

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

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

**Food Service Plan 2021/22**

## **1. 1. Introduction**

- 1.1 This Food and Safety Service Plan 2021-22 (FSSP) covers the key areas of food safety, and the relevant management arrangements and objectives against which the Council will monitor service delivery; it has been compiled in accordance with the guidance issued by the Food Standards Agency (FSA). This plan includes the impacts of the COVID 19 (CV19) pandemic on the work of the Food Safety Team.
- 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 (FA), 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, action plans were implemented in April and September 2017, and funding was secured for additional resources. The FSA formally closed the audit in September 2019 due to the excellent progress made, but continues to monitor our progress with our unrated and overdue inspections.
- 1.4 This FSSP is subject to approval by the Public Protection & Enforcement PDS Committee, it makes clear the arrangements that Bromley Council will put in place to ensure that there are adequate arrangements for food safety enforcement moving forwards, and states the objectives for the 2021-22 period. It normally includes a performance review against the previous year's plan (2020-21) however, due to the interruption to the food service caused by the CV19 pandemic, a service plan was not produced.

## **2. Aims, Objectives and Description of the Service**

- 2.1 The services delivered by the Food Safety Team are delivered in accordance with the Food Law Code of Practice (FLCoP), the latest version of which was released in March 2021. 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 microbiological food 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 Enforcement Policy**

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

- 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
- Quality Environment – by ensuring food operators dispose of their waste appropriately
- Regeneration – by supporting local businesses to thrive
- Excellent Council – By ensuring our service is well run

3.2 The work of the Team also delivers to the Public Protection & Enforcement Portfolio Plan 2021 -2022, 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 to the annual FSSP, the Public Protection Division has produced an enforcement policy in accordance with the Regulators Code 2014. Regulatory compliance and enforcement are common operational activities carried out by the Food Safety Team as part of the broader regulatory process, and involves actions that encourage and compel compliance within a regulatory framework, that covers various pieces of legislation.

3.4 Within our enforcement role, we consider how best we can:

- Encourage and promote compliance;
- Improve confidence in compliance for those we regulate;
- Focus on high risk issues;
- Provide encouragement for compliant businesses;
- Understand and minimise the negative economic impacts of our activities; and
- Minimise the costs of compliance for those we regulate.

#### **4. Background:**

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

- 4.1 The borough of Bromley is the largest borough in London in terms of geographical area; it 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 farmland.
- 4.2 It has the 6<sup>th</sup> largest population in London with over 330,000 people; 81% of the population are white or white other, 94.2% of Bromley's population speak English, the average age of our residents 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. The borough owns and manages two traveller sites, and is home to a large community of travelling show people.
- 4.3 There are four town centres; Bromley, Orpington, Beckenham and Penge; the latest figures show that there are over 14,000 businesses in the borough, the majority of businesses are small with less than nine employees in each, and most are within the sectors of finance, retail and construction. However, public administration, education and health are the borough's largest employers, and the Princess Royal University, Beckenham Beacon and Bethlem Royal NHS Hospitals are located within the borough, as is Biggin Hill airport.

##### **Organisational Structure**

- 4.4 The Food Safety Team sits within the Public Protection Division of the Environment and Public Protection Directorate; the feeding stuffs and alcohol authenticity enforcement are carried out by the Trading Standards Team, with Kent Scientific Services appointed as the Food Analyst, and Public Health England (PHE) acts as the Council's Food Examiner.
- 4.5 The organisational structure chart is provided in Appendix A of this plan (page 19).

## **Scope of the Food Safety Service**

4.6 Food safety activities normally undertaken include:

- Programmed inspections and interventions at food businesses, at a frequency set out in the FSA's 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" whereby the local authority is the enforcing authority where significant health and safety matters are noted in food premises. 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 2021, 2487 food premises were registered in Bromley, many of which are categorised as Small /Medium Enterprises (SME). In the 2020-21 period, 502 new premises were registered, this equates to a 34% increase on the number of new businesses (374) registered in 2019-20. This increase was due to a large number of home-based businesses starting up during the CV19 pandemic.

