

Food Safety Operating Plan 2017 / 2018

Regulatory Services

Business Support Team

Portsmouth City Council



Contents

1. Introduction
 2. Aims and Objectives of the Food Safety Service
 3. Background
 4. Service delivery
 5. Resources
 6. Quality assessment
 7. Key performance areas 2017 / 2018
 8. Key achievements in 2016 / 2017
 9. Review
- Appendix A - Service performance and trends analysis

1. Introduction

- 1.1 This Operating Plan has been produced in accordance with the Food Standards Agency (FSA) 'Framework Agreement on Official Feed and Food Controls by Local Authorities'.
- 1.2 The purpose of the Plan is to demonstrate that Portsmouth City Council (PCC), in its role as the designated 'Competent Authority', has in place adequate and effective arrangements to meet its statutory obligations in respect of food safety.
- 1.3 The Plan is subject to elected member approval to ensure local transparency and accountability. When approved, it is published on the Council's website.
- 1.4 Delivery of the Plan is the responsibility of Regulatory Services which currently forms part of the Culture and City Development Directorate.
- 1.5 The Plan covers the following:
 - A profile of Portsmouth and the organisational structure and business priorities relating to PCC and Environmental Health
 - The scope of the Food Safety Service and demands made on it
 - The delivery of the service in terms of food premises inspections and the sampling of food
 - Operational protocols to ensure compliance with legislative requirements and consistency of approach
 - A review of performance in 2016/17 and a summary of key activities identified for 2017/18
- 1.6 There is a lot of legislation which regulates foodstuffs, and a lot of guidance and codes of practice produced by Government and Industry. Enforcement of regulations on food standards, safety and hygiene is primarily the responsibility of Regulatory Services, but the making of legislation in the UK is the function of central government and Europe.
- 1.7 Legislation covers all parts of the food production and distribution chain, including:
 - production
 - processing
 - packaging and labelling
 - importing
 - distribution
 - retailing and
 - catering

2. Aims, Objectives and Auditing of the Food Safety Service

- 2.1 The Food Safety Service is delivered in accordance with the Food Law Code of Practice (FLCoP), the latest version came into force in March 2017. The Code is issued by the FSA and governs the manner in which a Competent Authority enforces relevant food safety legislation and delivers 'official controls' to secure food law compliance. The Code is issued under the Food Safety Act 1990 and has statutory force. Competent Authorities that do not have regard to its provisions could find their decisions or actions successfully challenged, and evidence gathered during a criminal investigation could be ruled inadmissible by a court.
- 2.2 The key objectives for the Food Safety Service are to:
- Ensure by education and enforcement that food intended for human consumption which is produced and/or sold in Portsmouth is safe to eat and complies with food safety requirements
 - Deliver a programme of inspections and interventions in relation to 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
 - 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
 - Deliver Port Health Authority functions, including those relating to food imports or exports
 - Maintain and improve dialogue with stakeholders and customers to improve the manner in which the service is delivered to them
- 2.3 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, a document which sets out the minimum standards of performance required from Local Authorities across the full range of their feed and food law enforcement activities. During the last audit of services in 2013, the Council was deemed to meet the basic standards in this agreement.
- 2.4 The service, and the manner in which it is delivered, contributes to three key priorities as set out in the Council's Corporate Plan, which was updated in March 2017.

1. Encourage regeneration and investment
2. Empower residents to be healthy and independent
3. Provide excellent customer service

3. Background

3.1 Profile of the Food Industry in Portsmouth

- 3.1.1 PCC is a Unitary Authority with a total area of 40 square kilometres and a population of approximately 207,000. It is a dense, highly urbanised city with approximately 6,800 business premises of which around 2,000 are food businesses.
- 3.1.2 The food industry in Portsmouth contributes significantly to the local economy. There are several concentrations of food businesses in the City (mainly food retail, caterers and takeaways), including Gunwharf Quays, Port Solent, Palmerston Road, Albert Road, Osborne Road, Kingston Road, Fratton Road and High Street, Cosham.
- 3.1.3 There are also several businesses which handle high risk foods such as meat and shellfish which are distributed nationally and internationally and are required by food law to be approved by the Council. These premises require an enhanced level of supervision and inspection by Council officers.
- 3.1.4 The Portsmouth International Port serves freight and ferry routes to France, Spain and the Channel Islands and, as a 'Designated Point of Entry', receives food imports from the European Union (EU) and countries such as the Dominican Republic, Costa Rica, Morocco, Trinidad & Tobago, Granada and Jamaica. No products of animal origin are received at the Port. The number of cruise vessels which visit Portsmouth in the summer months continues to increase and approximately 30 are due here in 2017 / 2018.
- 3.1.5 PCC also has responsibility for monitoring live bivalve mollusc shellfish beds in Portsmouth and Langstone harbours for microbiological and bio-toxin contamination.

3.2 Organisational Structure

- 3.2.1 The political structure of the Council is based on an executive Cabinet, comprising the Council Leader, Deputy and Portfolio Holders. The Portfolio Holder for Environmental Health is the Cabinet Member for Environment and Community Safety.

- 3.2.2 There are two standing and other ad hoc overview and scrutiny committees (known as Policy and Review Panels) who support the work of the Council members and provide some oversight of the decisions made by the Executive.
- 3.2.3 The food safety function was reviewed in 2016 / 2017 as part of a wider review of environmental health and trading standards services which were combined into a new Regulatory Services Team. The Regulatory Services Manager has responsibility for operational matters supported by a Team Leader and a Food Lead officer whose role has been extended to ensure the service is delivered in full compliance of the FLCoP. The food safety function is delivered by a team of field-based environmental health practitioners.
- 3.2.4 There is additional support to the service from several partners including:
- Public Health England (PHE) which examines food samples for bacterial and viral contamination at its accredited laboratory in Colindale
 - Hampshire Scientific Services which is an accredited food examiner for food standards matters including labelling and compositional issues
 - A Consultant in Communicable Disease Control at PHE who is appointed as the 'Proper Officer' under the Public Health (Control of Disease) Act 1984 and Health Protection Regulations 2011, with regard to food poisoning and food borne infectious disease incidents

