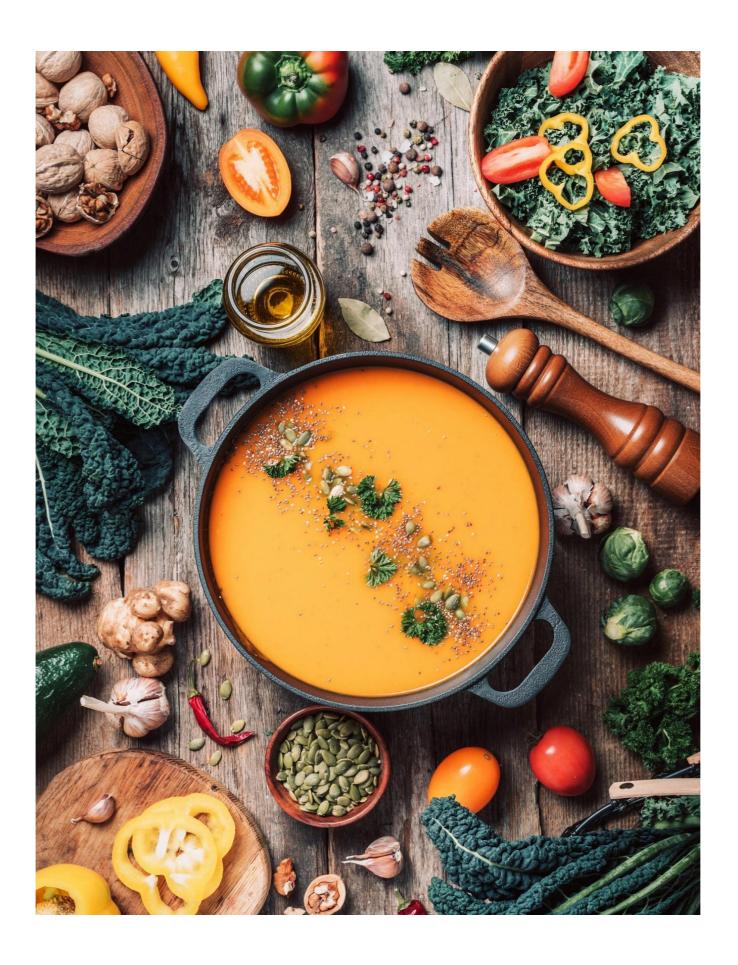
## Kirklees Council

# **Food Safety**

## Service Plan 2024/25







## **CONTENTS**

#### 1. INTRODUCTION

- 1.1 Aims and Objectives
- 1.2 Links to Corporate Objectives and Plans
- 1.3 Sustainable Economy

#### 2. BACKGROUND

- 2.1 Profile of the Local Authority
- 2.2 Organisation Structure
- 2.3 Scope of the Food Service
- 2.4 Demands of the Food Service
- 2.5 Regulation Policy

#### 3. SERVICE DELIVERY

- 3.1 Interventions of Food and Feeding Stuffs Establishments
- 3.2 Food and Food Premises Complaints
- 3.3 Compliance and Enforcement Action
- 3.4 Advice to Business
- 3.5 Food Sampling
- 3.6 Control and Investigation of Food Related Infectious Disease and Outbreaks
- 3.7 Food Safety Incidents
- 3.8 Liaison with Other Organisations
- 3.9 Home Authority Principle and Primary Authority Scheme
- 3.10 Food Safety Promotional Work and Non-Official Controls Intervention

#### 4. RESOURCES

- 4.1 Financial Allocation
- 4.2 Staffing Allocation
- 4.3 Staff Development Plan

#### **5. QUALITY ASSESSMENT**

5.1 Quality Assessment and Internal Monitoring

#### 6. REVIEW

- 6.1 Review against the Food Service Delivery Plan 2022
- 6.2 Identifications of Any Variation from the Service Delivery Plan 2022
  - 6.2.1 Inspections
  - 6.2.2 Requests for a Revisit under the National Food Hygiene Rating Scheme (FHRS)
  - 6.2.3 Revisits to Non-compliant Premises
- 6.3 Areas of Improvement for 2023/24

#### **Appendix 1 – Organisational Structure**

Appendix 2 – Food Hygiene Rating Scheme, Number of Compliant or Failed Premises Appendix 3 – Infectious Diseases Data



## 1. SERVICE AIMS AND OBJECTIVES

#### Introduction

The Food Standards Agency (FSA) is an independent Government body which has an oversight of how public health and consumers are protected with respect to food in England, Wales and Northern Ireland. The FSA's Food Law Codes of Practice and associated guidance, together with the Framework Agreement on Official Feed and Food Controls by Local Authorities, clearing sets out what is expected of local authorities in performing their regulatory role. This Service plan details the food safety work of the Kirklees Council's Environmental Health Food Safety Team for 2024/25. The plan follows the format set out by the FSA Framework Agreement and will also include a review of the previous year's activity and performance information.

Following the Covid-19 pandemic, the Food Standards Agency issued guidance to Local Authorities. Due to a pause with inspection programmes a significant backlog developed of food hygiene inspections. In 2023/2024 the Food Safety Team have continued to successfully complete the majority of these inspections backlog, along with completing the inspections of a high volume of newly registered food businesses.

#### 1.1 AIMS AND OBJECTIVES

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 deliver the planned interventions as set out in this Service Delivery plan in accordance with Food Law Codes of Practice (England) including all unrated premises (new registrations).

To respond to food and hygiene complaints, considering the risks to public health. In accordance with the Councils enforcement policy and the Regulators code.

Investigate food poisoning notifications and/or other food safety alert incidents to ensure the protection of wider public health.

To provide support and advice to local businesses so they a can comply with legal requirements and best practice.

To continue using the Food Hygiene Rating scheme (FHRS) to promote and improve food safety compliance with food businesses.

To play an active role in the Food Standards Agency plans under the Achieving Business Compliance programme to review and update how food safety is regulated in the UK in a post Brexit world: <u>Achieving</u> Business Compliance (ABC) programme | Food Standards Agency

#### 1.2 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:

- Sustainable Economy
- Well
- Safe and Cohesive
- Clean and Green
- Shaped by People

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 to 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. This means that imported foods coming into the UK (from Europe and other 'third' countries) ,require physical, documentary and identity checks at the border. These have now been introduced, for medium risk goods imported from the EU. Although a reduction of checks has been implemented a baseline of 3% for EU imports and 5% for non-EU imports. The UK Government will also begin to simplify imports from non-EU countries - this will include the removal of health certification and routine checks on low-risk plants and plant products from non-EU countries.