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

- 14 non-EU country food importers
- 1 EU importers
- 45 supermarkets
- 6 approved premises
- 2 fixed weekly market and several occasional and visiting markets and events.
- 1 Airport
- 3 NHS hospitals

### **Impact of COVID 19 on the Service**

- 4.10 From the outset of the pandemic, this service was severely impacted in its ability to deliver the usual obligations in relation to Food Safety. The cohort of Officers allocated to this work were immediately identified and delegated by Government, to provide the frontline enforcement response within the majority of Local Authority Coronavirus Regulations.
- 4.11 Throughout the pandemic, the FSA has issued guidance advising Local Authorities as to what they could and could not inspect. On 16th March 2020, the Council made the decision to cease face to face contact with the public in an attempt to reduce the spread of CV19. This was followed by an instruction from the FSA to suspend our inspection programme. Naturally, this impacted the team's ability to inspect, and meant that the usual statutory requirements in relation to food hygiene and safety inspections were amended on an ongoing basis as the year progressed. As such, there were minimal food hygiene inspection requirements placed upon the Council in 2020/21, and a formal Service Plan was not produced. However, during this time period, the Council responded to any high-risk food hygiene complaints in the usual manner.
- 4.12 The food team followed the FSA advice to carry out remote inspections to high-risk premises (rated A-B for food hygiene/standards) and non-complaint premises (with a food hygiene rating of 0-2), to assess their compliance with Food Safety and coronavirus legislation. In addition to this, remote inspections to restaurants, takeaways, home caterers, food retailers and the charity sector were carried out. This was undertaken to assess their level of Food Safety and CV-19 compliance; the team also used Facebook to find premises which were trading within Bromley but unregistered with the team.
- 4.13 Onsite inspections initially resumed in mid July 2020, these included Food Safety and CV-19 enforcement within the food businesses permitted to trade. However, before Officers could return to face-to-face visits to food premises, a CV-19 risk assessment was undertaken to protect both staff and businesses from the spread of infection. The risk assessment required Officers to carry out a remote assessment prior to conducting their inspection onsite, and this step lengthened the process. In response to the rise of CV-19 post July 20 onwards,

onsite inspections of home-based premises were suspended in November 2020, and as the infection rates continued to increase, all inspections were suspended in December 2020. Notwithstanding this, Food Safety compliance continued to be assessed remotely where possible, and full onsite inspection resumed in March 2021, along with the previous CV-19 precautions.

- 4.14 Onsite inspection resumed in March 2021, along with the previous CV19 precautions.
- 4.15 As a result of the restrictions and redirection of resources, in the 2020/21 period, 231 programmed inspections were carried out within food businesses, compared to 1067 in 2019/20; this represents a 78% decrease between years. As a result, there is a backlog overdue inspections from the previous reporting year, in addition to the inspections due this year (see section 6.1).
- 4.16 With regards to service requests (SRs), 411 reactive SRs were received in the 2020/21 period, compared with 450 in the previous year. This 9% decrease was not unexpected, as the pandemic affected the ability of food businesses to trade.
- 4.17 The focus moving forwards will remain on poorly performing and high-risk food and newly registered high-risk businesses as set out by the FSAs recovery plan published in July 2021.

## **5 FSA Recovery Plan**

- 5.1 The Recovery Plan (RP) sets out the FSA's guidance and advice to local authorities for the period from 1 July 2021 to 2023/24. This will supersede the current guidance and advice on the response to CV19 which applies until 30 June 2021. The Plan provides a framework for re-starting the delivery system in line with the FLCoP for new food establishments and for high-risk and/or non-compliant establishments while providing flexibility for lower risk establishments.
- 5.2 The RP is to be implemented alongside delivery of:
  - official controls where the nature and frequency are prescribed in specific legislation, and official controls recommended by FSA guidance that support trade and enable export;
  - reactive work including, enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints;
  - sampling, and
  - ongoing proactive surveillance.

