

**London Borough of Bromley
Environmental Services
Public Protection**

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

**Food Service Plan 2018-19
and
Performance Review 2017-18**

1. Introduction

- 1.1 This Food and Safety Service Plan 2018-19 covers the key areas of Food Safety and the relevant management arrangements and objectives against which the Council will monitor service delivery, and has been compiled in accordance with the Framework Agreement issued by the Food Standards Agency (FSA).
- 1.2 The FSA audits Local Authority food and feed enforcement activities and publishes reports of their findings. Local Authorities are audited against the feed and food law standard in the Framework Agreement, and the Code of Practice (CoP), which is a document that sets out the minimum standards of performance required from Local Authorities, across the full range of their feed and food law enforcement activities.
- 1.3 During the FSA audit of the Food Service in 2017, the Council was not deemed to have met all the necessary standards, and the lack of dedicated resources was identified as the main reason why. As a result an action plans were implemented in April and September 2017, and funding was secured for additional resources.
- 1.4 This service plan, is subject to approval by the Public Protection & Enforcement PDS Committee, and makes clear the arrangements Bromley Council will put in place to ensure that there are adequate arrangements for food safety enforcement moving forwards, it will demonstrate the progress against the FSA priorities expressed in the action plan submitted in September 2017, provide a performance review against the previous year's plan (2017-18), and state the objectives for the 2018-19 period.

2. Aims, Objectives and Description of the Service

- 2.1 Bromley's Food Safety Service is delivered in accordance with the Food Law Code of Practice (FLCoP), the latest version of which was released in March 2017. The Code is issued by the FSA and governs the manner in which a Competent Authority enforces relevant food safety legislation and delivers 'official controls' to secure food law compliance. The Code is issued under the Food Safety Act 1990 and has statutory force.
- 2.2 The key objectives of the service are to:
 - Ensure by education and enforcement that food intended for human consumption which is produced and/or sold in Bromley is safe to eat and complies with food safety requirements;
 - Deliver a programme of inspections and interventions in relation to primary producers and food businesses, on a risk-based frequency;
 - Provide support to help businesses comply with their legal obligations;

- Investigate and take appropriate action concerning complaints about food and food premises to protect public health;
- Provide a fair and equitable service that provides value for money;
- Take enforcement action when necessary in a consistent, transparent and proportionate basis;
- Carry out targeted and reactive environmental and food microbiological sampling;
- Prevent the spread of specified infectious and food borne diseases;
- Advise and educate consumers and service users on food safety matters;

3. Links to Corporate Plans and Objectives and Regulation Policy

3.1 The service, and the manner in which it is delivered, contributes to three key priorities as set out in the Council's organisation vision of Building a Better Bromley particularly:

- Vibrant Town Centres' - by engaging with and supporting businesses to thrive, and through enforcing where necessary,
- Safe Bromley –by safeguarding the vulnerable particularly in relation to food safety in educational and care homes settings
- Healthy Bromley' – by supporting Health and Well Being outcomes.

3.2 The work of the Team also delivers The Public Protection & Enforcement Portfolio Plan 2018 -19, in particular to Outcome 3 - We will support and regulate businesses by:

- Inspecting 100% of high-risk food businesses (Risk A and B premises) to ensure food safety standards are met;
- Implementing the Action Plan following the Food Standards Agency audit to address the inspection backlog;

3.3 In addition, the Public Protection Division has signed the Cabinet Office's Enforcement Concordat, and applies the Environmental Enforcement Policy to all enforcement action taken in relation to the food service. This policy is located in the Legal Process Quality Manual of Public Protection "A Guide to Our Enforcement Policy", and has been produced setting out the principles of the policy and enforcement actions. The policy is publicised on the Council's website. Finally, the Food Safety Team supports the aims of the Regulators Code.

4. Background:

4.1 Profile of the Food Industry in Bromley

- 4.2 The borough of Bromley is the largest borough 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 categorised as farm land.
- 4.3 It has a population of over 320,000 people, with a black and minority ethnic (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% being unemployed.
- 4.4 There are four town centres; Bromley, Orpington, Beckenham and Penge, and 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.

