

**London Borough of Bromley
Environment and Community Services
Public Protection**

**Food Standards Agency Framework Agreement on
Local Authority Food Law Enforcement**

Food Service Plan 2017-18 and Performance Review 2016-17

1.0	SERVICE AIMS AND OBJECTIVES
1.1	Aims and Objectives
	<ul style="list-style-type: none"> • To sustain and improve the standards of safety and quality of food manufactured, prepared and supplied in Bromley, following a risk based intervention and enforcement programme and via self-service web based business advice. • To exercise control and surveillance of communicable diseases. • To investigate complaints about food premises and food sold in the borough. • To provide a fair, equitable and cost effective service to the boroughs residents, visitors and businesses.
1.2	LINKS TO CORPORATE OBJECTIVES AND PLANS
	<ul style="list-style-type: none"> • Building a Better Bromley objectives • Public Protection & Safety Portfolio Plan. • Environmental Services Enforcement Policy
2.0	BACKGROUND
2.1	PROFILE OF THE LOCAL AUTHORITY
	<p>The borough is the largest in London by area and occupies 59 square miles (152.8 km²), of which the majority is Metropolitan Green Belt land. 30 % of the land is farm land. There are four town centers; Bromley, Orpington, Beckenham and Penge. It has a population of over 320,000 people, with a BAME population of 16%. This is less than most London boroughs. 72% of the residents are owner occupiers and over 74% of the economically active population are in employment with only 5.3% unemployed. The latest figures show that there are over 14,000 businesses in the borough, mostly operating in property, finance, retail and construction. The majority of businesses are small with less than nine people in each. Public administration, education and health are the boroughs largest employers. Business and financial services are the second largest employers. Biggin Hill airport, the Princess Royal University, Orpington, Beckenham Beacon and Bethlem Royal NHS Hospitals are located within the borough.</p>
2.2	ORGANISATIONAL STRUCTURE
	<ul style="list-style-type: none"> • The Food Team is located within the Public Protection Division of the Environment and Community Services Department (See tables 2 and 3 for structure details). • Feeding stuffs and alcohol authenticity enforcement are carried out by the Trading Standards team. • Kent Scientific Services is appointed as the Food Analyst. • Public Health England acts as the Council's Food Examiner.

2.3	SCOPE OF THE FOOD SERVICE
	<p>Scope</p> <p>The Food Safety team undertakes the following activities to improve the safety of food manufactured, prepared and supplied within the borough of Bromley, control food borne communicable diseases and prevent food fraud via:</p> <ul style="list-style-type: none"> • Food hygiene and Food standards inspections • Responding to food safety incidents • Issuing approvals for premises under product specific hygiene regulations, • Food sampling • The investigation of complaints relating to food premises within the borough • The investigation of complaints about food produced or purchased within the borough • To act as the Proper Officer for notifiable communicable diseases. • The investigation of notifiable food borne infections to determine the source of infection and prevent further spread • The investigation of premises within the borough where there are possible links to food poisoning • Provision of advice and support to existing and prospective food businesses within the borough on all issues relating to food hygiene and food standards via our website • Publicity relating to food safety • Consumer food advice via our website.
	<p>Other services provided alongside the food service:</p> <ul style="list-style-type: none"> • Health and safety “hazard spotting” is carried out in food premises where the local authority is the enforcing authority and where significant health and safety matters are noted. This is in line with the Health and Safety Executives (HSE) National Local Authority Enforcement Code. • Advice about infection control procedures is given during visits to child day care settings. • Responding to Freedom of Information requests. • Information sharing with Government departments on requests, e.g. Food Standards Agency, HMRC and UK Boarder Agency • Information sharing with utility companies on request.

2.4	DEMANDS ON THE FOOD SERVICE
a	<p>Premises Profile</p> <p>There are approximately 2600 food premises in Bromley, most of which are SMEs. They include:</p> <ul style="list-style-type: none"> 7 third country food importers 1 large manufacturing baker, 42 supermarkets, 4 approved premises 1 FSA approved catering butcher 1 weekly market with another one due to open in autumn 2017 and several occasional and visiting markets and events. <p>352 new premises were registered in 2016/17, an increase of 11% on 2015/16.</p> <p>The redevelopment at St Mark's Square in Bromley, due to be completed winter 2017, will result in an increased number of new food businesses.</p>
b	<p>Resources</p> <p>The Food Team is run and managed in-house. At the 1st April the establishment was:</p> <ul style="list-style-type: none"> • 4.5 FTE food safety officers • 0.8 FTE Food Team Coordinator, who does not have a full inspection caseload. • 0.5 FTE technical admin support, who does not have a full inspection caseload. <p>This was significantly below the number required to comply with our statutory requirements, and this was confirmed by an audit of the food team carried out by the Food Standards Agency in April 2107.</p> <p>Following the audit an Action Plan was presented to the PPS PDS Committee in June 2017 and agreed by the Portfolio Holder who secured additional resources from the Executive on 9 August 2017.</p> <p>An additional 2 FTE food safety officers will be recruited to carry out all inspections due in 2017/18 and leave scope for the team to undertake reactive and enforcement work. This is based on a food safety officer's annual target of 161 inspections over a 46 week year. The cost of this will be £100k per annum.</p> <p>Two full time temporary food safety officers will be recruited for up to 18 months to address the backlog of 715 overdue inspections. These comprise 192 C and 487 D rated inspections and 36 high risk unrated inspections.</p>

