Food safety and food standards

Service Delivery Plan 2024/25







Introduction

The Food and Safety Team, sits within the Public Protection service, which is part of the Public Health and Public Protection Directorate. The Public Protection service provides the following functions:

- Food & Safety
- Trading Standards & Licensing
- Primary Authority sits across both teams.

Our aim is to deliver a wide range of effective and responsive public protection services for our residents, businesses and visitors.

About our service:

Slough Borough Council is a designated Competent Authority for the purposes of official food controls it is responsible for the regulation of food safety, food standards and imported food legislation within the borough. This role is shared between the Food & Safety and Trading Standards & Licensing Teams. The teams are also responsible for:

- Health & Safety regulation
- Infectious disease control
- Consumer protection
- Animal health
- Primary Authority Partnerships
- Smoke Free regulation
- Licensing functions.

We provide a responsive service that aims to achieve a balance between regulation, enforcement and support. We take a minimum tolerance approach on issues of serious concern, while supporting compliant businesses.

We work closely with businesses and key stakeholders like the Food Standards Agency (FSA), UK Health Security Agency (UKHSA) and other partners within the council such as Public Health, Resilience and Enforcement team, Building Control & Planning.

Resourcing

In 2023/24 we had the equivalent of 3.3 FTE professional and managerial officers in our structure allocated to deal with food safety matters. It's important to note we have estimated that we need 4.27 FTE to deliver all the official food safety controls required within FSA Food Law Code of Practice (FLCoP). However due to a new food officer still completing training, we only had 2.95 FTE <u>available</u> to deal with food safety matters. **This leaves a shortfall of 1.32 FTE to deliver official food controls.**



To account for this, we have a contractor helping us at 0.65 FTE to bridge this gap.

We have one FTE to deal with food standards issues.

We also have pressures of other areas of work, including health and safety regulation, infectious discase control, and non-regulatory work, such as replying to emails, keeping up to date with training and competency, attending meetings, 1:1's and adhering to SBC policy and procedures etc. which together estimates an addition 3.77 FTE requirement.

To deliver our official food controls, health and safety requirements, and everything needed for effective service delivery, we need approximately 8.04 FTE, and we have 5.85 FTE posts within our budget, including a team manager, business support officer and 0.75 allocated to health and safety regulation.



This leaves an approx. 2.19 FTE shortfall to deliver statutory obligations and an effective service. See appendix A for details on this calculation.

This means we prioritise work, and do the best we can with what resources we have.

We have an apprenticeship EHP position become available this year, which means in four years time when the apprenticeship scheme is completed, we should be able to recruit another qualified officer into the team. It is seriously challenging to recruit a qualified authorised officers, hence we have launched an apprentice this year.

Outputs

The main outputs relating to Food Safety Regulation are:

- Undertaking risk based interventions, focusing on the highest risk and/or non-compliant establishments.
- Supporting business in Slough and protecting customers by using a range of interventions and enforcement tools to secure improvements.
- Providing information on food safety standards to residents and consumers through the Food Hygiene Rating Scheme (FHRS). This identifies both businesses which are operating to a satisfactory standards and also businesses which are non-compliant and may be putting Slough residents and visitors at risk

- Food safety, quality and composition sampling;
- Investigation of complaints about food and food businesses;
- Acting as 'Primary Authority' for large businesses and manufacturers both inside Slough and nationwide, which involves formal liaison with other local authorities, giving advice and support to the business in the Primary Authority partnership. Primary Authority is a cost recovered charged service.
- Investigating food poisoning outbreaks and infectious diseases; taking action to prevent infection and spread
- Inspecting imported food, food products and the verification of imported organic food arriving into the Borough.
- Supporting businesses involved in the export of foods by providing certification documentation.
- Promotion of Food Safety.

This plan is reviewed annually. We welcome your views, comments and suggestions on how it could be improved. Please forward your views to:

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Our objectives

The food safety function is a statutory service, the teams operate in within a legal framework supplemented by a Statutory Code of Practice which describes how to fulfil our obligations as a Competent Authority.

The Corporate Plan 2023-27 'A Fresh Start' and the Joint Wellbeing Strategy set out a vision for Slough, and the actions needed to be done to make this a reality. It reflects the significant challenges faced by the Authority while setting out the Council's Priorities for the medium term. Food Safety is a foundation stone upon which objectives such as helping residents live healthier lives and the vision for a thriving Town Centre are built. The Action Plan at the rear of this service delivery plan shows, in detail, how we are going to achieve this.

The Action Plan should be read in conjunction with our Enforcement Policy. <u>Enforcement policy for regulatory and</u> <u>enforcement services - Slough Borough</u> <u>Council</u>. The Enforcement Policy reaffirms our commitment to carry out our duties in an open, fair and consistent manner, with a graduated approach to enforcement, based on risk. Assessment of risk and the likelihood of reoccurrence are major factors in our enforcement decisions. Our service plan reflects the <u>minimum</u> service that we must deliver to meet our statutory obligations under the FSA Food Law Code of Practice.

Delivery of this plan will be dependent on having the resources needed. As always it may be necessary to reprioritise planned work throughout the year if unforeseen demands on the service, such as serious investigations, arise.

Appendix A gives an estimate of the resources needed to deliver all the objectives of the Food Service Plan. As with previous years, we do not have the resource to deal with all objectives, in that we have an approx. 1.32 FTE shortfall to delivery food obligations alone, and 2.19 FTE shortfall to deliver all services of the team. Hence our priorities will be based on risk and reprioritised as the demand and needs of the service change.



Looking back at 2023/24

Summary

2023/24 was a challenging year for a number of reasons, the most significant being a migration to a new Management Information Systems (MIS) which went live in February. Work on this project commenced in August, this has taken the majority of the time of both the Food and Safety Manager and the Food & Safety Professional. Work on this project has been intense, with a significant amount of time given to attending workshop and configuration of the system and ironing out several teething issues.

