



# London Borough of Bromley

## Food Safety Service Plan 2022-2023



This Food Safety Service Plan 2022-2023 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 the Food Standards Agency's (FSA) 'Framework Agreement on Official Feed and Food Controls issued by the Food Standards Agency (FSA) Local authorities | Food Standards Agency and in accordance with the FSA Local Authority Recovery Roadmap

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# 1. INTRODUCTION

- 1.1 This Food Safety Service Plan 2022-2023 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 the Food Standards Agency's (FSA) 'Framework Agreement on Official Feed and Food Controls issued by the Food Standards Agency (FSA) [Local authorities | Food Standards Agency](#) and in accordance with the FSA [Local Authority Recovery Roadmap](#)
- 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. The FSA have recently published a [5 year strategy and vision](#) which includes designing a more targeted and proportionate approach to local authority regulation of food businesses.
- 1.4 This service plan is subject to review 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 and states the objectives for the 2022-2023 period. It includes a performance review against the previous year's plan (2021-2022).

# 2. SERVICE AIMS & OBJECTIVES

- 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 2021.
- 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 Food Hygiene and Food Standards 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.
  - Carry out targeted and reactive environmental, microbiological and food standards 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 OBJECTIVES AND ENFORCEMENT POLICY

3.1 The service, and the manner in which it is delivered, contributes to the vision and ambitions set out in our [Making Bromley Even Better \(corporate strategy\)](#) aims to make Bromley a fantastic place to live and work, where everyone can lead a healthy, safe and independent lives. The five ambitions are:

- 1 For children and young people to grow up, thrive and have the best life chances in families who flourish and are happy to call Bromley home.
- 2 For adults and older people to enjoy fulfilled and successful lives in Bromley, ageing well, retaining independence and making choices.
- 3 For people to make their homes in Bromley and for business, enterprise and the third sector to prosper.
- 4 For residents to live responsibly and prosper in a safe, clean and green environment great for today and a sustainable future.
- 5 To manage our resources well, providing value for money, and efficient and effective services for Bromley's residents.

3.2 The work of the Team also contributes to the [Public Protection & Enforcement Portfolio Plan 2022](#) in particular to Outcomes 3 and 5:

“We will support and regulate businesses: We will follow the approach detailed in our enforcement policy with a risk-based, targeted, flexible, and proportionate approach to regulatory inspection and enforcement. There will be a graduated approach of advice, education, warning, and proportionate enforcement for all but the most serious of issues. This will ensure that our regulators are efficient, effective, and helpful, and avoid imposing unnecessary burdens on those businesses being brought into compliance.”

“We will provide value for money: We will focus on service outcomes, using rigorous financial evaluation, including metrics such as the social return on investment, to establish the full impact of a service programme and its value to the public. We will proactively and regularly review external sources of funding, income generation activities, fees and charges, benchmark against other local authorities, and ensure we are considering efficient operating models.”

3.3 In addition, the Public Protection Division has produced an [Enforcement Policy 2019](#) 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 it involves actions that encourage and compel compliance with a regulatory framework that covers various pieces of legislation.

## **4. PROFILE OF 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, increasing from 309,400 in 2011 according to the [2021 Census](#); data from the 2011 census reports 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 17,000 businesses in the borough, according to the London Councils [Borough Business Profiles 2019](#), 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, Orpington, Beckenham Beacon and Bethlem Royal NHS Hospitals are located within the borough, as is Biggin Hill airport.

## **5. STAFF RESOURCE**

5.1 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 UK Health Security Agency (UKHSA) acts as the Council's Food Examiner.

5.2 The food team at present is made up of:

- 1 x 1.0 FTE Food Team Manager
- 4 x 1.0 FTE Environmental Health Officers (one post is vacant)
- 1 x 0.83 FTE Environmental Health Officers
- 2 x 0.5 FTE Environmental Health Officers
- 1 x 0.54 Food Safety Officer

Total 7.37 FTE plus 0.75 Administrative Support. See Appendix A for staff structure.

Provision for specialist services is arranged through Kent Scientific Services and the UK Health Security Agency, Food Water Environment Microbiology laboratory.

## **6. SCOPE OF FOOD SERVICE**

6.1 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.

6.2 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.

## **7. SERVICE DEMAND**

7.1 In April 2022 there were 541 new food businesses registered and an additional 433 childminders added to the inspection programme, a total of 974, compared to 502 the previous year. There are various factors that contribute to this such as change of ownership and new High Street businesses opening and home-based business which opened during the Covid pandemic.