3.3 Scope of the Food Safety Service

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

- 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
- Providing Health Certificates for food to be exported and, where appropriate, certificates confirming imported fruit is of organic origin
- Issuing specific approvals to high risk food businesses subject to that requirement.
- Issuing Ship Sanitation Certificates
- Sampling potable water supplies on ships

3.4 Demands on the Service

- 3.4.1 Regulatory Services is based at the Civic Offices, Guildhall Square, Portsmouth and has an office base in the Port. The public has access to the service by direct contact through City Helpdesk, by e-mail and, for certain functions, through the Council's website.
- 3.4.2 Inspections of food businesses are normally undertaken when they are trading to ensure food handling practices can be assessed. The inspection of vessels is undertaken on a flexible basis and is governed by advance notification of vessel movements in and out of the Port. Inspection activity for premises and vessels is therefore frequently undertaken outside normal office hours.
- 3.4.3 There is no routine out of hours or emergency service for food safety matters; service requests are triaged each working day and prioritised for action on the basis of public health risk.
- 3.4.4 Demands on the service continue to increase, reflected by a 23.7% rise in food-related service requests from members of the public since 2014 / 2015 and the focus on poorly performing high risk businesses which has led to a significantly increased level of enforcement activity in the last 3 years. It is anticipated that the introduction of mandatory display of Food Hygiene Ratings and ongoing shellfish sampling responsibilities will place further demands on the service in 2017/18.
- 3.4.5 Portsmouth has a significant number of food business owners whose first language is not English. The service aims to provide access to appropriate verbal and written advice in the appropriate language. Translation and interpretation services have been used to aid understanding in cases with significant communication difficulties.
- 3.4.6 The profile of the registered food businesses in Portsmouth by category, as of **April 2017**, is shown in **table 1**.

Table 1

Category	Total premises
Importer/Exporter	1
Manufacturer or Packer	13
Distributor/Transporter	20
Retailer - Other	23
Supermarket/Hypermarket	33
Hotel/Guest House	41
School/College	66
Mobile Food Unit	47
Pub/Club	186
Caring Premises	221
Take-away	212
Small Retailer	313
Restaurants and Caterers - Other	294
Restaurant/Cafe/Canteen	374

Total number of registered food businesses in Portsmouth = 1844

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

The risk profile of food businesses in Portsmouth, as of April 2017, is provided in **table 2**.

Table 2

Rating category	Intervention risk rating	Minimum inspection frequency	Number
A	92 or higher	6 monthly	2
B	72-91	12 monthly	61
C	52-71	18 monthly	386
D	31-51	2 yearly	633
E	0-30	3 yearly or Alternative Enforcement Strategy	762

3.4.8 E-rated low or minimal risk food businesses are dealt with through an Alternative Enforcement Strategy (self-assessment or inspection on an alternate cycle). Follow-

up inspections following self-assessment will be carried out if deemed necessary i.e. the risk profile of the business has increased since the last assessment.

- 3.4.9 After each inspection a food business is rated under the national Food Hygiene Rating Scheme (FHRS) which 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'). It is PCC policy that proportionate action will be taken against any business with a rating below 3 ('generally satisfactory') to ensure it improves its compliance with food law.
- 3.4.10 The current FHRS profile of the registered food businesses in Portsmouth as of April 2017 is shown in **Appendix A (Graph 5)**. Currently 56% of food businesses are 'very good'; 82% are broadly compliant. Changes to the business FHRS profile in the last seven years are also shown in **Graph 5**.

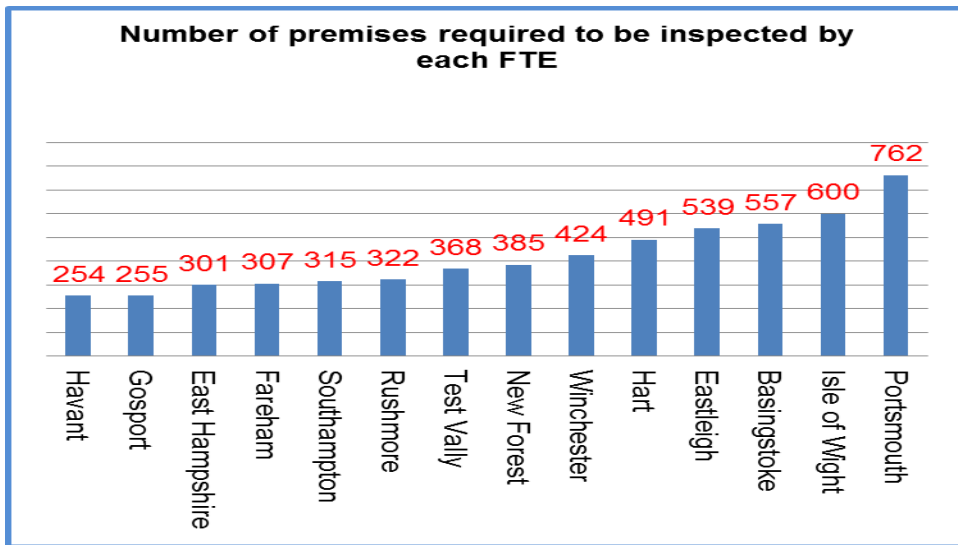
3.5 Enforcement Policy

- 3.5.1 Food safety enforcement is undertaken in a graduated manner and in accordance with the Council's Corporate Enforcement Policy and FSA guidance. Informal action, advice and persuasion are the usual methods of achieving compliance but other enforcement measures are taken if the circumstances demand this. Any enforcement action likely to lead to court proceedings is subject to a formal process and scrutiny by senior officers.

3.6 Benchmarking data from other Hampshire Local Authorities

- 3.6.1 In 2017, service profile information for the fourteen local authorities in Hampshire was collated by the Hampshire Food Advisory Committee. The data was based on LAEMS (Local Authority Enforcement Monitoring System) for 2015/16 and compared to national data supplied by the FSA in its annual report of UK local authority food law enforcement for the same period.
- 3.6.2 As demonstrated below in **figure 1**, based on the figures provided by the local authorities at that time, Portsmouth is now the lowest resourced authority in terms of FTE assigned to the FBO intervention program.