These additional controls on imports and exports of certain foods, may also impact on businesses within Kirklees and their ability to operate. This is because there were previously no import/export restrictions on their goods between the UK and EU. 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.

To date, there have not been any significant impacts from the UK's exit from the EU within Kirklees; however not all import controls for food emanating from the EU are in place. Although Kirklees is not a port of entry, there remains the potential for the imported foods to impact upon Kirklees Food Safety Department. This would be when problems were identified with imported foods that have not been checked at the port of entry, Kirklees Food Safety Team may need to detain and/or require disposal, destruction or return of such goods. This will require appropriate staffing resources.

In 2023/24 we saw no increase in the requests to Food Safety for export certificates from manufacturers located in Kirklees.

## 1.3 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 a reasonable, proportionate, risk-based enforcement action to secure compliance. The Public Protection Enforcement Policy outlines this approach by ensuring the full range of enforcement options are considered and using the hierarchy of enforcement options. Only using formal options where informal options have not achieved the desired outcome (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 complaints regarding businesses will increase. 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 the UK Health Security Agency (UKHSA) 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) in relation to infection prevention and control.

The Food Information and Nutritional Education (FINE) team was previously positioned within the Public Protection Service and worked with the Food Safety Team on a number of projects to promote healthy eating. One such project was 'Healthy Holidays' that was introduced during the Covid-19 pandemic in response to the problem of children not being at school and therefore not being able to access a nutritionally balanced lunch due to school closures and poverty. This project has continued during school holidays since that time and the Food Safety Team ensures that providers are compliant with food hygiene legislation and are providing safe food.



Since 1<sup>st</sup> April 2022, the FINE Team has now moved under the Public Health Directorate, however the joint working on Healthy Holidays continues, as will future projects, where appropriate.

The Food Safety Team maintains its links with the Consultant in Public Health Medicine in infectious disease control, particularly in connection with food poisoning and foodborne illness. 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.

Food Safety (and other Public Protection) officers worked closely with Kirklees Infection Prevention Control officers during the Covid-19 Pandemic to investigate outbreaks of COVID-19 in workplaces, particularly those associated with food businesses. The links developed during that period, have been maintained and will ensure continued collaborative working between the departments.



## 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 fourteenth largest local authority (in the UK) with a population currently estimated to be 437, 000 (2022 estimate, following the 2021 Census our population estimate was revised to a lower figure)

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 6,946 Full-time Equivalent (FTE) staff, as of August 2023. (This excludes schools).

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. Please see appendix 1 for the organisational structure. In accordance with the Food Law Code of Practice (England) we have appointed the UK Health Security Agency Food, Water and Environmental Microbiology Services 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 disease 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



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

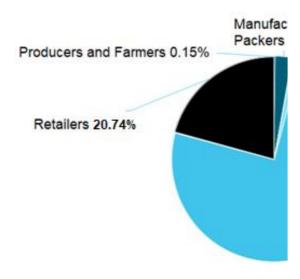
As of 1<sup>st</sup> April 2024, there were 4164 food businesses registered with the Food Safety Team.

The table below shows the number of food businesses registered with Kirklees Food Safety Department on the 1<sup>st</sup> April 2024. The pie chart below also represents this information.

## FOOD BUSINESSES REGISTERED WITH THE FOOD SAFETY TEAM ON 1st April 2024

Business type	Number
Producers and farmers	6
Manufacturers and packers	108
Importers and exporters	11
Distributors and transporters	53
Retailers	828
Restaurant/Caterers	3158
Total	4164

### Food Business Registered with the Food Safety Team 1st April 2024

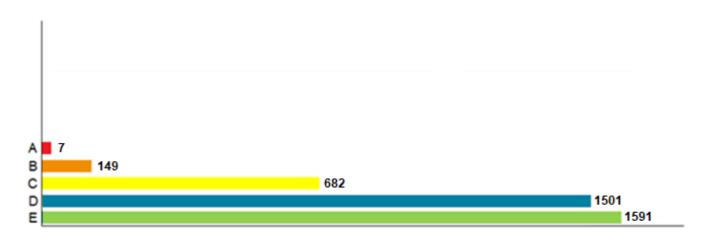


The risk rating relative to the number of food business is provided. The table below shows a breakdown of the number of food businesses that fall into the different risk categories A to E, as detailed within the Food Law Code of Practice. Businesses in risk category A are deemed the highest risk and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

## Rated premises profile 1st April 2024

Type of Risk	Type of Premises	Number
A		7
В		149
С		682
D		1501
E		1591
Outside programme		4
Unrated premises		192
Approved premises	Meat/minced meat or meat preparations products	12
	Fishery Products	2
	Cold Stores	8
	Egg Packing	3
	Dairy products	8
Specialist processes	On-Farm pasteurisers and dairy products	5
	Bottled water producers	1 on 2 sites

### Rated Premises Profile 1st April 2024



Kirklees Council currently has 38 premises that manufacture or process products of animal origin that require statutory approval. This also includes 5 on farm pasteurising dairies that we have specifically trained officers to deal with. Two officers will always attend approved premises interventions, this is due to risk and complexity of these types of premises. As each inspection can take two- three hours of officers' time and Kirklees council having 38 approved premises, this can equate to a minimum of 240hrs of officers' time. Therefore, the resources required for the delivery of official controls, in relation to approved premises, is greater. It is estimated that this would equate to around 120 food hygiene inspections in a catering establishment, such as takeaways/restaurants.

Furthermore, sampling and environmental swabbing is undertaken by Kirklees Council food officers at all approved premises, at least once per year. This is approximately a further 120 hours of officer time, consistent with approximately 50-60 inspections/official controls in catering establishments.

There are also 8 approved cold stores within Kirklees District, In the past these types of premises have been perceived to be classed as low risk food hygiene premises. Following the horse meat scandal in 2013 and other high profile food safety cases, this highlighted the need to reconsider the risk associated with these types of premises and food fraud continues to be a national issue.