4.5 Organisational Structure

- 4.6 The Food Safety Team sits within the Public Protection Division of the Environmental and Community Services Department, the feeding stuffs and alcohol authenticity enforcement are carried out by the Trading Standards team, Kent Scientific Services is appointed as the Food Analyst, and Public Health England (PHE) acts as the Council's Food Examiner.
- 4.7 Organisational structure charts are provided in Appendix A.

4.8 Scope of the Food Safety Service

4.8 Food safety activities currently undertaken include:

- Programmed inspections and interventions at food businesses at a frequency set out in the FLCoP risk rating scheme;
- Revisits to premises following programmed inspections to secure compliance with legal requirements;
- Assessing food hygiene and food standards issues (e.g. food allergens and 'use by' date labelling) during premises inspections;
- Carrying out assessments and updating data for the National Food Hygiene Rating Scheme;
- Food microbiological and compositional sampling which is either intelligence-led or forms part of national sampling programmes;
- Investigating complaints about the standard of safety in food businesses in Bromley;
- Investigating complaints about food that has been produced and/or sold in Bromley;

- Investigating food poisoning and food borne infectious disease cases;
- Responding to national Food Safety Alerts and Incidents issued by the FSA;
- Promoting food safety by education, training and business support and working with other organisations to assist food business operators.

4.9 In addition, the following additional services are provided alongside the above:

- 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 in accordance with General Data Protection Regulations.

4.10. Service demand

4.11 In April 2018 2600 food premises were registered in Bromley, many of which are categorised as Small Minority Ethnic Businesses (SME). 333 new premises were registered in 2017/18, and the redevelopment at St Mark’s Square in Bromley, due to be completed this year, will add to this number.

4.12 The business types for food premises are varied and include:

- 11 third world country food importers;
- 1 large manufacturing baker;
- 43 supermarkets;
- 4 approved premises;
- 1 FSA approved catering butcher
- 2 weekly market and several occasional and visiting markets and events.

4.13 Demands on the service continue to be high, since April 2018 812 programmed interventions within food businesses were achieved and 267 reactive service requests have been dealt with. The focus moving forwards will remain on poorly performing and high risk food

businesses; this approach has led to an increase in the level of enforcement activity since April 18, which in turn impacts on the resources available to carry out programmed inspections.

5 Service Delivery 2018-19

5.1 Food Premises Inspections, Interventions, Ratings and Enforcement

5.2 Food businesses will continue to be risk-rated according to prescribed criteria relating to food type, method of processing, customers at risk and level of compliance. Businesses will then be inspected on the basis of an intervention risk rating which determines the frequency of inspection. Inspection frequencies are set out in the FLCoP.

5.3 The risk profile of food businesses (with inspection intervals) in Bromley, as at 1st April 2018, is shown in Table 1.

Table 1 Risk Profile by Category with Inspection Intervals

Rating Category	Minimum Inspection Frequency	Number
A	6 Monthly	16
B	12 Monthly	116
C	18 Monthly	597
D	2 Yearly	698
E	3 Yearly or Alternative Enforcement Strategy	378
Outside the inspection programme	none	295
Unrated	Awaiting Inspection	500
		2600

5.4 E-rated low or minimal risk food businesses will be dealt with through an Alternative Enforcement Strategy (self-assessment or inspection on an alternate cycle) where possible. Follow-up inspections following self-assessment will be carried out if deemed necessary i.e. if the risk profile of the business has increased since the last assessment.

5.5 After each inspection food businesses are rated under the national Food Hygiene Rating Scheme (FHRS), this gives a measure of compliance against three key criteria: hygiene practice, premises structure and food safety management. The rating scale ranges from 5 ('very good') to zero ('urgent improvement necessary'). Most food businesses are included in the scheme but those that do not supply food directly to members of the public are exempted.

