

DACORUM BOROUGH COUNCIL

FOOD SERVICE PLAN

2021-2022

Computer Reference: Controlled Document FS 002g

Updated by: Rebecca Connolly

Plan Reviewed: June 2021

TABLE OF CONTENTS

1. Introduction
 - 1.1 Current and Emerging issues
 2. Service Aims and Objectives
 - 2.1 Aims and objectives
 - 2.2 Links to corporate objectives and plans
 3. Background
 - 3.1 Local Authority profile
 - 3.2 Organisational structure
 - 3.3 Scope of the food service
 - 3.4 Demands on the food service
 - 3.5 Enforcement policy
 4. Service Delivery
 - 4.1 Interventions at Food Establishments
 - 4.2 Food complaints
 - 4.3 Home Authority and Primary Authority Principles
 - 4.4 Advice to business
 - 4.5 Food sampling
 - 4.6 Control and the investigation of outbreaks and food related ID
 - 4.7 Food safety incidents
 - 4.8 Liaison with other organisations
 - 4.9 Food safety promotion
 5. Resources
 - 5.1 Financial allocation
 - 5.2 Staffing allocation
 - 5.3 Staff development
 6. Quality Assessment
 7. Review against Service Plan
 - 7.1 Review against service plan
 - 7.2 Identification of any variation from the service plan
 - 7.3 Areas of improvement
 8. Health and Safety Service Plan
-
- Annex 1 Regulating Our Future - Links to relevant documents explaining what it is.
 - Annex 2 DBC Structure
 - Annex 3 Environmental Health Structure April 2019
 - Annex 4 Food Safety Officer Competency Matrix Link
 - Annex 5 Dacorum Food Recovery Plan

COVID 19 Statement

The following food service plan is what the council would generally intend to deliver if we were not in a middle of a pandemic. It has reviewed the progress made in 2020/2021.

The Food Service Plan objectives for 2021/2022 have been set towards the end of June 2021 during the ongoing Covid-19 pandemic. Resources have been -and in many cases still are- diverted during the pandemic to activities related to reducing the spread of COVID-19.

The role of the Council and Environmental Health changed significantly during 2020/21 and priority has been given to local contact tracing, investigation of workplace outbreaks of COVID-19 and following up on COVID -19 complaints.

The Council has followed the COVID 19 Local Authority Enforcement guidance issued by the FSA throughout the pandemic and prioritised business as normal activities in line with this guidance and focused on the risk to public health.

The Council aims to follow the most recent FSA COVID 19 Local Authority recovery plan in order to deliver official controls and related activities in food establishments in Dacorum to ensure that businesses are complying with the requirements of food law and to enforce those requirements where necessary.

There is still a level of uncertainty at this current time due to the pandemic and resource planning has been particularly difficult. This may require that objectives change throughout the year.

The Dacorum Food Service Recovery Plan can be found below or in appendix 5



Dacorum Food
Recovery Plan.docx

1. Introduction

This Service Plan is dedicated to the food law enforcement functions undertaken by the Environmental Health Service, Environmental and Community Protection (ECP), Neighbourhood Delivery Directorate. The Service Plan includes details of works carried out under food safety legislation.

The scope of the service plan covers specific areas relating to:

- Food safety and hygiene enforcement
- Infectious disease investigations

The Food Service Plan expresses the Council's commitment to the development of the food service and the requirements set by the Food Standards Agency (FSA) who monitors and audits local authorities' activities on food law enforcement. The Service Plan helps to ensure that the national priorities and standards are addressed and delivered locally.

The FSA 'Framework Agreement on Official Feed and Food Controls By Local Authorities', provides service planning guidance and provides the format for this document. This is to enable the FSA to assess our delivery of the Service Plan and to enable comparison with (and benchmarking against) other local authorities.

The FSA, in the Framework Agreement, requires that the Food Service Plan be suitably approved, whether this is by Senior Officers or by members. Dacorum Borough Council service plan is approved by senior managers.

1.1 Current and Emerging issues

Public Health Agenda

The food team is looking into ways in which they can feed into the public health agenda.

The food team will assist Public Health England during the COVID 19 pandemic.

As previously mentioned the Food team are currently assisting with all local contact tracing, workplace outbreaks and Covid complaints that has diverted a large amount of resources away from the food team to focus on the COVID 19 response.

National Food Hygiene Rating Scheme (nFHRS)



The nFHRS operates in partnership with the Food Standards Agency (FSA) providing consumers with an easy to understand single scheme across the UK. After a programmed food inspection a food premises are given a rating (from zero to five) based on the findings of the inspection. The scheme is operated in strict compliance with the nFHRS Brand Standard and monitored to ensure a consistent approach amongst officers. The scope of the FHRS in England extends to establishments supplying food direct to consumers. This includes restaurants, cafes, takeaways, sandwich shops and other places where people eat food prepared outside of the home, as well as food retailers. There are some food businesses within Dacorum that fall outside of the scope of the scheme because they do not sell direct to the final consumer e.g. manufacturers who do not have a retail element and businesses that are not recognised as a food business e.g. childminders.

If the food business thinks their rating following an inspection is wrong or unfair they can appeal in writing or complete an appeal form and send it to the Food and Health and Safety Officer within 21 days of being notified of their rating.

The food business also has the “right to reply” which is different from an appeal. It gives the food business an opportunity to explain if there were unusual circumstances at the time of inspection or what steps they have taken since to rectify contraventions.

The food business also has an opportunity to request a rescore re-visit but only if the improvements to hygiene have been made following an inspection. The council have recently introduced a charge for a rescore re-visit request of £179.

1136 food premises in Dacorum are currently in the scheme.

Intervention Planning and Implementation

Whilst primary food hygiene inspections will continue to form an important part of our regulatory function, the Food Standards Agency has enabled a more holistic, targeted approach, by using a range of interventions. These include, Partial Audits, Sampling, etc.

The Regulating Our Future (ROF) Change Programme

The service plan introduces the Food Standards Agency's aims of its 'The Regulating our Future' (ROF) Change Programme' which seeks to change the regulation and inspection of food businesses by 2020 (Annex 1). The Food Standards Agency deadline regarding this has slipped due to EU exit and COVID 19. The Council are still waiting to hear the longer term plans for food regulation in the future. The FSA have focused on a series of guidance documents to assist Local Authorities with enforcement priorities throughout the COVID 19 Pandemic and developing a COVID 19 Local Authority Recovery Plan. The first draft of the plan was published in June 2021.