In summary, when considering the resources required to undertake all official controls in Kirklees, resources equivalent to an additional 150 interventions shall be factored in for increased demand associated with the regulation of approved premises. This is in addition to the number of interventions due under the food inspection programme each year and the estimate of new businesses registering in the calendar year (usually approximately 500 new businesses). The number of estimated interventions shall be considered with reference to the number of FTE food hygiene inspectors required to undertake official controls.

The budget allocated to delivering the Food Safety and Advice function is shown in section 4.1 and staffing allocation in section 4.

Environmental Health operates from Civic Centre 1, High Street, Huddersfield, HD1 2NF

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

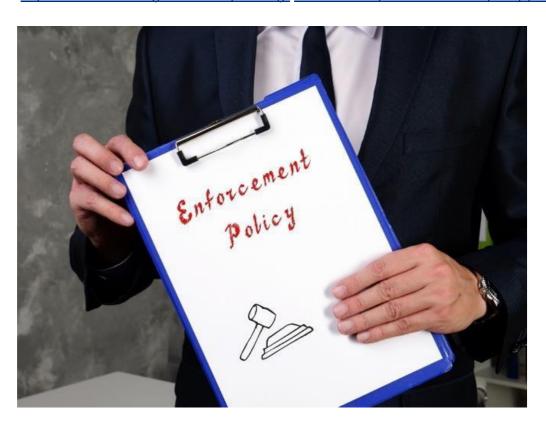
The public may also access the service from Customer Service Centres located in Huddersfield and Dewsbury.

## 2.5 REGULATION 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 Food Safety intervention programme undertaken by Kirklees Council operates in accordance to the Food Law Code of Practice (CoP) and any associated guidance/policy. The CoP sets out a range of interventions to support local authorities target resources more effectively on those premises that pose the highest risk. These official controls include inspections, audits, sampling, monitoring and verification.

We continue to follow an alternative intervention approach for low risk, category E premises, which have previously been inspected, whereby a 'low risk survey' form is sent to a business asking the food business operator about the types of foods handled and what food safety procedures are in-place at the business. From this, an assessment will be made of the food safety risk. Where there has been a change in food business operator, or if the information provided indicates an increase in risk, an on-site intervention shall be undertaken. Where the form is not returned, an officer will call the business to complete the assessment or will visit to assess the risk. These will also result in a full inspection, should the information indicate an increase in the food safety risk.

The following tables shows the number of interventions undertaken during the 2022/23 and 2023/24 and these are listed according to the type of intervention.

#### Interventions undertaken 2022/23

The following table shows the number of interventions undertaken during the 2022-2023 financial year and these are listed according to the type of intervention.

In 2022/23, the Food Safety Team significantly increased its delivery of official controls and not only met the Food Standards Agency's Recovery Plan minimum requirements at every milestone but exceeded the expectations. The numbers of interventions completed are also above pre-pandemic levels.

Number	
1434	
259	
289	
487	
N/A	
1	
77	
1047	
	1434 259 289 487 N/A 1

#### Interventions undertaken 2023/24

The table shows the number of interventions undertaken 2023-24 financial year and these are listed according to the type of intervention.

Intervention type	Number
Inspection or audit	1329
Re-Visits	136
Verification or surveillance ( all onsite visits)	153
Sampling*	466
Advice or education **	139
Information/intelligence gathering	2
Food Hygiene Rating re-assessments	85
Category E Low Risk interventions	243

<sup>\*</sup>Sampling number = the total number of samples taken

## 3.1 INTERVENTIONS OF FOOD AND FEEDING STUFFS ESTABLISHMENTS

During 2023/24 all inspections were undertaken by Environmental Health staff (rather than contractors). We place high value in the importance of consistency in our approach and amongst officers, which is better supported using in-house staff.

From the 1st April 2024, we have continued to carry out due interventions for establishments that are back in line with the routine inspection programme, in accordance with the frequencies set out in the Food Law Code of Practice 2023. This is in line with the expectation in the FSA Recovery Plan that establishments should revert to Code frequencies, once subject to an intervention, as part of the Plan. We have worked towards realigning with the provisions set out in the Code from 1 April 2023 using the full range of flexibilities already offered by the Code. Over the last 12 months we have continued to exercise a risk-based approach to the requirements set out in the Code based on available resource and will continue to do so over the coming 12 months.

The following table shows the number of programmed interventions that are due to be completed up to the 31<sup>st of</sup> March 2025:

Risk Category of Establishment	Number of premises due inspection in this category to 31.3.25
A	4
В	140
С	402
D	864
E*	286
Unrated	83

<sup>\*</sup> Please note that category E businesses will usually receive a low-risk survey either by post or conducted over the phone. Where this identifies that there have been no changes to the businesses and the risks are not deemed to have increased, then an on-site visit is not undertaken. Where there has been a change of food business operator or a change in their business operation an on-site inspection will be undertaken.

<sup>\*\*</sup> This includes number of businesses that have attended Steps to Success workshop.

There are currently 6.86 Full Time Equivalent (FTE) officers who are fully authorised to undertake all official controls and enforcement activities. There are a further 2 FTE with restricted authorisations (Category C to E premises interventions) and 1FTE in training, who undertakes information/intelligence gathering visits etc. The total FTE for food safety is 9.86 FTEs plus 1 FTE Group Leader.

In 2023/24, requirements of the FSA Recovery Plan were comfortably met but Kirklees Food Safety team also received 725 new business registrations, which required inspection. In addition to meeting the FSA's minimum requirements, it was a priority for the on-site inspection of category D premises that are broadly compliant be undertaken. It was aimed (the same as last year) that at least 50% of these businesses would be inspected. As of the 1st April 2024 Officers completed 556 category D rated premises inspections (65% of the actual outstanding total). This was an excellent achievement to ensure the inspection programme is back in line with the FSA Codes of Practice.

There was also a number of revisits planned, to ensure that businesses who were less than broadly compliant have made the required food safety improvements. In 2023/24, 136 revisits were completed.

The Food Safety Team has also continued to prioritise the allergen requirements in food businesses, during on-site inspections. These requirements came into force in 2021 and are commonly known as 'Natasha's Law' require businesses who wrap food for sale (pre-packed for direct sale e.g., packaged sandwiches) must provide ingredients and allergen information on the packaging to inform consumers. This has been a significant change in the requirements relating to allergens and therefore emphasis is being placed on this during inspections to assist businesses in complying and to keep consumers safe.