5.6 The FHRS profile of the registered food businesses in Bromley as at 5th November 18 is shown in Table 2

Table 2 FHRS Profile for Bromley November 2018

Rating	Descriptor	Number
0	Urgent improvement necessary	7
1	Major improvement necessary	77
2	Improvement necessary	59
3	Generally Satisfactory	308
4	Good	374
5	Very Good	980
	Total no of rated premises	1805

5.7 To reduce the burden on business and to increase efficiency, food standard and hygiene inspections will be combined where feasible, however, separate food standards inspections will be carried out in high risk premises. Following a food hygiene inspection, food premises will be rated in accordance with the FSA's Food Hygiene Rating Scheme (FHRS). Premises given a food hygiene rating of 0 - 2 will receive additional follow up visits and written guidance to ensure compliance and improved standards. Formal action will be considered where informal action has not been successful; this is in line with our Enforcement Policy.

5.8 Food safety enforcement will continue to be undertaken in a graduated manner, and in accordance with the Environmental Enforcement Policy and FSA guidance. Informal action, advice and persuasion are the usual methods of achieving compliance but other enforcement measures (including serving statutory notices and prosecutions) will be taken if the circumstances dictate. In 2017/18, 35 individual Hygiene Improvement notices were served to ensure non-compliant businesses improve, and a prosecution has been prepared and is with the Legal Department. Additionally, 1 Simple Caution had been administered to a business as an alternative to prosecution.

5.9 The action taken depends on the issue identified and the risk it presents to the public, and since April 2018 the level of enforcement/complex work carried out by the team has been at an unprecedented level including:

- 1 successful prosecution
- 6 simple cautions administered
- 3 voluntary closures of food premises
- 2 voluntary surrenders of unfit foods
- 2 product withdrawals of unsafe food
- 3 food poisoning outbreaks investigated

Much of this marked increase in enforcement activity is directly related to the increased number of inspections made this year to premises which were previously overdue.

5.10 Food Complaints and Service Requests

5.11 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.

5.12 Primary Authority Partnerships

5.13 Currently there are no Primary Authority partnerships in Bromley, however, the Home Authority principles will be followed when dealing with requests about or from premises based in our borough, even where no formal agreement exists.

5.14 Advice to Businesses

5.15 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 continue to be offered during inspections and revisits, and this includes giving businesses advice on allergen management within the Food Information Regulations 2014.

5.16 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

5.17 Food Sampling

5.18 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 will continue to be intelligence led, focusing on existing and emerging issues, especially for food manufactured in the borough or imported from third world countries. Where possible, food sampling will be combined with food inspections or revisits. The Team will also continue to participate in the South East London Food Liaison Group, London Food Coordinating Group (FLCG), Food FSA, PHE and EU sampling programmes for both analysis and examination.

5.19 Control and Investigation of Food Related Cases and Outbreaks

5.20 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 will be investigated along with the South East London Health Protection Team, who provide infection control advice along with statistical analysis.

5.21 Infectious disease investigations are made in accordance with a Single Case Plan which was updated by PHE in November 2016. Priority will be given to those cases involving persons who work in the food industry or have contact with vulnerable groups. The Council will continue to work in partnership with PHE to prevent and control cases and investigate wider outbreaks of food related disease that fall outside the scope of the single case plan.

5.22 In 2017-18 441 infectious disease notifications were received by the Council, which is a 5% decrease on the year before, and 270 have been received since April 18. It is generally recognised that the number of reported cases is a small proportion of the actual number of cases of food borne illness each year in the UK.

5.23 Food Safety Incidents and Alerts

5.24 There is a documented Food Alert and Incident procedure covering the issue of warnings arising from a food related issue in the Borough and the response to warnings issued by the FSA.

- 5.25 Responses to Food Incidents and Alerts are determined by the Head of Service and Lead Practitioner in consultation as necessary with the Food Standards Agency and PHE etc.
- 5.26 In March 2018 the FSA updated its communication platform to improve the notification of incidents and food hazards / alerts to local authorities. Although very few notifications require any form of direct action on the part of the service, these continue to emphasise the value of food safety intelligence and 'horizon scanning' in reducing public health risks.
- 5.27 1 food alert requiring action was received in 2017-18 this was a 50 % decrease on the previous year, and 4 have been received from April 18 to date. It is difficult to predict the number of warnings likely to be received in 2018 / 2019, however, should incidents rise there will be a negative effect on the ability of the team to achieve the programmed work.