Health Certificates

We have had a steady request for health certificates in 2020/2021. In total 296 certificates were issued. Businesses wishing to export their food items to destinations outside of the EU may require certification, from this department. This is not a statutory duty, however to assist our customers in running their businesses we do provide this service for a fee. The certification process has also been streamlined making it easier for our customers to request and pay for a certificate and reducing the administrative burden on the food team.

EU Transition

Exported Products of Animal Origin (POAO) will require Export Health Certificate (EHC) and businesses may request these from the Local Authority. As mentioned above DBC intend to assist our customers in running their businesses and will operate a fee paying service.

EHO's from DBC have attended Imported Food refresher training to ensure officers are competent to undertake the inlands checks and take the appropriate action if the situation arises.

DBC are also a member of the Hertfordshire EU Exit Food Resilience Group and attend meetings as and when required.

DBC have ensured that food & drink businesses can access the most up to Post –EU Exit guidance on our websites relating to importing and exporting food products.

The impact of leaving the EU on the food team's workload and resources has been less than expected. This is may be due to the UK government's decision to delay checks on food imports from the EU at the time of writing this service plan.

On-line Food Ordering Platforms

This year a number of the popular on-line food ordering services, including Just Eat and Deliveroo, announced that they would be introducing a minimum FHRS rating in order to be listed on their platforms. This is a positive and welcome move to raise standards in the industry.

Although a welcome move, the announcement has placed additional pressures and demands on the Service, including:

- Requests from food business operators to undertake inspections outside the planned inspection programme. We have seen a 50% increase in revisit request in 2020/2021 compared to 2019/2020.
- Direct pressure on officers during an inspection to award higher food hygiene ratings.
- Increase in the number of appeals in relation to FHRS ratings. This has not been demonstrated in 2020/2021 with food businesses opting to request a rescore revisit instead.

2. Service Aims and Objectives

2.1 Aims and objectives

- Protection of public health by ensuring the safety of food (including water) used for human consumption
- Preventing the occurrence and spread of infectious disease of environmental origin
- Providing accurate and consistent advice and information to businesses and the public
- Working with food businesses to ensure legal compliance
- Dacorum Borough Council's ECP Department are committed to provide 'a balanced service' in relation to food safety. Our service is driven by the four following criteria and the Regulators Code:
 - ❖ Demand driven – complaints/requests, food alerts for action, food poisoning, etc.
 - ❖ Inspection driven – programmed food visits, sampling programmes
 - ❖ Education driven – home authority principle, primary authority principle, public awareness campaigns, FHRS, FSA initiatives etc.
 - ❖ Intelligence driven – Food Alerts For Action, port health notifications, sampling

2.2 Links to corporate objectives and plans

Delivering for Dacorum Corporate Vision

The corporate vision 2020-2025 includes key areas plus an additional internal area.

- A clean, safe and enjoyable environment.
- Building strong and vibrant communities
- Ensuring economic growth and prosperity
- Providing good quality affordable homes, in particular for those in most need.
- Ensuring efficient, effective and modern service delivery
- Climate and Ecological Emergency - working to deliver net zero carbon

The Food Safety service plays a fundamental role in ensuring that the residents of Dacorum have an informed choice of where they can safely purchase food and drink. The Food Service also assist food businesses by providing advice on a range of food safety matters that can aid economic growth and prosperity.

3. Background

3.1 Local Authority profile

The Borough of Dacorum is in West Hertfordshire. It is composed of the main towns of Hemel Hempstead, Berkhamsted and Tring, plus a number of large and small villages. Dacorum in its present form was created in 1974, following a review of local government in England and Wales.

Dacorum has a population of 155,500 living in 59,938 homes. Based on current trends the population is forecast to increase by 15.96% by 2041. One of the most significant features is the growth of the population in the over 65 age group.

Dacorum has much to offer in terms of business location. Hemel Hempstead is only twenty-five miles (40km) outside central London. It sits very closely to motorways, and via the motorway network is well placed for all parts of the country and Channel Tunnel and Channel ports for surface travel to Europe.

The area has always enjoyed diversity of employment and is not dependent upon one employer or industry. This has been a big factor in fending off the worst effects of economic downturn, maintaining relatively low levels of unemployment. The labour pool covers a wide range of skills. Overall levels of deprivation are low (Dacorum is ranked 261 out of 326 English districts). Dacorum is one of the healthiest areas in the country and levels of crime are moderate by national standards and the lowest in the County.

3.2 Organisational structure

The Council currently implements a Leader with Cabinet style of decision making. (Annex 2 shows the DBC structure.) The Food Safety function sits within Neighbourhood Delivery. It operates under the direction of the Team Leader (Environmental Health) who reports to the Group Manager Environmental and Community Protection, who in turn reports to the Assistant Director for Neighbourhood Delivery. (Annex 3 shows the 2021 ECP structure.)

The Team Leader (Environmental Health) and Lead Environmental Health Officer (Food, Health & Safety) share the role of lead food officer. This role will be supported by the Group Manager, ECP. Specialist services for the food function are provided by external organisations, namely Public Health England as the food examiner and Kent Scientific Services as the public analyst, who has been nominated by Hertfordshire County Council Trading Standards Department.

Formal microbiological analysis of food samples and faecal samples is carried out by Public Health England, whilst Kent Scientific Services carry out physical and chemical analysis.

The Council's Scheme of Delegation filters down the powers to officers to undertake their functions. This is reviewed on a regular basis and Food Officers must meet the competencies set out in Annex 4.

