

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

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

**Food Service Plan 2019-20  
and  
Performance Review 2018-19**

## **1. Introduction**

- 1.1 This Food and Safety Service Plan 2019-20 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 guidance 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, 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 last audit in 2017, the Council was not deemed to have met all the standards in this agreement, 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 (2018-19), and state the objectives for the 2019-20 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 FLCoP 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 2019 -20 in particular to Outcome 3 - We will support and regulate businesses by:

- inspecting 100% of high-risk food businesses to ensure food safety standards are met. Investigating and taking appropriate action concerning complaints about food and food premises, to protect public health and
- Undertaking intelligence-led food sampling and participation in regional sampling programmes for both analysis and examination

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:**

#### **Profile of the Food Industry in Bromley**

4.1 The borough of Bromley is the largest borough in London by area, and occupies 59 square miles (152.8 km<sup>2</sup>) of which the majority is Metropolitan Green Belt land; 30 % of the land is categorised as farm land.

- 4.2 It has a population of over 330,000 people, with a black and minority ethnic (BAME) population of 19% (this is less than most London boroughs). 94.2% of the population speak English. The average age is 40. 72% of the residents are owner occupiers and over 78% of the economically active population are in employment, with only 4% being unemployed.
- 4.3 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.

### **Organisational Structure**

- 4.4 The Food Safety Team sits within the Public Protection Division of the Environmental and Public Protection 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.
- 4.5 Organisational structure charts are provided in Appendix A.
- #### **Scope of the Food Safety Service**
- 4.6 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 food fraud) 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 hygiene 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.

4.7 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.

### **Service demand**

4.8 In April 2019 2600 food premises were registered in Bromley, many of which are categorised as Small /Medium Enterprises (SME). 555 new premises were registered in 2018/19, which equates to a 67% increase on the number of new businesses (333) registered in 2017-18.

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

- 11 third world country food importers;
- 43 supermarkets;
- 6 approved premises;
- 1 FSA approved catering butcher
- 2 weekly market and several occasional and visiting markets and events.
- 1 Airport
- 3 NHS hospitals

4.12 Demands on the service continue to be high. In 2018/19, 1296 programmed inspections within food businesses were achieved which represents a 102% increase on the number accrued out in 2017/18 (640). Additionally, 425 reactive service requests were dealt with, a 12% (378) increase compared with on 2017/18. 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 in 2018/19, which in turn has an impact on the resources available to carry out programmed inspections. Additionally, the team has submitted a delivery plan to the FSA that will address the backlog of low risk unrated premises.

## **5 Service Delivery 2019-20**

## Food Premises Inspections, Interventions, Ratings and Enforcement

- 5.1 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 2019 is shown in Table 1.

**Table 1 Risk Profile by Category with Inspection Intervals**

<b>Rating Category</b>	<b>Minimum Inspection Frequency</b>	<b>Number</b>
A	6 Monthly	4
B	12 Monthly	112
C	18 Monthly	565
D	2 Yearly	763
E	3 Yearly or Alternative Enforcement Strategy	443
Outside the inspection programme	none	288
Unrated	Awaiting Inspection	424
<b>Total</b>		<b>2,599</b>

- 5.4 E-rated 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 New premises are to receive a food safety inspection within 28 days of registration to comply with the FLCoP. However, this is not always possible. We therefore aim to inspect new businesses deemed to be high risk within 3 months of registration e.g. caterers. New premises which are deemed to be low risk e.g. home cake-makers will be now be added to the inspection programme. These businesses make up the vast majority of the unrated premises which are awaiting an inspection.

- 5.6 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 confidence in management. The rating scale ranges from 5 ('very good') to zero ('urgent improvement necessary'). Most food businesses are included in the scheme except those that do not supply food directly to members of the public, e.g. food manufacturers, are exempted.
- 5.6 The FHRS profile of the registered food businesses in Bromley as at 1<sup>st</sup> April 2019 is shown in Table 2

**Table 2 FHRS Profile for Bromley May 2019**

<b>Rating</b>	<b>Descriptor</b>	<b>Number</b>
0	Urgent improvement necessary	3
1	Major improvement necessary	62
2	Improvement necessary	59
3	Generally Satisfactory	281
4	Good	343
5	Very Good	1,038
	Total no of rated premises	1,786

- 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. Premises given a food hygiene rating of 0 - 2 will receive additional revisits and written guidance to ensure compliance and improved standards. 0-1 rated businesses will also be offered additional 1-2-1 coaching to help them to comply. 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 Enforcement Policy and FSA guidance. Informal action, advice, education 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.
- 5.9 The action taken will depend on the issues identified and the risk presented to the public. In 2018/19 the level of enforcement/complex work carried out by the team was at an unprecedented level including:

**48 food safety improvement notices**

**1 successful prosecution**  
**8 simple cautions administered**  
**4 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 during 2018/19 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 Practitioner 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 labelling.