2.4	DEMANDS ON THE FOOD SERVICE Contd.
b	<p>Resources Contd:</p> <p>A further full time temporary food safety officer will be recruited for up to 18 months to address the 671 unrated businesses. These have been determined by a desk based risk assessment to present a low risk e.g. home based cake makers, chemists etc. However, the Food Law Code of Practice requires all premises to receive an initial inspection to enable them to be rated.</p> <p>Additional resources of £225k were agreed by the Executive on 9 August 2017 to fund the 3 temporary posts for 18 months. This will enable the Council to fully comply with the Code of Practice and meet the legal obligations to undertake official food controls. (See Table I – Summary of Food Team Resources).</p> <p>However, even with the additional resources that have been made available, there may still be a problem recruiting permanent and temporary staff as there is a shortage of qualified food safety inspectors. Last year it took 2 attempts to recruit a permanent food safety officer (the post was eventually recruited in house) and the only contractor available through ADECCO commuted to Bromley from Yorkshire. Another reason why it has been hard to recruit permanent staff externally is a concern over the Council's commissioning agenda and perceived job insecurity.</p> <p>Commissioning options for the service are still being explored.</p>
c	<p>Service Delivery</p> <ul style="list-style-type: none"> • The service is based at the Bromley Civic Centre where the Customer Service Centre (CSC) is located to receive personal callers. • Until the new posts are recruited to, the service will continue to focus on its statutory obligations with non-compliant, high risk businesses taking priority. • The service operates between 9am and 5pm • An emergency out of hours service is available. • Out of hours interventions are carried out by officers as required. • The Council's website has sign posts to food safety information for both consumers and businesses.

d	External Factors Having an Impact on the Service <ul style="list-style-type: none"> • Food Business Operators having limited understanding of English • Food Businesses operating with a low profit margin • The increasing number of business that only operate outside of office hours • The high turnover of food businesses • Emergency work such as closures, seizures, outbreaks and Food Alerts • Prosecution work • The increasing number of home based food businesses • The redevelopment of St Mark's Square, Bromley • Food Hygiene Rating re-score requests and appeals • Freedom of Information requests
2.5	REGULATION POLICY
	<ul style="list-style-type: none"> • Public Protection has signed the Cabinet Office's Enforcement Concordat. • The Enforcement Policy for Public Protection applies to all enforcement action taken in relation to the food service. It is located in the Legal Process Quality Manual of Public Protection "A Guide to Our Enforcement Policy" has been produced setting out the principles of the policy and enforcement actions. The policy is publicised on the Council's website. • The Food Safety Team supports the aims of the Regulators Code
3.0	SERVICE DELIVERY
3.1	Food Premises Interventions
a	Overview <p>Local authorities have a legal obligation to carry out official controls in food premises. The Food Standards Agency's (FSA) Food Law Code of Practice (The Code) stipulates how this is to be undertaken. Inspection frequencies are based on the food safety risk posed by the premises and are calculated using Chapter 5 of the Code.</p> <p>The Food Safety Team carries out official controls at premises according to the Code, where resources allow. Unfortunately, a backlog of inspections has built up over time resulting in inspection frequencies being greater than those in the Code. Also, category D compliant businesses and low risk new businesses are not routinely inspected. This has resulted from the gradual reduction in food safety officers and admin staff over recent years along with the continued increase in the number of registered food businesses.</p> <p>To reduce the burden on business and to increase efficiency, food standard and hygiene inspections are combined. However, separate food standards inspections are carried out in high risk premises.</p> <p>Following a food hygiene inspection, food premises are rated in accordance with the FSA's Food Hygiene Rating Scheme (FHRS).</p> <p>Premises rated 0 - 2 receive additional follow up visits and written letters to ensure compliance and improved standards. Formal action will be</p>

