



**FOOD LAW ENFORCEMENT PLAN 2014 – 2015**  
**(INCLUDING 2013 - 2014 OUTTURN)**

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## **PART 1 – THE PLAN FOR 2014 - 2015**

### **1. Introduction**

#### **Our Vision**

The annual Food Law Enforcement Plan is designed to work within the Bracknell Forest Community Plan to help deliver the Council's priorities. The Council's vision is:

**“To make Bracknell Forest a place where all people can thrive: living, learning and working in a clean, safe and healthy environment”**

Our Food Law Enforcement Plan aims to ensure a graduated approach based on risk to public health. It reaffirms our commitment to carry out our duties in an open and fair manner that protects the public and supports business and economic development. In doing so, at its core sits five basic principles:

- Targeting – taking a risk based approach
- Proportionality – only intervening where necessary
- Accountability – able to explain and justify service levels and decisions
- Consistency – apply standards consistently to all
- Transparency – open and user-friendly

We recognise that most businesses want to comply with the law; therefore we want to support and enable businesses to meet their legal duties, providing a level playing field without unnecessary expense. However, firm action, including prosecution, will be taken where appropriate in accordance with the national Regulators Code and our Enforcement Policy.

This Food Law Enforcement Plan sets out the actions we are taking to promote food safety and food standards for the benefit of local consumers and those who produce and sell food within our Borough.

The Council is responsible for food hygiene and standards under The Food Safety Act 1990, The European Communities Act 1972 and the associated Regulations. We advise on and enforce food safety in **1190** food premises including restaurants, cafés, takeaways, public houses, shops and hotels. The Food Standards Agency (FSA) Framework Agreement shapes the work of all local authorities in relation to food safety and standards and the FSA audit local authorities on their food law enforcement activities.

Bracknell Forest Council's Food Law Enforcement Plan contains details of:

- what we plan to do this year,
- how we intend to do it, and
- the work we have completed in the previous year

Our key priorities are to:

- promote food safety
- protect consumers from unsafe food and food fraud
- work with and support local food businesses
- reduce unnecessary interactions with businesses that consistently meet requirements
- encourage awareness of healthy food choices

Whilst this plan specifically deals with the forthcoming financial year of 2014-15, it takes place within the context of the wider agenda and the longer term view. The plan directly links the food law service areas with the identified Regulatory Service Priorities<sup>1</sup>. It is reviewed annually and additionally includes details of the previous years performance; the 2013-14 outturn.

## 2. The National Context to this Plan

In addition to directly linking to other internal Bracknell Forest plans, this food law plan is influenced by the national agenda.

Specific issues that have, and will continue, to impact on the direction of our work include:

### a) Food Standards Agency Guidance

The Food Standards Agency is the central Government body responsible for overseeing our food safety and standards work. All Local Authorities must undertake their food functions mindful of the national Code of Practice, associated guidance and the Framework agreement. Together these provide extensive guidance which guides and shapes our service provision.

### c) Reducing the Burden on Business



Better Regulation Delivery Office

There is a strong drive from Central Government to reduce the burden upon business and not to undertake inspection or enforcement activities without a specific reason. As an enforcing authority we fully support this view.

The Better Regulation Delivery Office (BRDO) has developed national Priority Regulatory Outcomes<sup>2</sup>, which provide a focal point for all of our regulatory work, including food safety and food standards. This food law plan directly links the food safety and food standards service areas with these Priority Outcomes.

### d) Primary Authority Partnerships

The concept of Primary Authority was formalised under the Regulatory Enforcement and Sanctions Act 2008. Under this legally recognised scheme (overseen by the Better Regulation Delivery Office), any business operating across more than one Local Authority can form a formal partnership, effectively forming a focus for consistent advice. It is the gateway to simpler, more successful local regulation.

We offer Primary Authority partnerships to businesses wishing to take advantage of the scheme and have signed partnerships that cover food matters with Waitrose Ltd and more recently Bennelong Golf Partners Subsidiary Ltd.

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<sup>1</sup> Details of the Regulatory Service Priorities are provided on page 20

<sup>2</sup> The National BRDO Priority Regulatory Outcomes are detailed on page 21

The impact of partnerships can be huge. A Primary Authority can issue formal advice to its partner business that applies throughout England & Wales regardless of where the outlets are based, and officers must take into account any such guidance or inspection plan. Primary Authority gives business the confidence to expand and grow, knowing that any such regulatory advice they receive is binding on other local authorities.

Recent changes to the scheme has meant a significant expansion to the range of businesses that can participate in the scheme, to now include franchise operations, trade associations and other business groups. Bennelong Golf Partners Subsidiary Ltd and its associated operations fall within this new 'Co-ordinated Partnership', and so these changes have enabled this local employer to participate in the scheme.

Additional changes last year mean that inspection plans produced under the scheme have a stronger status in law and any proposed deviations must be notified to the Primary Authority. The scheme has additionally expanded to cover a greater number of subject areas, now also including Under Age Sales, gambling and sunbeds. The various steps to expand and strengthen the scheme means that our local partners are able to gain greater utility with our local expertise.