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 needs, they may have to seek advice from an external source such as 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 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 Standards Agency (FSA) and Public Health England (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. The Council acts as the Proper Officer. 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 the South London Health Protection Disease Protocols. 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 2018-19, 405 infectious disease notifications were received by the Council, which is an 8% decrease on the previous year (441). 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, PHE and Trading Standards 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 4 food alerts requiring action was received in 2018-19, whereas only 1 was received in the previous year. It is difficult to predict the number of warnings likely to be received in 2019 /2020; 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. It 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 (ALEHM).
- 5.31 The Team will continue to send representatives to the South East London Food Liaison Group, Environmental Health Working Group, Public Health Group and ALEHM.

#### **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. Our website and press releases will be used to highlight key issues 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 2018-19 Plan**

- .35 A summary of the key activities undertaken by the team for 2018-19 is shown in Appendix B.

## **6. Resources**

6.1 In 2019/20 the Council has a dedicated budget of £412k to run the food safety service. This includes a sum of £6.4k set aside for food sampling and analysis. There are also additional resources of £163k for three temporary staff appointed to clear the backlog of food inspections.

6.2 The overall cost of the food service for 2018/19 was £493k, of which £78k was for additional 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 a 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 3 full time temporary food safety officers for up to 18 months, however, this term has been extended due to nationally recognised issues regarding the shortage of qualified competent officers.

6.7 Despite the additional funding being made available, the recruitment issues remain. With regards to the 3 temporary officers for which additional funding was received, 4 individual officers were recruited during the year but the time they spent with Bromley amounted to only 0.76 X FTE, as a result a proactive meeting was arranged with the FSA in September 18 to discuss matters. The FSA noted the efforts that had been made and acknowledged the impact that the recruitment issues had on the progress against the action plan. They further advised the Team to focus on completing the A -D inspections that were due and the overdue C-D inspections; in agreeing this strategy, they accepted that the focus would be shifted away from inspecting unrated premises. As a result of the refocus in September 18, by employing a limited pay per inspection regime, and by offering overtime to available Officers, significant progress was made against the action plan.

6.8 2 X FTE permanent officers were recruited in the first quarter of 2018; however one left the council in November 2018 to take up a role with another LA and thus creating a vacant post. This post has been covered by an officer on a fixed term contract pending receipt of permission to recruit. Permission has since been granted and the officer covering the post was successful at interview and took up the permanent post on 1<sup>st</sup> August 2019. One permanent officer returned from maternity leave in April 19 and is using her accrued annual leave to work 4 days a week for 12 months. Another fulltime permanent officer has requested to reduce her hours to 0.6 X FTE from June 2019, and it is planned to fill this with a permanent part time post.

6.9 The Food Team is run and managed in-house with 7.54 permanent FTE equivalent:

- **6 FTE Food safety officers**
- **1 FTE Lead Practitioner, who does not have a caseload.**
- **0.54 FTE Technical Support Officer.**

**In addition to permanent funded staff there are 3.0 FTE agency staff (1.98 are currently employed)**

#### **6.10 Inspection Programme 2019/20 and Required Resources**

In 2019-20 the following inspections are due to be undertaken:

- **628 Category A – D Food Hygiene inspections**
  - **69 Overdue inspections**
  - **7 Category A Food Standards inspections**
  - **50 Rescore requests (approx.)**
  - **350 (approx.) newly registered businesses**
- Total 1,104**

6.12 In addition to the 1,104 inspections that need to be carried out, there is the additional routine and enforcement elements that must be covered. A minimum of 6.8 X FTE competent food safety officers are required to deliver the 2019-20 inspection programme and to ensure a backlog of inspections does not build up in the future. However, if the unprecedented enforcement work as detailed in 5.9 continues at the same or similar rate, and if recruitment and retention issues persist the ability to deliver the inspection regime will be compromised.