3.1	Food Premises Interventions Contd.
	considered where informal action is not successful, in line with our Enforcement Policy
b	<p>New Premises</p> <p>New premises are required to receive a food safety inspection within 28 days of registration to comply with the Food Law Code of Practice. However, until the new posts filled we will continue to inspect new businesses deemed to be high risk within 3 months e.g. caterers.</p> <p>New premises which are deemed to be low risk e.g. home cake-makers, are not routinely inspected. Their risk is assessed by a desk top exercise. Until the new posts are filled we will continue with this pragmatic approach. This does not comply with the Food Law Code of Practice, but ensures our resources are targeted towards higher risk premises. These businesses remain on our database as unrated.</p> <p>This approach can be problematic for businesses that trade at markets or events as the organisers generally require their traders to have a Food Hygiene Rating score of 3 or more. Where a request for an inspection is received from such a business, they will be added to the inspection programme to enable them to trade.</p> <p>At 1st April 17 we had a backlog of 56 newly registered, high risk premises awaiting an inspection.</p>
c	<p>Category A & B Premises</p> <p>To comply with the Food Law Code of Practice, Category A & B food hygiene inspections should be carried out within 28 days of their inspection date and we aim to comply with this requirement. At the 1st April we had a back log of 6 B rated inspections. We will inspect these premises within 2017/18 as a priority.</p> <p>Category A food standards inspections are due annually. At the 1st April we had 2 outstanding which will be given priority in 2017/18.</p> <p>Category B food standards inspections are due every 48 months. At 1st April we had 106 outstanding category B food standard inspections. These will be combined with hygiene inspections when the hygiene inspection is due.</p>
d	<p>Category C Premises</p> <p>Category C food hygiene premises should be inspected every 18 months. Due to our current resources, these premises are only inspected when due if they have a food hygiene rating of 0-2 or when they are the subject of a genuine complaint. At 1st April we had a backlog of 193 outstanding C rated inspections from 2016/17. We will inspect these premises within 2017/18.</p> <p>The number of outstanding category C food hygiene inspections from 2016/17 will have an impact on the Council's ability to comply with the inspection intervals set out in the Code in 2017/18. Therefore, 231 broadly compliant C rated food hygiene premises due in 2017/18 will have their food hygiene inspections delayed until 2018/19. This will have a cumulative effect on target inspection numbers in the following years. This approach will be reviewed in the light of recruitment of the new posts.</p>

	Category C food standards inspections are carried out when the food hygiene inspection is due.
--	--

3.1	Food Premises Interventions Contd.
e	<p>Category D Premises</p> <p>Category D food hygiene inspections are due to have an intervention every 24 months. This can alternate between an official control e.g. inspection or non- official control e.g. information gathering, where high risk food is not handled.</p> <p>Until we fill the new posts, Category D premises will only be inspected if they have a food hygiene rating of 0-2 or when they are the subject of a genuine complaint.</p> <p>At 1st April we had a back log of around 487 Category D food hygiene premises from previous years. 83 D rated premises, which carry out high risk activities, will be added to the inspection programme for 2017/18. Until the new posts are recruited to, the majority of category D premises will remain uninspected. On the positive side these premises are largely those which handle high risk food and have very good controls or only handle low risk food. This approach will be reviewed in the light of the actual recruitment of the new posts.</p> <p>The number of outstanding category D inspections is a concern as, if their standards drop or their or ownership activities changes, this will not be routinely picked up by the team, potentially putting the public at risk. It also exposes the Council to the risk of reputational damage if one of these overdue premises were to be the subject of a food poisoning outbreak or cause a fatal allergic reaction. This position should improve once the new posts are recruited to.</p>
f	<p>Category E Premises</p> <p>Premises rated E for food hygiene which present a low food safety risk are not routinely inspected as permitted in the Code. They are contacted every 3 years to assess their food safety risk under our Alternative Enforcement Strategy (AES). The AES project due to be carried out during 2016/17 has been delayed until 2017/18 and its completion is dependent on the additional posts being filled .</p>
h	<p>Rescore requests</p> <p>Under the Food Hygiene Rating Scheme (FHRS), premises can request to have their business re-rated with a non- programmed inspection being carried out under the 'Brand Standard' for the scheme, which Bromley has agreed to follow. These rescore inspections were to take place within 3 to 6 months of the request being made. 48 were carried out during 2016/17. It is projected that approximately 30 rescore requests will be received this year as there will now be a charge of £165 per rescore inspections. Paid rescore request are now to take place within 3 months.</p>