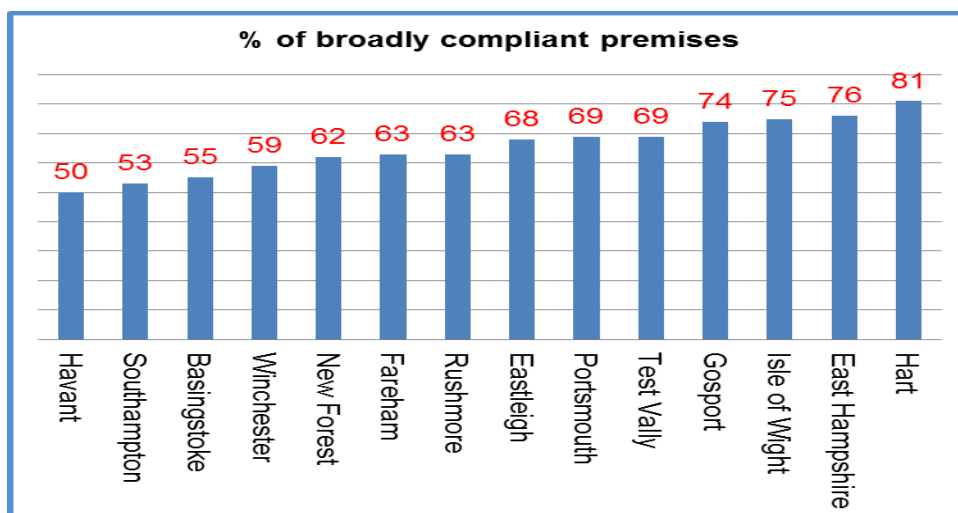
Figure 1



3.6.3 A consequence of the level of resource assigned to the food safety intervention program is that our ability to inspect premises in accordance with the FLCofP has been compromised. Behind Southampton, our inspection rate was, at the time the data was compiled, the second worst in the region at 67.3% and significantly below the UK average of 86.7%. It is worth highlighting however that the service recognised the falling level of inspections and subsequently employed a contractor to assist with the inspection programme. At the latter end of 2016 / 2017 the rate of inspection had slightly recovered to 80%.

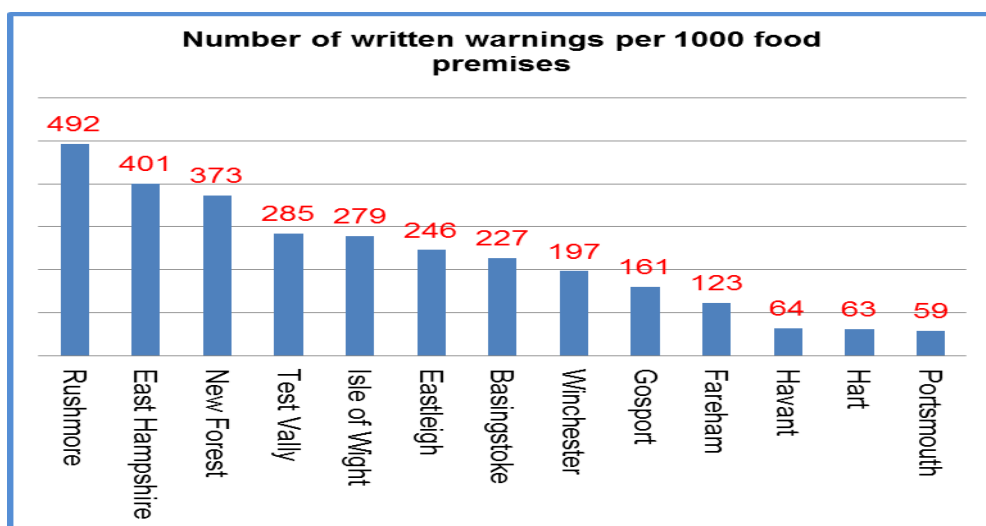
3.6.4 **Figure 2** highlights the number of broadly compliant premises within each authority i.e. those premises rated 3, 4 or 5. The performance of Portsmouth's food offer compares well with most other authorities and significantly better than our nearest neighbour Havant.

Figure 2



3.6.5 In terms of informal written warnings, which could be representative of the simplest level of enforcement action implemented by local authorities, as demonstrated below in **figure 3**, Portsmouth's officers exhibit the lowest level of business intrusion at 59 per 1000 premises. The national average is 265 written warnings per 1000 premises.

Figure 3



4. Service Delivery

4.1 Food premises inspections

4.1.1 Food safety inspections and interventions are carried out in accordance with the FLCoP and the relevant Food Safety Inspection Standard Operating Procedures and undertaken in accordance with frequencies described in para 3.4.7.

4.1.2 The number of programmed Food Safety inspections and Alternative Enforcement Strategy (AES) interventions undertaken in 2016 / 2017 were:

- **A – C category (high risk) = 304**
- **D category (low risk) = 326**
- **E category (lowest risk mainly AES) = 164**

4.1.3 Trends in inspections undertaken since 2013 / 2014 are shown in **Appendix A (Figure 2)**.

4.1.4 Inspection activity proposed for 2017/18 is shown in section 8. Additional food premises visits will be undertaken as a result of complaints, enforcement action, investigations and business requests for advice. In 2016 / 2017, 745 inspections were carried out together with 207 additional investigatory actions following 282

complaints. This activity, if continued at similar levels in 2017 / 2018, will significantly impact on the rate at which programmed inspections can be delivered.

4.2 Food complaints

4.2.1 Service requests are dealt with under the Standard Operational Procedure for complaints concerning either food items or food premises.

4.2.2 In 2016 / 2017, 282 complaints about food items and food premises were received. These complaint levels are likely to be similar in 2017 / 2018 although an accurate forecast is difficult to make.

4.3 Primary Authority Partnerships

4.3.1 PCC supports the operation of the Primary Authority Scheme and within Regulatory Services is seeking to establish new partnerships across a range of food safety and trading standards regulatory areas and also improve the way it works with its existing partners.

4.3.2 In 2011 / 2012, Environmental Health entered into Primary Authority Partnerships with the Southern Co-operative and the Royal Navy covering the regulatory area of food safety. These will continue into 2017 / 2018.