**e) E coli and emerging risks**

In 2009 Professor Hugh Pennington published his report into the results of a public enquiry into a large E coli outbreak in South Wales. In combination with previous outbreaks, this has led to a significant increase in focus on the control of this serious and potentially fatal organism. Key to its control is the implementation of strict procedures to prevent contamination of ready-to-eat foods and detailed guidance to control its spread published in 2011 and was subsequently further updated and strengthened. Focus has continued and has become a key aspect of our inspection and sampling work. Further information is available at:

<http://wales.gov.uk/ecoliinquiry/?lang=en>  
<http://www.food.gov.uk/business-industry/guidancenotes/hygguid/ecoliguide>

**f) Public Health Agenda**

The food activities we undertake contributes significantly to the Public Health agenda, as we work to prevent illness, protect consumers and promote healthier lifestyles. Further details are available at:

[http://www.local.gov.uk/web/guest/health/-/journal\\_content/56/10171/3541769/article-template](http://www.local.gov.uk/web/guest/health/-/journal_content/56/10171/3541769/article-template)  
<http://healthandcare.dh.gov.uk/vision-phe/>

**g) Food Hygiene Ratings Scheme**

Since November 2008 Bracknell Forest Council has published food hygiene ratings; previously under the Scores on the Doors scheme and now under the Food Standards Agency Food Hygiene Ratings Scheme (FHRS). The website currently displays food hygiene ratings for all but 1 Local Authority in England and the site allows customers to choose where to eat based on the hygiene ratings of premises.

This information is increasingly used by both customers and businesses when making choices on where to eat out and how they perform against competitors. The FSA is also increasingly using this data to assess the work of Food Teams and to gain a more time sensitive picture of the standards within the area. Further details are available at: <http://ratings.food.gov.uk/>

## **h) Food Fraud**

Food fraud is committed when food is deliberately placed on the market, for financial gain, with the intention of deceiving the consumer. Although there are many kinds of food fraud the two main types are:

the sale of food which is unfit and potentially harmful, such as:

- recycling of animal by-products back into the food chain
- packing and selling of beef and poultry with an unknown origin
- knowingly selling goods which are past their 'use by' date

the deliberate misdescription of food, such as:

- products substituted with a cheaper alternative, for example, corn fed chicken with coloured chicken, and Basmati rice adulterated with cheaper varieties
- making false statements about the source of ingredients, i.e. their geographic, plant or animal origin

This authority undertakes investigations regarding such matters. In recent years the prevalence of this form of crime has become more widespread particularly in the area of counterfeit and potentially unsafe alcohol. This authority continues to focus enforcement work in relation to these matters.

## **i) Animal Feeding Stuff**

The service undertakes an important role in verifying the safety of food from farm to fork. As part of this the service undertakes inspections regarding both food and feed hygiene at farm level. This year we will also be undertaking some additional Food Standards Agency funded sampling of feedstuffs.

## **3. The Local Context**

Within Bracknell Forest Council, the food safety and standards functions are located within Regulatory Services; within the Environment and Public Protection Division of Environment, Culture and Communities. The work is carried out by the Food Team, which is made up jointly of officers from the Commercial Team (Environmental Health) in relation to food hygiene and the Trading Standards Team in relation to food standards. The food hygiene aspects of this plan are managed day to day by the Commercial Team Manager (Karen O'Connor), whilst the food standards aspects by the Trading Standards Team Manager (John Nash). To maximise our resources and provide a consistent and balanced approach, both teams fall within Regulatory Services and are overseen by the Head of Regulatory Services (Rob Sexton).

Whilst much of our overall work is guided by the national context, it is refined and shaped locally as we take into account local intelligence and available information. This includes specific local knowledge of the nature and type of businesses within Bracknell Forest, and by utilising data sources such as complaints received, inspection data and the Food Hygiene Ratings Scheme scores. By utilising such local sources of information, taking into account the national context, we are able to prioritise our work to ensure best effect with the resources available to us. For example we have specifically targeted those operations with the lowest FHRS scores to provide additional voluntary advice, guidance and

education to help get to the root causes of their poor ratings. Whilst time intensive, this has yielded some significant results.

We continue to support the Catering for Health Award Scheme to encourage businesses to provide healthier alternatives. Food businesses are assessed for this award at routine inspections in partnership with the Public Health Dietician within Berkshire Healthcare Foundation NHS Trust. This ensures that the importance of healthy eating is encouraged and recognised. Details of the Award winners are published on the Council website at: <http://www.bracknell-forest.gov.uk/catering-for-health-catering-businesses.pdf>

#### 4. The Food Premises Within Bracknell Forest

Within Bracknell Forest there are currently **1190** premises that fall within the remit of the relevant food legislation. Whilst some may undertake very little actual food handling (e.g. importers, village halls, etc.), many premises such as takeaways regularly handle food. In summary, relevant food premises within Bracknell Forest fall into a number of categories:

Restaurant, café or canteen	115
Hotels and guesthouses	22
Smaller retailers (e.g. local shop)	80
Supermarkets	31
Caring premises (e.g. residential care home, child minders)	368
Other restaurants and caterers (e.g. home caterers or bakers)	198
Distributors	8
Pubs and clubs	87
Other retailers	56
Takeaways	50
Schools and other educational premises	67
Mobile food premises	48
Manufacturers and packers	7
Importers or exporters	4
Primary producers	49
Total	1190

In comparison with some other districts, Bracknell Forest has low numbers of manufacturers and primary producers, and higher proportions of catering premises. There are also limited numbers of seasonal businesses and we have a small number of premises that are directly operated by Bracknell Forest Council. In order to ensure a consistent approach we remove any potential conflict of interest by locating any Council operated food activities within completely separate divisions.

Under current national requirements most food operations need to either 'register' their premises, or alternatively may need 'Approval' if they for example manufacture meat-based foods. Whilst we do not currently have any specific premises that require 'Approval', we provide relevant advice to businesses on when they need to do this. Further guidance is on our website at: <http://www.bracknell-forest.gov.uk/registrationfoodbusinesses>

The visits we make to our businesses may be for a variety of reasons, including a routine inspection, complaint, request for assistance or a revisit to ensure earlier identified short-falls have been addressed. Whilst officers generally visit during office hours, this is very dependant upon the operating times of a business. Our flexible working arrangements mean that officers undertake visits both at evenings and over weekend periods in response to when businesses actually operate. We take into account the national Code of Practice and associated guidance when deciding on the types and frequency of our visits.