7.2 The addition of 433 unrated childminders is due to this category of business not being previously added to the inspection programme. This is because the process of registration introduced in conjunction with Ofsted and Early Years Teams resulted in these businesses not being registered with the local authority as intended. Now that the authority is aware of these childminders, the advice from the FSA is to include them in the inspection programme. Work is ongoing to assess the data provided by the Early Years Team and prioritise businesses according to the risk posed and activities undertaken.

**Table 1: Number of Registered Food Businesses 1<sup>st</sup> April 2022 compared with 1<sup>st</sup> April 2021**

	<b>No. of food businesses registered</b>	<b>No. of new food businesses registered</b>	<b>Number of unrated new food businesses</b>
<b>As of 1<sup>st</sup> April 2021</b>	2,487	502	190 Businesses
<b>As of 1<sup>st</sup> April 2022</b>	3,029	541 plus 433 childminders <b>Total 974</b>	387 Businesses plus 433 Childminders <b>Total 820</b>

- 7.3 The number of unrated new food businesses in Table 1 represents newly registered food businesses awaiting a first inspection.
- 7.4 The business types for food premises are varied and include non-EU country food importers, EU importers, manufacturers and processors, warehouses and distributors, supermarkets and other smaller food retailers and online businesses, hospitals, care-homes, schools, nurseries, restaurants, takeaways, home-based businesses, and primary producers.
- 7.5 The Food Hygiene Rating Scheme (FHRS) profile of the registered food businesses in Bromley comparing ratings of businesses at the end of 2020-21 and 2021-22 is shown in Table 2 below.

**Table 2: FHRS Profile for Bromley 1<sup>st</sup> April 2022 compared with 1<sup>st</sup> April 2021**

<b>Food Hygiene Rating</b>	<b>Descriptor</b>	<i>2020-21 Number of businesses</i>	<b>2021-22 Number of businesses</b>
0	Urgent improvement necessary	1	0
1	Major improvement necessary	18	28
2	Improvement necessary	21	24
3	Generally Satisfactory	262	231
4	Good	324	308
5	Very Good	1367	1496
<b>Total number of rated premises</b>		<b>1993</b>	<b>2088</b>

- 7.6 To reduce the burden on business and to increase efficiency, food standards 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 2019](#).
- 7.7 Ordinarily, new premises are to receive a food safety inspection within 28 days of registration to comply with the FLCoP. However, due to a 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 & 2 of the [Local Authority Recovery Roadmap](#). Newly registered business with a low food safety risk will be considered during Phase 2.



7.8 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 PERFORMANCE OUTCOMES 2021-2022

8.1 The Food team continues to recover from the impact of the covid-19 pandemic.

8.2 Throughout 2021-22 businesses started to re-open as part of the Government recovery roadmap, prompting a return to face to face inspections towards the end of Q2.

8.3 Table 3, compares the number of inspections and service requests for the last 3 years. Last year, April 2021 to March 2022, a total of 782 inspections were carried out within food businesses. This was 47% of the target (1,662) set in the previous year's Food Plan and the shortfall was largely due to staff absence and difficulties recruiting to vacant posts. From June 2021 to September 2021 three officers retired, one left for a new post. Recruitment to these vacancies was complimented by the recruitment of agency staff, however there were delays in engaging agency staff due to the shortage of qualified staff available across the UK. It has been recognised within the profession there is currently a shortage of qualified staff. The [Chartered Institute of Environmental Health Workforce Survey 2019](#) reported that 87% of local authorities were using agency staff because of delays in recruitment.

**Table 3. Comparison of number of inspections and service requests for the last 3 years**

	<b>Programmed Inspections completed</b>	<b>No of service requests</b>
<b>April 2019 – March 2020</b>	1,067	450
<b>April 2020 – March 2021</b>	231	411
<b>April 2021 – March 2022</b>	782	410

8.4 The focus moving forwards will remain on poorly performing, high-risk and non-compliant food businesses and newly registered high-risk businesses as set out by the FSAs recovery plan published in July 2021. In addition, we are also required to inspect and risk rate all other newly registered businesses in line with the Food Law Code of Practice.