4.4 Advice to Businesses

4.4.1 A significant element of PCC's regulatory strategy is the offering of advice to businesses to assist them in achieving a satisfactory standard of food safety and compliance with the law.

4.4.2 Examples of business support undertaken include:

- Carrying out assessments and publishing National Food Hygiene Rating Scheme scores
- Leaving a written report after each inspection giving advice about how a proprietor might improve the Rating score
- Promoting the Food Standards Agency 'Safer Food Better Business' pack to improve food safety management and diligence documentation
- Giving new businesses "start-up" advice prior to their first inspection
- Advising business proprietors during inspections and other visits
- Providing advice in leaflets or on the Council's website
- Responding to individual queries
- Giving advice to organisers planning high profile events in the city likely to be attended by large numbers of people
- Signposting to translated literature and interpreting services, when proprietors, managers or staff do not have English as their first language

- Offering Level 2 Chartered Institute of Environmental Health Food Safety training courses (through the Independence and Wellbeing Team)

4.5 Food Sampling

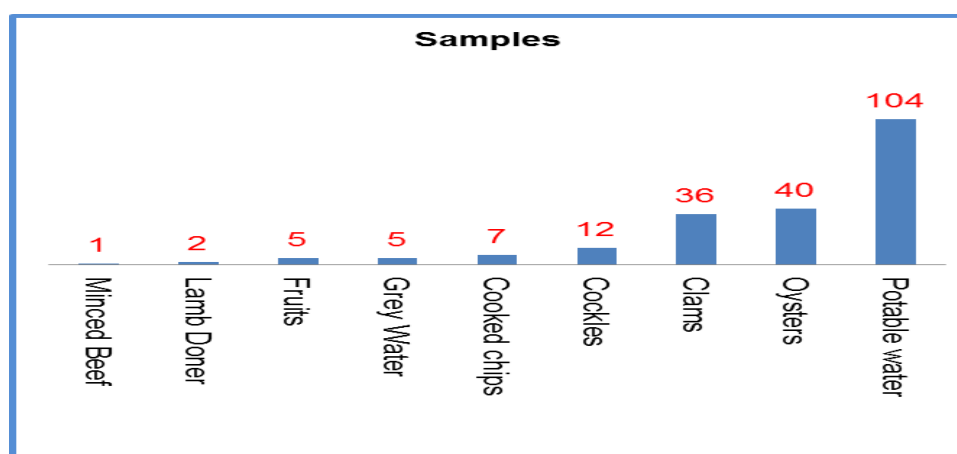
4.5.1 Formal and informal food sampling provides useful information about composition and the microbiological fitness of food for sale. PCC participates in the regional food sampling programme (Wessex Environmental Monitoring Service User Group) which targets particular foods according to FSA guidance or other local priorities.

4.5.2 In the Port, sampling priorities will be risk products featured on Annex 1 of EC Regulation 669/2009, any product notified on the FSA Early Warning System and routine monitoring based on any intelligence received via the EU's 'Trade Control and Expert System' (TRACES). It is anticipated that in the region of 24 samples will be taken in the Port during this financial year.

4.5.3 As the Port Health Authority, PCC has responsibility for monitoring the classification and bacteriological quality of the shellfish beds in Portsmouth and Langstone Harbours and also the bio-toxin levels in marine waters. Although the ongoing costs of bio-toxin analysis are met by the FSA, the sampling of shellfish and associated analytical costs are delivered within the service budget. It is anticipated that the level of sampling required to maintain the classification of our bivalve mollusc production areas will remain high in 2017 / 2018 - consequently drawing significant levels of resource from other service delivery areas.

4.5.4 In 2016/17 a total of 219 samples were taken. A breakdown of the sampling initiated is shown in **figure 4**.

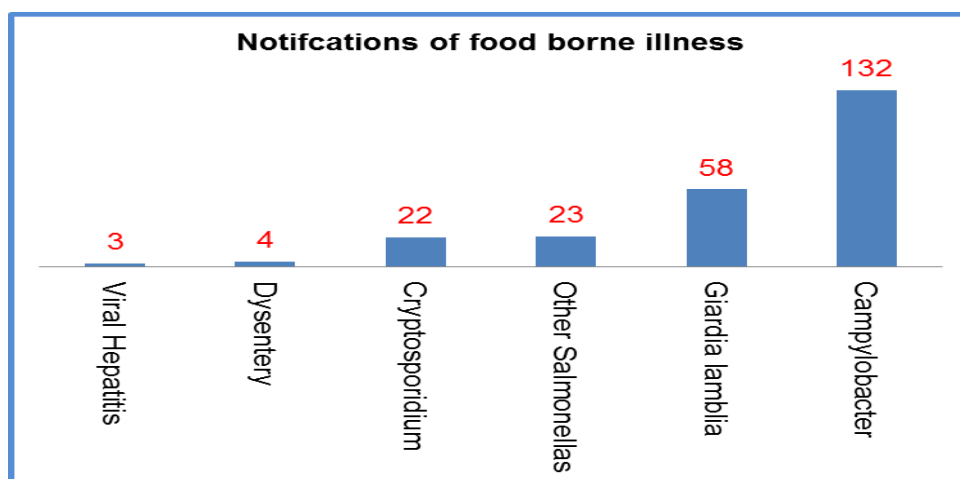
Figure 4



4.6 Control and Investigation of Food Related Cases and Outbreaks

- 4.6.1 The number of official notifications of individual suspected or confirmed cases of food borne illness in 2016 / 2017 was 244. 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.
- 4.6.2 Infectious disease investigations are made in accordance with a Single Case Plan which was updated by PHE in November 2016. This plan is made under the Local Agreement between Local Authority Environmental Health services of Hampshire and the Isle of Wight and the South East Centre Health Protection Unit (HIOW Office). It represents agreement between environmental health teams in Hampshire and PHE for the investigation of single cases of infectious diseases, many of which are food-borne. Priority is given to cases involving persons who work in the food industry or have contact with vulnerable groups.
- 4.6.3 The Council also works 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.
- 4.6.4 A breakdown of cases notified to the BST in 2016 / 2017 is shown in **figure 5**.