5.28 Liaison with Other Organisations

- 5.29 The Service remains committed to formal inter-agency liaison relationships as set out in the FLCoP. Additional communication will continue to take place at officer level during the process of investigating offences, sharing information and exchange of intelligence.
- 5.30 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 continue to 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.
- 5.31 The Team will continue to send representatives to the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group.

5.32 Promoting Food Safety

- 5.33 The promotion of food safety issues is an important means to secure food safety compliance in food businesses. Website and press releases will be used to highlight key issues such as food safety week, and the team will participate in the FSA Food Hygiene Rating Scheme and will encourage businesses to display the rating received.

5.34 Team Performance against the 2017-18 Plan

5.35 A summary of the key activities undertaken by the team for 2017-18 is shown in Appendix B.

6. Resources

6.1 Financial Allocation

6.2 In 2018/19 the Council has a dedicated budget of £390k to run the food safety service. This includes a sum of £6.3k set aside for food sampling and analysis. There are also additional resources of £150k for three temporary staff appointed to clear the backlog of food inspections. This excludes any budget that needs to be carried forward to 2019/20.

6.2 The overall cost of the food service for 2017/18 was £296k, of which £23k was for additional temporary staff.

6.3 Staff Development

6.4 A minimum of 20 hours CPD training each year on food safety related topics is required by the FLCoP and this will be met via a mixture of in-house and external training, and through 1-2-1's, cascade training, staff meetings and online training.

6.5 Staffing Resources

6.6 Following the FSA audit in April 2017, where the food serviced was found to be under resourced, an Action Plan was agreed and additional funding was provided for 2 full time permanent and three full time temporary food safety officers for up to 18 months, to implement the Action Plan.

6.7 Despite the additional funding being made available, recruitment issues still remained due to the national shortage of qualified food safety Officers, and due to permanent and temporary members of staff leaving the team. This has impacted on the ability to recruit to the vacant posts.

6.8 2 permanent officers have now been recruited; however, due to a member of staff leaving, a vacant post will occur at the end on November 18. With regards to the temporary officers, the number retained fluctuates, and .4 of a post remains vacant. Efforts are ongoing to recruit to the vacant temporary post.

6.9 The Food Team is run and managed in-house with:

- 6 FTE food safety officers (1 food safety officer is currently on maternity leave and is due to return in April 19. Another is due to leave in Nov 18 to take up a post with another LA and this post is to be covered by a contractor until a permanent replacement has been recruited.)
- 1.4 FTE Temporary consultant Food Safety Officers (1 X FTE post started on 5/11 and 0.4 X FTE is still to be recruited)
- 1.6 FTE Temporary food safety officers on fixed term contracts due to end on 31/3/19.
- 0.8 FTE Food Team Coordinator, who does not have a caseload.
- 0.5 FTE technical admin support Officer.

6.10 Inspection Programme 2018/19 and Required Resources

6.11 In 2018-19 following inspections are due:

- 455 Category A – D Food Hygiene inspections
- 8 Category A Food Standards inspections
- 40 Rescore requests (approx.)
- 350 (approx) newly registered businesses

6.12 The above work is undertaken in addition to the routine work of the team, and will require a minimum of 5.3 X FTE food safety officers to deliver. However, if the unprecedented enforcement work as detailed in 5.9 continues at the same or similar rate, and if recruitment continues to be an issue, the ability to deliver the inspection regime will be compromised.

6.13 In addition to the above there are also approximately 500 unrated businesses, which have been 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 using alternative enforcement strategies; a project will be undertaken to inspect these premises using 1.2 X FTE food safety officers. Due to the refocus steer provided by the FSA during their follow up to our audit mentioned at 8.1, these are viewed as low priority and will be undertaken once the backlog of overdue inspections has been fully addressed.