3.3 Scope of the food service

Protection of public health by ensuring the safety of food (including water) used for human consumption by:

- Undertaking a program of hygiene inspections / interventions of food premises,
- Issuing approvals
- Responding to service requests from food business operators and others
- Undertaking a program of microbiological food sampling
- Enforcing the imported food control legislation
- Implementing an alternative enforcement strategy
- Promoting food safety
- Promoting 'Safer Food, Better Business' as a recommended food safety management system

- Responding to food alerts and product withdrawals, as appropriate
- Continue to issue ratings and stickers under the National Food Hygiene Rating Scheme (nFHRS), enabling members of the public to make an informed choice as to those businesses they choose to purchase food from, and to encourage food business operators to improve and maintain hygiene standards
- Working with businesses to ensure compliance with relevant food safety legislation.
- Take appropriate enforcement action in accordance with the council's Enforcement Policy and Food Law Code of Practice and Guidance

Preventing the occurrence and spread of infectious disease of environmental origin by:

- Investigating and controlling cases and outbreaks of infectious disease and providing information and advice

In addition, the Service undertakes the following related areas of work:

- Carrying out health and safety inspections
- Carrying out proactive interventions in Health and Safety
- Investigating accidents
- Undertakes skin piercing premises and operator inspections on behalf of the licensing department who are responsible for registering all premises/ operators that carry out this function.
- Providing responses to Land Charge Searches and planning applications for new or altered premises
- Responding to Health and Safety consultations for licence applications and variations
- Responding to Freedom of Information requests.
- Responding to Planning Consultations with regard to contaminated land, air quality, noise, food and health and safety.
- Supporting other Teams within the department as and when required.
- Attending meetings of the Herts and Beds Food Liaison Meetings, Herts and Beds Sampling Sub- Group, Chartered Institute of Environmental Health, Public Health England Liaison Meetings, the Dacorum Safety Advisory Group, EU Exit group, and provide Environmental **Health Technical Advice to the Local Resilience Forum.**

COVID 19 Response

Working in partnership with the NHS and Hertfordshire County Council to carrying out local contact tracing within the borough.

Investigating workplace outbreaks and COVID 19 complaints (see section 8 below)

Targeted COVID 19 campaigns.

Attending IMT's for specific COVID 19 outbreaks

Attending the COVID 19 subgroups with various other stakeholders/ partners (Internal departments, HCC, Fire, Police, PHE, Hertfordshire District & Borough's)

1. Outbreak Tactical and Co-ordinating Group
2. COVID 19 Health Protection Board
3. District Outbreak Planning
4. Herts Environmental Health Officers' COVID-19 Group
5. Contact Tracing and Self Isolation – Operation Meeting
6. Internal EH Team Covid Meetings

3.4 Demands on the food service

Services are delivered from The Forum, Hemel Hempstead between 8.45 am and 5.15 PM on Mondays to Thursdays and between 8.45 am and 4.45 PM on Fridays. Inspections of businesses trading outside normal working hours are routinely undertaken. There is a duty emergency planning officer appointed, who can contact the Food Team outside of normal working hours should an emergency arise.

Specific Demands:

The Food Safety Service has specific demands placed upon it, as follows:

- Primary Producers 4
- Food Manufacturers and packers 29
- Importers and exporters 5
- Distributors/ Transporters 28
- Retailers 223
- Restaurants and Caterers 1070
- Within Dacorum there is an ethnic minority of 9.3 %(Office for the National Statistics, 2011 Census). The number and types of food establishments reflect this cultural diversity. Officers have been specifically trained on equalities and diversity.
- The Food Standards Agency (FSA) encourages local authorities to identify activities in imported food control. There are no airports, seaports nor external temporary storage facilities (ETSF) within Dacorum. 3 importers have been identified in the district from premises registration forms and local knowledge.

Distribution of FHRS ratings for Dacorum by establishment type.

	Restaurant Café Canteen	Hotel Guest House	Small Retailers	Super & Hyper market s	Caring Establish- ments	Restaurant Caterers Other	Pubs & Clubs	Retail Other	Take- away	Schools Colleges	Mobi le Food Unit	Manufac turers Packers
Rating												
5	189	6	103	26	121	130	103	32	73	79	40	10
4	16	2	30	2	47	15	13	5	13	6	5	3
3	16	0	6	0	1	1	6	1	15	0	0	2
2	4	0	2	0	0	0	2	0	0	0	1	1
1	1	0	2	0	0	0	0	0	6	0	0	0
0	0	0	0	0	0	0	0	0	1	0	0	0
Total	226	8	143	27	169	146	124	38	108	85	46	16

3.5 Enforcement policy

Dacorum Borough Council has a documented Environmental Health Enforcement Policy that was approved by cabinet in September 2015. The policy follows the regulators code and has regard to the Crown Prosecution guidelines.

The policy is made available whenever enforcement action is taken and whenever a member of the public requests a copy.

This has currently being reviewed and is due to be presented to the overview and scrutiny committee and cabinet in November 2021.

4. Service Delivery

4.1 Interventions at Food Establishments

The Council is required to follow the Food Law Code of Practice (England) in risk rating premises and setting targets for the inspection program. Within the overall objective of achieving 95% of planned interventions (categories A-D) each year. Low risk premises (category E) are subject to an Alternative Enforcement Strategy and will be re-assessed not less than once in any 3 year period.

The Food Law Code of Practice defines different types of interventions that local authorities may use in the future and the circumstances in which they may be applied. A range of interventions will be introduced as part of a plan to improve compliance with food law, whilst maximising use of resources. The selection of interventions will be based on risk assessment.

Table: Food Planned Inspections 2020/2021

	Interventions Due	Interventions Outstanding	Percentage Achieved
Premise Rating - A	11	4	60%
Premise Rating - B	46	11	76%
Premise Rating - C	156	28	82%
Premise Rating - D	172	95	63%
Premise Rating - E	132	132	0%
Totals	517	*270	48%

**The pandemic, subsequent lockdowns and government restrictions significantly impacted on the council's ability to carry out all planned inspections. The FSA guidance was followed all times. The outstanding inspections mainly relate to food businesses that closed (some permanently) due to restrictions (e.g. public houses, restaurants), residential care homes (generally very complaint vulnerable group settings) and home caterers. In comparison to other Local Authorities within Hertfordshire, Dacorum's food team did exceptionally well to inspect as many food businesses as it did during this period.*

In addition to the programmed interventions, new businesses and those trading occasionally in Dacorum are inspected during the year. In 2020/2021 the council received 196 food premises registration application forms. These were predominantly new businesses, the minority were existing businesses updating their food business details. Nationally there has been an unprecedented number of new food business registrations throughout the pandemic. These were reviewed on a risk basis.