In addition to routine inspection visits, we also prioritise our available resources and undertake alternative enforcement activities. These apply to the lowest risk businesses and may be in the form of a self-assessment questionnaire or a visit by a less experienced officer reporting back to fully qualified officers. When such alternative methods are used, any significant problems or concerns identified will always be investigated by fully qualified officers, including a full inspection if appropriate. By taking such alternative approaches we are able to focus our resources towards those higher risk operations, maximising the impact that available officer time can make on protecting the public.

## 5. Resources

Our primary resources are our staff. There are currently 1.5 full time equivalent qualified officers within Trading Standards and 2.75 full-time equivalent officers within Environmental Health who perform food law enforcement. In total 9 officer posts are involved in issues relating to food safety enforcement as part of their day-to-day duties, consisting of:

- 2 x Team Managers (currently one post vacant)
- 1 x Senior Environmental Health Officer (currently Acting as Team Manager)
- 3 x Environmental Health Officers
- 2.5 x Trading Standards Officers
- 1 x Trading Standards Enforcement Officers

The Commercial Team officers spend 60% of their time on food hygiene related matters, although a recent officer leaving and a further post with extended leave means that some of this work is currently undertaken by contacted staff. Within the Trading Standards Team 5 officers have been allocated to undertake food standards work accounting for approximately 30% of their time. The total cost of the food service for 2014/15 is estimated to be £213,660.

In addition to the work detailed elsewhere in this Plan, officers within the Food Team represent Bracknell Forest on relevant regional bodies with the aim of sharing good practice, benchmarking and achieving value for money. For example, we are members of the Trading Standards South East Limited (TSSEL) Food Group which seeks to identify and develop good practice procedures to help enhance the quality and consistency of service provision. We are also members of the Berkshire Food Liaison group with a key function of co-ordinating the food safety enforcement function towards a consistent approach across the county. This group periodically also undertakes county wide inter-authority audits, such as a desk-top exercise undertaken in early 2014 regarding how each authority applies the E coli guidance locally. Such activities aim to both improve regulatory service provision while maximising the effective use of local authority resources.

Officers can be contacted through our Customer Service Centre on 01344 352000 which is open from **8.30am - 5.00pm Monday to Friday**. Whilst officers are based at the Time Square offices on Market Street, Bracknell, officers are not generally office based and messages may well have to be left. Alternatively they can be emailed at [regulatory.services@bracknell-forest.gov.uk](mailto:regulatory.services@bracknell-forest.gov.uk)

## 6. Departures from the Plan

Departures from the Food Law Enforcement Plan, reported through Departmental Management Team, will inevitably occur due to the reactive nature of some of the areas of work. However, departures will be kept to a minimum, capable of justification and be fully considered by the Head of Regulatory Services before varying action is taken.

Whilst generally we adhere to all national requirements, due to the large number of low risk businesses within the district (e.g. child-minders and home bakers), we no longer undertake an initial full inspection. Instead we undertake a desk-top rating based on information about the activities, as we use our resources to best effect with higher risk operations. This departure is in accordance with our Enforcement Policy and enables us to use our local intelligence to more effectively target our resources.

## 7. Customer Feedback and Quality Monitoring

Procedures are in place to scrutinise all the work that is undertaken by the Food Team. Our quality monitoring includes detailed practice notes, checks on data entry and officer consistency. We additionally invite customer feedback, and during 2012-13 no formal complaints were received regarding the food service. Moving forward into 2014-15 we have just introduced a web-based survey for all regulatory services customers, both businesses and the general public, and the results will help us to ensure we are providing the best possible service to customers within the resources available. Paper copies will be available to those unable to complete the survey online.

We monitor our performance against targets on a monthly basis, via internal Key Performance Indicators (KPIs) which include both numbers of inspections, visits, etc. Moving forward into 2014/15 we have also introduced more outcome based targets such as Food Hygiene Ratings. Quarterly we additionally report on our performance via the Departmental Quarterly Monitoring Indicators and Key Actions. As of 1 April 2014, over 80% of our relevant food businesses received an FHR score of 4 or 5.

All such monitoring and performance information is fed back into the development of future food and other service plans.

## 8. Staff Development

We aim to make full use of the skills that exist in the Food Team and to develop those skills through updates, shadowed working and internal and external training. A record of continuous development is maintained for all officers, with all food officers supported to maintain a minimum of 10 hours relevant food training per year, in accordance with the Food Standards Agencies requirements.

## 9. Our Performance Outturn for 2013-14

In producing our Food Law Enforcement Plan each year we reflect on the previous years activities. This process provides the opportunity to identify what went well and what went less well, and identify trends or key areas for focus moving forward. The food law enforcement activity undertaken during 2013/14 is detailed on pages 11 to 16, although in summary we:

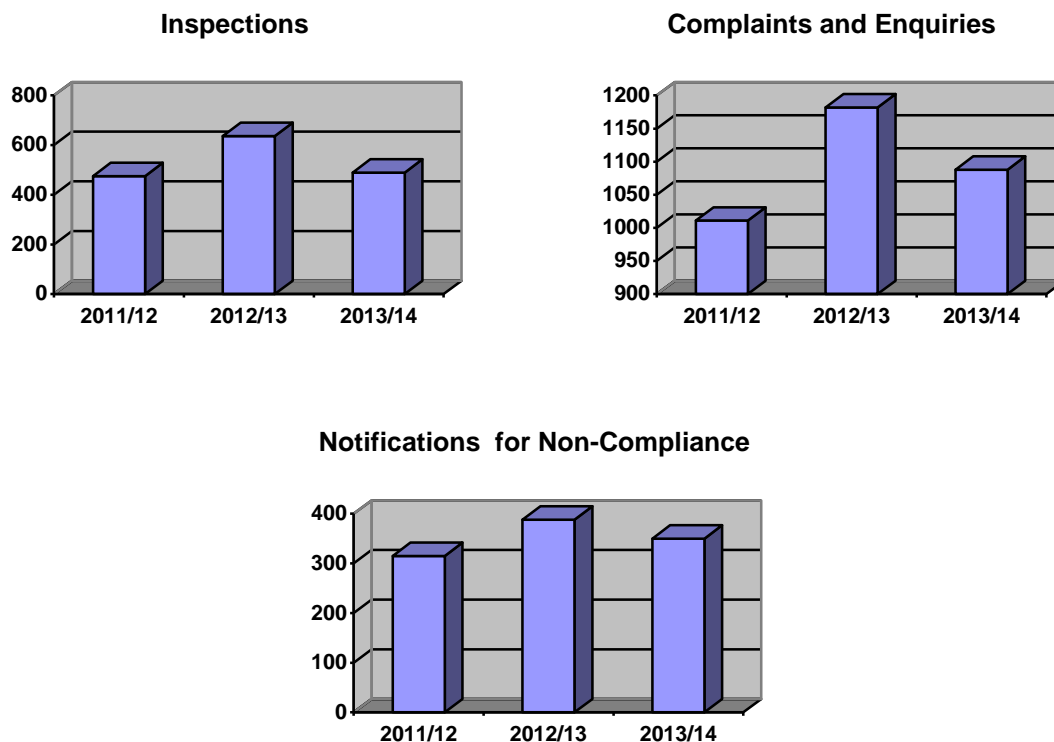
- Inspected **489** food businesses, carried out **345** other related visits and reviewed self- assessment questionnaires returned from **234** low risk premises,
- dealt with **1088** enquiries and complaints, of which **331** related to food and **112** related to food premises,
- issued written notifications on how businesses can comply with the law to **350** businesses, of which **5** were formal Notices,
- Secured **1** voluntarily agreement to cease an operation that created an immediate risk to public health
- undertook **165** food samples,



## Unrestricted

- Provided **192** hours of support to our Primary Authority Partners in relation to food matters,
- undertook a proactive educational project to target those businesses needing to make significant improvements to food hygiene

This activity can be compared with previous years:



## 10. Our Food Law Enforcement Plan for 2014-15

Details of planned activities for 2014-15 begin on page 17. However, in summary we plan to undertake the following:

- inspecting food premises on the basis of risk
  - Inspect 376 food businesses and provide self-assessment questionnaires to 210 low-risk premises,
- targeted sampling of food to ensure that it is safe to eat. Our planned sampling activity has been identified by research and intelligence and will be used to identify areas of potential problems and higher risk, and will include:

### **Food Hygiene:**

- Wooden chopping boards
- Water from standpipes at events
- Wristbands / wrist jewellery
- Locally identified high risk premises / products

### **Food Standards:**

- Basmati rice claims
- GMO oils at catering establishments
- Allergen sampling at catering establishments
- Composition of pizza topping / kebabs

## Unrestricted

- investigating complaints and concerns over food safety, including work with other authorities within Berkshire and the South East on issues that cross local authority boundaries and affect Bracknell Forest residents.
- providing advice, information and training, including:
  - extending our Primary Authority Partnership arrangements
  - continuing to offer the Level 2 Award in Food Safety in Catering course to local businesses and residents
  - providing advice and guidance on the Safer Food Better business pack to help businesses achieve compliance with legal requirements
  - supporting Food Safety week
  - ensuring the information on our website is up to date and accurate
- recognising and rewarding high standards of food safety through Award Schemes
  - Continue to support the Food Standards Agency Food Hygiene Rating Scheme
  - Continue to promote and enhance the Catering for Health Award run in partnership with the Public Health Dietician within Berkshire Healthcare Foundation NHS Trust,
- consulting our customers and seeking feedback on the quality of our service.

### 11. Concluding Information

This plan is reviewed every year and we welcome your comments and suggestions on how it could be improved further. If you would like further information or would like to speak to an officer for advice, please contact them via any of the following options:

Regulatory Services  
Environment, Culture & Communities Department  
Bracknell Forest Borough Council  
Time Square  
Market Street  
Bracknell, RG12 1JD  
Tel: 01344 352000  
Fax: 01344 351141  
Email: [environmental.health@bracknell-forest.gov.uk](mailto:environmental.health@bracknell-forest.gov.uk)  
Or look on our website at [www.bracknell-forest.gov.uk/environment.htm](http://www.bracknell-forest.gov.uk/environment.htm)

Additionally useful information is available at the following websites:

Food Hygiene Rating Scheme (FHRS)  
<http://ratings.food.gov.uk/>

Food Standards Agency (FSA)  
<http://www.foodstandards.gov.uk/>

Safer Food, Better Business  
<http://www.food.gov.uk/foodindustry/regulation/hygleg/hyglegresources/sfbb/>

Department of Environment, Food & Rural Affairs (DEFRA)  
<http://www.defra.gov.uk/>