Since the war in Ukraine, our Business Support Officer has been working the majority of her time in the Homes for Ukraine project meaning authorised officers are undertaking their own admin work.

We also have the ongoing financial situation and Commissioners supporting council leaders implement a number of directions from the Minister.

The team also had some personnel changes; we gained a newly qualified food officer in June who required competency development, but this still leaves a vacant post. Previous to this, the team had been stable for many years.

Key achievements

Despite the above, the team made great achievements, specifically:

- The team delivered most obligations within the FSA Food Law Code of Practice. We completed due inspections 100% of all high to medium risk rated premises (A, B and C rated), 63% of our medium to low rated premises (D rated), and 17% of our low rated premises (E rated).
- We also provided 219 Export Health Certificates, although a decrease on last years 326, this generated cost recovery 'income' of approx. £29K
- We continued to work with our PA Partners and local businesses resulting in salary off set 'income' of more than £21k. This is a significant increase on last years £17K. We deliver PA jointly with Trading Standards and this year generated a combined income of £43K.



- We also removed Approx. 600kg of illegal meat from a local retailer which had no identification approval marking and traceability indicated was Category 3 Animal by Products. A significant amount of work went into a multi agency and local authority investigation, involving the national food crime unit and authorities in Poland. Our food lead officer attended court twice due to the complexities of the matter, and was granted three condemnation orders.
- We also had a successful prosecution regarding serious food hygiene offences at a local green grocers with a butchery counter. The company was issued with a £32,000 fine.
- We undertook a joint project to look at pest control and waste management arrangements at food businesses along the high street, which resulted in two emergency closures for rodent infestations.
- We detained 2.5 tonnes of illegally imported product of animal origin (pet food), which was re-exported to the country from which it originated.

ARCUS (MIS)

Due to budget pressures and increasing costs and capabilities of our previous MIS, this year we migrated from Civica MIS to Arcus MIS. Preparation for this migration commenced in June 2023, and went live in February 2024, which was a tight and ambitious timescale considering the nature of the project.

Work on this project was significant, and took the majority of the time of both the Food and Safety Manager, Trading Standards and Licensing manager, and the Food & Safety Professional, who six months of this year, worked almost exclusively on this project. Demands have been intense, with a significant amount of time given to attending workshops, configuration of the system, testing the system, officer training and devising new ways of working. We've had to deal with numerous teething issues, some of which were quite substantial and still ongoing. This naturally has created additional pressure on the whole team, which will remain until the new Arcus has been successfully embedded, expected summer time 2024.

Primary Authority Scheme

Primary Authority (PA) Partnerships comprise a legally binding contract between the Authority and a business to provide ongoing specialist advice on specific areas of regulation applicable to that business, such as fair trading, product labelling, product safety, food safety and health & safety.

Our specialist officers provide companies trading across council boundaries robust and reliable advice, through these legally recognised partnerships. The scheme also provides a safety net to ensure that local authorities are consistent in the way they regulate businesses.

Cost recovery is an essential element of the scheme and is applied to Primary Authority partnerships with an hourly charge for any work undertaken. While the number of businesses in a Primary Authority Partnership with us is reasonably stable, we currently maintain 46 partnerships, the demand for support from our partners does vary. Generally over the past few years we have seen a downward trend in PA income, principally due to the fact we lost staff, whose key role was to provide PA advice. We therefore have refocused our abilities and priorities.

However, this year we saw an increase in demand from our PA partners resulting in salary off set 'income' of more than $\pounds 21k$. This is a significant increase on last year's $\pounds 17K$. The food & safety team gave over 250 hours of advice interactions with our PA companies; most of this was in response to requests from our partners.

Jointly with Trading Standards, this year we generated a combined income of *E*43K. In 2022/23 our joint income was *E*34k. This cost offset Primary Authority model offers benefits for the Authority and local businesses by improving resilience, competency and staff retention within the Teams. It also improves standards in business trading in and out of the Borough. Additionally as a Primary Authority we have access to specialist panels which support officers, improve consistency and provide access to experts in the field.

More information on Primary Authority Partnerships can be found on the website <u>https://primary-</u> <u>authority.beis.gov.uk/about</u>. Businesses that would like to join the scheme can email primary.authority@slough.gov.uk or <u>www.slough.gov.uk/primaryauthority</u>

PRIMARY AUTHORITY

Our Chargeable Services

We have historically made an offer to businesses for bespoke advice packages covering what need to do to improve their compliance with legal requirements and their Food Hygiene Rating. This is delivered on a salary and on-cost 'off set' basis. Due to ongoing lack of staffing capacity and demand we have not actively offered this support on 2023/24. We will review requests for support if received on an 'as and when' basis but are not planning to promote this offer in the near future.

We also provide a service to issue export health certificates to Slough based businesses exporting food products. This is discretionary but is offered as it supports local businesses to access the exported food market. This year we issued 219 export health certificates (decrease on 2022/23 at 326) but this made an income of approx. *E*29k. The fee charged for this service is based on salary and cost 'off-set'. The demand for this service is not reliable and may stop at any time.

Food Hygiene Premises Inspections and Interventions

Slough Borough Council is a Competent Authority and is responsible for ensuring that Official Food Controls are undertaken. We aim to undertake all of the interventions required by the FSA's Food Law Code of Practice, a Statutory Code of Practice. Where there is a gap between the resources available to deliver these interventions and the demands on the service then our priority is to complete interventions to food businesses which present the highest risk. Table 1 below shows the number of interventions due in 2023/24 and the number of full or partial inspections carried out at each category of premises.