There are a number of premises that fall outside of the inspection programme where the risk is considered to be so low as that there is effectively no risk, such as vending machines, a florist selling chocolate. We also keep a record of premises where the application of FSA Guidance on the application of EU food hygiene law (adopted in to national law) relating to community and charity food provision 3A para 2 & 3 is applicable. These types of premises are recorded as businesses that fall outside of the food planned inspection programme. We do not carry out any interventions within these businesses unless we receive a complaint.

Dacorum Borough Council Environmental Health team have continued to face a number of challenges in 2020/2021 including a number of failed attempts to recruit permanent staff until August 2020 with both positions in place by the end of 2020.

Despite the fact that 4 FTE professional posts were occupied on the 31/03/2021, two of these posts were only filled by permanent staff in November and December 2020. The Food team attempted to recruit at the beginning of 2020. Unfortunately no suitable applicants were received. All routine food hygiene inspections stopped due to the pandemic at the end of March. The Council followed the FSA COVID 19 Local Authorities enforcement guidance and only responded when there was a risk to public health.

A decision was made advertise the vacant positions again as restrictions lifted in the summer of 2020 and another round of recruitment was undertaken in August. This time a number of suitable candidates applied for the positions. Three people were interviewed and we successfully appointed two competent EHO's. One new employee started at the beginning of November 2020 and second new employee started in December due to the recruitment process and notices periods.

We made a successful bid to Hertfordshire County Council Public Health for funding to appoint a contractor to help backfill the occupied roles who were redeployed/ diverted to assist with the COVID -19 response. The council also engaged another contractor on a Paid per inspection (PPI) basis. The contractors started in August 2020 and started working through the backlog of inspections. Further restrictions and business closures in November 2020- January 2021 meant that some businesses were unable to be inspected and a significant number had yet to re-open since the easing of restrictions has commenced e.g. licensed premises without outside seating.

Even with the new recruits in post the main focus has been the C19 response, dealing with workplace outbreaks, complaints and local contact tracing that has pulled significant resources from the food team.

In addition to the food complaints we have received approximately 50% increase in general food service requests compared to 2019-2020, including requests for Health Certificates (not due to EU exit as countries are outside the EU), nFHRS queries, new business advice, trading standard complaints etc.

The Council's priority has been the C19 response but we have followed the FSA guidance and undertaken approval visits due or new, rescore revisits and followed up on complaints. We have taken the relevant enforcement action where deemed necessary and continued to serve notices, undertake closures and conduct interviews under caution.

We have used remote assessments during the initial lockdown. This generated a lot of work for not much return and we found that we had to inspect most of the premises we had targeted due to unsatisfactory responses.

'A' rated premises are high risk premises that are inspected every 6 months. In 2020/2021 the council saw an increase in 'A' rated premises. This was due to a small number of non-compliant businesses failing to comply with food hygiene legislation. These breaches were identified during routine inspections. This resulted in enforcement action being taken, including the service of notices and in one premises a voluntary closure. The outstanding A rated premises in the table above were either closed or due in March 2021 and inspected in early April 2021. They were also subject to compliance revisits between routine inspections. The outstanding B rated premises were either closed due to COVID 19 businesses restrictions or care homes that had current C19 cases.

DBC have been operating a reactive service in order to protect public health and responding to complaints as and when they arise. This has resulted in a number of notices being served, voluntary closures, PACE interviews by post and prosecution case file preparation.

Table: Enforcement Action Taken 2020/2021

Voluntary closure	1
Seizure, detention & surrender of food	0
Improvement notices	9
Written warnings	165
Simple Cautions	0
Prosecutions concluded	0

Compliance revisits are undertaken where enforcement action would be warranted if compliance is not achieved in line with the Food Law Code of Practice (England) and the nFHRS. If further non-compliance is identified formal action following DBC's EH enforcement policy is taken.

The emphasis of the service is to protect public health by enabling businesses to understand their legal obligations and measures which they must take to ensure food safety, rather than the blind pursuit of inspection targets. Advice and assistance are provided, particularly during programmed inspections / interventions, and training opportunities offered, to help businesses to control food safety hazards.

We have adopted a risk based approach in line with the Food Law Code of Practice (England) when making decisions to focus our limited resources when delivering the food service in conjunction with assisting with the council's Covid 19 response.

4.2 Food complaints

The purpose of investigating complaints regarding food sold within the borough, (whether the food originated within the UK or elsewhere) is to:

- Provide a service to the public

- Resolve problems which pose a risk to public health
- Provide information to the food industry in order to raise and maintain standards
- Offer advice and guidance, where appropriate, in food hygiene matters to food businesses and consumers
- Carry out appropriate enforcement action, where required
- Prevent future complaints
- Identify whether there is a wider national issue

It is difficult to predict the level of complaints for 2021/2022, although there has been a downward trend in recent years.

Overall, more customers seem to be contacting food companies directly regarding complaints about food, as a means of being compensated for their inconvenience.

The Council’s procedure on food complaints is to investigate where there is a genuine public health implication or where an offence may have been committed and the complainant is willing to give evidence in court. Customers are referred back to the retailer if compensation only is being sought. The Council has procedures for dealing with food complaints. Anonymous complaints are not usually investigated but the complaint is entered on the premises database and considered on the next scheduled inspection.

Other complaints relating to hygiene at premises are risk rated by the receiving officer and an investigation visit may be made if deemed necessary.

(Many requests for general advice and information are also received from the public, local organisations, businesses and new food operations, see 4.4 below.)

Food Safety requests received

	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021
Food Hygiene Complaint	24	20	3	10	10	11
Hygiene of premises complaint	87	106	124	81	60	46

4.3 Home Authority and Primary Authority Principles

Dacorum Borough Council recognises the importance of constructive partnerships with food businesses that can deliver reliable advice and coordinated and consistent enforcement.

The Council’s policy is to support:

- The Local Government Association (LGA) Home Authority Principle
- The Office of Product Safety and Standards, Primary Authority Principle

All food officers follow the Primary Authority (PA) principle.

Before undertaking a planned routine food hygiene inspections members of the Food Team will check the online Primary Authority Register to see if the business has a primary authority partnership.

The officer will check if there is a specific inspection plan or assured guidance that they must take note of. The officers will feedback as required to both the PA and the business.

If enforcement action is warranted the officer will ensure they notify the PA before taking action within the designated time period or retrospectively if the event of an imminent risk to health.