Foodlink  
<http://www.foodlink.org.uk/>

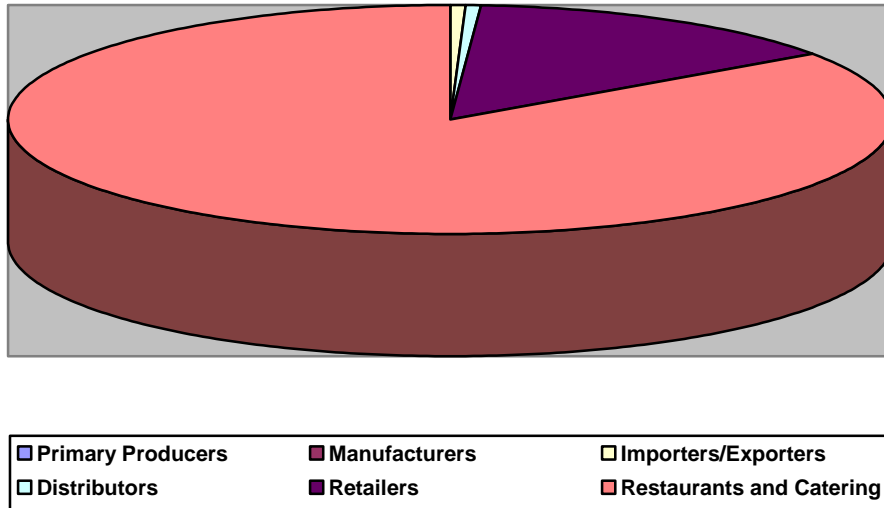
European Food Safety Authority  
<http://www.efsa.europa.eu/>

## PART 2 – Food Enforcement Plan Out-Turn 2013 – 2014

A summary of this Out-turn is provided under Section 9 above, with more detail below:

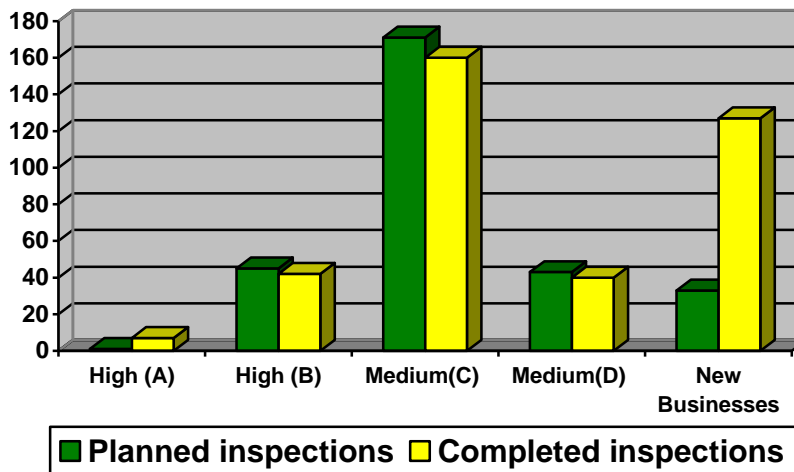
### 1. Inspections and Other Interventions

The chart shows the proportion and type of food businesses that were inspected by the Food Team during 2013/14.



All local authorities have a legal duty to inspect food businesses with a frequency based upon risk, so that our resources are directed to best effect. In 2013/14 officers completed a combined total of 798 inspections overall. The individual breakdown for Food Hygiene and Food Standards Inspections is illustrated in the sections 2 and 3 below.

### 2. Environmental Health - Food Hygiene Inspections for 2013/14



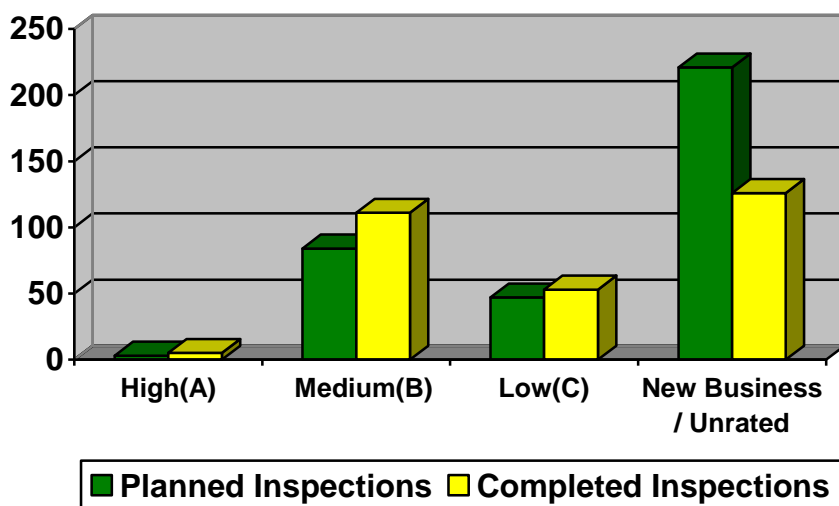
A total of **509** premises received a food hygiene inspection during 2013/14, of which **336** were full inspections and a further **173** lower risk premises were assessed via questionnaire. At the beginning of 2013/14 there was 1 premises rated as 'A'. However,

inspections of some lower rated premises revealed significant deteriorations in standards and so these were rerated an 'A' and thus inspected again within 6 months; making the total number of A rated premises inspected 7 and the 'B' rated changing from 45 due to 42 actually inspected. All high risk rated premises (A or B) due an inspection had those inspections completed. Whilst there were marginal shortfalls in the numbers of category 'C' and 'D' inspections (3 for each), in total 57 premises ceased trading, whilst 127 new premises received an inspection.

In addition, **320** reactive visits were undertaken during 2013/14 in response to enquires or complaints. These comprised of:

- **124** advisory visits
- **71** revisits to follow up on issues of non-compliance
- **41** visits in response to specific complaints received
- **6** visits following requests to rescore a businesses Food Hygiene Ratings
- **44** sampling visits
- The remaining **34** visits were made up of visits to assess businesses for the Catering for Health award (**4**) and visits where the business was identified as closed or not trading (**30**).

