

**FOOD SAFETY
SERVICE PLAN
2021**

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1. SERVICE AIMS AND OBJECTIVES

1.1 COVID-19 Pandemic Impact Statement

The Food Safety Service Plan for 2021 has been significantly impacted by the COVID-19 Pandemic. The Food Standards Agency (FSA) has issued guidance to local authorities on the expectations relating to the implementation of food safety official controls. From 20th March 2020, LAs were advised that all planned food hygiene interventions should be deferred to ensure that the foot fall in such businesses is kept to a minimum. As the situation developed, the FSA issued guidance that a risk-based approach to delivery of official controls should be taken. This resulted in different categories of priority work: high, medium and low priority. The requirement is that irrespective of resource implications to councils in relation to COVID-19 enforcement, food safety departments must undertake all high priority official controls: inspection of unrated (newly registered premises); assess risks associated with changes to operation of food businesses as a result of the pandemic (e.g. pubs forced to close changing their operation to do takeaway food etc.); inspection and assessment of approved premises; responding to any significant risks to public health. Where LAs are not able to meet the high priority actions, they are required to notify the FSA immediately.

1.2 Aims and objectives

- To seek to ensure that all food prepared, offered or exposed for sale is what it says it is and that it is safe and will not cause ill health
- To undertake 100% of the programmed inspection plan.
- To inspect all unrated premises (new registrations).

1.3 Links to corporate objectives and plans

The Council's vision is for Kirklees to be a district that combines a strong, sustainable economy with a great quality of life – leading to thriving communities, growing businesses, high prosperity and low inequality where people enjoy better health throughout their lives. This vision is underpinned by the Council's shared outcomes which are:

- Best Start
- Sustainable Economy
- Well
- Safe and Cohesive
- Independent
- Clean and Green
- Aspire and Achieve
- Efficient and Effective

In addition, the Joint Strategic Needs Assessment identifies Food and Nutrition as one of its priorities. Furthermore, the link between unsafe food and public health is clear, and therefore, it is important to ensure that food processed, produced and sold in Kirklees is safe and fit for human consumption.

Timely, programmed and risk-based interventions will ensure that food businesses are inspected, and where necessary, proportionate enforcement action is taken. This approach will aim ensure that problem premises are dealt with before their practices and procedures can have a detrimental impact on public health.

Climate Emergency is a key strategic priority for the Council. Climate change has the potential to significantly impact on food security due to negative impacts on food production (both crops and livestock). It may also have a detrimental impact on food safety through the increased growth and proliferation of pathogenic foodborne micro-organisms both in the UK but also in developing countries where foods may be imported from. It will be necessary for the Food Safety Team to remain vigilant and aware of any new evidence, which indicates food safety issues because of climate change. This should also incorporate increased sampling of imported foods on a more regular and programmed way.

Another significant impact on food supply and the delivery of official controls in relation to food safety is the UK's exit from the EU. From 31st December 2020, the UK has been a 'third country' and some food exports are required to meet EU imported food entry checks.

It also means that some foods coming from the EU now need to meet third country import checks in the UK (though the full requirements will not be implemented until July 2021). The other impact from a UK perspective is that foods from outside the EU (third countries) that are destined for the UK, will no longer be checked at the first point of entry into the EU, this will lead to increased import checks at UK Border Control Points.

The additional controls on imports and exports of certain foods, may also impact on businesses within Kirklees and their ability to operate. Significant work was undertaken in 2019 to contact all food manufacturers within Kirklees to signpost them to the relevant places for information on import/exports to and from the EU in preparation for UK's withdrawal from the EU. We are not currently aware of any businesses in Kirklees who export food subject to third country import controls and therefore do not believe that this is a significant risk.

The possible impacts from the EU exit upon Kirklees Food Safety Department are:

- There may be an increase in the requests to Food Safety for export certificates from manufacturers located in Kirklees.
- There will be an increase in the quantities of third country imported foods in circulation (as EU foods will now be third country imports) that may lead to an increased need to inspect/sample/seize/detain etc. imported foods, more than we previously experienced as EU members.
- Where third country imported foods are allowed to leave port (pending results of analysis) to be stored at an External Temporary Storage Facility (ETSF), if results are unsatisfactory, Kirklees food safety officers may be required to take appropriate action to deal with those foods. (Currently there are 2 ETSF facilities located within Kirklees, however neither are currently registered for food storage).