4.4 Advice to business

The advisory and training elements of the service are viewed as key to the Service's effectiveness (see section 3).

The main objectives are to:

- provide advice and information to food business operators and food handlers
- recommend practical, good food hygiene practices, in accordance with any Industry Guides or codes of practice where appropriate
- promote continuous improvements in food hygiene standards

Most contact with businesses arise during inspections, where the opportunity is taken to provide advice and information and to promote training opportunities. Small and medium size enterprises (and the voluntary sector when information is requested) are targeted, as expert advice is often not readily available to them. Close liaison is maintained with Council service providers, such as Adventure Playgrounds.

The council have recently introduced a fee for Food Hygiene advisory visit request (preopening/ new businesses/ pre inspection) with a report of £75 per hour.

The Food Safety page of the Council's website is reviewed annually. This is currently being updated.

The council continues to promote Safer Food Better Business to businesses that require support in producing a documented food safety management system. New premises are also identified at the planning stage, and when the applicant may be targeted with food safety information. The council have recently introduced a 3 Hours Safer Food Better Business Coaching session for a fee of £120 (plus 50% fee per additional person from the same business).

An Environmental Health Officer or Technical Officer regularly attends Dacorum Safety Advisory Group meetings, where the organisers of events due to be held in Dacorum are invited to attend to obtain relevant food safety guidance.

352 general food requests were received in 2020/2021, many from existing businesses or from people considering setting up new businesses. (The press, local publications and planning application lists are also used as methods to contact new and potential businesses.)

971 total Food Service requests (Including General Food Safety Requests, Hygiene of Premises Complaints, Food Alerts, Food Hygiene Rating System Requests, Health Certificate Requests) were received in 2020/2021 compared to **600** in 2019/2020.

4.5 Food sampling

The Council's policy is to undertake sampling where required by statute and where appropriate, to participate in sampling programme organised by the Public Health England and the Herts and Beds Food Liaison Group. Samples are also collected in outbreak situations or where there is an allegation of food poisoning. Follow up action is taken as a result of unsatisfactory results.

Food samples taken

Year	2014-15	2015-16	2016-17	2017-18	2018-19	2019-2020	2020/2021
Total Samples	116	38	24	6	0	0	0

The Herts and Beds Food Liaison Group, is represented by the Team Leader (Environmental Health) or the Lead Officer (Food, Health and Safety) or an allocated deputy from Dacorum Borough Council.

There is also a sampling sub group that has a representative from Dacorum Borough Council.

All local authorities have a budgetary provision with Public Health England for sampling.

2020/2021

During 2020/2021 we have followed the FSA Covid 19 Local Authority Enforcement Guidance in terms of what official controls need to be undertaken while we also divert resources to assist with the council's ongoing COVID 19 response. As a result of this we have not been in a position to participate in any National or Local sampling studies.

We have, however, always ensured that we are able to undertake formal sampling as part of an outbreak/ complaint investigation.

4.6 Control and investigation of food related infectious disease

The service will investigate food related infectious disease notifications in accordance with procedures agreed with Public Health England. Investigations of outbreaks will be undertaken in accordance with the Joint Plan for the Control of Communicable Diseases in Hertfordshire. When viral outbreaks are identified general guidance is offered to control the spread of the disease.

Notifications of persons in high-risk groups such as food handlers, those working in health care, children under 5 years and older children and adults who may find it difficult to implement good standards of personal hygiene, will be actioned as quickly as possible, together with more serious infections such as E.coli O157:H7, Typhoid, Botulism and cryptosporidium.

Reported infectious diseases

Year 2020/2021

Salmonella	1
Campylobacter	0
Cryptosporidium	1
ID/FP Enquiries	1

PHE stopped referring individual routine infectious disease cases to local authorities during this time period due to the COVID 19 pandemic. The small number of cases above were PHE had a particular concern.

The resource implications of such incidents in the forthcoming year are difficult to predict particularly as the pandemic continues. In the last normal operational year we received the following number:

Year 2019/2020

Salmonella	23
Campylobacter	75
Cryptosporidium	14
ID/FP Enquiries	5

4.7 Food safety incidents

The Food Law Code of Practice (England) details steps that must be taken when a Food Alert is issued or a food safety incident occurs within the borough.

Procedures are in place to ensure that the Council complies with the Code of Practice. These include:

- Ensuring all members of the food team are members of the FSA Smarter Communications platform and receive the Food Alerts by email.
- That the secure ECP mailbox is monitored daily for any FAFA received which is then forwarded to the duty officer to action.
- Maintaining emergency planning arrangements to respond to out-of-hours emergencies.
- Determining action to be taken in response to a food alert
- Notification of the relevant Central Government department when required if an incident occurs within Dacorum
- Invoking the Joint Outbreak Control Plan where an incident involves communicable disease

Date	2015-16	2016-17	2017-18	2018-19	2019-20	2020/2021
No of Food Alerts For Action	2	3	1	2	3	1

In June 2010 the Food Alert system was changed. This resulted in a decline in the numbers as the Food Alerts For Information became Product Recall Notices instead and do not need to be recorded for audit by the FSA. The Food Alerts for Action continue to be recorded in the same way.

4.8 Liaison with other organisations

The Council has made various arrangements to ensure that enforcement action taken within the Borough is consistent with that of neighbouring local authorities.

It is an active participant in:

- The Herts and Beds, Food Liaison Group (and Sampling Working Group)
- Inter-Authority Audits organised by the Food Liaison Group
- The Dacorum Safety Advisory Group

Liaison with other bodies includes:

- FSA
- Office of Product Safety and Standards
- LGA
- Hertfordshire County Council Trading Standards
- Chartered Institute of Environmental Health

- Commission for Social Care Inspection
- Ofsted (child care and nurseries)
- Public Health England
- Community Action Dacorum
- Affinity and Thames Water Companies
- Hertfordshire Interpreting and Translation Service

Arrangements are in place for liaison with Planning and Building Control where Environmental Health input is required. Partner and cross departmental working also takes place with other Council services e.g. Licensing, Legal and Corporate services, Housing, Land Charges, Environmental Services, Resident Services, Strategic Housing, Tenants and Leaseholders.

4.9 Food safety promotion

Officers keep up to date with all of the FSA Food Safety Campaigns and make sure that they are promoted/ advertised on the Councils Social Media Platforms by working closely with the council's communications team.