6.14 A summary of staff resources required for the Food Service delivery is provided in Appendix C

7. Quality Assessment

7.1 The Team has reviewed the documented internal monitoring procedures, and has subscribed to RIAMS to ensure that it covers the full range of food law enforcement activities, in accordance with the Food Law Code of Practice and centrally issued guidance. In addition, activities which are used to monitor and maintain service quality will include:

- Monthly team meetings;
- Review by the Lead Practitioner of any FHR inspection resulting in a rating of 0
- Peer review of statutory notices before service;
- Random post inspection checks by the Lead Practitioner officer of records and enforcement decisions made by team members;
- Benchmarking activities and information exchange between Bromley and the South East London Food Liaison Group;
- Examination of any customer complaints;
- Examination of any appeals against enforcement notices
- Examination of appeals against Food Hygiene Ratings –

8. Progress against the KPI's in the FSA Action Plan since April 2018

8.1 The FSA revisited the authority in September 18, and noted the efforts made thus far against the action plan and acknowledged the impact resultant of the recruitment issues. They advised the Team to focus on completing the due A -D inspections and overdue C-D inspections, and accepted that the focus would be shifted from inspecting unrated low risk premises.

8.2 This Food Safety Plan has been updated to demonstrate the progress made against the Action Plan, and reflects the refocus from rating unrated premises to that of completing the due A -D inspections and overdue C-D inspections.

8.3 In April 2018 the authority had 1193 due and 677 overdue food hygiene inspections; by September 2018 620 due inspections were completed (4.4% above the expected cumulative total) and 361 overdue inspections had been completed (11% above the expected cumulative total). The FSA agreed to review progress for the following 6 months (at 3 month intervals) and anticipated that the 2017 FSA audit will be closed at that time should progress against targets thus far achieved be maintained.

9. Key Performance Areas for 2018-19

	OBJECTIVES	PERFORMANCE MEASURES
8.1	Food Premises Interventions	
1	To carry out 853 due food hygiene interventions, largely by inspection, including rescore requests. This is a KPI.	100% of all inspections due
2	To reduce the backlog of overdue inspections by 100%. This is a KPI	Overdue inspections reduced by 100%
3	To reduce the backlog of high risk unrated premises by 100%, focussing on high risk businesses. This is a KPI.	High risk unrated inspections reduced by 100 %
4	To carry out 250 food standards interventions, largely by inspection. This is a KPI.	100% of food standards interventions carried out.
5	To send up to 600 schedules of improvement / warning letters to improve standards following interventions.	Number of schedules of improvements / warning letters sent =>600
6	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) This is a KPI.	Number of Premises broadly compliant as a % =>70%
7	To carry out up to 200 follow-up visits, focusing on zero - 2 star premises.	Number of follow-up visits carried out. =>200
8	To improve the 6 rated zero premises.	Number of zero rated premises which have improved their rating =6.
9	To improve 30 of the 60 1 rated premises.	Number of 1 rated premises which have improved their rating = >30
10	To serve improvement notices on all non-compliant businesses where informal action has been unsuccessful.	Number of non-compliant businesses and number improvement notices served = 100%
11	To prosecute / offer simple cautions to all non-compliant food business operators where other actions have been unsuccessful.	Number of prosecutions/simple cautions against no of non-compliant businesses = 100%
12	To assess newly registered unrated business by sending a questionnaire	Number of questionnaires sent = no of newly registered businesses.
8.2	Food Complaints /Service Requests	
	OBJECTIVES	PERFORMANCE MEASURES