Figure 5



4.7 Food Safety Incidents and Alerts

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

- 4.7.2 Responses to Food Incidents and Alerts are determined by the Regulatory Services Manager and Food Lead Officer in consultation as necessary with the Food Standards Agency, Public Health England, and Trading Standards etc.
- 4.7.3 In 2016 / 2017, 65 food hazard warnings were received from the FSA. This represents a 53% decrease on the previous year. Although very few required 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. It is difficult to predict the number of warnings likely to be received in 2017 / 2018 and the effect this might have on the programmed work the team undertakes.
- 4.7.4 In the Port, proactive examination of any risk products featured on Annex 1 of EC Regulation 669/2009 will continue (see para 4.5.2). This 'risk list' is updated on a quarterly basis.

4.8 Food Standards interventions

- 4.8.1 Food standards interventions are carried out as necessary by staff that are trained and competent in food law and food science or by staff supervised by such specialist staff. All Feed and Standards complaints received by the BST are assessed and either assigned to an appropriate officer for appropriate action or recorded for intelligence purposes.
- 4.8.2 The main standards issues reported during 2016 / 2017 are as follows:

- Allergens
- Nutrition and health claims
- Food labelling
- Substitution

4.9 Liaison with Other Organisations

- 4.9.1 The Service is committed to formal inter-agency liaison relationships as set out in the FLCoP. Additional communication takes place at officer level during the process of investigating offences, sharing information and exchange of intelligence.
- 4.9.2 The Hampshire and IOW local authorities have established a Food Advisory Committee to collaborate on food safety issues, produce common policies and procedures and promote consistency in food safety regulation. Portsmouth's Food Lead officer regularly attends the meetings of this group. A regional Trading Standards forum, which specifically covers food standards issues, is also attended.
- 4.9.3 Officers from the service also attend similar county-wide forums covering health and safety at work and infectious disease control which meet four times a year.

- 4.9.4 Officers routinely liaise with Building Control, Planning and Licensing staff, particularly when new businesses are being established. In 2016 / 2017 there was a significant increase in liaison with PCC's Private Sector Housing Team and Hampshire Fire and Rescue Service to deal with fire risks in mixed use premises that impacted significantly on the safety of food businesses and their resident food handlers.
- 4.9.5 The service continues to liaise with Southern Water to explore additional measures that might be taken to prevent or reduce the frequency of sewage discharges into the harbours and also to assess the impact that these discharges are having upon the quality of the shellfish production areas. Officers also undertake joint premises inspections with enforcement staff from Southern Water to reduce the amount of fat being discharged into shared sewers by commercial food businesses.
- 4.9.6 Meetings of voluntary organisations, such as the Portsmouth Chinese Association, have been attended with translation support, to improve the food safety message to food business operators whose first language is not English.
- 4.9.7 The service uses media such as The Portsmouth News and its web pages to deliver food safety messages and promote successful enforcement action taken in the courts.

4.10 Promoting Food Safety

- 4.10.1 Food Safety training, mainly CIEH Level 2 courses, is offered by the Council (through the Independence and Wellbeing Team).
- 4.10.2 Promotional work to be undertaken during 2017 / 2018 includes:
- Continued promotion of the National Food Hygiene Rating Scheme to encourage businesses to improve and to inform consumers of standards being achieved
 - Provision of advice and support to business with a poor track record of food hygiene compliance
 - Improvement of communication and dialogue with local businesses and consumers to improve food safety standards

5. Resources

5.1 Financial Allocation

- 5.1.1 The budget allocated for the BST in 2017/ 2018 is £288,500. A comparison with 2016 / 2017 is shown in **table 3**.

Table 3

Account Description	Service Budget 2016 / 2017	Service Budget 2017/ 2018	% Change
Employees	253,620	261,800	3%
Net Expenditure	279,670	288,500	3%

5.2 Staffing Resources

- 5.2.1 Food safety inspections are carried out by appropriately qualified and authorised environmental health practitioners. The officers deliver a single 'environmental health service' to a diverse customer base which, in addition to food safety, covers health and safety in the workplace, infectious disease control, animal health and port health. As a consequence, the maximum resource that is available to deal with food safety is approximately 2.5 FTE officers.
- 5.2.2 In 2016 / 2017 a contractor has been used to inspect / assess category E premises (lowest risk) to determine whether revision to their risk rating is appropriate and whether further action is necessary to improve compliance with food safety standards.

5.3 Staff Development Plan

- 5.3.1 All members of staff have the opportunity to have 1 to 1 meetings as necessary with the Regulatory Services Manager or Environmental Health Team Leader to consider and address personal development issues.
- 5.3.2 In 2016 / 2017 competency assessments were completed for all officers undertaking food law enforcement duties which have formed the basis for future training and staff development activity.
- 5.3.3 A minimum of 20 hours CPD training each year on food safety related topics is required by the FLCoP and this is achieved by the following:
- Structured in-house training for all food safety officers in bi-monthly meetings
 - Online training in relevant issues provided by an FSA-approved training provider
 - Cascade training sessions to pass on information or updates on specific issues or material considered by advisory committees (section 4.8)
 - Regular updates through staff briefings and circulation of relevant information and technical material
- 5.3.4 The service uses a range of training material provided by a range of organisations including the Chartered Institute of Environmental Health, FSA, PHE, Trading

Standards South East Limited and also external providers in areas of specialist expertise.