5. Resources

5.1 Financial allocation

Financial provision has been made for 4 full time equivalent (FTE) posts (excluding the Group Manager ECP and Team Leader (Environmental Health), within the Food, Health and Safety Team.

Officers also undertake specific duties not directly related to the activities considered in this plan (see 3.3 above) and contribute to the work of the department as a whole.

Approximately 5% of the Group Manager ECP work time is directly attributed to food safety work. Team Leader, Environmental Health spends approximately 30% of their time on Food Safety Work.

The Department has a fixed budget of £5,000 for legal action costs.

5.2 Staffing allocation

Approximately 4 FTE work will work on food safety and infectious disease matters by the end of 2022 as well as undertake work mentioned in 3.3 above. This is subject to change due to diverted resources to help with the councils COVID 19 response.

The service comprises of:

Post	Authorisations
Group Manager ECP Emma Walker	Inspections Hygiene improvement Notices Emergency Prohibition Notices Remedial Action Notices Food Seizure/ Detention
Team Leader (Environmental Health) Paul O'Day	Hygiene improvement Notices Emergency Prohibition Notices Remedial Action Notices Inspections Food Seizure/ Detention

Lead Officer Food, Health and Safety Rebecca Connolly	Hygiene improvement Notices Emergency Prohibition Notices Remedial Action Notices Inspections Food Seizure/ Detention
Environmental Health Officer Kal Ifegwu	Hygiene improvement Notices Inspections Food Seizure/ Detention Emergency Prohibition Notices Remedial Action Notices
Environmental Health Officer Jolade Alayo	Hygiene improvement Notices Emergency Prohibition Notices Remedial Action Notices Inspections Food Seizure/ Detention
Environmental Health Officer Mark Dewey	EHORB registered October 2020. Delay in food competency training due to COVID 19 and diversion of resources.

Activity	Projected Resource Required to Deliver the Service
Inspections	1.23
Approved Establishments	0.02
Sampling	stc*
Revisits	stc*
Investigations	0.25
Formal Action	0.2
Training	stc*
Liaison	0.04
Business Advice/ Liaison	0.2
Management	0.4
Total	stc*

stc* / subject to change due to significant changes in scale of service delivery

5.3 Staff development

Training needs and competence are assessed on appointment and then at annual personal development appraisals. Team Leaders are responsible for carrying out appraisals and assessing competence.

Training needs identified during the appraisals are then prioritised and planned to ensure that officers have the relevant competencies for their authorisations as specified in the Food Law Code of Practice (2021) Chapter 3. The link to the document outlining these can be found in Annex 4. Training could be provided in-house or externally. The Herts and Beds Heads of Service Food Group arrange courses throughout the year in accordance with generally identified needs. This usually enables more cost-effective training provision. Typical external providers include the FSA and ABC Food Law Ltd.

Officers are expected to lead learning circles for their colleagues following training courses, to ensure that relevant information is cascaded.

Individual training records are maintained for each officer and kept on file.

Members of the Chartered Institute of Environmental Health may attend relevant branch meetings.

In addition to staff appraisals, the Team Leader (Environmental Health) reviews a proportion of all case sheets and inspection records and aims to accompany officers on visits on an annual basis for quality monitoring purposes. A

report pro-forma is completed for each accompanied visit, the contents of which are fed back at a debrief meeting. The paperwork for a food inspection that receives a food hygiene rating of less than 3 is passed to another officer for peer review auditing. This ensures consistency between officers.

Food Service meetings are held approximately every six weeks (more often if required). This is slipped in 2020/2021 being replaced with daily COVID 19 update meetings.

6. Quality Assessment

Quarterly performance reviews are based on the Intervention Strategy. The Group Manager (ECP) will then report to overview and scrutiny committee, on a quarterly basis for KPI and significant service updates.

The Food Safety Service has developed a series of procedures to ensure the delivery of quality services. These are revised routinely to ensure compliance with current legislation, codes of practice and other guidance. Customer feedback may also lead to procedures being revised. All documents are held centrally as computerised 'controlled documents'; they are available in read only format and are available for all officers.

7. Review against Service Plan

7.1 Review against Service Plan

Key performance indicators are reported on a quarterly/ monthly basis during the quarterly review. These reviews will identify where the Council is at variance with the Service Plan and, where appropriate the reasons for variance.

7.2 Identification of any variation from the service plan

As previously mentioned COVID 19 and the councils response has been the main reason for variation away from the food service plan in 2020/2021 and is likely to a continuing factor for the foreseeable future.

Officers within the Environmental Health Team were also involved in two Health and Safety accident investigations that has resulted in the preparation of two prosecution files taking up a significant amount of officer time. One of these cases is due to conclude in September 2021 due to both defendants pleading guilty in May 2021. The other case is currently ongoing. A number of court hearings have taken place and the council is due to attend an Employment Tribunal in July 2021 to defend their decision to serve and Improvement Notice and Prohibition notice in January 2020.

The council successfully prosecuted a food business for failing to comply with a Health and Safety Prohibition Notice. The matter was listed before Luton Magistrate Courts on the 06/10/2020. The defendant pleaded guilty to two counts under the Health and Safety at Work etc. Act 1974 and was fined a total of £30,000 and was instructed to pay the council legal costs amounting to £4,000.

7.3 Areas of improvement

- Staff development

Staff development is paramount; we have and continue to invest heavily in staff development. This includes supporting the council's student Environmental Health Officer's to achieve EHORB registration or chartered status depending on what route they have decided to take that is achievable and not constrained by CIEH timescales. There are currently two officers undertaking training to become qualified Environmental Health Officers in the Environmental Health Team. Predicted completion dates are, June 2022, and August 2025.

- Failure to recruit and retain permanent staff.

This is an area that has proved problematic for the council in recent years. This has resulted in reliance on external contractors to assist the council in delivering the food service plan, in particular the food planned interventions. The

quality of the contractors used can vary despite checking competencies and undertaking audit inspections at the beginning of the contract period. The council have also been through the recruiting process for contractors, appointed individuals who have then chosen not take up the position or have had to end the contract early due to various reasons.