1.4 Sustainable economy

The Food Safety Team recognises the importance of engaging with business and how successful business can impact and increase local and council wide economic development. A consistent approach to food safety ensures a level playing field, with compliant businesses receiving recognition (through higher food hygiene rating scores) and failing businesses requiring proportionate enforcement action to secure compliance. The Public Protection Enforcement Policy outlines this graduated approach. This has been prepared in-line with the Regulators' Code.

Given the increase in awareness of food safety, and food hygiene rating scores, it is anticipated that customers to compliant businesses will increase and make the businesses more resilient. Similarly, it is anticipated that a consistent approach to enforcement will, in the longer term, ensure greater compliance and reduce the need for enforcement action.

The Service works closely with Public Health England and undertakes a food sampling programme that focuses on national/international food safety concerns and trends. We continue to work with colleagues from the Public Health Team (formerly NHS Kirklees) as partners in delivering the FINE Project.

The key aims of the FINE project are to develop a healthy eating culture by training, sign posting and supporting key professionals and key volunteer coordinators who work with community groups in targeted localities. Due to the COVID-19 pandemic, this work has been postponed and new projects developed to deal with the crisis, e.g. the Healthy Holiday Scheme whereby food parcels and online cooking skills were delivered to school children across Kirklees.

The Healthy Choice Award was introduced to encourage food business to provide healthy alternatives and this was recognised/demonstrated through receipt of Gold, Silver or Bronze Awards. As of April 2017, the Healthy Choice Award was placed on hold for 12 months with a view to re-brand and re-launch a new healthy eating accreditation scheme in April 2018. However, due to developments in other areas of work and priorities and a perceived poor outcome from the Healthy Choice Award, this project is still on hold.

In addition, the FINE project also had the following priorities, which continue:

- Ravensthorpe Pilot – Increasing nutrition literacy**
- Nutrition literacy in the under 5 setting
- Nutrition literacy in older people

**The Ravensthorpe Pilot Project aims to concentrate resources in a deprived area where there are a large number of fast-food outlets. The rationale is that focusing resources, working with local community groups/schools and Kirklees Public Health will result in making a more meaningful impact on the health and wellbeing of residents.

Healthy Holidays was brought to the forefront from children not being at school and therefore not being able to access a nutritionally balanced lunch due to school closures and poverty. This created the emphasis for additional work to address this issue. Therefore, the FINE team undertook a comprehensive, 'Healthy Holidays Project' in the summer holidays of 2020. This incorporated a programme whereby children and families could access healthy menus by being provided with a recipe to follow and the ingredients to make the recipe.

Due to the COVID-19 pandemic the service level agreement for the FINE team has been put on hold until 2021. The officers have been redeployed.

The priorities for the FINE team from April 2021 to March 2022 are:

- Under 11s and pre-conception nutrition literacy
- Over 65s nutrition literacy
- Healthy Holiday nutrition literacy
- Place Based Working – focusing projects in areas of greatest need. This has built on the evaluation of the learning from the Ravensthorpe Project

The Food Safety Team maintains its links with the Consultant in Public Health Medicine in infectious disease control, particularly in connection with food poisoning. Links have also been maintained with the Consultant in Public Health Medicine in infectious disease control, particularly in connection with food poisoning outbreaks and surveillance, including quarterly operational and strategic meetings, which aim to identify and adopt solutions to larger, more regional issues. Officers from Kirklees Infection Prevention and Control Team also sit on these meetings. During the COVID-19 pandemic these meetings have been suspended, however PHE officers are consulted in relation to individual infectious disease notifications/investigations and suspected outbreaks of food poisoning.

As part of the COVID-19 response, Public Protection has been collaborating with PHE (and Kirklees Public Health) in relation to COVID-19 outbreaks and attending at least weekly Incident Management Team meetings. Food Safety (and other Public Protection) officers have worked closely with Kirklees Infection Prevention Control officers to investigate outbreaks of COVID-19 in workplaces, particularly those associated with food businesses.



2. BACKGROUND

2.1 Profile of the local authority

Kirklees is the third largest Metropolitan District with an area of 157 square miles (40,860 Hectares) and measured in population terms is the eleventh largest local authority with a population currently estimated to be 439,800.

Kirklees is an area of diverse communities, topography, settlement and industrial development. Current ONS figures suggest that 23.3% of the total population are from minority ethnic groups (compared to 19.5% nationally), the largest group being Asian or British Asian (16% of total population).

Under the political structures, the principal executive decision-making body of the Council is a cabinet of councillors, which includes the Leader, and the Lead Members for the Service groupings.

The council employs approximately 6,816 Full-time Equivalent (FTE) staff (as of 2020).