### 3. Trading Standards - Food Standards Inspections for 2013/14



High, medium and low risk premises are defined as those visited at least once every 12, 24 and 60 months respectively. There were fewer new / unrated premises to undertake inspections than initially expected.

### 4. Sampling

We routinely sample food produced and offered for sale in the Borough to check quality and safety. In 2013/14 we sent **165** samples for analysis, of which 70 were found to be unsatisfactory, and which resulted in follow-up action. The significant proportion of unsatisfactory results was due to many of the samples taken being swabs of food contact surfaces and dish cloths, rather than food itself. It is well established that such 'environmental' sampling frequently yields poor results, and so was of real benefit to help businesses better understand the impact their cleaning and cloth usage can have. The remaining results were satisfactory.

Last year our surveys looked at a range of issues including:

### **Sampling 2013/14 for Food Hygiene**

- Cleaning clothes from low FHRs rated businesses
- Soft cheese and cooked meats from residential care homes
- Pre-packed sandwiches from retail establishments
- Reactive sampling of identified specific risk products and premises

### **Summary of Findings**

A total of 52 separate non-disposable cleaning cloths were tested for common bacterial indicators of poor hygiene. These were taken from those businesses identified as having the lowest FHRs levels and participating in the 'Poor Performers' project. A total of 46 cloths didn't meet acceptable levels, and detailed advice and guidance was provided on the reasons for the levels found. Participation in the project included a commitment not to take formal action, and so no formal action was taken.

Residential Care Homes were sampled for foods that present a higher risk of Listeria, including both soft cheese and cooked meat items. All samples were within acceptable levels for Listeria, although one sample had unsatisfactory levels of other bacteria (Enterobacteriaceae).

A total of 10 ready to eat pre-packed sandwiches were tested as part of a national survey. Whilst no sandwiches were found to contain unacceptable levels of bacteria, 4 were borderline; all originating from the same manufacturer based in London. Both the manufacturer and relevant Local Authority were advised of the results found.

All businesses involved were advised of their results, and appropriate steps were taken to provide, support and guidance to make the necessary improvements to prevent a reoccurrence of the failures found.

### **Sampling 2013/14 for Food Standards**

- Burgers at catering premises
- Imported foods
  - Halloween sweets and containers
  - Novelty chocolate
- Corn fed chicken
- Food supplements sold at gyms, etc.
- Nutrition in Residential Care Homes

### **Summary of Findings**

With the food standards sampling the majority of the unsatisfactory samples related to inadequate or incorrect labelling. The imported food survey revealed a high number of non compliant products; these were broadly of two main types incorrect labelling or products failing to comply with legal compositional standards (11 of the 20 samples were non compliant).

The various surveys on meat products revealed few issues with one chicken being misdescribed (not being corn fed). The burger audit has resulted in two products being further analysed in relation to their meat content.

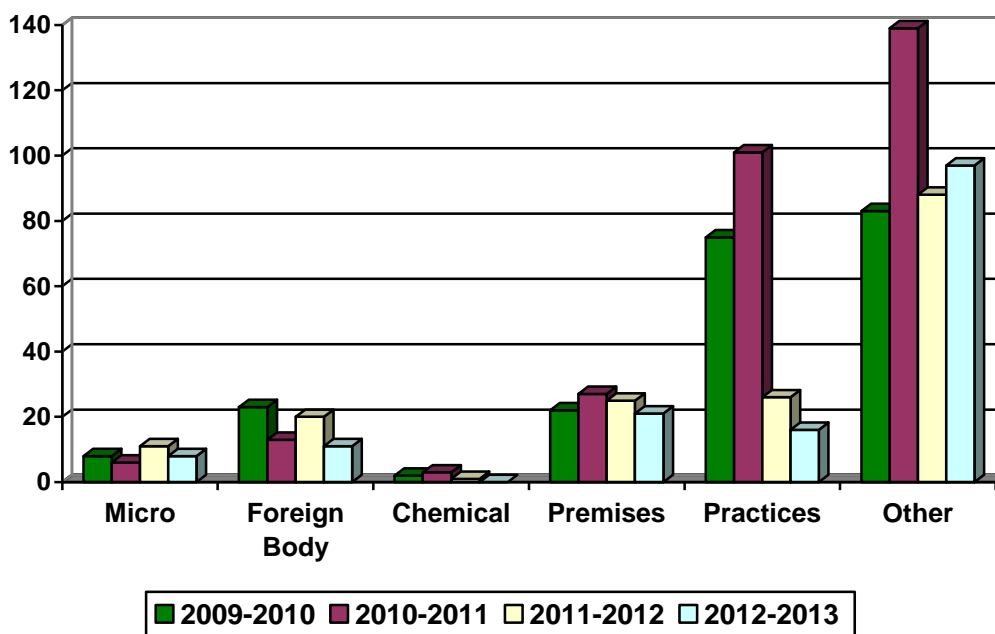
One sample of vodka was found to have been substituted for a cheaper brand.

The results for the care home revisit survey have not yet been received.

## 5. Enquiries and Complaint Investigations

In addition to receiving enquiries from both businesses and those considering setting up a food business, we also continue to receive consumer complaints about dirty food premises, poor food hygiene practices and contaminated food products. In 2013/14 we handled 643 enquiries and dealt with 123 such complaints. We investigate all such complaints and provide advice or take enforcement action as appropriate.

The table below shows the number of complaints in these categories dealt with by the Food Team in 2013/14. The overall level of complaints remaining stable, although there were some variations by complaint type.



We also received and dealt with 102 food complaints concerning matters such as labelling, composition and out of date food.