In order to combat the failure to recruit permanent staff but ensure that the inspections undertaken by external staff where done to a high standard, the Team Leader (Environmental Health) devised a Paid per Inspection (PPI) protocol. This offered fair rates of PPI and attracted a significant amount of applicants when the advert was placed in trade publications. The response was so significant that the council were able to select very competent Environmental Health contractors after the recruitment process. The PPI officers have been fundamental in helping the council achieve the amount of inspections they have in 2020/2021 while permanent staff have been diverted to assist with the councils COVID 19 response. The inspections are peer reviewed by permanent staff and the level of consistency has remained high. The PPI protocol was implemented in December 2018 and the council will continue to use this method to assist with food hygiene inspections while permanent staff resources are diverted elsewhere.

The cost of operating the PPI protocol has saved the council money as the PPI officers have been employed direct instead of through recruitment agencies (n.b all procurement procedures have been followed and adhered to).

The council have advertised 3 vacancies during 2019-2020 to try and recruit to the Food Service.

- Sampling Programme

This is an area that requires attention, as mentioned above

8. Health & Safety Service Plan 2020/2021

Dacorum follows the HSE document LAC 67-2 (Revision 8) – Setting Local Authority Priorities and Targeting Interventions when planning proactive health and safety inspections.

However in 2020/2021 the main focus of the councils proactive H&S interventions has been ensuring business are COVID secure. We carried out a range of interventions.

1. Proactive campaigns

Food Businesses

Visits were made to 452 food businesses to provide guidance and assistance to help businesses to understand their roles and responsibilities with regards to test and trace, social distancing and enhanced cleaning

Supermarkets

Officers from the Council visited 35 supermarkets and convenience stores across the borough to witness the level of compliance with face mask regulations. We saw almost 1,200 shoppers and were delighted to see that 98% were wearing masks.

Barbers and Hairdressers

DBC staff visited 75 Barbers and Hairdressers throughout the district to help businesses from that sector to understand the restrictions that were in place regarding close contact services and to help them comply with these.

Takeaways

Staff from the Council visited 56 food businesses that were offering a takeaway service and provided guidance and assistance to help these businesses to reduce the transmission of the virus, and to assist them in following the latest Government guidance

2. Service requests

In addition to the above proactive work, the Council's Environmental Health team have responded to 166 requests from businesses for advice with regards to Covid regulations and helping them to comply.

3. Workplaces visited

Officers from the Council's Environmental Health team have also carried out visits to 33 workplaces where there have been cases of Coronavirus to provide support and guidance to ensure the workplace is safe.

Health and Safety general requests received 2020/2021

Type	Number
Skin Piercing Operator/ Premises Assessments	10
LOLER Lift Defect Reports	7
Asbestos Notification	0
General HASWA requests	34
Total	51

Health & Safety Notices served 2020/2021

Type	Number
Section 20 Request for information	15
Section 21 Improvement Notice	3

Annex 1. Food Standards Agency - Regulating Our Future

https://www.food.gov.uk/sites/default/files/media/document/rof-paper-july2017_0.pdf

<https://www.food.gov.uk/sites/default/files/media/document/changing-food-regulation-what-weve-done-where-we-go-next.pdf>

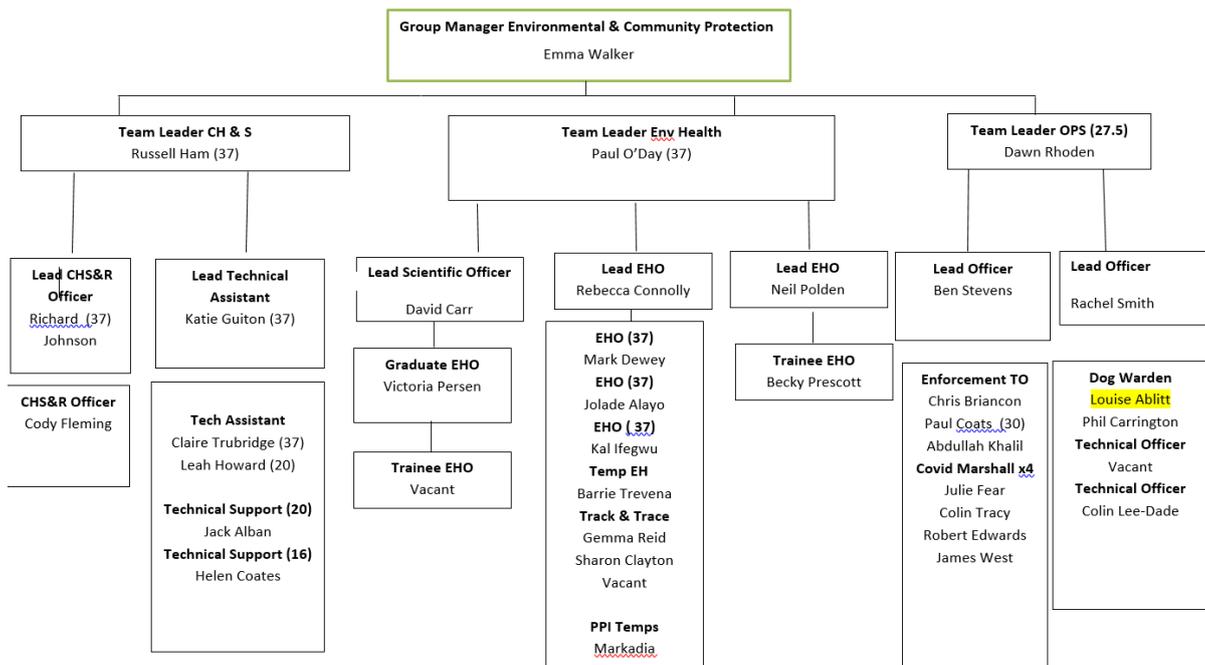
<https://www.food.gov.uk/13th-regulating-our-future-newsletter>

Annex 2 – DBC Structure Chart

<http://www.dacorum.gov.uk/docs/default-source/council-democracy/organisation-chart-2018.pdf?sfvrsn=12>



Annex 3. ECP Structure Chart June 2021



Qualifications	
	Higher Certificate in Food Control (EHRB/SFSORB)
	Certificate of Registration as an Environmental Health Officer (EHRB)
	Diploma in Environmental Health (or historical equivalent) (EHRB/SFSORB)
	Ordinary Certificate in Food Premises Inspection (EHRB/IFST/SFSORB) *Restrictions Apply*
	Higher Certificate in Food Premises Inspection (EHRB/IFST/SFSORB) *Restrictions Apply*

Cluster No. 1 - Local and Specialist Knowledge (Lead Food Officers Only)	
1.1	Knowledge and understanding of the area for which he/she is acting as the Lead Food Officer – this may include more than one Competent Authority area.
1.2	Knowledge and understanding of the hazards that can occur in premises within the authority's area and risk management techniques.
1.3	Knowledge and understanding of when specialist auditing and quality assurance skills are needed to deliver official controls.