Kirklees is a very large food authority and currently supports over 4,100 food premises.

2.2 Organisational structure

The Food Safety and Infectious Diseases team sits within Public Protection.

In accordance with the Food Law Code of Practice (England) we have appointed the Public Health England Laboratory in York as our food examiner and through West Yorkshire Joint Services, Lancashire Analytical Services as our food analyst, both of whom are suitably qualified.

2.3 Scope of the food service

The food safety and infectious diseases function is dedicated wholly to food related activities and sits alongside the other core environmental health functions of pollution and noise control and health and safety.

The food safety and infectious diseases team is responsible for undertaking the following work activities:

- programmed food hygiene interventions
- provision of advice to food businesses
- food sampling (including milk and dairy products)
- investigation of food complaints
- investigation of food poisoning and outbreak control
- responding to Food Standards Agency food alerts
- inspection of food
- monitoring licensed/approved premises
- imported food control
- FINE (Food Initiatives & Nutrition Education) project
- providing food and wellbeing advice to target groups
- undertaking projects linked to corporate priorities.

West Yorkshire Joint Services are responsible for food standards, feed hygiene and inspection of primary production premises in the Kirklees area. Kirklees Council's Animal Health Team support the Food Safety Team through the inspection of farms and small holdings; the investigation of animal welfare complaints; and attendance at livestock markets etc.

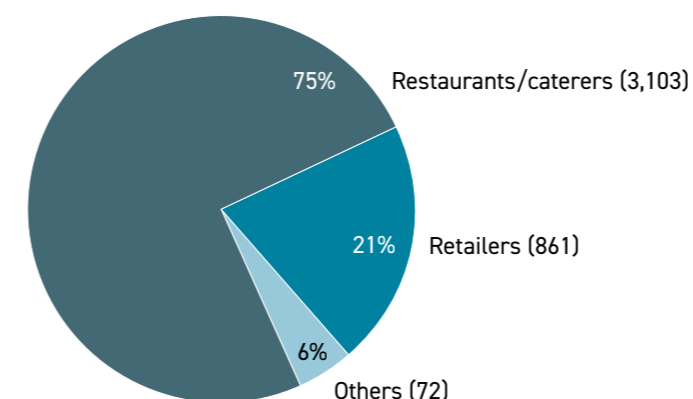
2.4 Demands on the food service

As of 1st April 2021, there were 4,151 food businesses registered with the Food Safety Team.

The table below shows the number of food businesses registered with Kirklees Food Safety Department at the 1st April 2021. The pie chart below also represents this information.

Food businesses registered with the Food Safety Team at 1st April 2021

Business type	Number
Producers and farmers	13
Manufacturers and packers	115
Importers and exporters	6
Distributors and transporters	53
Retailers	861
Restaurants/caterers	3,103
Total	4,151



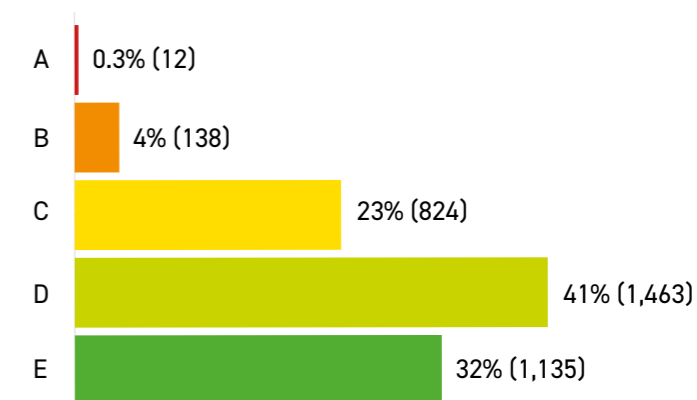
Summary

As at 1st April 2021 three-quarters (75 per cent) of food businesses registered with the Kirklees Food Safety Team were restaurants or caterers, whilst 21 per cent were retailers. The next largest group are manufacturers and packers who represent three per cent.

The risk rating relative to the number of food business is provided. The table below shows a breakdown of the number of food businesses that fall into the different risk categories A to E as detailed within the Food Law Code of Practice. Businesses in risk category A are deemed the highest risk and therefore get inspected the most often through to category E premises that are deemed the lowest risk and therefore get inspected the most infrequently.