Risk Rating	Frequency of intervention	Number of interventions due in 2023/4 (as per FSA FLCoP)	Total number of full or partial inspections carried out in 2023/24	Number of interventions not completed and now overdue
Premise Rating - A	6 months	8	8	0
Premise Rating - B	remise Rating - B 12 months 30		27	0
Premise Rating - C	18 months	124	148	0
Premise Rating - D	24 months	269	169	100
Premise Rating - E	Alternative Intervention	208	27	172
Premise Rating - Awaiting initial Unrated inspection		55	111	70 (of which 52 are low risk and low priority)
Total		694	490	342

Please note the number of inspections due compared to those carried out may not always align due to premises being closed, new premises registering and changes in ratings. This is especially relevant to unrated premises. We triage new businesses as they register, and as a priority inspect those that present greater risk. Businesses which are lower risk, such as businesses who bake a small number of cakes from home, are classed as lower risk. We get a high number of businesses registering throughout the year, 161 this year, many of these also close within the year. This high churn of businesses naturally creates pressure on the team. The table 2 below shows our current premises profile and interventions due for 2024/25.

Risk Rating	Number of food premises	Number of interventions due in 2024/25 (as per FSA FLCoP) including overdue	
Rating - A	5	10	
Rating - B	26	26	
Rating - C (broadly compliant)	168	97	
Rating - C (non-broadly compliant)	19	11	
Rating - D (broadly compliant)	384	233 (133 due & 100 overdue)	
Rating - D (Non-broadly compliant)	11	4	
Rating - E	330	234	
Rating - Unrated at Apr 23	70	70*	
Outside programme	10	0	
Total	1,023	683	

*Plus any other business that register during the year, estimated an additional 150. The number that will need physical visits will be determined by guidance from the FSA. There are currently 1,023 registered food premises within the borough, ranging from large manufacturing premises to small corner shops. This is a slight decrease on last year.

Regulation and demands on the service

We undertake sensible and progressive regulation and enforcement in line with our enforcement policy.

We continued to receive a significant number of new food business registrations. At the end March 2024 we had 70 unrated premises on our database, of which 52 were classed as low risk and low priority, these are prioritised for inspection as soon as we can free up resources. Within the year 161 new food business registrations were received, this is steadily increasing year on year. Of those 34 have subsequently ceased trading within the year. All new businesses were provided with advice upon registration and are prioritised for their first inspection on the basis of risk, the high churn of businesses creates a growing demand on the service. The number of unrated premises on our data base fluctuates and we aim to keep this number as low as possible.

We routinely use broadly compliant (BC) data as a benchmarking tool. BC means that the premises is broadly complaint with food hygiene requirements **achieving a Food Hygiene Rating score of 3, which is 'generally satisfactory'.** At the start of 2023/24 our BC figure was 87.5%. At the start of 2024/25 it was 88%. This figure fluctuates marginally and includes premises which are unrated and awaiting an inspection, as unrated premises are classed as 'non-Broadly compliant'. If you removed unrated premises from this figure and made the assessment on premises that have had an actual inspection and accurate risk rating, our BC figure for the end of 2023/24 was 95% which is more an accurate and reflective. This figure is the same as last year. This means that 95% of all our food businesses at the end of 2023/24 were broadly compliant with food hygiene requirements and achieving a Food Hygiene Rating score of 3, which is 'generally satisfactory'.

If a business is identified as 'non-broadly compliant' during an intervention, further enforcement action and revisits are undertaken to secure improvements. In the past year 12 Hygiene Improvement Notices were served on five Food Business Operators and we served three Hygiene Emergency Prohibition notices to close a business instantly. We also served five food detention notices, three food seizure notices and two notices regarding the sale of unsafe food. We also issued 344 written warnings, a slight increase from last year.



We also gained a successful prosecution against a local retailer following serious food safety breaches over numerous visits. This resulted in a fine of £32,000 and costs awarded to the Council.

In November 2023, we identified and detained approx. 600kg of meat at local retailer, for various reasons including no ID approval marking and the sale of Cat 3 Animal by Products for human consumption. A significant amount of work went into a multi-agency and local authority investigation. Bags of Kpomo (cow skin) from Italy were detained but later released. The distribution of this illegal meat was believed to be wider than Slough, and resulted in an FSA food crime investigation. The wider implications of this issue is still ongoing. To deal with the meat in Slough, we attended court twice, and was granted three condemnation orders meaning the items were safely destroyed.

Food Hygiene Rating Scheme

We participate in the National Food Hygiene Rating Scheme, the Food Hygiene Rating of businesses within the Borough are published on the national website <u>http://ratings.food.gov.uk/</u> <u>authority-search/slough</u>. The scheme helps consumers by giving them information about the hygiene standards in food businesses. There is also evidence that the scheme encourages businesses to improve standards.

Assessments for a Food Hygiene Rating are carried out during routine food hygiene inspections when inspecting officers look at:

- How hygienically food is handledincluding preparation, storage and temperature control.
- The condition of the structure of the building - including cleanliness, layout, facilities and maintenance.
- How the business manages and records what is does to make the food that it sells safe.

Officers participate in local and national consistency exercises to ensure that we are applying the risk assessment scoring in the code accurately.

Food Safety Complaints and Enquires

The team dealt with 134 complaints and enquiries from or about food businesses in Slough during 2023/24 (this figure excludes imported and exported food referrals and PA queries as they are mentioned elsewhere). This figure is a significant drop from 165 the previous year, and 288 in 2021/22, and supports a general decrease year on year. The team also gave advice to 161 new/potential food businesses.

FOOD HYGIENE RATING

A range of enquiries were responded to. In particular we investigated:

- 114 complaints about hygiene standards at food businesses.
- 20 complaints about food (including contamination with foreign bodies and mould)

The team follows a procedure in relation to complaints and aims to keep the customer informed of our progress and outcome. We triage the information provided and review the intelligence we already have about the business before deciding on a course of action. We prioritise complaints which indicate a serious risk to public health and/or breach of the legal requirements.

The type of complaints we've dealt with include a cockroach in food, ants on a pizza, hair in food, glass in food, drink that tasted of chemicals, a dog in a kitchen, pin in chicken pieces, maggots in eggs, several pest complaints, poor hygiene of staff including nose picking, several alleged food poisoning complaints, no hot water, cooking food in a car park, out of date food, smelly drains, and a complaint of foul water leaking through a kitchen roof.