## 6. Bracknell Forest Borough Council Primary Authority Work

We continue to devote resources to working with Bracknell-based food businesses, dealing with 64 referrals from around the country involving local businesses and handling 51 formal requests for advice on food matters.

## **7. Food Safety Incidents**

Food Alerts, such as warnings for removal of particular products from sale or use, are issued by the FSA. The Food Team respond to the Alerts taking whatever action is needed. In 2013/14 we received 318 Alerts, 31 of which were for 'action' the remainder for 'information'. Alerts that we responded to included: food from unapproved establishments, traceability of beef, salmonella outbreaks in peanut products.

## **8. Food Poisoning; Infectious Disease Notifications**

An important part of our work is the investigation of infectious diseases, including food poisoning, to locate potential sources and prevent the spread of infection. In 2013/14 we dealt with 194 notifications of infectious diseases. The gastrointestinal infection *Campylobacter* accounted for over 80% of the notifications, *Salmonella* for just under 7% and *E coli* for approximately 4%.

## **9. Training and Information**

Education and information are an important part of our enforcement activity. We have assisted and supported local businesses through the provision of the Level 2 Award in Food Safety in Catering training for food handlers. We provided 2 courses in 2013/14. Our pass rate was once again a rate of 100%.

In addition we have continued to utilise a system developed by the Food Standards Agency called 'Safer Food Better Business' (SFBB) to help small food business operators draw up food safety management systems specific to their own food activities. In 2012/13 we continued to offer advice to businesses at every relevant inspection and we additionally received 12 specific enquiries for assistance.

## **10. Food Hygiene Rating Scheme and Catering for Health**

During 2013/14 we continued to work in partnership with both the Food Standards Agency and the Public Health Dietician within Berkshire Healthcare Foundation NHS Trust in supporting the FHRS and additionally awarding Catering for Health Awards. The award recognises catering businesses that provide a variety of healthy eating options for their customers. A total of 21 food businesses within Bracknell Forest Borough currently hold this award, and this information is publicised on our website.

The Food Hygiene Ratings were additionally utilised as the basis for the very successful 'Poor Performing Premises' project in which 21 of the lowest rated premises were targeted for a voluntary coaching project in which purely educational and coaching styles of interactions were undertaken on a voluntary basis. Officers undertook several free sessions in which those areas of higher risk were targeted in a practical way. Feedback has been extremely positive and whilst resource intensive, subsequent full inspections revealed significant increases in ratings. With all premises showing an increase in ratings, two premises showed their ratings changed from 1 to 5 reflecting significant improvements.

## **11. Enforcement Action**

We have adopted a broad and comprehensive set of measures to protect consumers and promote food safety, and actively work with local business to achieve a balanced approach.

## Unrestricted

Any enforcement action taken by the Food Team is graduated, proportionate and in accordance with the Council's Enforcement Policy. A full copy of the policy can be found on our website: <http://www.bracknell-forest.gov.uk/enforcement-policy.pdf>.

In 2013/14 the Food Team issued 345 written notifications of non-compliance with legal requirements. 5 Formal Improvement Notices were served and 1 premise ceased a high risk activity by voluntary agreement due to an imminent risk to public health; all in line with our staged enforcement approach outline in the Enforcement Policy.

The enforcement action taken in relation to food safety and standards for recent years is shown below:

<b>ENFORCEMENT ACTION</b>	<b>2008/09</b>	<b>2009/10</b>	<b>2010/11</b>	<b>2011/12</b>	<b>2012/13</b>	<b>2013/14</b>
Informal improvement notices	347	369	270	315	375	392
Formal notices	10	34	14	16	11	5
Prosecutions	2	0	0	1	0	0
Immediate Prohibition Notices	0	0	0	0	0	0
Voluntary Closure	<b>2</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>
Simple Cautions	<b>1</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>0</b>
<b>TOTAL</b>	<b>362</b>	<b>405</b>	<b>284</b>	<b>334</b>	<b>389</b>	<b>398</b>

## 12. Staff Development

A record of continuous development is maintained for all Officers. The following courses were attended during 2013/14:

- Food Information for Consumers
- Food Allergens
- Legionella Control in Cooling Towers
- Investigative Interviewing
- Public Health Law (Infection Control)
- Infection Control at Open Farms
- Food Standards Update
- Food Labelling



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 Section: Regulatory Services  
 Team: Food Law Enforcement

National BRDO Priority	Council Priority	MTO	Reg Services Priority	Service Priority	Service Action	Outcome Measure	Priority
<b>Protecting Consumers, Supporting Business</b>							
				<b>Food Safety</b>			
5	5	9	2	To maintain and deliver a comprehensive Food Law Enforcement Plan.	To adopt an annual Food Law Enforcement Plan, ensuring programmed interventions are risk based.	Adoption of plan by Lead Councillor.	High
1	5	9	4	Develop an integrated approach with TS, Licensing and EP to maximise resources and reduce burden on compliant businesses.	Where practicable, ensure programmed interventions are integrated and local intelligence is utilised across Teams.	Low risk interventions facilitated by alternative Teams.	Low
1	5	8, 9	1	Ensure consistency in the delivery of local regulation, mindful of the economic climate.	Liaise with primary authorities and existing home and lead authorities to ensure that inspection and enforcement action reflects the advice given. Respond to requests for advice and assistance from all Primary and Home Authority Partners and other Local Authorities in order to promote consistency in actions between Authorities, reducing the regulatory burden on businesses.	Liaise with any relevant Primary Authority or Home Authority where formal action is considered.  Respond to 100% requests from our Primary Authority partners within 5 working days	Med  Med