Rated premises profile at 1st April 2020

Risk category	Type of premises	Number
A		12
B		138
C		824
D		1,463
E		1,135
Outside programme		13
Unrated premises		579
Approved premises	Meat/minced meat or meat preparations products	16
	Meat and fish products	1
	Cold stores	7
	Egg packing	4
	Dairy products	4
Specialist processes	On-farm pasteurisers and dairy products	7
	Bottled water producers	4



Summary

Of 3,572 businesses in the A-E category, 0.3 per cent were rated at the highest level A, four per cent at level B, 32 per cent at level C, 41 per cent at level D, and 32 per cent at level E.

Compared to many authorities, we have a large number of on-farm pasteurising dairies within the district and consequently we have two officers specifically trained for this area of work.

The budget allocated to delivering the Food Safety and Advice function is shown in [Appendix 1](#) as part of the Environmental Health Budget.

Service delivery points

Environmental Health operates from Flint Street, Fartown, Huddersfield, HD1 6LG.

Opening hours are Monday to Thursday from 8.45am to 5.15pm, Fridays from 8.45am to 4.45pm.

The public may also access the service from Information Centres located in Huddersfield and Dewsbury.

2.5 Enforcement Policy

The Enforcement Policy was reviewed and updated in 2019 and incorporates the Enforcement Concordat.

The Policy may be viewed on the Council's website at: <https://www.kirklees.gov.uk/beta/planning-enforcement/pdf/enforcement-policy.pdf>

3. SERVICE DELIVERY

The Foods Standards Agency issued a revised Code of Practice in 2021. The code of practice continues to support local authorities in using a range of interventions that allow local authorities to target resources more effectively on those premises that pose the highest risk.

In 2010 a series of alternative interventions was introduced and we continue to follow the same approach. The following table shows the number of interventions undertaken during the 2019-2020 financial year and these are listed according to the type of intervention.

Interventions undertaken 2019/20

Intervention type	Number
Inspection or audit	1,467
Verification or surveillance	284
Sampling*	51
Advice or education	8
Information/intelligence gathering	236
Food Hygiene Rating re-assessments	50

*Excluding routine dairy sampling

The following table shows the number of interventions undertaken during the 2020-2021 financial year and these are listed according to the type of intervention.

Interventions undertaken 2020/21

Intervention type	Number
Inspection or audit	210
Verification or surveillance (including onsite visits and some reote assessment)	147
Sampling*	11
Advice or education (remote only)	409
Information/intelligence gathering	1
Food Hygiene Rating re-assessments	10
COVID-19 remote assessments**	629

*Excluding routine dairy sampling

** Remote assessments were brought in by the Food Standards Agency to identify food safety risks that would give rise for the need for an on-site visit during the COVID-19 pandemic:

- Monitor compliance at businesses which had a food hygiene rating of 0, 1 or 2 to ensure that food hygiene problems had

been satisfactorily addressed (note - an on-site visit would be undertaken if concerns remained).

- Assess any risks posed by newly registered businesses.
- Contact businesses to identify any changes in how they would normally operate during COVID-19 pandemic.

3.1 Food premises inspections

During 2019/20 the vast majority of inspections were undertaken by Environmental Health staff (rather than contractors). In 2019/20 only 89 inspections were undertaken by a contractor. This is because we work to very tight targets compared to most local authorities and as a result, we can achieve an excellent output given the resources available. We also place high value in the importance of consistency in our approach and amongst officers, which is better supported using in-house staff.

Staff resources are organised on a north/south district basis. In addition, some staff have responsibility for specialist areas of work including infectious diseases, meat and dairy products premises etc.

We continue to operate the national 'Food Hygiene Rating Scheme' (FHRS). The scheme is supported and promoted nationally by the Food Standards Agency - it helps consumers choose where to eat out or shop for food by giving them information about the hygiene standards in food premises at the time they were inspected to check compliance with legal requirements, and through this, it encourages businesses to improve their standards.

The map "Food Hygiene Rating Scheme, Number of Compliant or Failed Premises" in [Appendix 3](#) shows that there appears to be a correlation between areas of worst deprivation and low food hygiene ratings. This is an area of work we plan to look at more closely, to try and identify some of the reasons for this and to focus resources to attempt to work with businesses/communities to improve food hygiene ratings in these most deprived areas and also to raise awareness of the food hygiene rating scheme amongst consumers so that they can make informed choices about the businesses they buy food from.

Since the introduction of smoke-free legislation in 2007 premises and vehicles are also assessed for compliance at each inspection.