3.1	Food Premises Interventions Contd.
i	Enforcement We have an enforcement policy and follow a graduated approach to enforcement.
j	Inspection Programme 2017/18 and Required Resources The 918 inspections due in 2017/18 are: 531 Category A – D Food Hygiene inspections 7 Category A Food Standards inspections 30 Rescore requests 350 (approx) newly registered businesses Based on an inspection target of 161 inspections per food safety officer over a 46 week year. The <u>additional 2 full time permanent food safety officers if recruited will enable the Team</u> to carry out these inspections and leave scope to undertake reactive and enforcement work. The Council will then be able to fully comply with the Food Law Code of Practice and meet the legal obligation to undertake official food controls.
k	Low Risk Unrated Premises We also have around 600 unrated businesses which we have determined by questionnaire to present a low risk e.g. home based cake makers. However, the Code requires all premises to receive an inspection before they can be dealt with as AES. <i>This should be addressed by employing an additional full time food inspector for 18 months (see para 2.4 b).</i>
l	Backlog for 2017/18 The backlog of overdue inspections amounts to 735 inspections, composed of 192 C and 487 D rated inspections and 56 high risk unrated inspections. <i>This should be addressed by employing 2 full time temporary food inspectors for 18 months who would be dedicated to addressing the backlog only (See para 2.4 b).</i>

3.1	Food Premises Interventions Contd.	
m	<p>Until the new posts are recruited to, during 2017/18 the following will be prioritised:</p> <ul style="list-style-type: none"> • 199 overdue B & C food hygiene inspections • 2 overdue food standards inspection • 135 due A & B food hygiene inspections • 27 due non-compliant Cs & Ds • 56 unrated premises which are high risk • 83 overdue Ds which are high risk • 150 new high-risk premises; and • 30 FHRS rescore requests 	
o	<p>This gives a total of 682 food inspections for the year and will require 4 FTE food safety officers based on our current inspection target, if no emergency or enforcement work is undertaken. This will be carried out by the equivalent of 4 FTE food safety officers and it is anticipated the team will achieve 100% of the inspections selected.</p> <p>The food team objectives below will be reviewed once the new posts have been filled.</p>	
	OBJECTIVES 2017/2018	PERFORMANCE MEASURES
1	• To carry out 682 food hygiene interventions, largely by inspection, including rescore requests.	• Number of hygiene interventions carried out and % of those due.
2	• To carry out 250 food standards interventions, largely by inspection.	• Number of food standards interventions and % of those due.
3	• To send up to 600 schedules of improvement / warning letters to improve standards following interventions.	• Number of schedules of improvements / warning letters sent
4	• To maintain the percentage of premises broadly compliant* for food hygiene at the time of inspection at 70%. (* Food Hygiene Rating of 5,4 or 3)	• Number of Premises broadly compliant as a %
5	• To carry out up to 200 follow-up visits, focusing on zero - 2 star premises.	• Number of follow-up visits carried out.
6	• To improve 4 rated zero premises (This is a key performance indicator)	• Number of zero rated premises which have improved their rating.
7	• To improve 40 of the 80 1 rated premises. (This is a key performance indicator)	• Number of 1 rated premises which have improved their rating.

3.1	Food Premises Interventions Contd.	
8	<ul style="list-style-type: none"> To serve improvement notices on non-compliant businesses where informal action has been unsuccessful. 	<ul style="list-style-type: none"> Number of improvement notices served.
9	<ul style="list-style-type: none"> To prosecute food business operators where other actions have been unsuccessful. 	<ul style="list-style-type: none"> Number of prosecutions.
10	<ul style="list-style-type: none"> To enforce the Food Information Regulations 2014 via Food Information Regulations Improvement Notices (FIRINs) 	<ul style="list-style-type: none"> Number of FIRINs served.
11	<ul style="list-style-type: none"> To assess newly registered unrated business. 	<ul style="list-style-type: none"> Number of questionnaires sent.
12	<ul style="list-style-type: none"> To carry out an AES survey of E rated businesses 	<ul style="list-style-type: none"> AES survey carried out.
13	<ul style="list-style-type: none"> To reduce the level of unrated premises by 25% 	<ul style="list-style-type: none"> Unrated premises reduced.
14	<ul style="list-style-type: none"> To reduce the level of outstanding inspections by 25% 	<ul style="list-style-type: none"> Outstanding inspections reduced.
3.2	Food Complaints /Service Requests	
	The team will respond to complaints about food and food premises within the borough where a breach of food safety legislation is suspected. The speed of response and level of investigation will depend on the severity of the complaint. This will be decided by the investigating officer with advice from the Lead Officer for food and/or the team manager, as required and in accordance with our internal procedures. Urgent complaints will be responded to within 24 hours and non-urgent ones within 5 working days.	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To respond to up to 250 complaints/enquiries about food and food premises. 	<ul style="list-style-type: none"> Number of complaints/service enquiries responded to.
3.3	Home Authority Principle/ Primary Authority Partnerships	
	The authority respects both the Primary and Home Authority schemes. We currently have no Primary Authority partnerships. We follow the Home Authority principles when dealing with requests about or from premises based in our borough, even where no formal agreement exists.	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To use Primary Authority Inspections forms where appropriate and refer to the Primary Authority to resolve issues found during inspection. 	<ul style="list-style-type: none"> No performance measure
2	<ul style="list-style-type: none"> To refer to Primary Authorities when dealing with food complaints about food manufactured outside the Borough. 	<ul style="list-style-type: none"> No performance measure