6.13 There are also approximately 425 unrated businesses, which have been determined (by questionnaire) to present a low risk e.g. home based cake makers. Also, approximately 290 premises which have been placed outside the inspection programme as they present an insignificant food safety risk e.g. chemists, green grocers, non-food retailer selling confectionary. Notwithstanding this, the FLCoP requires that all premises receive an inspection before they can be dealt with using alternative enforcement strategies. To facilitate this, a project is being undertaken to assess how many of these unrated businesses are still trading, as many may have closed without notifying the authority. Once the current number is established, their present food safety risk will be assessed and with premises added

to our inspection programme where required. The inspection of the established relevant unrated businesses will be delivered by a discrete project, and the team has submitted the delivery plan to the FSA, once approved they have indicated that the action plan will be signed off.

6.14 All food safety legislation enforced within the UK is EU legislation. When the UK leaves the EU, this legislation will be replaced with domestic legislation. The impact of this change on food safety enforcement is unknown however it is likely the team will be likely to issue more food export certificates.

6.15 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:

- 6 weekly team meetings;
- Review by the Lead Practitioner of any FHR inspection where the risk rating of A changes.
- Peer review of statutory notices before service;
- Annual post inspection checks by the Lead Practitioner of inspections and service requests;
- 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 2019**

8.1 The main issue for the authority was the number of overdue inspections and unrated premises. In April 2018 there were 677 overdue food hygiene inspections, whereas the number for April 2019 was 69 which is a reduction of 93%. The FSA noted this significant improvement in their latest correspondence in July 19, and the delivery plan for the backlog of unrated low risk premises is being considered, and as previously mentioned it is anticipated that the FSA Audit will be closed once the delivery plan has been approved.

## 9. Key Performance Areas for 2019-20

	OBJECTIVES	PERFORMANCE MEASURES
<b>9.1</b>	<b>Food Premises Interventions</b>	
1	To carry out 1104 due food hygiene interventions, largely by inspection, including rescore requests. <b>This is a KPI.</b>	100% of all inspections due
2	To reduce the backlog of high risk unrated premises by 100%, focussing on high risk businesses. <b>This is a KPI.</b>	High risk unrated inspections reduced by 100 % = 69
3	To assess the food hygiene risk presented by the low risk unrated businesses.	No target outcome based
4	To carry out 250 food standards interventions, largely by inspection. <b>This is a KPI.</b>	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) <b>This is a KPI.</b>	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 3 rated zero premises.	Number of zero rated premises which have improved their rating =3.
9	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%
10	To prosecute / offer simple cautions to persistent non-compliant food business operators where other actions have been unsuccessful.	Number of prosecutions/simple cautions offered – outcome based

<b>9.2</b>	<b>Food Complaints /Service Requests</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To respond to up to 300 complaints/enquiries about food and food premises within 5 working days (80% target).	Number of complaints/service enquiries responded to within 5 working days = 80%.
<b>9.3</b>	<b>Home Authority Principle/ Primary Authority Partnerships</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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
<b>9.4</b>	<b>Advice to Food Businesses</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To continue to provide advice to business during inspections.	Advice given at every inspection = 100%
<b>9.5</b>	<b>Food Inspection and Sampling</b>	
	<b>OBJECTIVES</b>	
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 +=
2	To carry out intelligence-led local sampling projects as a result of inspections, complaints or other information	
<b>9.6</b>	<b>Control and Investigations of Outbreaks and Food Related Infectious Disease</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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 Number investigated = 100%
2	To investigate outbreaks of food poisoning/suspected food poisoning/viral gastroenteritis.	Number of outbreaks reported against Number investigated = 100%
<b>9.7</b>	<b>Food Safety Incidents</b>	

	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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
<b>9.8</b>	<b>Liaison with Other Organisations</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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, Public Health Group and ALEHM.
2	To send representatives to the South East London Food Liaison Group, Environmental Health Working Group, Public Health Group and ALEHLM	Attend 6 meetings
<b>9.9</b>	<b>Food Safety and Standards Promotion</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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.
<b>9.10</b>	<b>Health and Safety in Food Premises</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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:

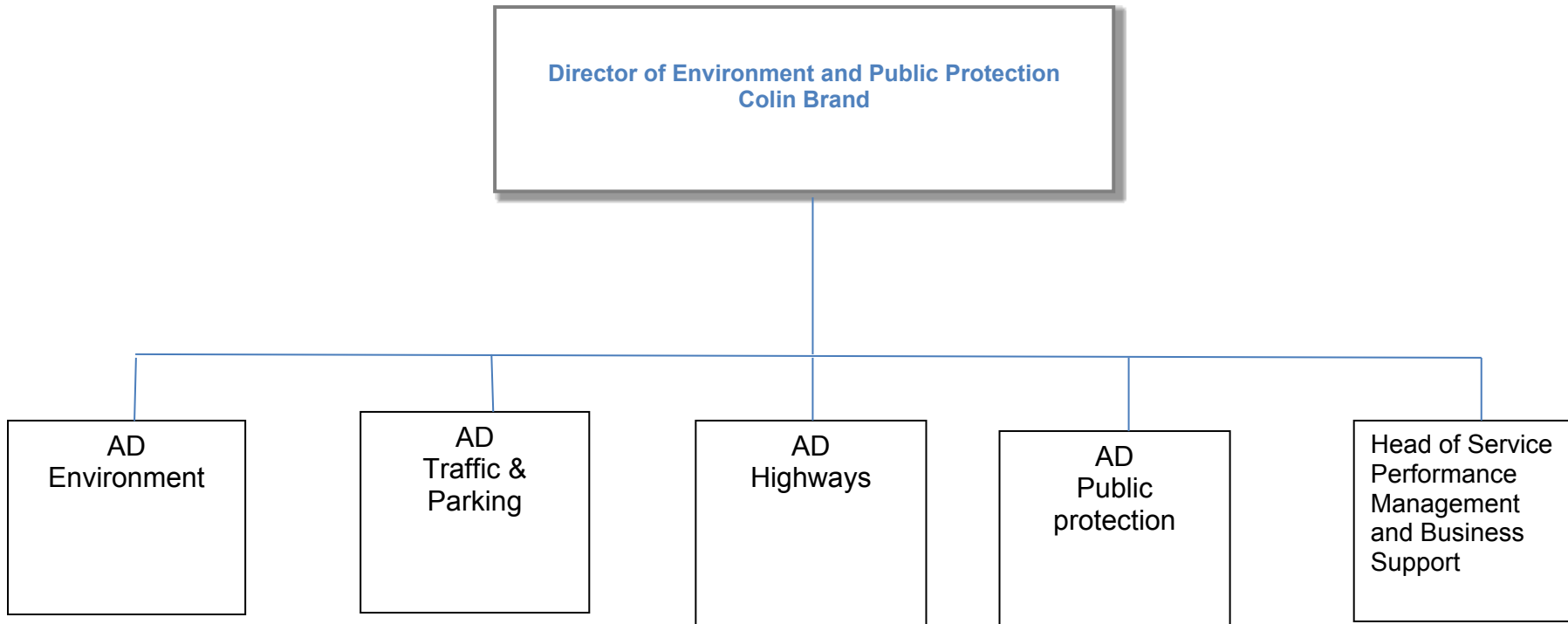
- performance and resources available over the previous 12 months;
- responses to feedback from local businesses and the community;
- observations from members and the food safety team;
- advice and guidance issued by the FSA and other agencies;



- 10.2 The review of this document will then inform the development of the Food Safety Plan for 2020 / 2021 which will be scheduled for member consideration in September 2020.
- 10.3 Review of officer workload and priorities will be done on an ongoing basis throughout the year.

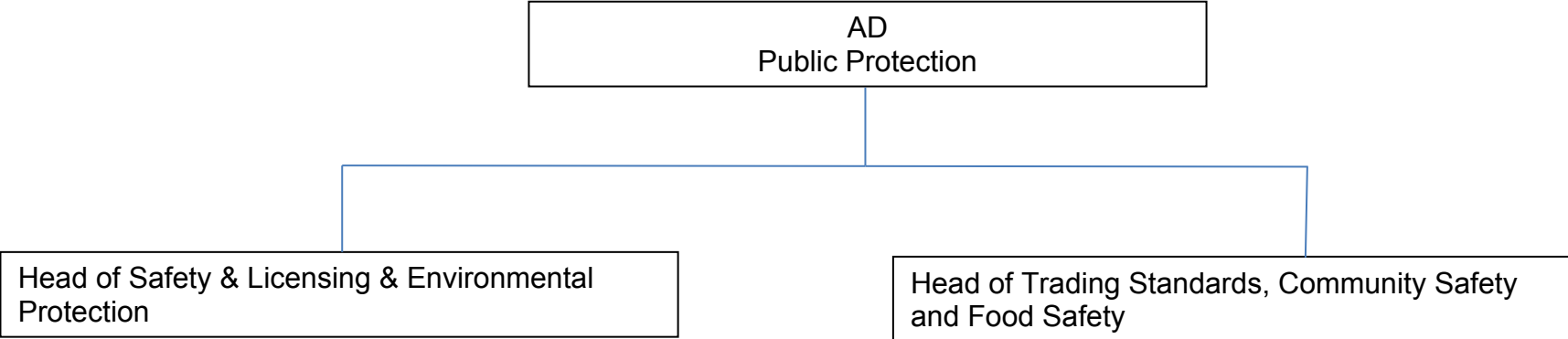
**Appendix A - Organisational Structure Charts**