Food team Environmental Health Officers have been specifically authorised to enforce legislation relating to Imported Food. There are no ports of entry within Kirklees. There are two External Temporary Storage Facilities (ETSF) in Kirklees (ETSFs are HMRC controlled warehouses where foods may be stored until import clearance is given), but neither of these currently receive food goods; therefore there is only a low level of work involved.

Officers look for imported food on inspections and take appropriate action if required. In 2019/20 officers undertook an imported food sampling exercise (funded by the Food Standards Agency) to check the safety of imported foods being sold in Kirklees. All samples were satisfactory. There is also a requirement for Food Safety Departments to undertake the sampling of imported foods as part of their sampling programme.

Primary producers (food growers) are inspected in West Yorkshire by West Yorkshire Joint Services Food Feed and Standards officers. Additional support for this is undertaken by animal health officers in conjunction with their farm inspections.

The following image shows a chef cooking Chinese cuisine. Kirklees Food Safety Team inspect all types of food business and catering businesses make up the majority of food businesses inspected.



3.2 Food and food premises complaints

It is the policy of the food team that complaints received by the Service in relation to food and food premises are investigated in accordance with the relevant guidelines and Public Protection Enforcement Policy.

Complaints which are of a minor nature, and therefore, unlikely to result in formal action receive a limited response.

When a complaint is, or may be, associated with the business' central policies or procedures, where appropriate, the primary, home and/or originating authority are contacted for advice if it is outside Kirklees.

Any complaints received relating to food standards issues are referred to West Yorkshire Joint Services.

In 2019/20 the Food Team received 443 complaints relating to the condition of either food or food premises. In 2020/21, 633 complaints relating to the condition of food or food premises were received (this is consistent with previous years). The type of complaints varied, ranging from bits of plastic in food to complaints of rats in premises. All complaints require a degree of investigation. However, those considered to pose the greatest risk to public health are afforded more time and resources.

3.3 Compliance and enforcement action

The tables below detail the enforcement action undertaken during 2019/20 and 2020/21.

The enforcement option used depends very much on the risk present at the time of the inspection and varies from a simple report, outlining corrective actions needed to the service of a hygiene emergency prohibition notice, which requires the business to close immediately. Enforcement, in accordance with the Food Law Code of Practice and Public Protection Enforcement Policy, follows a graduated approach. Our enforcement actions are consistently within the top 15 local authority food safety departments nationally.

The enforcement actions during the 2020/21 period reflect the impacts of the COVID-19 pandemic upon the work of the Food Safety Team, who undertook far fewer interventions, due to those officers playing a crucial role in the Council's Coronavirus response.

Enforcement actions 2019/20

Enforcement action type	Number
Voluntary closure	1
Seizure of food	0
Suspension/revocation of approval/ license	0
Emergency prohibition	4
Simple Caution	7
Improvement Notices	54
Remedial Action and detention Notices	2
Written Warnings	1,157
Prosecutions	7

Enforcement actions 2020/21

Enforcement action type	Number
Voluntary closure	3
Seizure of food	1
Suspension/revocation of approval/ license	0
Emergency prohibition	0
Simple Caution	3
Improvement Notices	5
Remedial Action and detention Notices	2
Written Warnings	TBC
Prosecutions	1

3.4 Advice to business

The Food Safety and Infectious Diseases Team is committed to providing advice to food businesses; this often involves carrying out a visit to assist food businesses to comply with food hygiene legislation. During 2019/20, 198 requests for advice were received. During the 2020/21 period, 409 requests for advice were received. These were dealt with remotely due to the COVID-19 pandemic. Given the limited resources, and following Council priorities, we've placed greater information and detail on the Kirklees website, which, coupled with information available on the FSA website, gives prospective businesses all the information they require. For unique/high risk businesses, officers still visit and provide the advice needed. Ultimately, however, the responsibility to operate and produce food safely remains with the business.

We have also begun to provide advice to food businesses when they register a new business with us. This is done by sending the food business operator an email with advice on how to comply with the legal requirements, with links to further sources of information. The intention is to provide them with the information they need to make sure they are complying with the main elements of food safety law, including the need for documented food safety management procedures. The aim is that this will enable them to get things in place before the inspection so that they can achieve the highest food hygiene rating possible and, of course, to produce safe food.

As part of our commitment to support new food businesses, the Food Safety Team also operates a 'Getting It Right First Time' course. This is currently on-hold due to the COVID-19 pandemic. However, the principal is that we encourage newly registered businesses to attend this course. The aim of the workshop is to inform new businesses of the most important information they need to consider in operating a compliant food business. It covers topics such as written food safety management systems, Food Hygiene Rating Scheme, health & safety, fire safety, waste, business support and licensing. We worked with the other regulators in putting the course and the delegate pack together. Each business that attends receives a free printed copy of Safer Food, Better Business.