## 9 FSA RECOVERY PLAN (RP)

9.1 The [Local Authority Recovery Roadmap](#) sets out the FSA's guidance and advice to local authorities for the period from 1 July 2021 to 31<sup>st</sup> March 2023. The Plan provides a framework for re-starting the delivery system in line with the Food Law Code of Practice (FLCoP) for new food establishments and for high-risk and/or non-compliant establishments while providing flexibility for lower risk establishments.



- 9.2 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.
- 9.3 Phase 2, 1<sup>st</sup> October 2021 to April 2023 and beyond, will continue until a new food Hygiene and Food Standards delivery model and a revised food hygiene intervention rating scheme are in place – implementation is due by March 2023.

## 10. INSPECTIONS DUE & OVERDUE 2022-23

- 10.1 As outlined in section 4, in addition to the inspections due in this reporting year (2022-23), there is a backlog of inspections, table 4 below details these.

**Table 4: Due and Overdue Inspections 1<sup>st</sup> April 2022 compared with 1<sup>st</sup> April 2021**

<b>Risk Category</b>	<i>Inspections Due 2021-22 Food Hygiene</i>	<b>Inspections Due 2022-23 Food Hygiene</b>
Category A	0	7
Category B	17	84
Category C	135	101
Category D	285	104
Category E	192	245
Unrated premises	494	387
Unrated childminders*	0	433
<b>Total</b>	<b>1123</b>	<b>1,361</b>
<b>Risk Category</b>	<i>Inspections Overdue 2021-22 Food Hygiene</i>	<b>Inspections Overdue 2022-23 Food Hygiene</b>
Category A	0	0
Category B	20	8
Category C	365	185
Category D	483	621
Category E	64	275
<b>Total</b>	<b>932</b>	<b>1089</b>
<b>Grand Total</b>	<b>2055</b>	<b>2,450</b>

\*7.2 above explains the addition of the unrated childminders to the inspection programme.

- 10.2 As of 1<sup>st</sup> April 2022 the total number of inspections (backlog and due) for food hygiene inspections is **2,450**. The FSA RP accepts that LA's do not have the resources to clear all

overdue inspections caused by the pandemic. The RP deadline to clear overdue inspections is 31<sup>st</sup> March 2023 and the service delivery plan below sets out the predictions of the outputs for this year.

## 11. Service Delivery 2022-23

- 11.1 The authority maintains an up-to-date list of food businesses operating throughout the borough due to the statutory requirement for all food businesses to be registered with the authority.
- 11.2 Table 5 below sets out the risk profile of all 3,029 registered food premises in the borough as of April 2022. Of these, there are 2,450 which require an inspection this year.

**Table 5: Food Hygiene Risk Profile by Risk Category with Inspection Intervals**

<b>FH Risk Category</b>	<b>Minimum Inspection Frequency</b>	<i>2021-22 Number of businesses</i>	<b>2022-23 Number of businesses</b>
A	6 Monthly	0	7
B	12 Monthly	36	87
C	18 Monthly	539	448
D	2 Yearly	876	964
E	3 Yearly or Alternative Enforcement Strategy	542	679
Outside the inspection programme	None	7	24
Unrated	Awaiting Inspection	494	387
Unrated childminders	Awaiting inspection	0	433
<b>Total</b>		<b>2487</b>	<b>3,029</b>

- 11.3 Table 6 below provides the total number of outstanding inspections for this year, together with the resources available to achieve it.

**Table 6: Food Hygiene (FH) Inspections Due and Resources 2022-23**

<b>FH Risk Category</b>	<b>No. of FH Inspections Due 2022-23</b>	<b>Resources</b>
Category A	7	5.37 FTE (not including Manager & current vacancy)
Category B	84	
Category C	101	
Category D	104	
Category E	245	
<b>Total</b>	<b>541</b>	

<b>Inspections Overdue on 1<sup>st</sup> April 2022</b>		One agency officer 1 <sup>st</sup> April 2022 to 30 <sup>th</sup> Sep 2022 with option to extend to 31 <sup>st</sup> March 2023 subject to budget plus an additional short term agency subject to recruitment. Agency funded from vacancy underspends
Category A	0	
Category B	8	
Category C	185	
Category D	621	
Category E	275	
<b>Total</b>	<b>1,089</b>	
Unrated businesses at 1 <sup>st</sup> April 2022	387	
Unrated childminders at 1 <sup>st</sup> April 2022	433	
<b>Total</b>	<b>820</b>	
<b>GRAND TOTAL</b>	<b>2,450</b>	