3.4	Advice to Food Businesses	
	<p>The provision of advice and guidance to secure compliance with food law is an integral part of the work carried out by the service. Advice to existing food businesses will mostly be offered during inspections and revisits. Businesses seeking advice which is not directly related to a current food safety inspection or investigation will be directed to our website where food safety advice is available on a self-serve basis. Where this is insufficient to meet the businesses need they may need to seek advice from a food safety consultant.</p> <p>Businesses will be given advice on the new Food Information Regulations 2014 during inspections.</p> <p>Advice to new and proposed food business and to consumers is given via our website only on a self-serve basis. Advisory visits to proposed food or refurbished premises are not made.</p>	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To continue to provide advice to business during inspections. 	<ul style="list-style-type: none"> No performance measure
3.5	Food Inspection and Sampling	
	<p>Food sampling is an essential part of our enforcement service and is carried out in line with our sampling policy and programme. Our food sampling is intelligence led, focusing on existing and emerging issues, especially for food manufactured in the Borough or imported from third countries. Where possible, food sampling will be combined with food inspections or revisits.</p>	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To participate in South East London Food Liaison Group, London Food Coordinating Group (FLCG), Food Standards Agency (FSA) and Public Health England (PHE) and EU sampling programmes for both analysis and examination. 	<ul style="list-style-type: none"> Number of food samples analysed or examined.
2	<ul style="list-style-type: none"> To carry out intelligence-led local sampling projects as a result of inspections, complaints or other information 	

3.6	Control and Investigations of Outbreaks and Food Related Infectious Disease	
	The Public Health (Control of Disease) Act 1984 as amended and the Public Health (Infectious Disease) Regulations 1988 require certain communicable diseases to be notified to the Proper Officer within a Local Authority. Food Team officers investigate food borne diseases and food poisoning to establish the source of infection and prevent further spread. Outbreaks are investigated along with the South East London Health Protection Team who provide infection control advice along with statistical analysis.	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To investigate cases of food poisoning or suspected food poisoning connected with premises within the Bromley, in line with South East London Health Protection Team guidelines 	<ul style="list-style-type: none"> Number of cases investigated.
2	<ul style="list-style-type: none"> To investigate outbreaks of food poisoning/suspected food poisoning/viral gastroenteritis. 	<ul style="list-style-type: none"> Number of outbreaks investigated.
3.7	Food Safety Incidents	
	Food Alerts are received from the Food Standards Agency by email to our Food Safety Team email inbox. This is monitored regularly by the team admin. Alerts are sent to the Food Team Lead Practitioner or team manager to determine the action required.	
	Where urgent action is required this work will be given priority, and, if necessary, resources can be brought in from other teams to assist. There is an out of office hours emergency arrangement where urgent action is required when the office is closed. (This flexibility must remain, because even with an enlarged team, additional assistance may be required to deal with a major emergency)	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To respond to all food alerts and other food safety incidents issued by the FSA, as appropriate. 	<ul style="list-style-type: none"> Number of food alerts/incidents responded to.

3.8	Liaison with Other Organisations	
	The Team is a member of the South East London Food Liaison Group, Environmental Health Working Group and the Public Health Group, London Food Fraud group and has designated members to attend. The team will also liaise with other enforcement organisations such as the Food Standards Agency and Department for Environment, Food and Rural Affairs etc., other Environmental Health Departments and professional organisations such as The Association of London Environmental Health Managers.	
	OBJECTIVES	PERFORMANCE MEASURES
	<ul style="list-style-type: none">To ensure the food service liaises with and participates in joint initiatives with other Council Departments, organisations and Boroughs as required.	<ul style="list-style-type: none">No performance measures.
	<ul style="list-style-type: none">To send representatives to the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group	
	<ul style="list-style-type: none">To have a nominated OFSTED liaison officer	
	<ul style="list-style-type: none">To have a nominated schools liaison officer	
3.9	Food Safety and Standards Promotion	
	The promotion of food safety issues is an important means to secure food safety compliance in food businesses. The website and press releases are used to highlight key issues such as food safety week. The team participates in the FSA Food Hygiene Rating Scheme and encourages business to display the rating received.	
	OBJECTIVES	PERFORMANCE MEASURES
	<ul style="list-style-type: none">To update the food service’s website.	<ul style="list-style-type: none">Evaluated by the Website Coordinator.No performance measure
	<ul style="list-style-type: none">To publicise food hygiene myths during Food Safety Week	
	<ul style="list-style-type: none">To continue to participate in the FSAs FHRS	
	<ul style="list-style-type: none">To issue Press Releases	
3.10	Health and Safety in Food Premises	
	Food team officers carry out health and safety hazard spotting while visiting food premises. Significant offences will be reported to the Public Protection Health and Safety team for action.	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none">To carry out up to health and safety “hazard spotting” in food premises where significant offences are noted.	<ul style="list-style-type: none">Number of health and safety “hazard spotting” inspections carried out.
2	<ul style="list-style-type: none">To liaise with the Health and Safety Team where formal action in food premises is required.	<ul style="list-style-type: none">No performance measure.