If businesses attend the course, they are allowed up to 6 months before their first inspection to allow them time to put into practice what they have learned. No courses were run during the 2019/20 and 2020/21 periods, but we hope to get this up and running again in the future.

3.5 Food sampling

It is the policy of the food team to carry out routine sampling and to take samples where problems with food production have been identified.

Other sampling is linked to our food premises interventions programme and where problems associated with high-risk foods are anticipated or are revealed during routine inspections.

Because of the farm dairies in Kirklees, we offer an economical chargeable service for the collection and analysis of dairy products on their behalf. This is considered to be an important area of work given past experience of infections in milk and the high-risk nature of the product. This work has continued during the COVID-19 pandemic.

The Food team also participates in cross regional and national surveys organised through Public Health England.

In addition, samples are taken following referrals of sample failures from other local authorities and by officers following routine inspections or complaints. All sampling is undertaken by officers in accordance with quality procedures and relevant sampling protocols. Formal samples are taken in accordance with the Food Law Code of Practice. Samples are submitted to either the Public Health England Laboratory or Lancashire Analytical Services Laboratories.

In 2019/20, 1106 samples were taken which includes those taken for sample studies as well as those taken to verify process/environmental hygiene within businesses. In 2020/21 213 samples were taken.

3.6 Control and investigation of food related infectious disease and outbreaks

The Food Safety Team's policy concerning investigation of food poisoning notifications and outbreak control is contained in a joint procedure manual, produced in conjunction with Public Health England and other West Yorkshire Authorities. The document is known as the "Protocol for investigation and management of sporadic cases and outbreaks" and "Kirklees Infectious Disease Outbreak Protocol".

Communicable diseases investigated up to the years 2018/19, 2019/20 and 2020/21 can be found in [Appendix 2](#).

In the event of a serious outbreak, staff resources are utilised from the food team and across the whole Service if necessary. In 2019/20 we dealt with three significant infectious disease/food poisoning related events which required significant investigation and resource allocation. In 2020/21 we investigated one suspected outbreak of food poisoning. During these instances, we worked closely with Public Health England and Kirklees Public Health colleagues.

There is also a Memorandum of Understanding between the West Yorkshire authorities that would permit colleagues from neighbouring authorities to assist us, should there be the need.

3.7 Food safety incidents

Procedures for dealing with Food Alerts are clearly documented in a specific quality guideline in order to comply with the Food Law Code of Practice (England). All food officers are required to be signed up to the FSA Smarter Comms system, whereby officers will receive food alerts directly. The Food Lead Officer also requests officers to take appropriate action should a food alert be received that relates to food or premises located within Kirklees.

3.8 Liaison with other organisations

This authority has liaison arrangements with other West Yorkshire authorities through the West Yorkshire Food Lead Officers Group (WYFLOG) and also at Chief Officer level with West Yorkshire Authorities.

The Environmental Health Group Leader attends the WYFLOG meetings on a six-weekly basis. Other agencies also attend these meetings, namely: Public Health England Food, Water & Environmental Microbiological Laboratory; Food Standards Agency (FSA) Imported Food; and FSA Relationship Manager and West Yorkshire Trading Standards.

This enables consistency between the five West Yorkshire authorities, which is particularly important for businesses who may have outlets in more than one of the West Yorkshire authority areas to ensure that there is consistency in enforcement. To this end, all five authorities use the same aide memoire and other documentation for inspections, including approved premises to ensure consistency.

Regular liaison takes place with the Council's Licensing department in response to proposals for new food premises, whereby licensing officers notify us of any changes to licensees at food businesses.

Regular liaison takes place with colleagues in Public Health in co-ordinating the FINE project.

4. RESOURCES

4.1 Financial allocation

The Service has, as have all local authorities continued to face financial constraints. The team continue to focus limited resources in a proportional risk-based approach.

The budget allocated to delivering the Food Safety and Advice function for 2019/20 and 2020/21 is shown as part of Environmental Health Revenue Budget in Appendix 1.

The 2021/22 budget has been reprofiled to provide extra resources for this important area of work and will look to finalise recruitment within the next financial year. It is hoped that this will bring the FTE more in-line with the national average (average number of food premises to Full Time Equivalent officers (FTEs): Nationally: 416:1, in Kirklees, this ratio has previously been 560:1). It should be noted that due to Food Law Code of Practice qualification and Competency Framework requirements for food safety inspectors, it is very difficult to recruit suitably qualified and experienced staff; therefore there may need to be some reliance on external contractors. We will continue to train and develop in-house members of staff to meet these recruitment needs.