5.3 There are two phases to the Recovery Plan:

- **Phase 1 - 1 July to 30 September 2021**

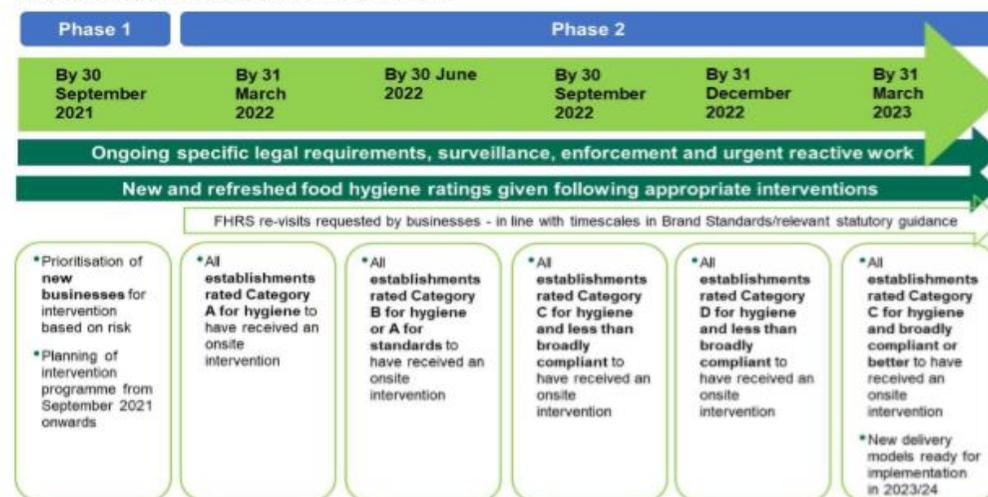
*Prioritise new businesses for interventions based on risk, and develop intervention programme from September 2023 onwards, reactive work including responding to food incidents, alerts, food complaints and foodborne outbreaks, food sampling, ongoing proactive surveillance to obtain an accurate picture of the local business landscape, triaging new food premises registrations to identify those requiring addition to our food premises inspection programme due to food safety, and planning for the resumption of planned interventions for high-risk and non-compliant businesses*

- **Phase 2 – 1 October 2021 to 2023/24**

*Continuation of Phase 1, Implementing our planned food premises inspection programmes for high risk category and non-compliant establishments, implementing an intelligence-based approach for low risk category establishments, responding to FHRS rescore requests within 3 months of application, addressing the backlog See Fig 1 5.4 for details*

5.4 Figure 1 below provides an outline of the recovery plan

**Figure 1: Outline of the Recovery Plan**



**Notes**

The key milestone dates within the Recovery Plan for higher risk establishments are shown.

For lower risk establishments not shown in the figure, local authorities have the flexibility to defer planned interventions and only undertake intervention where information/intelligence suggests that risks have increased/standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed.

In the case of food standards, the impact on the business of the new requirements on allergen labelling for products prepacked for direct sale - that apply from 1 October 2021 - should also be taken into account.

5.5 In essence, Phase 2 will continue until a new food standards delivery model and a revised food hygiene intervention rating scheme are in place. The new delivery model for food standards is being piloted in England and Northern Ireland until the end of December 2021. Subject to the findings of an evaluation of the pilot and stakeholder consultation, it is anticipated that the new model will be rolled out nationally from April 2023. Work to review and revise the food hygiene intervention rating scheme is planned to commence shortly with a view to implementation in 2023/24.

## 6. Inspections due and overdue 2021-22

6.1 As outlined in section 4, in addition to the inspections due in this reporting year (2021-22), there is a backlog of inspections, table 1 below details these.

