months
C	103	18 Months
D	253	2 Years
E	372	AES / 3 Years
New Premises not yet rated: 25		
As of 1 April 2024, food premises categories were:		
Number identified as Catering premises are	:	589
Number identified as Retail premises are	:	140
Number identified as Warehousing/Distribution are	:	29
Number identified as Manufacturing / packers/importers	:	13
As of 1 April 2024 the number of approved premises are: 11		
Meat Products Premises - 2		
Minced Meat & Meat Preparations Premises – 2		
Cold Stores – 7		
There are a number of mobile food businesses operating in the town which are registered with other Local Authorities, which comprise mainly ice cream and burger vans. In addition, there are a number of food traders operating at a Car Boot Sale which usually occurs on Sundays.		
The Environmental Health Service is based on the 3 rd Floor, Civic Centre, The Water Gardens, Harlow, Essex, CM20 1WG. The service can be accessed via:		
<ul style="list-style-type: none"> • The internet 		

- Telephone via Contact Harlow (9am to 4.45pm Monday to Friday)
- E-Mail/letters/correspondence.

The Service has an out of hours answer phone that directs callers to the Council's 24-hour 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 website.

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.

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.

The Service operates according to its documented Enforcement Policy which is available on Harlow Council's 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.

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

3.0 Service Delivery

3.1 Interventions / Inspection Programme

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.

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).

The Food service would normally aim to achieve 100% programmed interventions. However, the Food Standards Agency in response to the COVID-19 (SARS-CoV-2) pandemic produced a recovery plan, which highlights the pressures that LAs are under and proposes a way forward to re-start the regulatory delivery system for the highest risk businesses and providing greater flexibility for lower risk businesses wherever possible. The recovery plan ended at the end of March 2023.

The number of interventions / inspections achieved for the period 1 April 2023 to the 31 March 2024 = **367**

The number of programmed food hygiene interventions / inspections (risk categories A to E) carried over to 24/25 = **0**

The number of unprogrammed inspections (i.e. new premises / new operators) not inspected in the period 1 April 2023 to the 31 March 2024 = **0**

3.1.1 Inspections achieved

Therefore, a figure of 100% of all interventions / inspections due was achieved in 23/24.

<p>3.1.2 Broadly compliant</p>	<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 of 1 April 2023, the percentage of premises “broadly compliant” is 97.7%. Premises with a food hygiene rating of 3 or more are broadly compliant. It should be noted that premises that are yet to receive a rating (i.e. new unrated premises) are automatically counted as non-broadly compliant by default.</p>
<p>3.1.3 Inspections programmed</p>	<p>The number of programmed food hygiene inspections for the period 1 April 2024 to 31 March 2025 = 385</p> <p>In addition to the 385 inspections there will also be unprogrammed inspections (i.e. new premises / new operators that have re-registered a business). The exact number is difficult to predict but based on recent years we estimate this figure to be around 110 premises. Therefore, total number of inspections to be achieved for 2024/2025 is 495 premises.</p>
<p>3.1.4 Enforcement</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 Enforcement Policy</p> <p>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 Officers.</p> <p>There were no premises prosecuted in the period 2023-24, however an emergency closure was undertaken in this period due to the imminent health risk conditions found during routine visits to the premises.</p>

<p>3.2 Complaints</p>	<p>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.</p> <p>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.</p> <p>For the period 2023/2024 the food service received 60 complaints/cases.</p> <p>It is estimated that approximately 60 complaints/referrals will be investigated during 2024/2025.</p>
<p>3.3 Primary Authority Principle</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>

3.4 Advice to Business

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:

- 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 enquiries or emails and letters received;
- 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.

3.5 Food Sampling

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.

A food sampling programme has been devised for 2024/2025 but is also based on the UKHSA (UK Health Security Agency) studies / Eastern Region / FSA / Essex Food Liaison group requirements. Local priorities have also been included in this programme.