4.2 Staffing allocation

The current staff resources covering Food Safety work:

- 1 Environmental Health Group Leader (Food Lead Officer)
- 2.0 FTE Senior Environmental Health Officers
- 5.6 FTE Environmental Health Officers
- 2.0 FTE Senior Technical Officer
- 1 Business Support Officer

FINE (project):

- 1 Food and Wellbeing coordinator
- 2 Food and Wellbeing advisors
- 0.5 Business support officer

Due to COVID-19, currently 1 FTE Senior Environmental Health Officer and 1 FTE Environmental Health Officer are working full time on COVID-19 work. Other food officers are providing significant support in this critical public health work.

4.3 Staff development plan

Each individual staff member has an annual appraisal meeting with their line manager (plus a six monthly review) to evidence individual contributions in achieving our stated goals and identifying any development needs. This is in addition to regular, ongoing 1-2-1s. Nationally, the FSA has introduced a competency framework which lists the main sections in which an EHO must be competent, covering a range of food safety disciplines, with officers now requiring authorisation for each specific section.

The new competency framework is a fluid document, requiring regular updates but also acting as a guide as it identifies development and training needs to ensure officers remain competent in relevant areas. Officers are required to review this document at least annually, usually prior to their annual appraisal. The new Competency Framework and new Food Law Code of Practice and associated Practice Guidance have recently been published in March 2021.

All officers are required to maintain at least 20 hours Continuing Professional Development programme as required by the Food Law Code of Practice. This is also reviewed at the annual appraisal.

Importance is given to the need to ensure continuing professional competence in technical areas of work. Training/development of staff remains challenging due to the current economic climate. Efforts are being made to carry out more in-house training which is taking the form of regular consistency meetings as well as undertaking training identified as part of the competency framework (e.g. imported foods).

Regionally, organised training is also taking place, twice a year, focusing on national drivers as well as regional training needs and requirements. E.g. PHE undertake microbiology training for the five West Yorkshire authorities.

Due to COVID-19 most planned training had been postponed, but this is now being undertaken e.g. FSA Imported Food training etc.

5. QUALITY ASSESSMENT

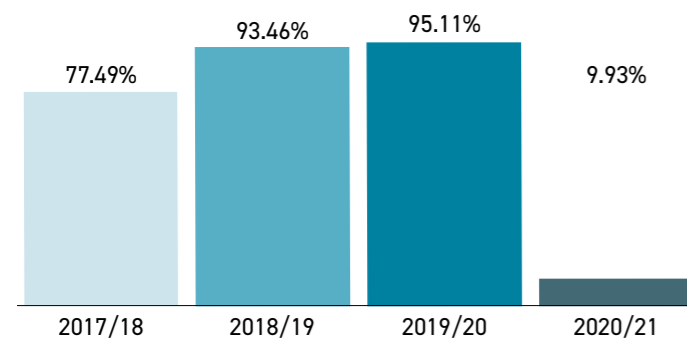
Officers' work is subjected to monthly quality checks which results in 10% of completed worksheets assessed for a number of parameters, focusing on consistency in application of legal requirements, updating of information and consistency in Food Hygiene Rating Score application and risk ratings. In addition, 'accompanied visits' are also undertaken to ensure officers are undertaking the role in accordance with the Code of Practice.

As most 'food work' has not taken place due to the COVID-19, these checks have not been undertaken.

The percentage of the inspection programme achieved for the periods 2017/18, 2018/19, 2019/20 and 2020/21 are listed below. The impact of COVID-19 on the 2020/21 inspection programme can clearly be seen from these figures.

Percentage of the Food Safety Inspection Programme Achieved

2017/18 = 77.49%
2018/19 = 93.46%
2019/20 = 95.11%
2020/21 = 9.93%



Summary

The ratio of planned inspections undertaken increased by 17.62 per cent between 2017 and 2020, from 77.49% in 2017/18 to 95.11% in 2019/20. The impact of COVID-19 on the 2020/21 inspection programme has been significant with the figure dropping down to 9.93%

6. REVIEW

6.1 Review against the Food Safety Service Plan

This Service Plan will be reviewed in summer 2021, once the FSA publishes its local authority recovery plan. The review will include information on the previous two years' performance against the Service Plan and will specify performance targets, performance standards and targeted outcomes. It will also have to review the impacts of COVID-19 on the Food Safety function.