**Table 1 Due and Overdue Inspections**

<b>Inspections Due 2021-22</b>	
<b>Category or Type of Inspection</b>	<b>Food Hygiene</b>
Category A	0
Category B	17
Category C	135
Category D	285
Category E	192
Unrated new premises	390
Unrated existing premises	160
<b>Total</b>	<b>1179</b>
<b>Inspections Overdue 2021-22</b>	
<b>Category or Type of Inspection</b>	<b>Food Hygiene</b>
Category A	0
Category B	20
Category C	365
Category D	483
Category E	64
<b>Total</b>	<b>932</b>
<b>Grand Total</b>	<b>2111</b>

6.2 The total number of inspections (backlog and due) for food hygiene and food safety is **2055**, however, the FSA RP accepts that LA's do not have the resources to achieve this target within the financial year, and have given a 3 year period in which to address the backlog created by the pandemic, and further achieve the normal inspection targets set by the FSA.

## 7. Service Delivery 2021-22

7.1 Government lifted all CV19 restrictions on the 19th July 2021, however, at this point, the first quarter for inspections had lapsed, notwithstanding this, 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 (as per FLCoP).

7.2 The risk profile of food businesses (with inspection intervals) in Bromley, as at 1st April 2021, is shown in Table 2.

**Table 2 Food Hygiene Risk Profile by Category with Inspection Intervals**

<b>FH Rating Category</b>	<b>Minimum Inspection Frequency</b>	<b>Number</b>
<b>A</b>	<b>6 Monthly</b>	<b>0</b>
<b>B</b>	<b>12 Monthly</b>	<b>36</b>
<b>C</b>	<b>18 Monthly</b>	<b>539</b>
<b>D</b>	<b>2 Yearly</b>	<b>876</b>
<b>E</b>	<b>3 Yearly or Alternative Enforcement Strategy</b>	<b>542</b>
<b>Outside the inspection programme</b>	<b>none</b>	<b>7</b>
<b>Unrated</b>	<b>Awaiting Inspection</b>	<b>494</b>
<b>Total</b>		<b>2487</b>

7.3 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. Table 3 on the following page provides the inspection ambition for this year, together with the resources allocated to achieve it.

**Table 3 Inspections and Resources 2021-22**

<b>Inspections Due 2021-22</b>			
<b>workstream</b>	<b>Category or Type of Inspection</b>	<b>Food Hygiene</b>	<b>Resources</b>
1	Category A	0	5.54 FTE
2	Category B	17	
3	Category C	135	
4	Category D	285	
5	Category E	192	0.5 FTE Alternative Enforcement Strategy and Inspections
6	New unrated	390	
7	Overdue Category C & D	848 (435 (C) 483 (D))	OT
8	Unrated existing premises	160	0.5 FTE
	<b>Total</b>	<b>2027</b>	

7.4 The work programme above exceeds the ambitions within the FSA RP, as their initial targets were expressed as a minimum expectation, and LAs were encouraged to move at a faster pace where possible. With that in mind, the targets were adjusted and increased, and the overdue category C and D inspections are included for this year. The rationale being that the greatest risk is presented within these overdue categories, that it is prudent to address these as a priority, and, to fail to try and address these at this stage will add to the overdue inspections moving forwards.

7.5 The above work programme in Table 3 is undertaken in addition to the routine work of the team. Work streams 1-5 & 8 will require a minimum of 6.54 X FTE Food Safety Officers to deliver. The additional work in Work streams 6&7 (Table 1 section 6.1) will be undertaken on overtime where Officers are available, or potentially via agency staff. This additional work will be funded through the underspend created by vacancies in year. However, the ability to deliver the proposed work programme in Table 1 relies on the following:

- The ability to recruit to vacant posts (workstreams 1-5&8)
- The availability of Officers to work overtime (workstreams 6&7)
- The cost of agency staff if Officers are unavailable on overtime (workstreams 6&7)

It is important to note, that ability to deliver the proposed work programme will also be compromised if the level of enforcement work (as experienced pre-pandemic in 2019-20) returns. As such, the regime will be reviewed and adjusted accordingly in year, and throughout the 3-year grace period to track progress, and respond to risks.