4.0	RESOURCES	
4.1	Financial Allocation	
	<ul style="list-style-type: none"> The overall cost of the food service for 2016/17 was £302k. The original budget set aside for 2017/18 is £311k, of which £6.2k is set aside for food sampling & analysis Executive on 9 August 2017 agreed additional funding to meet the costs of two permanent full time food safety officers (£100k p.a.) and three temporary full time food safety officers for 18 months (£225k). 	
4.2	Staffing Allocation	
	<ul style="list-style-type: none"> See Table 1 	<ul style="list-style-type: none"> No performance measure.
4.3	Staff Development	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> Staff training and development needs are met via a mixture of in-house and external training. 	<ul style="list-style-type: none"> Staff carryout a minimum of 20 hrs training
2	<ul style="list-style-type: none"> DISCUSS sessions are carried out by the lead practitioner for food. 	<ul style="list-style-type: none"> DISCUSS sessions are carried out on a 1/4ly basis.
5.0	Quality Assessment	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To carry out internal monitoring to verify conformance with legal obligations, the Code and internal procedures. 	<ul style="list-style-type: none"> Internal monitoring to be carried out for all staff.
2	<ul style="list-style-type: none"> To track the outcomes of zero rated inspections, with the aim of improving their star ratings. 	<ul style="list-style-type: none"> Internal monitoring.
3	<ul style="list-style-type: none"> To participate in Inter authority auditing as required. 	<ul style="list-style-type: none"> No performance measure
6.0	Review	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> The Service Plan will be reviewed at 6 monthly intervals and progress reported to the Head of Food, Safety and Licensing along with service developments. 	<ul style="list-style-type: none"> Internal Monitoring

TABLE 1 - SUMMARY OF STAFF RESOURCES REQUIRED FOR FOOD SERVICE

SERVICE DELIVERY	FULL TIME EQUIVALENT OFFICERS - BELOW MANAGER LEVEL REQUIRED TO UNDERTAKE 2017/18 WORK PLAN (IF NO ENFORCEMENT WORK IS UNDERTAKEN)	FULL TIME EQUIVALENT OFFICERS - BELOW MANAGER LEVEL TO CARRY OUT ALL OVERDUE INSPECTIONS) (IF NO ENFORCEMENT WORK IS UNDERTAKEN)
Food Premises Inspections	• 4.6 *FSO/LO	• 7.6 *FSO/LO
Food Complaints	• 0.5 FSO/LO	• 0.5 FSO/LO
Home Authority Advice	• 0.0 (No longer offered directly)	• 0.0 (No longer offered directly)
Advice to Businesses	• 0.0 (No longer offered directly)	• 0.0 (No longer offered directly)
Advice to Consumers	• 0.0 (No longer offered directly)	• 0.0 (No longer offered directly)
Food Sampling	• 0.10 FSO/LO	• 0.10 FSO/LO
Control and Investigation of Outbreaks and Food Related Infectious Disease	• 0.25 FSO/LO	• 0.25 FSO/LO
Food Safety Incidents	• 0.02 FSO/LO	• 0.02 FSO/LO
Liaison - with the South East London Sector food liaison & Environmental Health Working Groups	• 0.02 LO	• 0.02 LO
Food Safety and Standards Promotion	• 0.01 FSO	• 0.01 FSO
Health and Safety in Food Premises	• 0.10 FSO/LO	• 0.10 FSO/LO
Staff Training and Development	• 0.10 FSO/LO	• 0.10 FSO/LO
Assessing low risk businesses via AES	• 0.20 FSO	• 0.20 FSO
FOIs and FHRS appeals and right of reply	• 0.10 FSO/LO	• 0.10 LO
Quality Assessment	• 0.20 LO	• 0.20 LO
Technical Support	• 0.60 LO	• 0.60 LO
Administration	• 0.50	• 0.50
TOTAL STAFF RESOURCE REQUIRED	• 7.3	• 10.3
TOTAL RESOURCE PROVIDED	• 5.3	• 5.3