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 2 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.

To try to support businesses with poor food hygiene ratings to improve and maintain their hygiene rating, in January 2023 we held a pilot workshop called 'Steps to Success' for food businesses with a low food hygiene rating, 15 Food Business Operators attended the workshop. The workshop covered the areas which are most frequently associated with poor food hygiene ratings, as follows: food safety documentation requirements, cleaning, cross contamination, pest control and what to expect when an Officer is completing a food hygiene inspection.

The workshop's facilitators have received positive feedback from all food businesses that attended. In 2023/24 we facilitated these workshops every 6-8 weeks in venues throughout North/South Kirklees. The workshops have taken place in localities where there is a concentration of poor food hygiene ratings to make the training as accessible as possible. An impressive 84 businesses have attended the Steps to Success workshops, with a total of 134 individuals. A review of the subsequent inspections' Food Hygiene Rating (FHR) data, of attending businesses, has been analysed to identify whether attending the workshop leads to improvements in the businesses' FHR/compliance with legislation has been achieved. Of the 84 businesses attending the data shows 82 business are now compliant and have achieved a FHR of 3 (satisfactory) or above. The FHR data will continue to be analysed to identify if the increase has a long-term impact of the businesses' compliance with legislation.

Food team 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 2024/25 officers will undertake imported food sampling to check the safety of imported foods being sold in Kirklees. This is a requirement for Food Safety Departments to undertake the sampling of imported foods as part of their sampling programme as it provides important surveillance of imported foods which ensures the safety of foods being imported to the UK.

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

Since the introduction of smoke-free legislation in 2007 premises and vehicles are also assessed for compliance at each inspection and the necessary action(s) taken.



#### 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 2022/23 the Food Safety Team received 666 complaints relating to the condition of either food or food premises. In 2023/24 the Food Team has received 490 complaints relating to the condition of food or food premises were received (this is a 26% decrease from the previous year). 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.

The resources allocated to the Food Safety Team are sufficient to enable all complaints relating to food or food premises to be triaged and action taken according to risk and our work instructions regarding such complaints.

### 3.3 COMPLIANCE AND ENFORCEMENT ACTION

The tables below detail the enforcement action undertaken by the Food Safety Team during 2021/22 and 2023/24.

#### **ENFORCEMENT ACTIONS 2021/22**

Enforcement Action type	Number
Voluntary closure	13
Seizure of food	0
Suspension/revocation of approval/licence	0
Emergency prohibition	0
Simple caution	3
Improvement notices	93
Remedial action and detention notices	2
Written warnings	972
Prosecutions	1

#### **ENFORCEMENT ACTIONS 2022/23**

Enforcement Action type	Number
Voluntary closure	3
Seizure of food	0
Suspension/revocation of approval/licence	0
Emergency prohibition	9
Simple caution	3
Improvement notices	104
Remedial action and detention notices	1
Written warnings	1240
Prosecutions	10

#### **ENFORCEMENT ACTIONS 2023/24**

Enforcement action type	Number
Voluntary closure	9
Seizure of food	1
Suspension/revocation of approval/license	1
Emergency prohibition	6
Simple caution	1
Improvement notices	54
Remedial Action and detention notices	4
Written warnings	1129
Prosecutions	3 completed (4 pending)

The above data on enforcement actions taken, reflects the impacts of the Covid-19 Pandemic with the return to more frequent inspection/intervention in 2021/22 and 2022/23 there has been a significant increase in the numbers of enforcement actions. The data for 2023/24 is consistent with or higher than data from the pre-pandemic period and also the ongoing impact the cost-of-living crisis is having on food businesses. Officers are continuing to find a decline in food hygiene standards in food businesses and this is resulting in an increase in enforcement actions.

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.

In line with Kirklees Enforcement Policy and the graduated approach, prosecution will only be used when all other enforcement options have been exhausted. However, where very serious and high-risk contraventions are identified, prosecution may be taken without following a graduated approach. Kirklees Council's Enforcement Policy can be accessed at the following link:

https://www.kirklees.gov.uk/beta/planning-enforcement/pdf/enforcement-policy.pdf

#### 3.4 ADVICE TO BUSINESS

The Food Safety and Infectious Diseases Team is committed to providing advice to food businesses; this may involve carrying out a visit to assist food businesses to comply with food hygiene legislation. During the 2023/24 period, 139 requests for advice were received, this is an Increase on the previous year (74) with implementation of the Steps to Success workshop and the limited resources, 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 business, the Food Safety team has now signed up to the Food Standards Agency Register a Food Business Service (RAFB). Registration is a legal requirement and is the foundation of food business operator (FBO) data that is used by those delivering official food controls. The FSA RAFB will ensure that information captured is accurate and in a consistent way through out LAs and that the right information is obtained at the point of registration. The Food Safety Team will continue to be responsible for the registration of food businesses. The RAFB service aims to improve the overall effectiveness, efficiency and consistency of registering food business establishments across England, Wales and Northern Ireland. In 2024, the FSA are reviewing the RAFB and hoping to include some further information such as an addition of three risk-based questions to help local authorities triage and prioritisation of newly registered food businesses. Along with a date of birth field for the FBO to complete. It is a user-friendly process that captures relevant data from food business operators (FBOs). In addition to it being easier and quicker for food businesses to register, they also receive links to relevant information and guidance to help them comply with safety and standards regulations. Later versions of the service will provide links tailored to the type of business registering.



As part of our commitment to supporting food businesses and from reviewing our data regarding food business compliance and localities, it has been identified that there is a significant correlation between poor levels of food hygiene compliance and businesses being located in areas/wards with high levels of deprivation (please see Appendix 2 – Food Hygiene Rating Scheme, Number of Compliant or Failed Premises). As previously mentioned, we are therefore, refocusing our resources to supporting these businesses by continuing with a low-cost training workshop that was piloted in 2022/23 on businesses that are less than broadly compliant, particularly those with food hygiene ratings of 0, 1 or 2 and has been a success of 2023/24.

The 'Steps to Success' (STSS) workshops have now taken place in localities where compliance is low and so that the workshops are easy to access and provide an opportunity for the food business operators to get one-to-one help and advice. Each business that attended also received a printed copy of the Safer Food, Better Business pack along with a 1-hour re-visit from an officer to check ongoing standards/ improvements. Due to receiving positive feedback, STSS workshops will be facilitated every 6 weeks within numerous localities, following a place based working approach.