Food sampling will be conducted where appropriate and in particular;

- 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;
- For identified planned internal, regional and national projects.

The Service has been allocated a sampling budget by UKHSA for the 2024/2025 period; this includes the full cost of laboratory analysis and the full cost for sample collection from Harlow. Arrangements are in place with the PHE at Colindale to carry out the microbiological examination of samples.

The sampling allocation credit for Harlow equates to a maximum target of **140** samples per year.

The local target set in relation to sampling is to utilise 80% of the credit allocation. This equates to 112 samples. This target will remain in place for the 2024-25.

The number of samples taken for the year 2022/2023 was **112**.

The number of samples taken for the year 2023/2024 was 112.

This includes food samples and environmental swabs. All samples are classified by the PHE laboratory to be of a satisfactory, borderline or unsatisfactory 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.

Of the 112 samples taken in 2023/2024 a total of 94 were satisfactory and 18 were either of a borderline or unsatisfactory microbiological standard. Follow-up action is taken in respect of all borderline or unsatisfactory samples.

<p>3.6 Infectious Disease</p>	<p>National sampling study examples for 2024/25 include;</p> <ul style="list-style-type: none">• <u>Study 80</u>: Unpasteurised and pasteurised milk cheeses (UK and non-UK) from retail and manufacturers/dairies. Study to run from April 2024 until the end of March 2025.• <u>Study 81</u>: Hygiene in Tattoo and Cosmetic Piercing Premises. Study to run from June 2024 until the end of November 2024. <p>Food composition and labelling are the remit of Essex County Council's Trading Standards Department.</p> <p>The UKHSA and Trading Standards 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 2023/2024 the Service received 106 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 single case may lead to the discovery of an outbreak if the person concerned is a food handler. A total of 20 allegations of food poisoning were received in 2023/2024.</p> <p>The Food Service, in conjunction with UKHSA 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>
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	<p>The resource requirement for this function for 2024/2025 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>3.8 Liaison</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 smarter communication platform.</p> <p>Food Safety Alerts 'for action' received are always printed off, actioned immediately by the team 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 hour's scheme.</p> <p>The Environmental Health Service supports the work of the Chartered Institute of Environmental 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>

<p>3.9 Food Safety Promotion</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 UKHSA 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 UKHSA. 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">• UKHSA, 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>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,</p>
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3.10 National Food Hygiene Rating Scheme

- **Ongoing Education** – This will take place when triaging new food premises and during the planned food hygiene inspections for the period 2024/2025 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 22 July 2024;

Rating	%
5 (very good)	83.5
4 (good)	12.2
3 (generally satisfactory)	3.4
2 (improvement necessary)	0.3
1 (major improvement necessary)	0.6
0 (urgent improvement necessary)	0

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.

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.

3.11 Food Hygiene Training	The Service promotes the food hygiene courses offered by accredited trainers including Harlow College.
<p>4.0 Resources</p> <p>4.1 Staffing Allocation</p>	<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> <p>For the plan period 2024/2025 the available staff for this Service Plan includes:</p> <ul style="list-style-type: none"> • 0.1 Environmental Health & Corporate Safety Manager • 1 FTE Commercial Services Manager • 2.5 FTE Principal/Senior/Environmental Health Officer (S/EHO) - Fully competent for all food safety activities; (*currently on secondment and backfilling with agency staff) • Approx 300 food inspections per year outsourced to competent contractors; • 0.5 FTE Technical Support Officer (TSO) - Not formally competent in food safety matters. <p>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. Some resource has been diverted to carry out inspections under</p>

the Homes for Ukraine Scheme. The team has also visited funeral directors during June / July 2024 in line with Ministry of Justice requirements following the publicised events in Hull and East Riding.

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.

The resource allocated for 2024/25 is sufficient to execute the delivery of the required food service functions.