Imported Food Control

We undertake the following controls on imported food:

- Control of Products of Animal Origin which are in Enhanced Temporary Storage Facilities (ETFS) in Slough but which have bypassed imported food controls at the point of entry into the UK.
- Supervision of High Risk Non-Products of Animal Origin which are located in ETSFs in Slough pending the results of sampling at the point of entry into the UK- including the destruction of goods which fail those checks. This is part of formal onward transmission arrangements that we have with Border Control Posts around the UK.
- Dealing with other restricted foods located in ETSFs in the Borough as and when we become aware of them.
- Certification of Organic Foods being imported through ETSFs in the Borough.



Inland imported food checks during routine food hygiene interventions, to ensure food has been imported correctly and does not pose a health risk.

In 2023/24 we undertook the following work in specifically in relation to imported food:

- Dealt with 46 Onward Transmission notifications (decrease from 76 in 2022/23)
- Detained and notified Border Force about three consignments of illegally imported POAO (significant decrease from 18 in 22/23).
- Detained and oversaw the destruction of five consignments of High Risk NPOAO (decrease from nine in 2022/23)
- Deal with two consignments of illegally imported organic food

As the import regimes for food from the EU changes, and now due to be implemented in April 2024, as a result of EU Exit, the focus of and demand for imported food controls will change - we



are unsure at this time what the likely impact will be but would anticipate an increase in issues arising from increased inland checks. We anticipate, the need for secure storage facilities or arrangements if we are to detain large amounts of food. Currently the advice from regulators is vague. We have written to all our businesses likely to be affected by this change with advice. The team manager also attended extensive imported food training to ensure we are kept up to speed on changing and complex imported food controls.

Food Poisoning and Infectious Disease Investigations

Last year, the Food and Safety Team were notified of 252 infectious diseases and food poisoning related illnesses. This figure is similar to last year.

We follow up in line with regionally agreed protocols, co-ordinating with the South East Region of the UK Health Security Agency where necessary.

The most common food poisoning reported in Slough remains to be Campylobacter which made up 50% of the reported illnesses; this corresponds with national trends, as campylobacter is the most common type of food poisoning in the UK. Salmonella accounted for 9.5% of notifications, Giardia for 10%, Hepatitis 7%, and E.coli VTEC 4%.

Sampling

This year we took a total of 30 official samples for microbiological examination were taken in 2023/24, all for micro examination and part of a National Study by UKHSA. This was similar to last year's routine sampling.

Food Standards Official Food Controls

Slough Borough Council is a Competent Authority and is responsible for ensuring that Official Food Controls are undertaken. We aim to undertake all of the interventions required by the FSA's Food Law Code of Practice (FLCoP) (a Statutory Code of Practice), there may be deviations due to exceptional circumstances.

For 2023/24 we continued our prioritisation work for yet to be inspected premises. This enabled our Food qualified officers to greater prioritise the yet to be inspected premises. During this reporting period, an officer retired. We were able to recruit to the vacancy, however this process was protracted and meant the final quarter of the year we were left with the service manager being the only qualified officer due to staff sickness.

As with Food and Safety, Food Standards was also migrated to the new MIS platform. This was a big undertaking with officers juggling the task with normal day to day duties.

This table shows the number of interventions due in 2023/24 and the number of full or partial inspections carried out at each category of premises and the activity due for 2023/24. The number of lower risk visits is relatively high due to an accumulation from previous years.

Risk Rating	Frequency of intervention	Number of interventions due in 2022-23 (as per FSA recovery plan)	Total number of interventions carried out in 2022/23	Activity due for 2023/24
Premise Rating - A	12 months	5	5	100% of A rated premises
Premise Rating - B	24 months	143	70 (4 closed)	50% of B rated premises
Premise Rating - C	5 yrs	210	56 (3 closed)	25% of C rated premises
Premise Rating - Unrated	5		41 FSI visits (8 x closed) 67 Virtual Visits Total - 109	100% of unrated premises
Total food premises		555	239	

In order to meet the minimum requirements of the FSA plan in 2023/24 we will be expected (as a minimum) to

- Assess and visit in accordance with risk, all business that register with us plus any existing unrated businesses;
- Carry out interventions in line with the normal programme for inspections set out in the Food Law Code of Practice
- Of the businesses awaiting initial inspection it is planned to inspect the premises identified as high risk and carry out alternative interventions with remaining lower risk establishments.

We continued to receive a significant number of new food business registrations at the end March 2023 we had 177 businesses that we had never visited. In 2023/24 we received 161 new business registrations. Of those approximately 34 have subsequently ceased trading. All new businesses were provided with advice upon registration and are prioritised for their first inspection on the basis of risk.



We dealt with 112 food related complaints ranging from out of date food, incorrectly labelled imported food, pre-packed for direct sale enquiries and allergen controls.

Customer Pledge

We aim to provide every customer with a quality service and will seek feedback from you to help further improve the quality of the services we provide. A manager will contact you personally if you are unhappy with the service received.

In addition, we have introduced the following standards against which we will monitor the responsiveness of our service, namely:

Service Standard	Target/ Response Times
Respond to customer complaints and enquiries	Within five working days
Provide a full response	Within 10 working days

Quality Assurance

We aim to undertake formal monthly quality assurance monitoring on the whole range of our service delivery. Our QA procedures assess the work of our officers to ensure that it meets the high standard expected by the service. Some monitoring was undertaken in 2023/24 but not at the intended levels due to demands of work and competing priorities. However, all enforcement notices are closely checked before serving. This year we aim to undertake increased QA in line with our policy.

Members of the team represent the Authority in a number of regional bodies with the aim of sharing good practice, including a range of Primary Authority Expert Panels, The National Food Hygiene Focus Group, Berkshire and Oxfordshire Food and Health & Safety Liaison Group & Regional Sampling Group.