6.2 Identification of any variation from the Service Plan

Any variation from the Service Plan will be reported to Senior Management with a view to corrective action being taken.

6.3 Team priorities

The following priorities have been identified for the Food Safety & Infectious Disease Team. They have been modified to incorporate the instructions from the FSA relating to the undertaking of food safety official controls during the COVID-19 pandemic:

1. Continue to undertake food hygiene duties according to the FSA requirements during the COVID-19 pandemic. In particular, to ensure that all high priority work is undertaken and try to extend that to the medium priority work.
2. Identify the impacts of COVID-19 on the inspection programme and identify the shortfall in inspections completed.
3. Implement a recovery plan to address the inspections backlog resulting from the COVID-19 pandemic.
4. Review the alternative intervention approach to ensure food official controls are being delivered in line with the Food Law Code of Practice.
5. Maintain staffing levels as per the budget and consider additional resources (e.g. use of external consultants; offering additional hours to existing staff etc.).

6. Ensure officer development continues as required in the FSA competency framework and officer authorisations reflect the individual competency matrix.
7. Continue to work toward implementation of the risk-based inspection programme, making use of the range of enforcement options available.
8. Ensuring interventions are risk based and in accordance with the agreed protocols.
9. Increase business resilience by improving the information that we have available for businesses on the website.
10. Continue to develop/sharing expertise across WYFLOG.
11. Ensure annual returns (LAEMS) to the Food Standards Agency are completed accurately and to agreed timescales.
12. Continue to respond to, and where necessary, lead on FSA issued alerts and requests for action.
13. Exploration of potential commercial opportunities in relation to the skills and expertise within the Food Safety Team. E.g. consultancy service work; primary authority agreements etc. This will look to enhance the support to businesses both within and outside of Kirklees.

The COVID-19 pandemic will influence the way that we focus our efforts for the forthcoming year. In summer 2021, it is hoped that the longer-term impacts of the COVID-19 pandemic will be known and the food safety service plan can be designed to address the impacts the pandemic has had on food safety service delivery and implement a plan to address the resulting backlog.

APPENDIX 1

The following table shows the budget for Environmental Health for the periods 2019/20 and 2020/21. Food Safety and Infectious Diseases are part of Environmental Health and the wider Public Protection Service.

Environmental Health Budget

Department	2019/20 £	2020/21 £
Food safety	682,265	698,135
FINE	65,760	67,200
Management and support	45,890	66,021
Animal licensing	116,466	118,615
PNC	985,722	996,328
Water safety	67,842	79,171
Infection control	32,938	32,678
Night time noise	112,379	116,234
Health and safety	98,920	100,691
Total	£2,208,182	£2,275,073

APPENDIX 2

This table shows the number of communicable diseases reported to the Food Safety and Infectious Diseases Team for the periods, 2018/19; 2019/20 and 2020/21.

Kirklees Environmental Health Communicable Diseases Review

Disease	Disease sub-type	2018/19	2019/20	2020/21	
Viral Hepatitis A		1	4	2	
Cholera		1	0	0	
Dysentery	Entamoeba histolytica	1	0	0	
	Shigella Boydii	1	1	0	
	Shigella Dysenteriae	1	0	0	
	Shigella flexneri	2	1	0	
	Shigella sonnei	9	6	2	
	Not typed	0	0	0	
Food poisoning	Bloody diarrhoea	0	0	0	
	B.cereus	0	0	0	
	C.botulinum	0	0	0	
	C.perfringens	0	0	4	
	Campylobacter	374	273	184	
	E.coli 0157	3	4	8	
	Listeria	0	1	0	
	Salmonella	70	48	19	
	Suspected food poisoning	5	0	1	
	Yersinia	0	0	0	
	Not typed	0	0	0	
	Gastro Enteritis	Cryptosporidium	53	29	7
		Giardia	9	12	5
Respiratory Disease	Legionella	10	7	1	
Paratyphoid Fever	Salmonella	3	5	0	
Typhoid Fever	Salmonella	0	0	0	
Total		543	391	233	

APPENDIX 3

Food Hygiene Rating Scheme, Number of Compliant or Failed Premises

This map shows the locations of food businesses which are compliant – this means those businesses with a 3, 4 or 5 food hygiene rating and those that are failed – those with a food hygiene rating of 0, 1 or 2. The map also identifies the areas in Kirklees that are the least deprived and the areas that are the most deprived.