#### 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. There is also a focus on sampling at premises that pose a higher risk due to the type of food and the quantities of food produced, e.g., approved premises that manufacture meat/dairy products etc.

This sampling of both food and environmental swabbing provides reliable information regarding the hygiene standards in premises and the safety of food products.



Due to the number of 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. In 2022 we started to expand this service to other approved premises and manufacturers of high-risk food, such as meat products premises, to assist such businesses in verifying that their food safety management procedures (based on the HACCP principles) are effective. Due to a reduction in the availability of local food microbiology services, we see this as an important area of work that requires development. We have been successful in gaining 2 new commercial contracts and will be looking to further expand these in 2024/25 to support businesses.

The Food team also participates in cross regional and national surveys organised through UKHSA. In addition, samples are taken following referrals of sample failures from other local authorities; by officers following or during routine inspections; and/or in response to 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 UKHSA Food and Water Laboratory or Lancashire Analytical Services Laboratories.

In 2022/23, 483 samples were taken in total (95% increase on the previous year). In 2023/24 466 samples were completed. We will continue with our sampling programme for surveillance purposes due to having additional staffing resources available in the form of 3 officers undertaking studies to become Environmental Health Officers/Senior Technical Officers who, once competent, will undertake sampling as part of our surveillance of food hygiene standards and food safety at businesses.

## 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 UKHSA 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 investigations up to the years 2024 can be found in Appendix 3.

In the event of a serious outbreak, staff resources are utilised from the food team and across the whole Service if necessary. In 2023 we investigated one suspected outbreak of food poisoning. In 2022/23 we had not received any suspected outbreaks of food poisoning. During instances of suspected food poisoning outbreaks, we work closely with UKHSA and Kirklees Public Health colleagues. There is also a Memorandum of Understanding (MOU) between the West Yorkshire authorities that would permit colleagues from neighbouring authorities to assist us, should there be the need.

The incidence of food poisoning follows a national pattern, with Campylobacter being the most prevalent cause of reportable food poisoning. However in the last 2 years Salmonella cases are on the rise.

#### 3.7 FOOD SAFETY INCIDENTS

Procedures for dealing with Food Alerts and food safety incidents 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. Those food alerts that are 'for action' will be acted upon by officers and the Food Lead Officer will co-ordinate the response and direct officers to take appropriate action should a food alert be received that relates to food or premises located within Kirklees.

Where the Food Safety Team are contacted directly by the FSA in relation to a food incident, relating to a business within Kirklees, action will be taken immediately. This will also extend to responding to urgent food standards issues, in order to assist West Yorkshire Joint Services in responding quickly to an issue. This will be to identify whether the affected item is present and to take steps to remove it from sale etc.

Where a significant food safety incident occurs, all of the Food Safety Team would be made available to respond. This might include a national recall etc. However, these incidents are generally infrequent and, as such, all necessary resources are available. Should this not be the case, other officers from Environmental Health would be called upon to assist and/or other West Yorkshire colleagues would be requested to assist under the MOU.

## 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: UKHSA Food, Water & Environmental Microbiological Laboratory; Food Standards Agency (FSA) Imported Food; and FSA Relationship Manager and West Yorkshire Joint Services (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.

There are also close links established with the UKHSA colleagues and internally, with Kirklees Public Health, in relation to communicable diseases and infection prevention and control.



## 3.9 HOME AUTHORITY PRINCIPLE AND PRIMARY AUTHORITY SCHEME

There are a number of large food manufacturing businesses within Kirklees' borough that distribute foodstuffs nationally and some internationally. There are also a number of food businesses that operate multiple outlets. However, there are currently no primary authority agreements, relating to food safety, between Kirklees Council and businesses.

We do, however follow the Home Authority Principle, in that we provide assistance to other competent authorities in relation to facilitating the sharing of intelligence or investigating any concerns regarding a product produced within Kirklees or by a company located within Kirklees.

The Food Safety Team follows the Home Authority (HA) principal when undertaking regulatory duties and would contact the HA should there be any concerns regarding the food safety compliance at the business or in relation to a complaint.

The Food Safety Team also verifies whether there is a Primary Authority Agreement in place at businesses, prior to undertaking official controls and would verify whether there were any relevant assured advice/inspection plans etc. to be considered prior to on-site visit. Any proposed enforcement action would be considered following consultation with the primary authority, except in emergency situations where there was an imminent risk to health.

The lack of any food safety Primary Authority Agreements means that this area does not currently require any resource. The Service would openly consider establishing a primary authority partnership should it be approached.

Resourcing both the Home Authority Principle and Primary Authority Scheme does not require significant resource at this time, as officers undertake their duties with reference to these principles when undertaking official controls at businesses.



## 3.10 FOOD SAFETY PROMOTIONAL WORK AND NON-OFFICIAL CONTROLS INTERVENTIONS

The service takes part in a variety of food safety promotion activities in order to raise awareness of food safety in the home and in businesses.

#### Such promotions include:

- 1. Maintenance of the Food Safety section on the council Website
- 2. Publishing the food hygiene ratings of food businesses on the FSA national website: <u>Search for ratings</u> | Food Hygiene Ratings
- 3. Steps to Success Workshops
- 4. Fee paying service for businesses seeking bespoke advice
- 5. Identification of opportunities for engaging in the wider Public Health Agenda
- 6. Promote any FSA campaigns such as Food Safety Week, safe summer BBQ's and Christmas Messages.

In relation to non-official controls interventions, the Service also undertakes compliance interviews with businesses that have been found to be failing over a period of time. The aim is to try to achieve an improvement in standards, without the need to take enforcement action. The focus of the interview is to discuss the food hygiene contraventions with the Food Business Operator (FBO), away from the business where they have time to discuss and understand the issues at the business and for food safety officer and Environmental Health Group Leader (EHGL) to understand the reasons for the contraventions and for the FBO to provide some pledges as to how they intend to rectify the problems and to maintain an hygienic and compliant business. These pledges are recorded at the time of the interview and both the FBO and the EHGL both sign the agreement. Should future interventions identify that the business has failed to implement the required improvements or maintain previous improvements, then formal enforcement action will be taken.