- 11.4 There are 541 Food Hygiene inspections *due* for 2022-23 and a target to complete these by 31<sup>st</sup> March 2023. There is also a target to complete all overdue category A and B and non-compliant 0-2 rated food businesses in line with the Recovery Plan. This will also include Category A premises for food standards.
- 11.5 We will also inspect all less than broadly compliant Category C and category D businesses as per the deadline dates set by the Recovery Plan. We will prioritise businesses which are the subject of food complaints for inspection.
- 11.6 We will also inspect all broadly compliant Category C and D premises in line with the plan. We will also triage and inspect all newly registered unrated high risk and low risk businesses in line with the FLCoP and RP. This will be dependent upon resources available.
- 11.5 With our current resources of 5.37 FTE and a contractor working for 6 months we predict that we will be able to complete 1,400 inspections. This is subject to successful recruitment and/or maintaining agency staff with under spends from the vacant post.
- 11.6 This leaves an overall shortfall for the outstanding and due and unrated of 1,050. If we keep the current contractor on to the end of 31<sup>st</sup> March 2023, we predict an additional 300 visits will be completed. This leaves an expected shortfall on 31<sup>st</sup> March 2023 of 750. This has been communicated with the FSA.

## 12. ENFORCEMENT

- 12.1 Food safety enforcement will continue to be undertaken in a graduated manner, and in accordance with the [Enforcement Policy 2019](#) 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.

## **13. FOOD COMPLAINTS**

- 13.1 Additional inspections may be required following a food or food hygiene complaint. The speed of response and level of investigation will depend on the severity of the complaint. This will be decided in accordance with our internal procedures. Urgent complaints will be responded to within 24 hours and non-urgent ones within 5 working days.

## **14. ADVICE TO BUSINESSES**

- 14.1 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. There is also an extensive food safety resource available for businesses on the food safety pages on the council's website.
- 14.2 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.
- 14.3 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.

## **15. FOOD SAMPLING**

- 15.1 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 regional sampling programmes for both analysis and examination.

## **16. INFECTIOUS DISEASE CONTROL**

- 16.1 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 London Health Protection Team (SLHPT) / UK Health Security Agency (UKHSA), who provide infection control advice along with statistical analysis.
- 16.2 Infectious disease investigations are made in accordance with the SLHPT Infectious Disease Protocol. Priority will be given to those cases involving persons cases of high and medium risk diseases and those who work in the food industry or have contact with vulnerable groups. The Council will continue to work in partnership with SLHPT/UKHSA to prevent and control

cases and investigate wider outbreaks of food related disease that fall outside the scope of the single case plan.

- 16.3 In 2021-22, 309 infectious disease notifications were received by the Council, which was a 34% increase on the previous year (229).

## **17. Food Safety Incidents & Alerts**

- 17.1 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.
- 17.2 Responses to Food Incidents and Alerts are determined by the Food Safety Team Manager in consultation as necessary, with the Food Standards Agency, UKHSA and Trading Standards etc.
- 17.3 Resource implication is unknown as it depends on the number and nature of the alert. In 2020-21 there were 6 alerts which required action.

## **18. WORKING IN PARTNERHSIP**

- 18.1 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.
- 18.2 The Team is a member of the Southeast London Food Liaison Group, Environmental Health Working Group, the Public Health Group and the 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, other Environmental Health Departments and professional organisations such as The Association of London Environmental Health Managers (ALEHM).

## **19. FINANCIAL RESOURCES**

- 19.1 The Net Controllable budget of £132,100 is made up of the following: Staffing budgets of £448,240, Overhead budgets of £24,930 and the Recharge to Public Health CR £341,070.
- 19.2 The overall cost of the Food Team for 2021/22 was £77,326, made up as follows: Staffing costs of £413,316, overhead costs of £22,704, Income and Government Grants CR £17,624 and the Recharge to Public Health of CR £341,070.

## **20. STAFF DEVELOPMENT**

20.1 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 formal in-person and on line training, group and individual peer to peer mentoring and shadowing and coaching from senior colleagues and managers.

## 21. QUALITY ASSESSMENT

21.1 The Food Law Code of Practice (FLCoP) requires the Food team to have internal monitoring systems. The team has reviewed the documented internal monitoring procedures and subscribes to online resources to ensure that it covers the full range of food law enforcement activities.

## 22. REVIEW

22.1 The Food Safety plan is reviewed annually, and performance reported to the FSA. Food safety actions (inspections and complaints) are reported to departmental management board monthly.

### Team Structure Food Safety