1	To respond to up to 300 complaints/enquiries about food and food premises within 5 working days.	Number of complaints/service enquiries responded to within 5 working days= 80%.
8.3	Home Authority Principle/ Primary Authority Partnerships	
	OBJECTIVES	PERFORMANCE MEASURES
1	To use Primary Authority Inspections forms where appropriate and refer to the Primary Authority to resolve issues found during inspection.	No performance measure
2	To refer to Primary Authorities when dealing with food complaints about food manufactured outside the Borough.	No performance measure
8.4	Advice to Food Businesses	
	OBJECTIVES	PERFORMANCE MEASURES
1	To continue to provide advice to business during inspections.	Advice given at every inspection = 100%
8.5	Food Inspection and Sampling	
	OBJECTIVES	
1	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. .	Number of food samples analysed or examined 46
2	To carry out intelligence-led local sampling projects as a result of inspections, complaints or other information	
8.6	Control and Investigations of Outbreaks and Food Related Infectious Disease	
	OBJECTIVES	PERFORMANCE MEASURES
1	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	Number of cases reported against No investigated = 100%
2	To investigate outbreaks of food poisoning/suspected food poisoning/viral gastroenteritis.	Number of outbreaks reported against No investigated = 100%
8.7	Food Safety Incidents	
	OBJECTIVES	PERFORMANCE MEASURES

1	To respond to all food alerts and other food safety incidents issued by the FSA, as appropriate.	Number of food alerts/incidents = 100% of applicable alerts
8.8	Liaison with Other Organisations	
	OBJECTIVES	PERFORMANCE MEASURES
1	To ensure the food service liaises with and participates in joint initiatives with other Council Departments, organisations and Borough as required.	Attendance at the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group
2	To send representatives to the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group	Attend 6 meetings
8.9	Food Safety and Standards Promotion	
	OBJECTIVES	
1	To update the food service's website.	Evaluated by the Website Coordinator.
2	To publicise food hygiene myths during Food Safety Week	Prepare press release
3	To continue to participate in the FSAs FHRs scheme	No performance measure.
8.10	Health and Safety in Food Premises	
	OBJECTIVES	PERFORMANCE MEASURES
1	To carry out up to health and safety "hazard spotting" in food premises where significant offences are noted.	Number of health and safety "hazard spotting" inspections carried out
2	To liaise with the Health and Safety Team where formal action in food premises is required.	No performance measure.

10. Review

10.1 The process of review of the Plan as a whole will be undertaken in March next year based on:

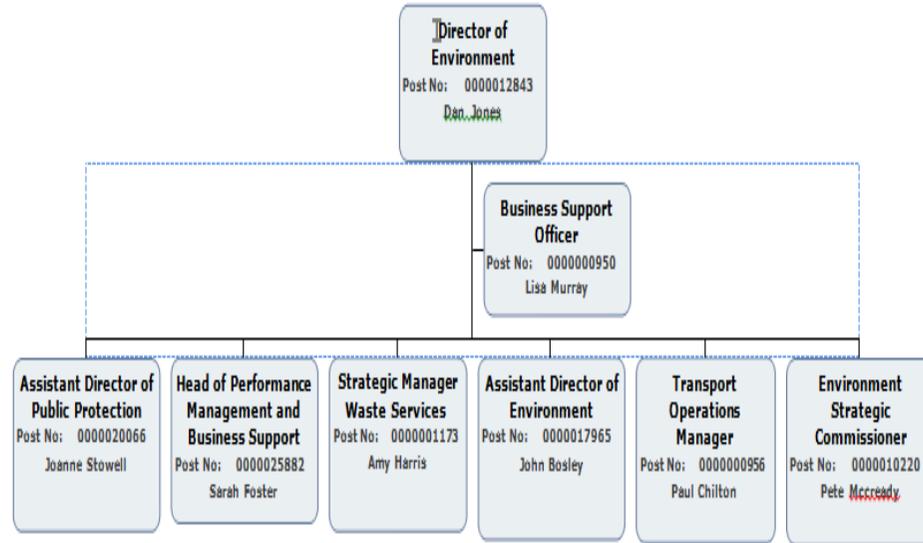
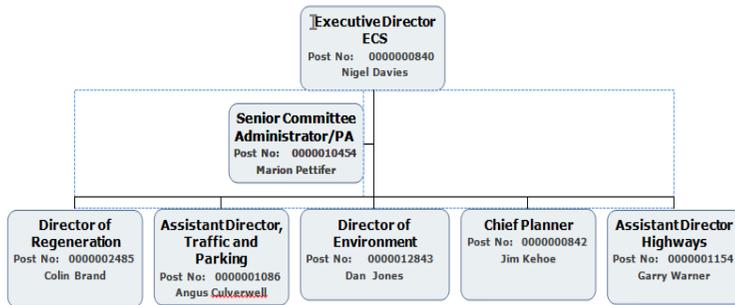
- performance and resources available over the previous 12 months;
- responses to feedback from local businesses and the community;
- observations from members and the food safety team;