Resourcing

The Full Time Equivalent (FTE) staff authorised allocated to food safety & standards work is 4.3 FTE. Appendix A identifies a need for resourcing in the region of 4.27 FTE to deliver the Food Safety & Standards service. There would appear to be a shortfall of approximately 1.32 FTE, and 2.19 FTE shortfall to deliver all services of the team.

The cost of the service during 2024/24 to meet the Food Standards Agency (FSA) Food Law Code of Practice obligations will be approximately £300,000, for both Food Safety and Food Standards. A breakdown of the resources committed to Food Safety and Standards work is contained in Appendix A.

We aim to make efficiencies, work smarter and create income to offset this shortfall. We aim to change the way we undertake food hygiene interventions from paper based and typing a report, to this all being on a table and automatically generating a report. Whilst this will take some time and investment initially, this should increase significant efficiencies year on year.

To complete all of the obligations within this plan is ambitious. Where necessary we will prioritise on the basis of risk and work may be re-prioritised as needs change. Aspirational health and safety projects may not be undertaken. Premises deemed as low risk will be managed so their risk is reviewed regularly, and should their risk rating increase, the premises will immediately be subject to interventions. Where possible we will make use of flexibilities within the guidance and other smarter, agile and mobile working initiatives, all of which are detailed in the Action Plan attached as appendix B.

Areas for development/Future delivery models

We are always striving to move the service forward. We have set the following areas for development during the coming year;

- Enabling food hygiene inspections to be undertaken remotely on a hand held device, where by the inspection is automatically entered into our database, and any compliance report autogenerated and sent to the business operator whilst onsite. This is a significant project, but should create beneficial efficiencies once embedded
- Linking in with Public Health colleagues to support the wider health agenda for Slough.
- Complete an ongoing backlog of medium and low risk food hygiene interventions, specially focusing on D rated premises. We have a backlog of 100 interventions, in addition to the 133 D rated interventions due this year. This backlog is mostly due to covid recovery.
- Increasing the number of businesses within Slough achieving a 3, 4 and 5 score in the FHRS (broadly compliant % figure) and measuring the impact of our regulatory activity on improving standards in non-broadly compliant businesses.
- Updating our general procedures.
- Improving our customer engagement.
- Increased QA monitoring.

In 2022-23 the FSA is undertook a review of the Hygiene Delivery Model and a new model was expected from 2024. However after consulting with local authorities, the food Hygiene Delivery Model is going to remain largely same although there will almost certainly be significant changes to the FLCoP. The FSA have changed their current workstreams and are focussing on setting KPIs and Data collection projects. We continue to receive communications from the FSA on requirements form them.

Staff Development

On-going development of the work force is paramount to ensure a comprehensive service is provided to the customer, whilst maintaining continuous improvement and providing value for money. The Food Standards Agency requires that the Council maintains the competency of its officers and also that we have officers with sufficient skills to maintain the breadth of competency needed for Slough specifically. The town's close location to Heathrow airport places additional training requirements upon the team in relation to complex Imported Food legislation.

Variation from service plan

The action plan for 2024/25, outlines planned work for the year in Appendix B.

Departures from this service will be exceptional, capable of justification and be brought to the attention of the Associate Director for Place Regulation without delay. Reasons for any departure from the plan will be fully documented.

Appendix A

Resource Requirements for Food Service Delivery 2024/25

Service provision for 24.25	Expected output	FTE required	Resource
Food hygiene interventions to all premises due Businesses overdue for intervention:	Cat A (5) 10 visits Cat B 26 visits Cat C 106 visits Cat C 106 visits Overdue D 100 visits Cat E all 62 Overdue E 172 Unrated 70 Businesses registering in year - estimate 170, approx. 85 (50%) will be med or high risk and need an inspection 85 LOW RISK Total due	100h 156h 530h 399h 300h 124h 344h 390h 425h 170 2,938 1.52 FTE	ЕНО
Primary food standards inspections	High Risk (A) (5) 100% of A Medium Risk (B) (85) 50% of B due Low Risk (C) (90) 50% of C due Unrated (120) 100% of unrated	1.0 TS	EHO/TSO
Imported food control	Difficult to estimate demand	0.1	EHO/TSO
Complaints and service requests	650	0.75	EHO/TSO
Sampling	50	0.10	EHO/TSO
Food Enforcement Action - emergency procedures, case files. Prosecutions, etc	May vary - but based on previous experience	1.0	EHO/TSO
QA and updating of procedures		0.3	Manager/TL
Day to day management of service delivery		0.5	Manager
Total to deliver FLCoP requirements		4.27 excluding TS	
Other service demands not in the FLcoP:			
Delivery of Primary Authority scheme	Approx. 240hrs	0.12	
Administration		1.0	BSO
Export Certification	Estimated at 350	0.3	EHO
Health and Safety Regulation		0.75	
Infectious disease control		0.1	
Other non regulatory work & managing the team		1.5	
	Total additional rescores required on top of FLCoP requirements	8.04 excluding TS	

We have allocated 3.3 FTE to undertake the obligations of the FSA FLCoP as detailed above for food hygiene excluding standards. This is without the pressure of other non-regulatory work, such as replying to emails, keeping up to date with training and competency, attending meetings, 1:1's and adhering to SBC policy and procedures, which together estimates an addition 3.77 FTE requirement. There is an approx. 1.32 FTE shortfall to meet our food statutory obligations alone, and **approx. 2.19 FTE** shortfall to deliver all statutory obligations and an effective service.

Appendix B: Food Safety and Standards Action Plan 2024/25

Directorate: Public Health and Public Protection	Service manager: Levine Whitham
Division: Public Protection	Budget: £300,000 (including Food Standards)
Team: Food and Safety Team, and Trading Standards & Licensing Team	Number of staff employed: 5.55 FTE Dealing with Food Safety and Hygiene, and Standards (including Management at 0.5 and Business Support Officer at 0.75.