6. Quality assessment

- 6.1 Officers authorised under food safety legislation are provided with Standard Operating Procedures describing how inspections are carried out, how complaints are investigated and how legal powers are enforced. This ensures that the service complies with the service standard set out in the FSA Framework Document.
- 6.2 The service was subject to a full FSA audit in 2013. The subsequent service improvement plan was actioned in 2014, which included the review of all Operating Procedures and quality measures. The plan was signed off by the Agency in 2014. The reviews will continue into 2017 / 2018 to drive service improvements despite restrictions on available resources.
- 6.3 Activities which are used to monitor and maintain service quality include:
- Monthly team meetings with six each year being reserved for training
 - Random accompanied inspections of officers by Food Lead officer to ensure risk rating is consistently applied
 - Review of any FHR inspection by Food Lead officer resulting in a rating of 0,1 or 2
 - Peer review of all statutory notices before service
 - Random post inspection checks, of records and enforcement decisions made by team members, by the Food Lead officer
 - Peer-reviewed benchmarking activities co-ordinated by Hants and IOW Food Advisory Committee
 - Examination of any customer complaints made through the corporate procedure - 0 complaints about the food safety service were made in 2016/17
 - Appeals against enforcement notices - 0 appeals were made against the 17 Hygiene Improvement Notices served between April 2016 and March 2017
 - Appeals against Food Hygiene Ratings - only 1 appeal was made against the 745 ratings issued between April 2016 and March 2017

7. Key Performance Areas 2017/18

- 7.1 Key activities for 2017/18 are to
- 7.1.1 Continue to target inspection resources to the highest risk premises.
- 7.1.2 Continue to take appropriate action against poorly performing businesses (FH rated 0, 1 or 2) including proportionate enforcement measures in line with EH and corporate enforcement policies.

- 7.1.3 Continue to manage the planned inspection programme to achieve a 100% inspection rate for high risk Category A to C premises.
- 7.1.4 Ensure that 95% of newly registered businesses are inspected within 28 days of first registration.
- 7.1.5 Ensure that requests for service are subject to an initial response within 3 working days or sooner depending on the seriousness of the issue.
- 7.1.6 Ensure that all applications for premises approval under EC 853/2004 are determined within 28 days of receipt.
- 7.1.7 Continue to inspect Category D premises (lower risk) at a rate determined by available resource levels.
- 7.1.8 Continue to subject Category E premises (lowest risk) to an alternative enforcement strategy in lieu of inspections (which may include telephone surveys and questionnaires) to determine current activity and whether a PCC intervention is required.
- 7.1.9 Increase awareness of FHR in business rated 0,1 or 2 with a view to improving future compliance with food safety standards.
- 7.1.10 Evaluate the impact of FSA proposals to introduce mandatory FHR display and charging for revisit requests.
- 7.1.11 Review and update all food service policies and procedures to reflect changes in legislation, FLCoP and FLPG since the FSA service audit in 2013 to ensure they remain fit for purpose.
- 7.1.12 Identify additional means to promote food safety standards and requirements to local businesses to improve compliance in key areas.
- 7.1.13 Continue to participate in the Hants and IOW Food Advisory Group work programmes and meetings.
- 7.1.14 Continue to participate in local, regional and national food sampling surveys concerning microbiological quality and food standards matters.
- 7.1.15 Ensure that staff receive appropriate and sufficient up to date training to meet the 20 hour CPD and competency requirements as defined in the FLCoP. Priority will be given to that CPD necessary to deliver the service priorities, to meet statutory and procedural requirements, and any training needs of new members of the team.

- 7.1.16 Carry out internal peer reviews to promote consistency in approach towards inspection, risk rating and enforcement of food law.
- 7.1.17 Track and consider the impact of proposals to change food law delivery currently under review by the FSA in its 'Regulating Our Future' strategy.
- 7.1.18 Engage with the organisers of key outdoor events to ensure that food businesses that come to the City meet the necessary hygiene standards when trading.
- 7.1.19 Continue to engage with organisations supporting minority ethnic groups to support food business operators whose first language is not English.
- 7.1.20 Continue the shellfish sampling programme in consultation with CEFAS/FSA with ongoing review of bed classifications in Portsmouth and Langstone harbours.
- 7.1.21 Deliver the new iDOX database to ensure food interventions are accurately recorded and statutory returns are not compromised.

8 Key Achievements in 2016 / 2017

8.1 Key achievements include:

- 8.1.1 831 interventions were carried out to improve business compliance with food safety law, 80% of which were within the timescales prescribed by the FLCoP. This was achieved despite available inspection resources falling from 3.35 FTE officers in 2012 / 2013 to 2.5 FTE officers in 2016 / 2017. Priority was given to the highest risk premises (A, B and non-compliant Cs).
- 8.1.2 Due interventions outstanding (as assessed under FLCoP) at the year-end are down to 208 (the lowest level for 4 years).
- 8.1.3 69% of all registered food businesses are now FH rated 5, an increase of 8% from 2015 / 2016.
- 8.1.4 Significant enforcement action has been taken against poorly performing businesses:
 - 15 Hygiene Improvement Notices
 - 1 Hygiene Emergency Prohibition Notice
 - 6 premises closures
 - 10 prosecutions for food safety and standards offences.
- 8.1.5 A competency matrix has been completed for each officer with an updated programme to support continuing professional development in relevant areas.

9. Review

- 9.1 The process of review of the Plan as a whole will be undertaken in March each 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

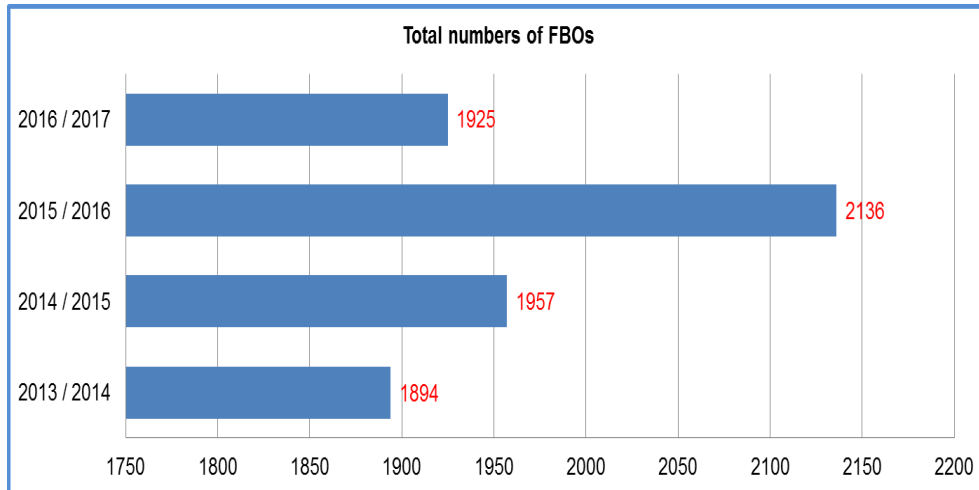
The review of this document will then inform the development of the Food Safety Plan for 2018/19 which will be scheduled for member consideration in June 2018.