- 7.6 After each inspection food business 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.
- 7.7 The FHRS profile of the registered food businesses in Bromley as at 1<sup>st</sup> April 2021 is shown in Table 4

**Table 4 FHRS Profile for Bromley April 2021**

<b>Rating</b>	<b>Descriptor</b>	<b>Number</b>
<b>0</b>	<b>Urgent improvement necessary</b>	<b>1</b>
<b>1</b>	<b>Major improvement necessary</b>	<b>18</b>
<b>2</b>	<b>Improvement necessary</b>	<b>21</b>
<b>3</b>	<b>Generally Satisfactory</b>	<b>262</b>
<b>4</b>	<b>Good</b>	<b>324</b>
<b>5</b>	<b>Very Good</b>	<b>1367</b>
	<b>Total no of rated premises</b>	<b>1993</b>

- 7.8 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. Formal action will be considered where informal action has not been successful; this is in line with our Enforcement Policy.

### **Unrated New Premises**

- 7.9 Ordinarily, new premises should receive a food safety inspection within 28 days of registration to comply with the FLCoP, however, as a result of the backlog created by the pandemic, this will not be possible. As such, the Team will continue to prioritise those businesses with high risk activities, or where intelligence indicates a food safety concern, as permitted by Phase 1 of the FSAs Recovery Plan. Newly registered business with a low food safety risk will be considered during Phase 2.

- 7.10 With regards to the 160 unrated existing businesses which were previously determined to present a low risk e.g. home-based cake makers. These businesses will be contacted to determine if they are still trading by means of a questionnaire. The current risk will be determined, and the premises will be placed into the inspection programme as appropriate if the risk has changed. 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 0.5 X FTE food safety officers.

### **Enforcement**

- 7.11 Food safety enforcement will continue to be undertaken in a graduated manner, and in accordance with the Public Protection Enforcement Policy 2020 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.
- 7.12 The action taken will depend on the issues identified and the risk presented to the public. In 2020/21 the level of enforcement/complex work carried out by the team was greatly affected by the pandemic with our focus being on CV19 compliance in all Bromley businesses and not just food businesses. It is anticipated that as businesses emerge from the pandemic, lower food safety standards and greater enforcement work may be required.

### **Food Complaints and Service Requests**

- 7.13 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 Food Safety 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. The team will also continue to respond to complaints about CV19 in all Bromley premises along with the commercial teams within Public Protection.

### **Primary Authority Partnerships**

- 7.14 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.

## **Advice to Businesses**

- 7.15 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. During the CV 19 outbreak, advice on compliance with the Public Health (Coronavirus Restrictions) England Regulations 2020 is being offered to all businesses.
- 7.16 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 business's needs, they may have to seek advice from an external source such as a food safety consultant.
- 7.17 From 1<sup>st</sup> October 2021, new allergen labelling legislation will come into force for foods pre-packed for direct sale. It is anecdotally known as "Natasha's Law" following the sad death of a teenager who suffered an allergic reaction, after she consumed a sandwich from a retail shop that did not carry a warning of an ingredient with known allergenic potential. The change will require businesses (which produce and pack food onsite for direct sale to the public) to label food with a full list of ingredients with allergenic ingredients emphasised. As many of our businesses affected by this requirement will be small independents, we will offer information and support to assist them with compliance.

## **Food Sampling**

- 7.18 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) sampling programmes for both analysis and examination.

## **Control and Investigation of Food Related Cases and Outbreaks**

- 7.19 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; and 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.

- 7.20 On 5<sup>th</sup> March 2020 Coronavirus was made a notifiable disease by an amendment to the Health Protection (Notification) Regulations 2010. As a result, the team also investigates workplace outbreaks of CV19 notified by the PHE's London Coronavirus Response Cell (LCRC).
- 7.21 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 within 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.
- 7.22 In 2020-21, 229 infectious disease notifications were received by the Council, which was a 47% decrease on the previous year (434). This reduction is likely to be the result of the pandemic restricting overseas travel, reduced eating outside of home, and underreporting of food poisoning symptoms due to restricted access to the NHS for non CV19 related symptoms. In any case, 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.