### 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 Infectious Disease functions for 2021/22 and 2022/23 is shown below.

Expenditure	2022/23	2023/24	2024/25
Staffing	£615,102	£659,965	£663,908
Training	£2000	£2000	£2000
Travel and other subsistence	£3083	£3083	£3083
Supplies and services	£702	£1702	£1702
ICT	£0	£4368	£0
Sampling	£8650	£2783	£2783
Total Expenditure	£629,537	£673,900	£673,476

In 2021/22 the budget was reprofiled to provide extra resources for this important area of work. This has since continued with a view to finalising recruitment and to assist with staff retention. In the last 12 months we have had 1.5 EHOs take retirement or leave the service but another 2 EHOs join therefore, 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 (FTE's) the generally accepted national guidance is that:

- 250 premises per FTE is a well-resourced LA
- 350 or more premises per FTE is a stretched LA
- 450 or more premises per FTE is an LA which is likely to flounder and not deliver all the statutory functions.

Kirklees current staffing resource stands at 9.86 FTE which is 422 premises per FTE; however low risk premises (category E) do not always require an onsite, official control and have an alternative intervention. When excluding the number of low risk rated premises the number of food premises per FTE is 260 and therefore it is believed that this resource is adequate.

It should be noted that due to the Food Law Code of Practice (CoP) qualification and Competency Framework requirements for food safety inspectors, it is very difficult to recruit suitably qualified and experienced officers. In considering this, Kirklees will continue to train and develop in-house members of staff to meet these recruitment needs. This is also part of the wider workforce and succession planning, in response to expected retirements in the coming years. There are currently three officers training to be either EHOs (2) or an STO (1). The current staffing resources are satisfactory in order to deliver the estimated food official controls for 2024/25, in line with the requirements of the CoP.

Due to the national shortage of suitably qualified food safety officers, the FSA are currently reviewing officers' qualification and competency framework as part of a Local Authority resourcing project. The FSA are aware of the following issues LA are facing:

- 1. Insufficient number of students working towards qualification
- 2. Current qualification routes and training programmes do not provide early career professionals competent to deliver official controls.

- 3. Early career professionals require significant levels of support, which some LAs do not have the capacity to provide.
- 4. A lack of practical experience provided (or required) by the current qualification and training routes.
- 5. Current qualification routes perceived to be too linear and take a long time to achieve.

The sampling element within the above budget information, relates to sampling income from undertaking the sampling service that is provided for dairies and other 'approved' premises.

We receive sampling credits from the UK Health Security Agency's Food, Water and Environmental Laboratory in relation to sampling as part of surveillance or as part of a formal investigation, which enables the Food Safety Team to undertake good levels of sampling. As previously described in Section 3.5, sampling levels have returned to pre-Pandemic levels.



### 4.2 STAFFING ALLOCATION

The current staff resources covering Food Safety and Infectious Diseases work at 1<sup>st</sup> April 2024:

- 1 Environmental Health Group Leader (Food Lead Officer)
- 1.86 Full Time Equivalent Senior Environmental Health Officers (SEHO)
- 6 FTE Environmental Health Officers (EHO)
- 2.0 FTE Senior Technical Officer (1 officer in training and not able to undertake official controls at the time of writing)
- 1 Business Support Officer

The staffing resource to the Food Safety Team has increased in recent years and, as can be seen in 4.1 above, the ratio of food businesses per food safety officer has significantly reduced.

The food safety team have 9.86 FTE delivering official controls, which is deemed adequate to ensure the appropriate delivery of official controls. The performance of the Team, with regards to completing all necessary official controls will continue to be monitored on an, at least, quarterly basis. This is discussed further in Section 6 – Review.

#### 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, food safety officers are required to be competent according to the Food Law Code of Practice and the FSA's Competency Framework, which identifies the key areas of skills and knowledge that a food safety officer must have in order to be deemed competent for the delivery of official controls. The Competency Framework covers a wide 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 in the Food Law Code of Practice and associated Practice Guidance was first published in June 2023 and all officers who were not deemed 'competent' before 1st March 2021 have been through the new competency framework. Their knowledge and skills have been assessed by the Food Lead Officer through discussion and from observation during accompanied visits and where this has been identified as satisfactory, they have been deemed competent and authorised accordingly. Competency requirements were further reviewed in 2023, following the release of an updated CoP and Practice Guidance in June 2023.

As part of the competency framework and requirements of the Food Law Code of Practice, all officers are required to maintain at least 20 hours Continuing Professional Development (CPD). 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 was challenging due to the Pandemic; however, CPD has been maintained through online training and from in-house training.

In-house training consists of regular consistency meetings as well as undertaking training focused on specific areas of official controls, e.g., inspection of approved premises. These training sessions are led by the Food Lead Officer or other senior members of staff to impart their knowledge and experience to colleagues.

Regionally organised training also takes place, twice a year, focusing on national drivers as well as regional training needs and requirements. e.g., UKHSA undertake microbiology training for the five West Yorkshire authorities at least annually. There is also £2,000 allocated towards staff training in the budget.

Officers Training needs are met by:

- a) Courses to achieve specific qualifications.
- b) Attendance at technical seminars.
- c) In-house training
- d) Cascade training by officers that have attended relevant courses.
- e) Accompanied inspections.
- f) On-line training provided by the Food Standards Agency/UKHSA

#### **Training Program 2024**

Kirklees council will provide 10 CPD hours relating to food matters directly related to official controls for authorised officers. In 2024 the following training will be provided:

- a) Approved premises, meat preparation and meat products. (WYFLOG Approved Premises Working group to cascade)
- b) Outdoor Events Management
- c) Listeria
- d) VAC Pack and Sous Vide (Internal Exercise)



## 5. QUALITY ASSESSMENT

## 5.1 QUALITY ASSESSMENT AND INTERNAL MONITORING

In addition to training, the Food Lead Officer and/or Senior EHOs ensure the competency of officers delivering official controls, through accompanied visits (minimum annual frequency) and ongoing by conducting monthly audits of officers' work.

These monthly quality checks comprise the supervisor reviewing 10% of an officer's completed worksheets and assesses them against several parameters, focusing on consistency and accuracy in the application of legal requirements, updating of information and consistency in the application of the Food Hygiene Rating Scheme and risk rating of businesses. Where inconsistencies are identified, these will be discussed with the officer and training provided. This process may also identify a wider training need within the team and will inform the subject area for internal or external training.