Service objectives:

We have strong links to the Council's Corporate Plan, as indicated against each service activity below. The work of the Food Safety & Standards teams is essential in securing safe foundations from which the council can deliver its plan. Without the basics, such as safe places to eat and protection against disease and food related illness, it would be impossible to build a safe, healthy and vibrant place to live, work or visit. The service provides a foundation stone for a fit and resilient Borough.

Protecting public health via ensuring Food Safety; supporting local businesses in Slough and offsetting salaries via the Primary Authority Scheme, Exported food certification and other chargeable services.

Provide a value for money food safety service within the Food & Safety and Trading Standards Teams with excellent customer focus and wellmotivated competent staff to deliver our statutory obligations and the meet the specific needs and priorities of Slough.

The timely delivery of specific work plans, evidence based initiatives and joint working with partners both within and beyond the Council to improve the quality of life in Slough and protect customers whilst supporting business growth and developments within the Town Centre.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
Primary Authority (PA)	A cleaner, healthier, more prosperous Slough, by engaging with businesses to create new employment opportunities.	Monies invoiced recouped by way of Salary & cost off set target of £78,000 invoiced in conjunction with Trading Standards Team. Consolidate and further develop existing PA partnerships.	Designated officers to work closely with PA businesses to: Develop partnerships with PA clients. Provide specific advice in relation to management systems and procedures and controls adopted by the company nationally. Issue 'formal PA advice' where procedures and controls are deemed suitable and compliant. Handle referrals from other local authorities and central government bodies on behalf of that business. Develop and publicise Inspection Plans where requested. Issue of advice and guidance to other Enforcement Authorities on the company's activities. Maintain an accurate record of any advice and guidance. Hold meetings with partner businesses on a regular timetable of mutual agreement, along with annual action plans where mutually agreeable. Respond to requests within in line with Customer Charter and Pledge, or as agreed with the PA.	Partial offset of salaries and costs. Improved standards, efficiencies and compliance within PA's, with less enforcement action taken by Enforcement Authorities (EA). Reduced, efficient and effective regulation by other EA nationwide, via the provision of PA support which has a national impact. Reduced regulatory burden on PA businesses.	Food & Safety Manager. Trading Standards & Licensing Manager. All Food Safety & Trading Standards Officers.	March 2025 Monthly Reports on hours and income generation. Quarterly Reviews of progress. Yearly overview of individual company Action Plans.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
Supporting economic development and business compliance: Providing advice for businesses on compliance and chargeable services such as export certification and FHRS rescores	A cleaner, healthier, more prosperous Slough, by engaging with businesses to create new employment opportunities.	Monies invoiced and recouped by way of Salary and cost off set. Target of £30,000 for export certification. Review offer of chargeable services in line with corporate recovery plan.	 Provide free signposting to comprehensive self-help support and guidance to new business start-ups and existing SME's in Slough. To provide an export certification service to local businesses. Charge for Food Hygiene Rating Scheme rescore visits and SFBB packs when requested. Ensure recharging for enforcement activities where legislation allows including the administration of Official Food Controls on certain Imported Foods. Provide easy to access payment services, including telephone and online payments. Maintain up to date information on the Council website - signposting to current guidance and resources. Review our offer of chargeable business support options in line with existing resourcing constraints and current corporate objectives including consideration of: Primary Authority Tailored business advice Assessment of labelling/brochures/website Pre-start up advice 	Improved standards, efficiencies and compliance within businesses. Partial offset of salaries and costs. Reduced the amount of regulation required by the council via business paying for support and improving standards before statutory inspections are undertaken.	Food & Safety Manager. Trading Standards & Licensing Manager. All Food Safety & Trading Standards Officers.	March 2025 Quarterly review & Monthly Reports on hours and income generation. Number of Export Certificates Issued. Number of businesses given chargeable business support. Number of businesses achieving 5 FHRS.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
			 Pre-Inspection support visits Review of policy and procedures Audit of systems Support in achieving 5 FHRS Supply of SFBB material Funded projects from regional or national groups (TSSE/NTS) 			
Hygiene Interventions with food premises in Slough Statutory Requirement	Statutory Requirement Closing the healthy life expectancy gap in Slough by, having a town where residents can live healthier, safer and more independent lives; and working with partners to target health inequalities and promote wellbeing.	100% of due food interventions to A- C rated premises including approved premises in line with FSA FLCoP. Undertake a risk based approach to undertaking interventions to D rated premises. All approvals to be issued within time limits as defines in FSA CoP.	Undertake Routine Food Hygiene Interventions in line with FSA FLCoP. Making full use of Alternative Enforcement Strategies (AES) where available. Assess compliance with allergen information to consumers and safe handling of allergens during food interventions. Share intel and concerns regarding allergens with trading standards, and take action to ensure compliance and consumer safety where necessary. Secure improvements where there are evident concerns, taking enforcement action where compliance is poor; in line with the council's Enforcement Policy. Recover costs for service of Hygiene Emergency Prohibition Notices and voluntary closures.	Safer food businesses in Slough & increase in % of broadly compliant premises. Reduced incidence of food poisoning. Increase in proportion of premises achieving 3, 4 & 5 in the Food Hygiene Rating Scheme (FHRS).	Food & Safety Manager. Food Safety Team Leader. All Food Safety Officers. TS/NET/ Licensing acting as 'eyes and ears'.	Ongoing until March 2025. Quarterly review of number of interventions. Compared to those due. Number of high risk unrated businesses overdue for intervention. % of broadly compliant premises.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
		Ensure all new food business registrations are risk assessed & inspected in line with risk and FSA CoP. Improve Business Food Safety compliance in the Borough. Undertake intervention and follow up regulation in line with the Code of Practice.	 Publicise enforcement action taken against non-compliant premises as a deterrent to other businesses and incentivise improvements. Explore focused interventions and sector specific projects on high risk premises or where local intelligence suggests necessary. Added Value: Joined up enforcement: Use professional curiosity when visiting premises to identify concerns and share intelligence with relevant bodies (safeguarding, CSE, modern day slavery, housing, NET team planning, licensing). Assessing compliance with Smoke Free requirements Identify H&S matters of concern and take appropriate action where necessary. 	Consumers have greater up to date information for consumers on hygiene standards, so they can make informed choices on where to eat and purchase food. Proportionate enforcement taken in non- compliant premises.		Impact of regulation (Revisit outcomes). QA monitoring completed & feedback actioned.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
Reactive Investigations, response to intelligence from other areas of work, Food Complaints and response to service requests. Statutory Requirement.	Statutory Requirement Closing the healthy life expectancy gap in Slough by, having a town where residents can live healthier, safer and more independent live; and working with partners to target health inequalities and promote wellbeing.	Respond to 100% of service request within five days and to deal with these in line with customer charter.	Review service requests and triage. Investigate service requests and where necessary using a full range of enforcement options to ensure compliance and safety. Managing customer expectations in line with Customer Charter. Where appropriate signpost customers to self help resources. Work in line with Enforcement policy, prosecution template and internal procedures. Explore joined up enforcement opportunities on a case by case basis including liaison in relation to (safeguarding, CSE, modern day slavery, housing, NET team planning, licensing).	Safer food businesses in Slough. Reduced incidence of food poisoning. Consumers feel able to eat out and purchase food safely in businesses within Slough. All complaints and service requests dealt with in line with Customer Service Charter and Pledge.	All officers	Ongoing until March 2025. Assess during 1:1 meetings and Case Reviews. QA monitoring completed & feedback actioned.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