### **Food Safety Incidents and Alerts**

- 7.23 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.
- 7.24 Responses to Food Incidents and Alerts are determined by the Food Safety Team Manager in consultation as necessary, with the Food Standards Agency, PHE and Trading Standards etc.
- 7.25 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.
- 7.26 6 food alerts requiring action was received in 2020-21. It is difficult to predict the number of warnings likely to be received in 2021 /2022 however, should incidents rise, there will be a negative effect on the ability of the team to achieve the programmed work schedule.

### **Liaison with Other Organisations**

- 7.27 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.

- 7.28 The Team is a member of the South East London Food Liaison Group (SELFLG), Environmental Health Working Group (EHWG), the Public Health Group (PHG), and the London Food Fraud Group (LFFG), and has designated members to attend. It will also continue to liaise with other enforcement organisations such as the FSA and Department for Environment, Food and Rural Affairs (DEFRA) etc, other Environmental Health Departments and professional organisations such as The Association of London Environmental Health Managers (ALEHM).
- 7.29 The Team will continue to send representatives to the SELFLG, EHWG, PHG and ALEHM.

### **Promoting Food Safety**

- 7.30 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. The team will participate in the FSA Food Hygiene Rating Scheme and will encourage businesses to display the rating received.

## **8. Financial Resources**

- 8.1 In 2021/22 the Council has a dedicated budget of £488k (gross expenditure) to run the food safety service. This includes a sum of £6.4k set aside for food sampling and analysis.

## **9. Staff Development**

- 9.1 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.

## **10. Staffing Resources**

- 10.1 Following an 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. The FSA formally closed the audit in September 2019 in recognition of the excellent progress made, but continues to monitor our progress with our unrated and overdue inspections.

10.2 PP management is committed to maintaining a full complement of officers, using temporary food safety staff where necessary, to ensure the Council can meet its food safety obligations. As of April 2021, The Food Team is run and managed in-house with 8.29 permanent FTE equivalent:

- 6.54 FTE Environmental Health / Food safety Officers
- 1 FTE Food Safety Manager, who does not have a caseload.
- 0.75 FTE Administrator

**A structure chart is provided in Appendix A (page 19), and a summary of staff resources required for the Food Service delivery is provided in Appendix B (page 20).**

10.3 2 X FTE permanent food safety officers retired in 2021 (including the Food Safety Manager); permission to recruit to these posts was received, and thus far 1 X FTE has been recruited. The FSM post has been filled (initially on an acting up basis) by an existing permanent food safety officer. This acting up opportunity creates an additional vacancy, which will be covered by a contractor. An additional 1 X FTE permanent food safety officer is due to leave in September 2021, due to career progression, permission to recruit to this post was received and recruitment is underway.

## **11. Quality Assessment**

11.1 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 FLCoP and centrally issued guidance. In addition, activities which are used to monitor and maintain service quality will include:

- Weekly remote team catch ups
- 6 weekly remote team meetings
- Review by the Food Safety Manager of any FHR inspection where the risk rating of A changes
- Peer review of statutory notices before service
- Annual post inspection checks by the Food Safety Manager of inspections and service requests
- Benchmarking activities and information exchange between Bromley and the South East London Food Liaison Group
- Investigation of any customer complaints
- Investigation of any appeals against enforcement notices
- Investigation of appeals against Food Hygiene Ratings