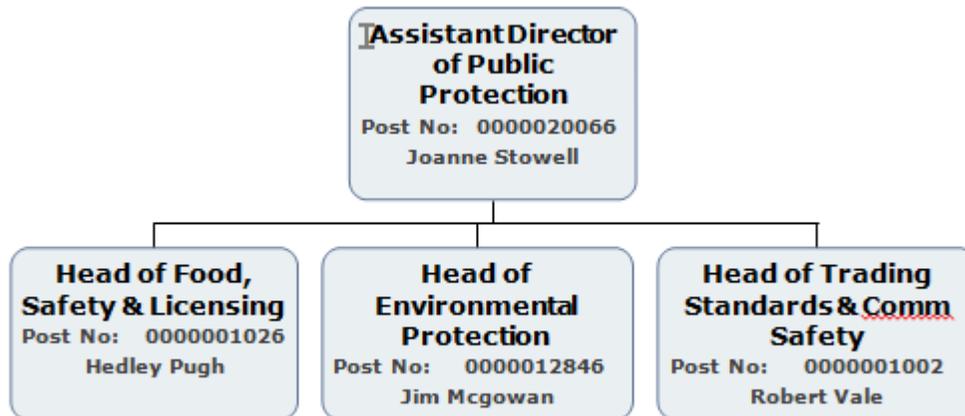
- advice and guidance issued by the FSA and other agencies;

10.2 The review of this document will then inform the development of the Food Safety Plan for 2019 / 2020 which will be scheduled for member consideration in June 2019.

10.3 Review of officer workload and priorities will be done on an ongoing basis throughout the year.

Appendix A - Organisational Structure Charts





APPENDIX B PERFORMANCE REVIEW 2017-18

	OBJECTIVES 2017/2018	PERFORMANCE MEASURES
3.1	Food Premises Interventions	
1	To carry out 682 food hygiene interventions, largely by inspection, including rescore requests.	639 hygiene interventions were carried out = - 6.3% below target
2	To carry out 250 food standards interventions, largely by inspection.	480 food standards interventions were carried out = 80% over target.
3	To send up to 600 schedules of improvement / warning letters to improve standards following interventions.	741 schedules of improvements / warning letters were sent = 23.5 % over target.
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)	75 % of premises remained broadly compliant = 7.14% over target.
5	To carry out up to 200 follow-up visits, focusing on zero - 2 star premises.	146 follow up visits were carried out = -27% below target
6	To improve the 4 rated zero premises (This is a key performance indicator)	4 zero rated premises had their ratings improved (target met 100%)
7	To improve 40 of the 80 1 rated premises. (This is a key performance indicator)	68 1 rated premises have improved their rating = 70% above target.
8	To serve improvement notices on non-compliant businesses where informal action has been unsuccessful.	Number of non compliant businesses requiring a Notice 35, No of improvement notices served 35 (100%)
9	To prosecute food business operators where other actions have been unsuccessful.	No prosecutions were undertaken but 1 simple caution was administered.
10	To enforce the Food Information Regulations 2014 via FIRINs	Number of FIRINs served. 2
11	To assess newly registered unrated business.	Number of questionnaires sent 110 ((no target set)
12	To carry out an AES survey of E rated businesses	AES survey carried out in March 18
13	To reduce the level of unrated premises by 25%	Unrated premises due in 2017/18 reduced by 50% =100% above target.