**FSO = Food Safety Officer LO = Lead Officer*

Table 2



Table 3



PERFORMANCE REVIEW 2016-17

	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To carry out 757 food hygiene interventions, largely by inspection. 	<ul style="list-style-type: none"> Number of hygiene interventions carried out was 638 and 84% of those selected for inspection and 34% of the total number of inspections due and overdue.
2	<ul style="list-style-type: none"> To carry out 300 food standards interventions, largely by inspection. 	<ul style="list-style-type: none"> Number of food standards interventions was 332 and over 110 % of those selected for inspection and 38% of the total number of inspections due and overdue.
3	<ul style="list-style-type: none"> To send up to 600 schedules of improvement / warning letters to improve standards following interventions. 	<ul style="list-style-type: none"> Number of schedules of improvements / warning letters sent was 700. 72 formal Hygiene Improvement notices were served to ensure non-complainant businesses improve and 1 business was successfully prosecuted
4	<ul style="list-style-type: none"> To maintain the percentage of premises broadly compliant for food hygiene at the time of inspection to 70%. 	<ul style="list-style-type: none"> Number of Premises broadly compliant as a % is 76%
5	<ul style="list-style-type: none"> To carry out up to 200 follow-up visits, focusing on zero - 2 rated premises. 	<ul style="list-style-type: none"> Number of follow-up visits carried out was 225.
6	<ul style="list-style-type: none"> To improve 4 rated zero premises (This is a key performance indicator) 	<ul style="list-style-type: none"> Number of zero premises which have improved their rating is 4
3.2	Food Complaints /Service Requests	
	<p>The team responds to complaints about food and food premises within the borough where a breach of food safety legislation is suspected. The speed of response and level of investigation depends on the severity of the complaint. This is decided by the investigating officer with advice from the Lead Officer for food and/or the team manager as required and in accordance with our internal procedures. Urgent complaints were responded to within 24 hours and non-urgent ones within 5 working days.</p>	
	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none"> To respond to up to 300 complaints/enquiries about food and food premises. 	<ul style="list-style-type: none"> Number of complaints/service enquiries responded to was 358.

3.3	Home Authority Principle/ Primary Authority Partnerships	
2	The authority respects both the Primary and Home Authority schemes. We currently have no Primary Authority partnerships and 2 Informal Home Authority agreements which were terminated during 2015-2016. We will follow the Home Authority principles when dealing with requests about or from premises based in our borough, even where no formal agreement exists.	
3	<ul style="list-style-type: none"> To use Primary Authority Inspections forms where appropriate and refer to the Primary Authority to resolve issues found during inspection. 	
4	<ul style="list-style-type: none"> To refer to Primary Authorities when dealing with food complaints about food manufactured outside the Borough. 	
3.4	Advice to Food Businesses	
	<p>The provision of advice and guidance to secure compliance with food law is an integral part of the work carried out by the service. Advice to existing food businesses will mostly be offered during inspections and revisits. Businesses seeking advice which is not directly related to a current food safety inspection will be directed to our website where food safety advice is available on a self-serve basis. Businesses will be given advice on the new Food Information Regulations 2014 during inspections.</p> <p>Advice to new and proposed food business and to consumers is given via our website only on a self-serve basis. Advisory visits to proposed food or refurbished premises are not made.</p>	
1	<ul style="list-style-type: none"> To continue to focus on improving the rating of food premises in the borough with 0 stars by 100%. 	<ul style="list-style-type: none"> 100 % of zero star premises have a higher rating at the end of March 2017.
3.5	Food Inspection and Sampling	
	Food sampling is an essential part of our enforcement service and is carried out in line with our sampling policy and programme. Our food sampling is intelligence led, focusing on existing and emerging issues, especially for food manufactured in the Borough or imported from third countries. Where possible, food sampling will be combined with food inspections or revisits.	