In addition, 'accompanied visits' are also undertaken to ensure officers are undertaking the role in accordance with the Code of Practice and that actions are consistent with our Enforcement Policy.

The Food Safety Team also takes part in the FSA's National Food Hygiene Rating Scheme Consistency Exercises. The Team's findings have always been in-line with the published results. This supports our internal checks that officers are correctly administering the Food Hygiene Rating Scheme.

During the first year of the Covid-19 pandemic, routine food hygiene inspections were temporarily suspended. This significantly affected the percentage of the inspection programme achieved for the period 2020/21 as can be seen below. Following the Pandemic, the Food Safety Team followed the FSA's Recovery Plan during 2021 to 2023 and met its obligations in relation to this. Therefore, the percentage of the inspections completed, during this period were 100% of the FSA Recovery Plan. As detailed in point 6.1, the food safety team had another successful year in 2023/24 with the inspection outcomes.



## 6. REVIEW

### 6.1 REVIEW AGAINST THE FOOD SAFETY SERVICE PLAN 2023

The Food Safety Group Leader (FSGL) monitors performance on a quarterly basis and shall be documented. The Information is provided to the Environmental Health Operational Manager and Head of Public Protection. A review of performance is undertaken at the Food Safety Group Leader's one to one meetings and yearly appraisals. The relevant performance data is also submitted to the FSA data team, in accordance with their requirements.

Should these internal, performance reviews identify any actual or likely failure to meet the FSA/CoP requirements, the FSGL will report this to the Service Director for Environmental Strategy and Climate Change.

A review of the performance data for 2023/24 identifies that the food safety team completed the following:

- 1. All High-risk Category A- B that were due a programmed intervention were completed (100%)
- 2. 98% of Category C's were inspected by the 31<sup>st</sup> March 2024 not all were completed due to officers not being able to gain access, due to seasonal operation of the business or the premises were closed for Ramadan/Eid. As at the time of writing, the majority have now been completed.
- 3. Of the Backlog of Category D Rated premises (868) 556 (65%) were completed.
- 4. 725 new food premises registrations were received. On the 1<sup>st</sup> April 2024 only 83 were outstanding, however these had been triaged and risk assessed to ensure they did not pose any significant risk.
- 5. During 2022/23 and 2023/24, the food safety team were trialling a mobile tablet to use when completing inspections. Unfortunately due to practical and technical issues the tablets were not suitable for the needs of the service and have been discontinued.
- 6. In September 2023, as part of the FSA audit programme, Kirklees Council was selected for audit with a focus on a specific area of local authority feed and food law enforcement approved premises. Whilst some recommendations have been identified, this report is seen as positive by the management team (including the Head of Service) as it supports the Department's ethos of continuous improvement.
- 7. The delivery of a low-cost workshop (Steps to Success) 84 Business have attended with all achieving compliance on their following inspection. An average increase of 2.4 in their FHR (max FHR 5 can be achieved)

- 8. The continued high number of HEPNs and voluntary closures is likely to be as a result of us focusing on high-risk businesses, but also prioritising complaints relating to businesses that have resulted in a business being required to close due to an imminent risk to public health. In the majority of cases, pests were identified to be the imminent risk.
- 9. Again, a high volume of prosecutions and pending prosecutions, is a reflection that over time we follow a graduated approach to enforcement in line with Kirklees Enforcement policy. In the majority of cases, all informal and/or other enforcement options have previously been used by an officer and the Food Business Operator has continued to fail to implement the necessary actions to rectify any contraventions found.



## 6.2 IDENTIFICATION OF ANY VARIATION FROM THE SERVICE PLAN 2022

### 6.2.1 INSPECTIONS

The Food Safety Team undertook 1,329 inspections or audits over the 2023/24 period. This again was a fantastic achievement.

A good number of category E premises were also assessed following our alternative intervention strategy for category E premises.

A total of 490 complaints were received by the Service in 2023/24. All complaints receive some level of response and officers follow a work instruction in relation to when action, including an onsite visit to the premises needs to be taken. As a minimum, complainants will be contacted and be given information about the action that will be taken.

In cases where the complaint is of a low-risk nature (e.g., food being sold beyond its best before date) the complainant will be informed that a note will be placed on the premises file and the officer will look at this at the next routine inspection.

For anything more serious, e.g., contaminated food; poor hygiene practices observed by a customer or undercooked foods then an onsite intervention will be undertaken.

A total of 1129 written warnings were issued to businesses for various contraventions of the hygiene regulations. This is approximately 80% of businesses receiving a written warning, following an on-site intervention.



## 6.2.2 REQUESTS FOR A REVISIT UNDER THE NATIONAL FOOD HYGIENE SCHEME (FHRS)

In 2023/24, 85 requests for a revisit (reassessment of their food hygiene rating) were received. This demand remains high, as a low food hygiene rating can impact on a business' ability to trade e.g., on online food platforms, such as Just Eat and also from the negative publicity that a low food hygiene rating can attract, particularly on social media or in local media who regularly publish the details of businesses with a 0 or 1 food hygiene rating. At the time of writing all these businesses had received their reassessment inspection.

#### 6.2.3 REVISITS TO NON-COMPLIANT PREMISES

In 2023/24, a total of 136 revisits were undertaken at food premises to ensure compliance with contraventions identified during a previous inspection or complaint visit. Revisits are undertaken in accordance with the Food Law Code of Practice and all businesses that are less than broadly compliant receive a revisit. This high number of revisits reflects the focus of officers in ensuring any risk-related matters are addressed and to ensure that a food business is operating hygienically and is being well-managed.