14	To reduce the level of outstanding inspections by 25%	Outstanding inspections due in 2017/18 reduced by 25%
3.2	Food Complaints /Service Requests	
	OBJECTIVES	PERFORMANCE MEASURES
1	To respond to up to 250 complaints/enquiries about food and food premises within 5 working days.	378 complaints/enquiries responded to = 51.2% over target
3.3	Home Authority Principle/ Primary Authority Partnerships	
	OBJECTIVES	PERFORMANCE MEASURES
1	To use Primary Authority Inspections forms where appropriate and refer to the Primary Authority to resolve issues found during inspection.	No performance measure
2	To refer to Primary Authorities when dealing with food complaints about food manufactured outside the Borough.	No performance measure
3.4	Advice to Food Businesses	
	OBJECTIVES	PERFORMANCE MEASURES
1	To continue to provide advice to business during inspections.	682 interventions and 682 businesses advised
3.5	Food Inspection and Sampling	
	OBJECTIVES	
1	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. .	Groups attended, and 46 food samples analysed or examined
2	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	
	OBJECTIVES	PERFORMANCE MEASURES
1	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	Number of cases reported 441 No investigated 441 = 100%
2	To investigate outbreaks of food poisoning/suspected food poisoning/viral gastroenteritis.	Number of outbreaks reported 2 No investigated 2 = 100%

3.7	Food Safety Incidents	
	OBJECTIVES	PERFORMANCE MEASURES
1	To respond to all food alerts and other food safety incidents issued by the FSA, as appropriate.	Number of food alerts/incidents issued 1 No responded to is 1 = 100%
3.8	Liaison with Other Organisations	
	OBJECTIVES	PERFORMANCE MEASURES
1	To ensure the food service liaises with and participates in joint initiatives with other Council Departments, organisations and Borough as required.	Attended the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group 6 times
2	To send representatives to the South East London Food Liaison Group, Environmental Health Working Group and Public Health Group	Attended 6 times
3.9	Food Safety and Standards Promotion	
	OBJECTIVES	
1	To update the food service's website.	Evaluated by the Website Coordinator.
2	To publicise food hygiene myths during Food Safety Week	4 press releases sent
3	To Prepare Press Releases	4 press releases sent
3.10	Health and Safety in Food Premises	
	OBJECTIVES	PERFORMANCE MEASURES
1	To carry out up to health and safety "hazard spotting" in food premises where significant offences are noted.	Number of health and safety "hazard spotting" inspections carried out was 32.
2	To liaise with the Health and Safety Team where formal action in food premises is required.	No performance measure.

Appendix C SUMMARY OF STAFF RESOURCES REQUIRED FOR FOOD SERVICE

SERVICE DELIVERY	FULL TIME EQUIVALENT OFFICERS - BELOW MANAGER LEVEL REQUIRED TO UNDERTAKE 2018/19 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	• 5.3 *FSO	• 3.0 *FSO
Food Complaints	• 0.4 FSO	• 0.0 FSO
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	• 0.0 FSO
Control and Investigation of Outbreaks and Food Related Infectious Disease	• 0.20 FSO	• 0.0 FSO
Food Safety Incidents	• 0.03FSO*/LO	• 0.0FSO
Liaison - with the South East London Sector food liaison & Environmental Health Working Groups	• 0.01 LO	• 0.0 LO
Food Safety and Standards Promotion	• 0.00 FSO (No longer offered directly)	• 0.0 FSO
Health and Safety in Food Premises	• 0.10 FSO	• 0.0 FSO
Staff Training and Development	• 0.10 FSO/LO	• 0.0 FSO
FOIs and FHRS appeals and right of reply	• 0.05 FSO/LO	• 0.0 FSO/LO
Quality Assessment	• 0.10 LO	• 0.0 LO
Technical Support	• 0.50 LO	• 0.0 LO
Administration	• 0.30	• 0.0
TOTAL STAFF RESOURCE REQUIRED	• 7.3	• 3.00
TOTAL RESOURCE PROVIDED	• 7.3	• 3.00

*FSO = Food Safety Officer LO = Lead Officer