**Environment and Public Protection**



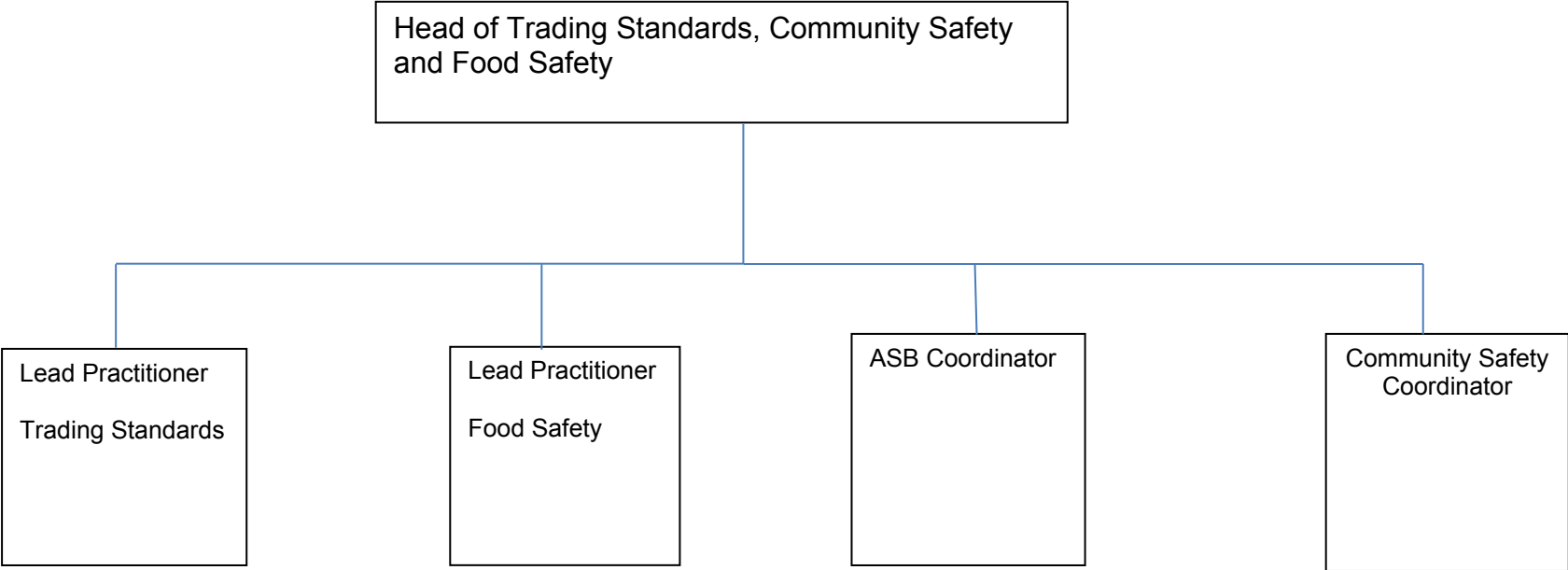
**Appendix A - Organisational Structure (contd.)**

**Public Protection**



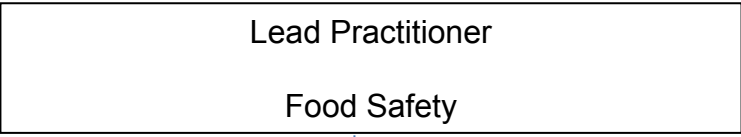
Appendix A - Organisational Structure (contd.)