## 12. Review

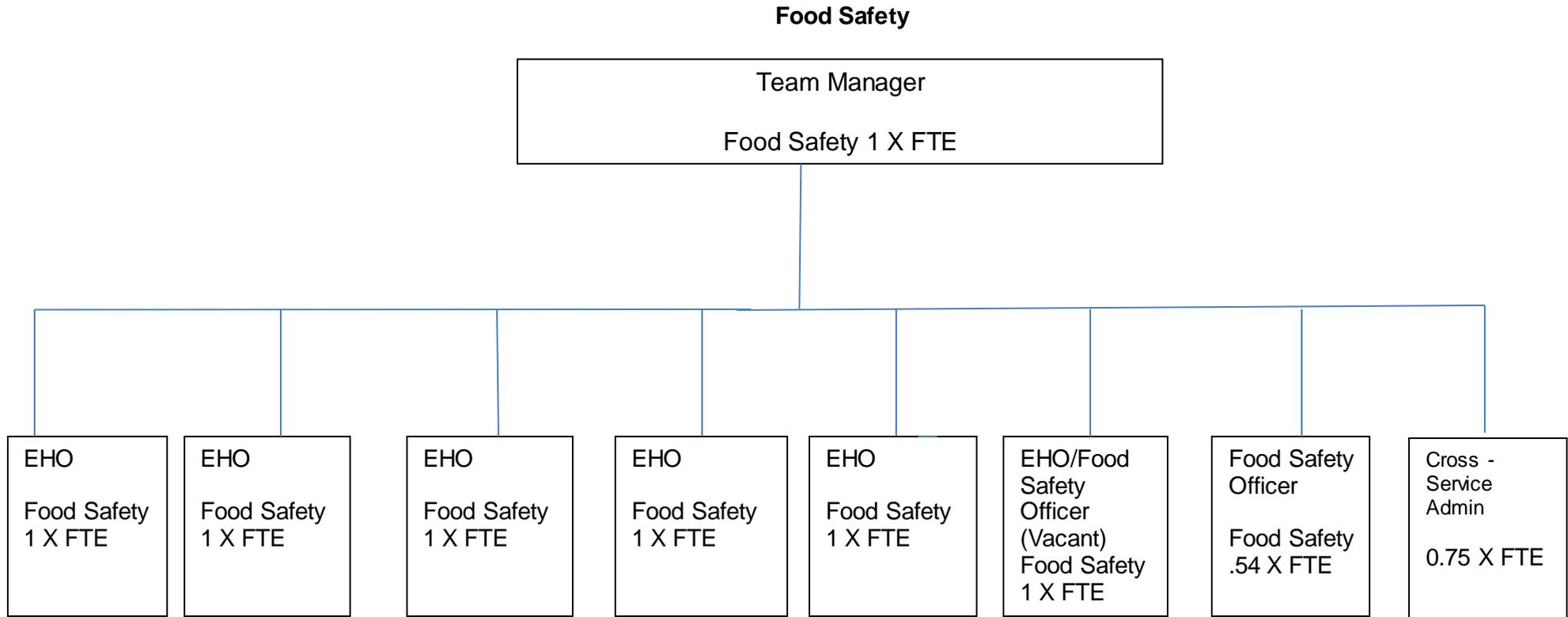
12.1 The process of review of the plan as a whole will be undertaken in March next year based on:

- 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;

12.2 The review of this document will then inform the development of the Food Safety Plan for 2022 / 2023 which will be scheduled for member consideration in June 2021 (committee date to be confirmed).

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

**Appendix A - Organisational Structure**



**Appendix B SUMMARY OF STAFF RESOURCES REQUIRED FOR FOOD SERVICE for 2021-22**

\*EHO = Environmental Health Officer FSO = Food Safety Officer TM = Team Manager AO= Admin officer

<b>SERVICE DELIVERY</b>	<b>FULL TIME EQUIVALENT OFFICERS - REQUIRED TO UNDERTAKE 2021/22 WORK PLAN (does not include Enforcement Work)</b>
Food Premises Inspections	6.54 FSO/EHO
Food Complaints	
Home Authority Advice	
Advice to Businesses	
Advice to Consumers	
Food Sampling	
Control and Investigation of Outbreaks and Food Related Infectious Disease	
Food Safety Incidents	
Liaison - with the South East London Sector food liaison & Environmental Health Working Groups	
Food Safety and Standards Promotion	
Health and Safety in Food Premises	
Staff Training and Development	
FOIs	
Administration	
Management/Staff Training/Monitoring	1.0 TM
<b>TOTAL STAFF RESOURCE REQUIRED</b>	<b>8.29</b>
<b>TOTAL RESOURCE PROVIDED</b>	<b>8.29</b>