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

Appendix 1 Service performance and trends analysis

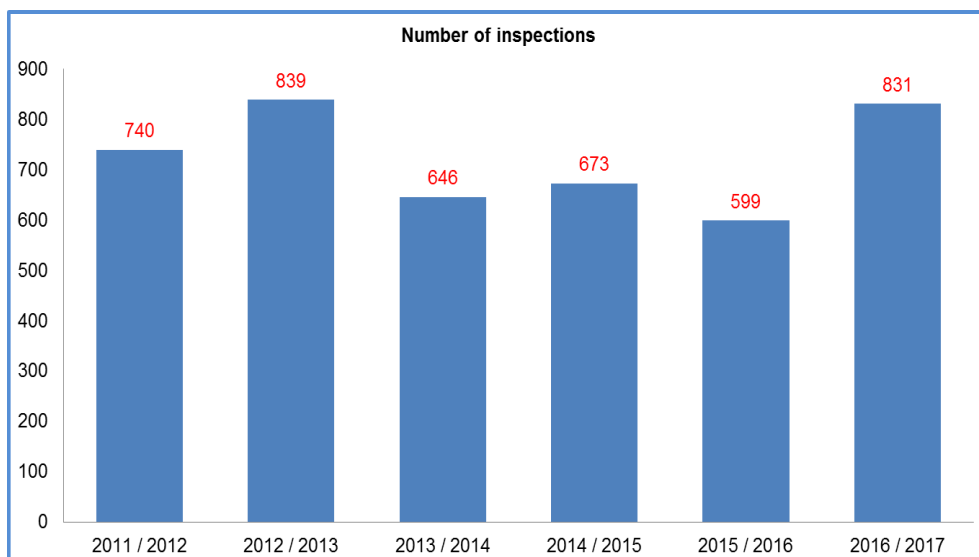
- 1.1 The number of FBOs registered with the BST since 2012 / 2013 is illustrated in **figure 1**.

Figure 1



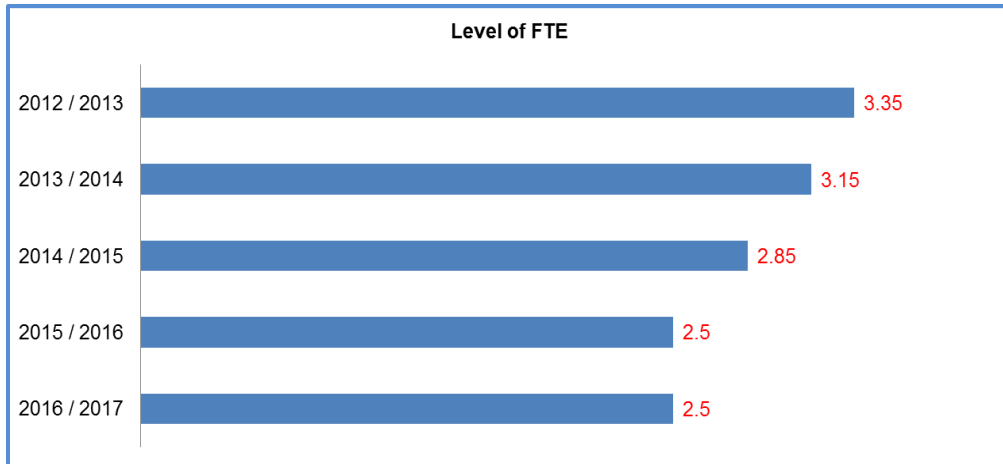
- 1.2 The total number of inspections carried out in the last six years is shown in **figure 2**. The numbers of inspections carried out in 2016 / 2017 was the second highest over this period being 38.73% higher than delivered in 2015 / 2016.

Figure 2



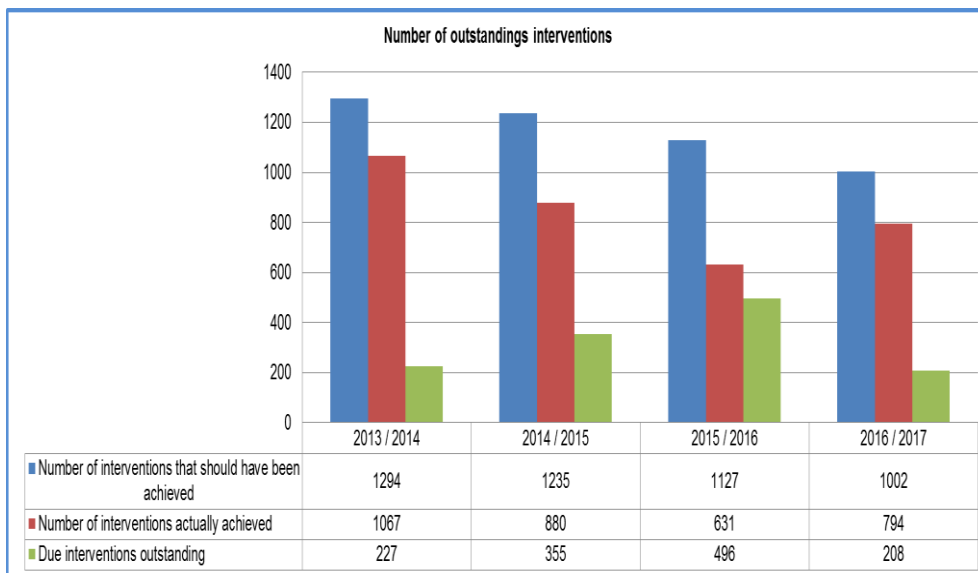
- 1.3 The levels of staff resource available to inspect food businesses since 2012 / 2013 are demonstrated in **figure 3**. The reduction equates to a 25% decrease in staff in this area over this period.