<u>Officer</u>	<u>FTE</u>
Environmental Health & Corporate Safety Manager	0.10
Commercial Services Manager (Lead Food Officer)	0.50
Principal EHO / Senior EHO / EHO	1.40
Contract Staff	0.40
TSO/Administration (Not formally competent in food safety matters)	1.00
TOTAL	3.40

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

The Commercial Services Manager, PEHO's, S/EHO's, Contractor EHO's are fully competent to inspect all risk categories of premises as required by the Code of Practice and take formal food samples. The Commercial Services Manager / PEHO, S/EHO's, EHO's, are authorised to serve

4.2 Competencies

4.3 Staff Development Plan

Hygiene Improvement Notices, detain and seize Food and the Commercial Services Manager, PEHO and S/EHO's are authorised to serve Hygiene Emergency Prohibition Notices.

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.

Team meetings are held with the Commercial Services Manager to discuss matters and issues of consistency arising under this Service Plan area.

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.

Training needs are identified by examining:

- Operational requirement arising from Service Demands;
- Individual needs highlighted at Personal Performance Plan review meetings;
- The introduction of new legislation/Code of Practice and FSA.

How these needs are met may vary, but the typical sources of training include:

	<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 team has participated in FSA national rating consistency exercises.
- Continual development of the Uniform, along with Enterprise to ensure it can meet all Service needs and to improve management systems.
- 5 members of the team have undertaken additional Animal and Plant Health Agency training and are now authorised as Food Competent Certifying Officers.
- The team has reviewed procedures in relation to export certificates for food not of animal origin. (there has been a significant increase in export certificates since Brexit.)
- The team has introduced a fee for food hygiene rating rescores.

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;
- Revisits;
- Responses to complaints;
- Reactive work, formal actions and investigations.

6.1.1 Performance Targets

A key aim of The Service is to continually improve the quality, efficiency and effectiveness of its Services.

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.

For the period 2023/2024 **100%** of all programmed and unprogrammed inspections were completed
For the period 2022/2023 **97.8%**
For the period 2021/2022 **88.6%**
For the period 2020/2021 **59.83%**
For the period 2019/2020 **79.28%**
For the period 2018/2019 **99.32%**

The target is to achieve **100%**, as prescribed by the Food Standards Agency. The figure for 22/23 is greatly improved on the previous financial year. (19/20 and 20/21 were significantly impacted by the COVID pandemic). **The 100% achievement figure has been recognised by the Food Standards Agency.**

At this present time (July 2024) the team is on track with programmed and unrated food inspections and expect to achieve over 95% of all inspections due by the end of March 2025.

The percentage of premises that are broadly compliant with food hygiene was

For the period 2023/2024 **97.7%** of all premises were broadly compliant.
For the period 2022/2023 **93.6%**
For the period 2021/2022 **92.9%**
For the period 2020/2021 **89.0%**
For the period 2019/2020 **95.37%**
For the period 2018/2019 **95.94%**

6.2 Areas for development

The following Service developments are planned for the period 2024/25:

- Continue the review and updating of the Standard Operating Procedures and Policies for this Service.
- Adapt to any changes as a result of the FSA achieving business compliance programme. <https://www.food.gov.uk/about-us/achieving-business-compliance-abc-programme>
- Review procedures in relation to export certificates for food not of animal origin. (there has been a significant increase in export certificates since Brexit.)
- Keep under review the Border Target Operating Model in relation to food imports.
- Follow guidance provided by FSA/APHA/DEFRA to continue to ensure officers are competent to carry out duties such as the predicted increase in export health certificates as a result of Brexit.
- Recommence participation in the public health 'Tuck In' project where resources permit.
- 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.
- Review inspection file records to ensure they are up to date with pertinent food safety matters.
- Adopt the new UKHSA power BI infectious disease notification system into routine procedure and review and implement systems for following up on notifications (such as Salmonella, Giardia and Cryptosporidium) in accordance with UKHSA guidelines.