	OBJECTIVES	PERFORMANCE MEASURES
1	<ul style="list-style-type: none">To participate in South East London Food Liaison Group, London Food Coordinating Group(FLCG), Food Standards Agency (FSA) and Public Health England (PHE) and EU sampling programmes for both analysis and examination. .	<ul style="list-style-type: none">Number of food samples analysed or examined was 48.
2	<ul style="list-style-type: none">To carry out intelligence-led local sampling projects as a result of inspections, complaints or other information.	
3.6	Control and Investigations of Outbreaks and Food Related Infectious Disease	
	The Public Health (Control of Disease) Act 1984 as amended and the Public Health (Infectious Disease) Regulations 1988 require certain communicable diseases to be notified to the Proper Officer within a Local Authority. Food Team officers investigate food borne diseases and food poisoning to establish the source of infection and prevent further spread. Outbreaks are investigated along with the South East London Health Protection Team who provide infection control advice along with statistical analysis.	
1	<ul style="list-style-type: none">To investigate cases of food poisoning or suspected food poisoning connected with premises within the Bromley, in line with South East London Health Protection Team guidelines	<ul style="list-style-type: none">Number of cases investigated was 482.
2	<ul style="list-style-type: none">To investigate outbreaks of food poisoning/suspected food poisoning/viral gastroenteritis.	<ul style="list-style-type: none">Number of outbreaks investigated was 1.
3.7	Food Safety Incidents	
	Food Alerts are received from the Food Standards Agency by email to our Food Safety Team email inbox. This is monitored regularly by the team admin. Alerts are sent to the Food Team Lead Practitioner or team manager to determine the action required. Where urgent action is required this work will be given priority, and, if necessary, resources can be brought in from other teams to assist. There is an out of office hours emergency arrangement where urgent action is required when the office is closed.	
1	<ul style="list-style-type: none">To respond to all food alerts and other food safety incidents issued by the FSA, as appropriate.	<ul style="list-style-type: none">Number of food alerts/incidents responded to was 2.

3.8	Liaison with Other Organisations	
	The Team is a member of the South East London Food Liaison Group, Environmental Health Working Group and the Public Health Group and has designated members to attend. The team will also liaise with other enforcement organisations such as the Food Standards Agency and Department for Environment, Food and Rural Affairs etc., other Environmental Health Departments and professional organisations such as The Association of London Environmental Health Managers.	
	<ul style="list-style-type: none"> To ensure the food service liaises with and participates in joint initiatives with other Council Departments, organisations and Borough as required. To send representatives to the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group. To have a nominated OFSTED liaison officer To have a nominated schools liaison officer 	<ul style="list-style-type: none"> No performance measure
3.9	Food Safety and Standards Promotion	
	The promotion of food safety issues is an important means to secure food safety compliance in food businesses. The website and press releases are used to highlight key issues such as food safety week. The team participates in the FSA Food Hygiene Rating Scheme and encourages business to display the score received.	
1	<ul style="list-style-type: none"> To update the food service's website. 	<ul style="list-style-type: none"> Evaluated by the Website Coordinator.
2	<ul style="list-style-type: none"> To publicise food hygiene myths during Food Safety Week 	<ul style="list-style-type: none"> No performance measure
3	<ul style="list-style-type: none"> To continue to participate in the FSAs FHRS 	<ul style="list-style-type: none"> No performance measure
4	<ul style="list-style-type: none"> To issue Press Releases 	<ul style="list-style-type: none"> No performance measure
	OBJECTIVES	PERFORMANCE MEASURES
3.10	Health and Safety in Food Premises	
	Food team officers carry out health and safety hazard spotting while visiting food premises. Significant offences will be reported to the Public Protection Health and Safety team for action.	
1	<ul style="list-style-type: none"> To carry out up to health and safety "hazard spotting" in food premises where significant offences are noted... 	<ul style="list-style-type: none"> Number of health and safety "hazard spotting" inspections carried out was 25.
2	<ul style="list-style-type: none"> To liaise with the Health and Safety Team where formal action in food premises is required 	

4.0	RESOURCES	
4.1	Financial Allocation	
	<ul style="list-style-type: none"> The overall cost of the food service for 2016/17 was £302,293 £2,544 of this was spent on food sampling & analysis 	
4.2	Staffing Allocation	
	<ul style="list-style-type: none"> See Table 1 	
4.3	Staff Development	
	<ul style="list-style-type: none"> Staff training and development needs are met via a mixture on in-house and external training. 	<ul style="list-style-type: none"> All staff carried out a minimum of 20 hours CPD as required by the Code.
	<ul style="list-style-type: none"> PADs reviews are carried out by the team manager 	<ul style="list-style-type: none"> Pads undertaken by team manager.
5.0	Quality Assessment	
1	<ul style="list-style-type: none"> To carry out internal monitoring to verify conformance with legal obligations, the Code and internal procedures. 	<ul style="list-style-type: none"> Qualitative monitoring did not take place in 2016/17.
2	<ul style="list-style-type: none"> To track the outcomes of zero rated inspections, with the aim of improving their star ratings. 	<ul style="list-style-type: none"> Internal monitoring.
3	<ul style="list-style-type: none"> To participate in Inter authority auditing as required. 	<ul style="list-style-type: none"> The team underwent a FSA audit in April 2017.
6.0	Review	
1	<ul style="list-style-type: none"> The Service Plan will be reviewed at 6 monthly intervals and progress reported to the Head of Food, Safety and Licensing along with service developments. 	<ul style="list-style-type: none"> Internal Monitoring