Figure 3



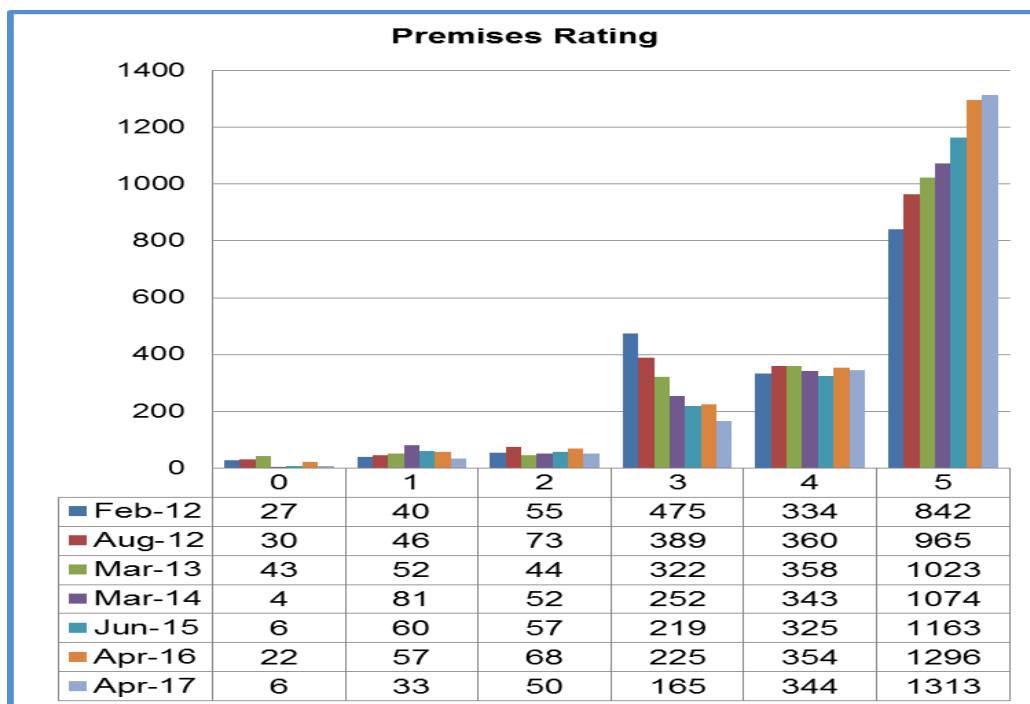
1.4 Intervention performance is shown within **figure 4**. In 2014 / 2015, 880 interventions, which equates to 71%, were delivered on time. This was a reduction of 11% on the 2013 / 2014 figure. In 2015 / 2016 this had fallen to 44% of inspections being delivered within the specified criteria set out within the FLCofP. This equates to a reduction of 27% in intervention performance since 2013 / 2014. In 2016 / 2017 794 of 1002 inspection were delivered on time which equates to nearly 80% of all inspection being delivered on time and a 9% improvement on the previous best year in 2014 / 2015.

Figure 4



1.5 The numbers of premises rated '0', '1', '2', '3', '4', or '5' as of February and August 2012, March 2013, March 2014, June 2015, April 2016 and April 2017 are illustrated in **figure 5**.

Figure 5



1.6 The number of broadly compliant premises (those premises rated '3', '4' or '5') has remained static, as shown in **Table 1**. In 2016 / 2017 95 % of rated businesses were broadly compliant, representing a 3% increase on the previous year.

Table 1

Year	Number of food businesses	Number of broadly compliant premises	% of 'broadly compliant premises
2013 / 2014	1894	1691	87
2014 / 2015	1957	1707	87
2015 / 2016	2136	1875	88
2016 / 2017	1925	1822	95

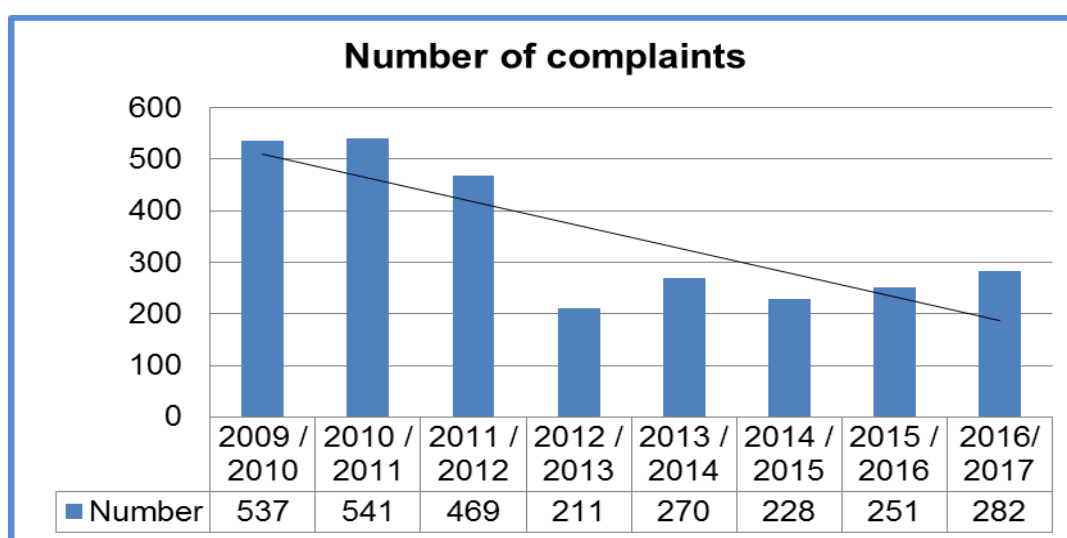
1.7 The number of enforcement actions taken during the last seven years is recorded in **Table 2**.

Table 2

Year	Improvement Notices	Closure	Prosecution
2009 / 2010	4	1	0
2010 / 2011	3	1	0
2011 / 2012	12	2	0
2012 / 2013	47	8	2
2013 / 2014	60	5	5
2014 / 2015	26	8	4
2015 / 2016	14	13	10
2016 / 2017	15	6	10

1.8 The number of complaints received fell significantly in 2012 / 2013 and has remained relatively static since and is a further reflection of how standards of food businesses have improved since that time. The number of complaints relating to food businesses is shown in **figure 6**.

Figure 6



7.38 The number of 'A' 'B' 'C' 'D' and 'E' rated premises as of 1 April 2014, 13 June 2015, 4 April 2016 and 7 April 2017 are shown in **figure 7**.

Figure 7