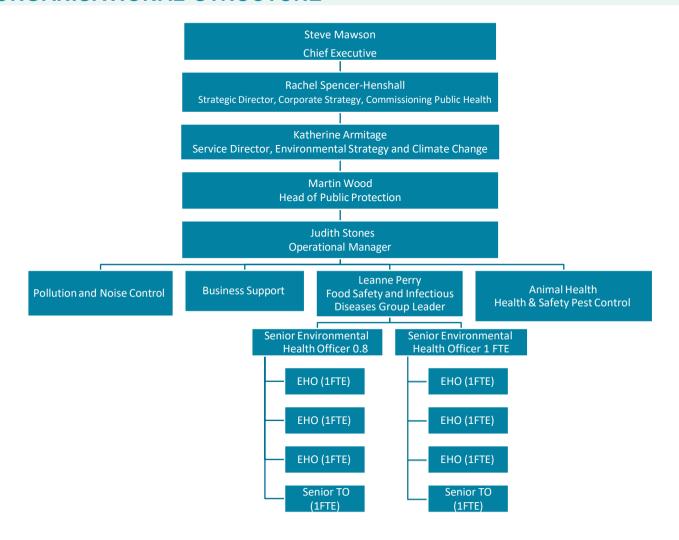
## 6.3 AREAS OF IMPROVEMENT FOR 2023/24

The following priorities for improvement have been identified for the Food Safety & Infectious Disease Team. They take into account the requirements of the FSA Food Law Codes of Practice and our own ambitions to ensure that food that is produced or sold in Kirklees is safe for our residents and visitors. We will achieve this through improving the hygiene standards at food businesses by better focusing our resources on areas and businesses with low levels of compliance and by providing additional support to such businesses:

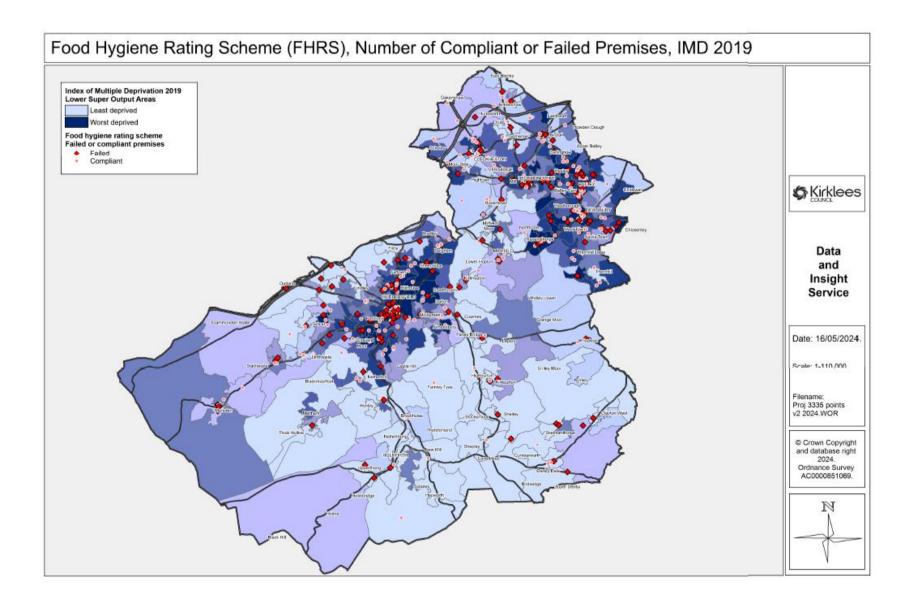
- 1. Continue to delivery official food controls in accordance with the FSA Recovery Plan/Codes of Practice and any other instruction that is received during the year.
- 2. Maintain the implementation of the National Food Hygiene Rating Scheme and ensure that the requirements of the 'Brand Standard' are followed and that food hygiene ratings are being correctly issued across Kirklees.
- 3. Review the alternative intervention approach to ensure food official controls are being delivered in line with the Food Law Code of Practice for category C, D and E premises.
- 4. Maintain staffing levels as per the budget and monitor performance to ensure the delivery of official controls is met.
- 5. Ensure officer development continues as required in the FSA competency framework and officer authorisations reflect the individual competency matrix.
- 6. Increase business resilience by improving the information that we have available for businesses on the website and the FSA RAFB.
- 7. Continue to develop/sharing expertise across WYFLOG.
- 8. Continue to respond to, and where necessary, lead on FSA issued alerts and requests for action.
- 9. To Continue to deliver a low-cost food hygiene workshop aimed at food businesses with 0, 1 or 2 food hygiene ratings and further expand it to areas of high deprivation to support businesses in these localities. This will include the continued evaluation of the workshop.
- 10. To develop a communications strategy to address the declining standards Officers are coming across when completing visits to food premises. To ensure that we design communication around the ways people access information- Twitter/Facebook etc.

- 11. To develop our place-based working approach through the review of data on poor levels of food hygiene compliance and localities to focus resources appropriately. This will include feedback from businesses in these areas on barriers affecting compliance.
- 12. To explore and develop 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.
- 13. To explore and develop links with local colleges to promote the Environmental Health profession and the roles available and qualifications required to work in Environmental Health, as part of our commitment to workforce planning.
- 14. To keep informed with the FSA Achieving Business Compliance Programme and attend all LA engagement events: Achieving Business Compliance (ABC) programme | Food Standards Agency

## APPENDIX 1 - ORGANISATIONAL STRUCTURE



## APPENDIX 2 – FOOD HYGIENE RATING SCHEME, NUMBER OF COMPLIANT OR FAILED PREMISES



## **APPENDIX 3 - INFECTIOUS DISEASES DATA**

Disease		2020/21	2021/22	2022/23	2023/24
Viral Hepatitis A	·	2	0	2	1
Cholera		0	1	0	0
	Entamoeba Histolytica	0	0	0	1
	Shigella Boydii	0	1	0	0
Dysentery	Shigella Dysenteriae	0	1	0	0
	Shigella flexneri	0	1	3	0
	Shigella sonnei	2	2	6	8
	Not typed	0	0	0	0
	Bloody diarrhoea	0	0	0	0
	B.cereus	0	0	0	0
	C.botulinum	0	0	0	0
	C.perfringens	4	0	0	0
	Campylobacter	184	182	184	197
Food Poisoning	E.coli 0157	8	6	8	1
rood Poisoning	Listeria	0	1	1	0
	Salmonella	19	9	34	42
	Suspected food poisoning	1	3	0	2
	Yersinia	0	0	0	0
	Not typed	0	2	0	0
Contro Enteritie	Cryptosporidium	7	5	13	16
Gastro Enteritis	Giardia	5	4	4	5
Respiratory Disease	Legionella	1	4	1	1
Paratyphoid Fever	Salmonella	0	0	0	0
Typhoid Fever	Salmonella	0	0	0	0
Total		233	225	256	274