Food Hygiene Rating Scheme	Closing the healthy life expectancy gap in Slough by, having a town where residents can live healthier, safer and more independent live; and working with partners to target health inequalities and promote wellbeing.	Continue to implement FHRS in Slough food businesses in line with FSA Brand Standard. Increase in premises achieving 2, 3, 4 and 5 score in the FHRS. Improved customer awareness of the Scheme, and better informed choices when eating out.	 Data on National FHRS platform updated monthly. Appeals and rescores processed in line with the Brand Standard. Engage with National publicity campaigns to raise awareness of FHRS. Encourage businesses to seek a rescore where their compliance has improved. Added value: Work to support % increase in BC businesses. Support compliance businesses and target those seeking financial gain from noncompliance. Peer pressure to improve ratings and threat of adverse publicity. 	Up to date information available for consumers. Consumers have greater information on local business hygiene standards, so they can make informed choices on where to eat and purchase food. Businesses motivated to improve their hygiene standards.	Food Safety Team Leader. All Officers to support.	March 2025 Monthly review. Number of publicity actions to raise customer awareness.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
Imported Food Controls Statutory Requirement	Statutory Requirement Closing the healthy life expectancy gap in Slough by, having a town where residents can live healthier, safer and more independent live; and working with partners to target health inequalities and promote wellbeing.	Intelligence and risk lead checks on 100% of imported food notifications. Continue to support and facilitate Onward Transmission (OT) arrangements with clearing agents in Slough, regarding high risk food imported and subject to BIP testing.	 Duty officer to monitor and respond to all notifications of imported food on a risk based approach, taking appropriate enforcement action where necessary. Maintain close working arrangements with both MHMRC, Hillingdon, Stanstead and Felixstowe BIP, regarding the sharing of intel, OT's and location of ETSF's. Process imports of organic food and issue certificates. Control of onward transmission referrals and notifications of Personal Imports. Investigations into illegally imported Products of Animal Origin (POAO) and other restricted foods (NPOAO), both at ETSF's and inland. Work with clearing agents and importers regarding the safe and legal import of non EU foods, including signposting to information and advice. Annual review of internal procedures, including keeping abreast of new and emerging issues and rapid changes in import controls. Added value: Slough community, the rest of the UK and other 3rd countries are protected against illegal and hazardous imports from third countries. 	Safe and complaint food imported into the EU via Slough. Food businesses in Slough, offering safe and complaint imported food.	Food & Safety Manager. All officers to support.	March 2025 Quarterly Review. Number of imported food consignments checked and notices served. Number of inland food investigations undertaken & notices serviced. Number of organic COIs issued.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
Sampling Statutory Requirement	Statutory Requirement Closing the healthy life expectancy gap in Slough by, having a town where residents can live healthier, safer and more independent live; and working with partners to target health inequalities and promote wellbeing.	Participating in National and Regional sampling programmes (where relevant to Slough) to investigate emerging food concerns, and to ensure food is safe. Undertake sampling as part of a suite of interventions to improve food hygiene and food standards and focus on high risk and local needs.	Regional sampling projects to be agreed at Berkshire Food Sampling group & TSSE. Explore funding avenues from external organisations e.g. Food Standards Agency. Timely follow up on sampling results, including investigation into unsatisfactory results where necessary. Explore joint sampling initiatives with Food Standards Officers where appropriate. Undertake imported food sampling where intelligence suggests necessary.	Contribute to local and national sampling intelligence, which will support improved both hygiene and food standards levels in Slough and nationwide. Minimum of 70 samples submitted for microbiological examination. Safer food locally and nationwide.	Laura Charlton (Hygiene Sampling). All officers to support.	March 2025 Quarterly review Number of samples taken. Number of unsatisfactory results acted upon.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
Infectious Disease Notifications & Control, and Public Health. Statutory Requirement	Statutory Requirement Closing the healthy life expectancy gap in Slough by, having a town where residents can live healthier, safer and more independent live; and working with partners to target health inequalities and promote wellbeing.	Investigation of Infectious Notifications including suspected food poisoning outbreaks in line with UK Health Security Agency (UKHSA) protocols. Support Public Health Initiatives.	100% of notified infectious disease cases investigated in line with UKHSA Protocols. Appropriate action taken where food handlers, or high risk groups are involved, including exclusion from work until clear of infection. Where source can be identified, take appropriate action to prevent reoccurrence, including enforcement. Participation in Incident Management Teams where necessary and associated follow up action undertaken.	Reduced incidents of infectious disease. Increased intelligence on sources of infectious disease, locally and nation wide.	Food Safety Team Leader. All Officers to support.	March 2025 Quarterly reviews
Food Standards Inspections and work.	Statutory Requirement Closing the healthy life expectancy gap in Slough by, having a town where residents can live healthier, safer and more independent live; and working with	100% of due A category food standard inspections. Inspect or alternative enforcement of premises yet to be inspected. Carry out Intel led - sampling	 Allocation of interventions based on risk priority. Make full use of Alternative Enforcement Strategies (AES) to applicable businesses in line with FSA CoP, including newsletter, SAQ's, targeted advice sessions and other relevant advice. Inspections based on risk: inspection of A, yet to be inspected food businesses 	Safer food businesses in Slough & increase in % of broadly compliant premises. Increased awareness among traders of their legal responsibilities in	Trading Standards & Licensing Manager/Food Standards Lead Officer. Food Safety Team Leader. All TS Food Officers.	Ongoing until March 2025 Monthly and Quarterly review.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
	partners to target health inequalities and promote wellbeing	Calculate amount of traders brought into compliance. Participation in national/regional sampling programmes as directed by TSSE or the Public Analyst. Including Internet sellers within the Borough. To work collaboratively with TSSE to undertake the Food Standards that have been identified as a regional national problem. Ensure all new food business registrations are	 Identified poor performing businesses targeted with appropriate interventions and re-rating the risk. To tackle Food Fraud Secure improvements where there are evident concerns, taking enforcement action where compliance is poor; in line with the council's business growth agenda, providing 'incubation periods' where suitable. Provide free regulatory advice for new businesses starting up. Publicise enforcement action taken against non- compliant premises as a deterrent to other businesses and incentivise improvements. Involvement in targeted sampling projects for compliant (e.g. compositional standards, compliant labelling, health nutritional information, additives, allergens, colourings, GM Oil and traceability etc.), with further follow up enforcement as required. Participating in National and Regional sampling programmes to investigate emerging food concerns, and to ensure food is safe 	respect of Food Standards. Working alongside our colleagues in Food Safety the aim will be to provide consumers with greater information on food standards and local business hygiene standards in order that they can make informed choices on where to eat and purchase food. Working in partnership on local, regional and national basis.	FS/NET/ Licensing acting as 'eyes and ears' Support material from the FSA	