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National BRDO Priority	Council Priority	MTO	Reg Services Priority	Service Priority	Service Action	Outcome Measure	Priority
5	4	6,9	2	To seek to ensure all local food businesses are operating as safely as practicable and are seeking to comply with all relevant legislation.	Undertake a risk-based and targeted food safety programme relevant to local food outlets and mindful of FSA requirements. Note: FSA requirements are 100% of all risk categories, and 100% inspection of all new operations within 28 days. Note: to include duty of care inspections – waste enforcement.	Programmed interventions: 100% high risk - A and B rated 75% medium risk – C and D rated 50% low risk – E rated. 100% first inspection where risk category likely to be A to D. Alternative interventions where risk likely to be E. 100% revisits where required by FSA or where initial visit confirms notable risk to public health.	High High Med High  Low  High
5	4	8	2	Investigation of food premises and food-related complaints and requests for service.	Respond and investigate in accordance with agreed Corporate timescales and national guidance.	100% requests responded to within 5 working days.	High
5	4	8	2	Investigation of alleged food poisoning including those not relating to food premises.	Respond and investigate in accordance with agreed Corporate timescales and national guidance.	100% requests responded to within 5 working days.	High
5	4	8	2	To respond to all categories of food hazard warnings in accordance with statutory requirements linking responses between EH and TS.	Respond in accordance with agreed response times and act in accordance with national guidance.	100% requests responded to within 5 working days.	High
1	5	9	1	Sustain the economic prosperity of the borough.	Ensure fair trading in Bracknell Forest through a programme of intelligence led enforcement activities to monitor and improve business compliance and consumer protection.	Programme of surveys developed and delivered	Med
1	4	9	1	Ensure database is kept up to date and maintained.	Ensure identified changes to operations are reflected in database, and known empty commercial premises monitored.	100% amendments updated. To introduce survey programme for known empty units.	Low Low

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National BRDO Priority	Council Priority	MTO	Reg Services Priority	Service Priority	Service Action	Outcome Measure	Priority
<b>Project Working – Focussing Resources</b>							
5	4	6 &8	2	Implement a food and water sampling programme which is in accordance with national and local requirements and priorities.	Participate in BFBC programme of sampling from local food outlets, based on identified national priorities and local intelligence.	Undertake 80 samples for microbiological quality and 60 samples for food standards	Med
5	3	6	2	Provide additional support and advice to those businesses with the lowest Food Hygiene Ratings in order to provide an alternative educational programme to assist in making improvements	Undertake a programme of targeting premises with FHRS scores of 0, 1 or 2 in order to raise standards with non-enforcement activities; the 'Poor Performers' project	FHRS scores raised from pre-intervention levels	Med
4	3	6	5	In partnership with the Public Health Dietician within Berkshire Healthcare Foundation NHS Trust, promote and encourage caterers to provide healthy menu choices through the promotion and participation in the Catering for Health award scheme.	To continue to encourage new premises to gain the Catering for Health Award in order to offer a range of choice to customers. Review existing premises that have the award during appropriate visits to businesses and seek to increase holders – targeting residential care homes and nurseries.	Increase numbers of award holders and those applying for the award.	Low
4	4	7	4	Develop a review program to establish any local Campylobacter patterns that may indicate priority areas for reducing food poisoning; Campylobacter being the highest source of food poisoning	Review Campylobacter cases in order to establish any variations in age or likely source profile from national or regional levels	Review 100% of Campylobacter cases to establish any local variations in age or likely source from national levels.	Low
1	4 6	7 11	6	Develop the use of knowledge, intelligence and operational support and partnerships to improve planning and delivery of services.	To support and participate in the working of regional groups (Berks Food Group and TSSE region of 19 local authorities)	To deliver value for money by working together.	Med

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National BRDO Priority	Council Priority	MTO	Reg Services Priority	Service Priority	Service Action	Outcome Measure	Priority
<b>Performance Management</b>							
3	5	11	6	Review our plans, policies and strategies to ensure that they meet the needs and expectations of our stakeholders where possible.	Ensure current practice notes are up to date and in accordance with FSA requirements (with exceptions identified in this plan).	100% existing practice notes reviewed within revision due dates and a range of relevant practice notes for TS service developed and implemented.	Med
1	4 6	7 11	6	Develop the use of knowledge, intelligence and operational support and partnerships to improve planning and delivery of services	To maintain and encourage uptake of a level 1 National Intelligence Model compliant system to aid the identification of priority areas of work	To implement the TSSEL ibase intelligence system	Low
1	4	6&8	4	Continue to improve our service by managing our performance and comparing ourselves against others	Apply best practice, enabling the service to continually improve and identify areas suitable for collaborative working.	Systems in place	Med

**Regulatory Services Priorities:**

1. To protect and support residents and legitimate business through the promotion of a fair, safe, responsible and competitive trading environment.
2. To work with local business to deliver a safe and quality food chain.
3. To work with partners on improvements to the local environment which positively influence the quality of life and promote sustainability.
4. To target enforcement action against those who demonstrate a disregard for the law and the consequences of their actions.
5. To promote public health and healthy living.
6. To constantly keep under review existing working procedures to ensure improvements in service delivery, effectiveness and efficiency

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**National BDRO Priority Regulatory Outcomes:**

1. Support economic growth, especially in small businesses, by ensuring a fair, responsible and competitive trading environment.
2. Protect the environment for future generations including tackling the threats and impacts of climate change.
3. Improve quality of life and wellbeing by ensuring clean and safe neighbourhoods.
4. Help people to live healthier lives by preventing ill health and harm and promoting public health.
5. Ensure a safe, healthy and sustainable food chain for the benefits of the consumer and the rural economy.