Trading Standards, Community Safety, Food Safety



**Appendix A - Organisational Structure (contd.)**

**Food Safety**



## APPENDIX B - PERFORMANCE REVIEW 2018-19

	OBJECTIVES	PERFORMANCE MEASURES
<b>8.1</b>	<b>Food Premises Interventions</b>	
1	To carry out 853 due food hygiene interventions, largely by inspection, including rescore requests. <b>This is a KPI.</b>	830 FH inspections carried out. This is 97% of all inspections due.
2	To reduce the backlog of overdue inspections by 100%. <b>This is a KPI</b>	Overdue inspections reduced by 90% with 69 remaining.
3	To reduce the backlog of high risk unrated premises by 100%, focussing on high risk businesses. <b>This is a KPI.</b>	High risk unrated inspections reduced by 100 %
4	To carry out 250 food standards interventions, largely by inspection. <b>This is a KPI.</b>	1065 Food Standards were carried out = 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 =1439
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 % = 75%.
7	To carry out up to 200 follow-up visits, focusing on zero - 2 star premises.	Number of follow-up visits carried out. = 160
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.	No. 1 rated premises which have improved their rating = 41
10	To serve improvement notices on all non-compliant businesses where informal action has been unsuccessful.	Number of notices served on non-compliant businesses = 43
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 = 1 prosecution and 8 simple cautions administered.
12	To assess newly registered unrated business by sending a questionnaire	No. of questionnaires sent = 128 no to newly registered businesses.

<b>8.2</b>	<b>Food Complaints /Service Requests</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To respond to up to 300 complaints/enquiries about food and food premises within 5 working days.	425 received complaints/enquires received and 92% responded to within 5 working days.
<b>8.3</b>	<b>Home Authority Principle/ Primary Authority Partnerships</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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
<b>8.4</b>	<b>Advice to Food Businesses</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To continue to provide advice to business during inspections.	Advice given at every inspection = 100%
<b>8.5</b>	<b>Food Inspection and Sampling</b>	
	<b>OBJECTIVES</b>	
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 = 54
2	To carry out intelligence-led local sampling projects as a result of inspections, complaints or other information	
<b>8.6</b>	<b>Control and Investigations of Outbreaks and Food Related Infectious Disease</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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	405 cases reported against Number investigated = 100%
2	To investigate outbreaks of food poisoning/suspected food poisoning/viral gastroenteritis.	3 Food poisoning outbreaks reported against Number investigated = 100%
<b>8.7</b>	<b>Food Safety Incidents</b>	

	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To respond to all food alerts and other food safety incidents issued by the FSA, as appropriate.	Number of food alerts/incidents = 4 =100% of applicable alerts
<b>8.8</b>	<b>Liaison with Other Organisations</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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
<b>8.9</b>	<b>Food Safety and Standards Promotion</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
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.
<b>8.10</b>	<b>Health and Safety in Food Premises</b>	
	<b>OBJECTIVES</b>	<b>PERFORMANCE MEASURES</b>
1	To carry out up to health and safety "hazard spotting" in food premises where significant offences are noted.	30 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.



**Appendix C SUMMARY OF STAFF RESOURCES REQUIRED FOR FOOD SERVICE for 2019-20**

<b>SERVICE DELIVERY</b>	<b>FULL TIME EQUIVALENT OFFICERS - REQUIRED TO UNDERTAKE 2019/20 WORK PLAN (IF NO ENFORCEMENT WORK IS UNDERTAKEN)</b>	<b>FULL TIME EQUIVALENT OFFICERS - TO CARRY OUT ALL UNRATED INSPECTIONS) (IF NO ENFORCEMENT WORK IS UNDERTAKEN)</b>
Food Premises Inspections	• 7*FSO	• 1.0 *FSO (contractor)
Food Complaints	• 0.6FSO	• 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	• 0.40 FSO	• 0.0 FSO
Control and Investigation of Outbreaks and Food Related Infectious Disease	• 0.30 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	• 0.20 FSO	• 0.0 FSO
Staff Training and Development	• 0.20 FSO/LO	• 0.0 FSO
FOIs and FHRS appeals and right of reply	• 02 FSO/LO	• 0.0 FSO/LO
Quality Assessment	• 0.10 LO	• 0.0 LO
Administration	• 0.50 AO	• 0.0
<b>TOTAL STAFF RESOURCE REQUIRED</b>	• <b>9.64</b>	• <b>1.00</b>
<b>TOTAL RESOURCE PROVIDED</b>	• <b>9.64</b>	• <b>0.00</b>

\*FSO = Food Safety Officer LO = Lead Officer AO= Admin officer