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
		risk assessed & inspected in line with risk and FSA CoP. Offer business support options as detailed above. Align interventions to new Food Standards Agency delivery module.	 Offer chargeable business support options as detailed above. Enhance advice and signposting for businesses on SBC website. Focused interventions and sector specific projects on high risk premises or where local intelligence suggests necessary. Added Value: Assessing compliance with all consumer protection legislation. Identify matters which may be relevant to other services. 	Better understanding of compliance levels in take away sector in relation to food standards.		
Safeguarding & intelligence sharing	Closing the healthy life expectancy gap in Slough by, having a town where residents can live healthier, safer and more independent live; working with partners to target health inequalities and promote wellbeing; and improving	All officers to use their professional curiosity when making face to face contact with service users, and refer concerns in a timely manner, 100% of the time. Ensure all staff are trained in safeguarding and following the SBC.	Use the 'Concern Card', and assess effectiveness of this avenue to rapid reporting. All staff to undertaken SBC online training for safeguarding adults and children on a annual basis. Safeguarding to be on the agenda and discussed at team meetings, 121's, and appraisals. All officers to be vigilant and aware of safeguarding issues when making any face to face service user contact, and follow the corporate safeguarding principles if any concerns are raised.	Improve the safety of children and vulnerable people in Slough. Improved life's of people in Slough.	Food & Safety Manager. All officers to support.	Ongoing Monthly review in team meetings.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
	community safety, tackling anti-social behaviour, providing a safer town to grow-up.	safeguarding principles. Continue to share intel and concerns with other partners such as TVH, HMRC, Immigration & RBFRS.	Holistic approach to all operations which involve potential victims with safeguarding issues.			
Looking Ahead & Service Development		Horizon scanning; providing a forward thinking service and fulfilling statutory obligations. Improving information sharing across the organisation. Exploring new ways of working.	Keep abreast of developments from the Food Standards Agency on the future of the Standards & Hygiene Delivery Models of Official Food Controls and align our service provision accordingly. Keeping abreast of changes from DEFRA regarding Boarder Target Operation Delivery Model (increased checks from food from the EU post Brexit). Enabling FHI's to be undertaken remotely on a HHD, automating interventions on our MIS and any compliance report autogenerated and sent to the FBO.	Trained and competent staff on delivery of new FHDM & new TODM. Probably significantly more imported food work required as a result of TODM changes and checked required to some foods coming in from EU.	Food & Safety Manager, Trading Standards & Licensing Manger, Food team Leader and Principal TSO.	Ongoing Number of projects undertaken/ key outcome report. Number of procedures reviewed.

Service activity	Council priority/ statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
		Joined up enforcement initiatives. Updating or processes and procedures, increasing QA undertaken.	Building links with other teams within the Council to ensure that changes in business ownership and nature and identified and acted upon in a timely fashion. Assess feasibility of undertaking joint food hygiene and standards visits to make efficiencies and reduce burden on business. Consider development of joint hygiene/ standards initiative. Explore options for collaborated working with Pubic Health, including supporting the PH officer, Health Places to encourage food businesses to give healthy food options. Review of processes and procedures to align with current standards and reflect smarter ways of working.	Arrangements for information sharing established. Feasibility study/project plan developed for rolling out joint food hygiene/ standards inspections. Development of a network to discuss common enforcement challenges/themes. Draw up timetable for review of procedures and implement.		

Food safety and food standards - service delivery plan 2024/25