Cluster No. 2 - Legislation and Centrally Issued Guidance (Lead Food Officers Only)	
2.1	Understands relevant EU and National food hygiene or standards legislation and can advise on their application.
2.2	Understands, interprets and applies the Framework Agreement on Food Law Enforcement with Local Authorities, the Food Law Code of Practice and associated Practice Guidance appropriately.
2.3	Understands and can advise on the application of the full range of enforcement sanctions available and proportionate application of food law.

Cluster No. 3 - Planning of an Official Control Programme (Lead Food Officers Only)	
3.1	Can appropriately apply national and local priorities to the profile of food business establishments and points of entry in the authorities' area when planning a programme of official food controls.
3.2	Can identify skill or knowledge gaps in officers delivering official food controls.
3.3	Understands the process of raising and managing food incidents as set out in the Code of Practice, including responses to infectious disease outbreak(s).
3.4	Understands how local contingency arrangements apply to the management of serious food related incidents e.g. infectious disease outbreak.
3.5	Understands the role of Home Authorities and Primary Authority Partnerships in co-ordinating the delivery of official controls and ensures it is applied by the authority.
3.6	Understands how to comply with local and national data gathering and reporting requirements.
3.7	Co-ordinates consistent delivery of official controls within the authority and between other Competent Authorities.

Cluster No. 4 - Inspection of Food Establishments (Authorised Officer)

4.1	Comprehensive understanding and knowledge of HACCP-based procedures. Has the ability to apply that knowledge taking account of flexibility principles contained within Article 5 of 852/2004.
4.2	Can determine and identify hazards and risks that occur in establishments and products. Understands the principles of risk assessment related to food types; processing methods and products.
4.3	Understands relevant Food Hygiene legislation and can advise on their application. Understands how to assess compliance with the requirements of food hygiene legislation with further reference to the Food Law Code of Practice and Practice Guidance
4.4	Able to determine the appropriate course of action to remedy non-compliance, including when it is appropriate to escalate enforcement action.
4.5	Can make a Food Hygiene/Standards Intervention Rating assessment of risk using section 5.6 of the Food Law Code of Practice.
4.6	Understanding of the common food types and understanding of hazards associated with their use.

Cluster No. 5 - Use of Enforcement Sanctions (Authorised Officer)

5.1	Can clearly differentiate between legal requirements and recommendations of good practice by avoiding gold plating and 'regulatory creep'. Can provide advice and enforce based on levels of compliance with regard to consistency and proportionality based on the hierarchy of risk.
5.2	Understands levels of authorisation, enforcement policies and procedures for appeal.
5.3	Understands the legal framework with regard to the use of enforcement powers including the role of Primary Authorities and Home Authorities
5.4	Can demonstrate an understanding of how to serve Notices; gather evidence; prepare cases for prosecution and apply knowledge to comply with the requirements of PACE and RIPA, where appropriate.

Cluster No. 6 - Sampling (Authorised Officer)

6.1	Understands formal/informal sampling methodologies and the role of the Public Analyst and Food Examiner.
6.2	Is aware of national and local sampling priorities. Can use UKFSS and searchable database, where appropriate.
6.3	Can interpret sampling results and make a judgement on appropriate action based on risk.

Cluster No. 7 - Import and Export Controls (Authorised Officer)

7.1	Understands the legal framework with regard to Imported / Exported food and how to assess compliance.
7.2	Can determine the most appropriate course of action and the range of enforcement sanctions available.
7.3	Can identify food types and comment on fitness at Border Inspection Posts (also see Chapter 4.6).
7.4	Can demonstrate an understanding of controls at points of entry include carrying out systematic documentary checks, random identity checks and sampling for analysis or microbiological examination, as appropriate.

Cluster No. 8 - Reactive Investigations (Authorised Officer)

8.1	Understands how to conduct an investigation and gather evidence in accordance with PACE and RIPA, where appropriate. Is then able to analyse information and determine an appropriate course of action.
8.2	Can identify when it is appropriate to engage with other agencies and stakeholders in particular when investigating food incidents and or infectious disease outbreaks.

Cluster No. 9 - Information Gathering (Regulatory Support Officer)

9.1	Understanding of Informal Sampling methodologies and is able to gather samples according to PHE/FSA protocol.
9.2	Can demonstrate an understanding of how to identify food hazards and gather accurate information. Can identify when appropriately authorised officers need to intervene.
9.3	Can demonstrate the communication skills needed to engage with stakeholders and signpost to sources of information and guidance.
9.4	Is able to locate current sources of guidance for food hygiene and standards.

CPD - Core Food Matters

	Food enforcement training
	Food hygiene inspection training
	Food microbiology
	HACCP / hazard analysis

	ID investigation
	Sampling techniques
	Vacuum packing
	E.coli / cross contamination
	Food allergens
	Inland imported food
	Sous-vide
	Prohibition procedures
	FHRS/Annex 5 consistency training
	Detention and seizure
	Improvement notices
	Approved premises - dairy
	Approved premises - meat processing
Total CPD - Core Food Matters	
0:00	

CPD - Other Professional Matters

	Court skills
	PACE & RIPA
	Lead assessor
	Investigation skills
	Advanced Investigative Interviewing

Dacorum Food Safety Recovery Plan

Introduction

With the covid-19 pandemic, there has been a knock on effect to services especially around where proactive inspection regimes are in place, being mainly:

- Food Safety Inspections
- Health and Safety Inspections

Food Safety and Health & Safety inspections are determined by a risk rating inspection regime and are statutory. For these, the governing bodies (Food Standards Agency and Health & Safety Executive) have set the way forward. Health and Safety inspections have been maintained throughout the covid-19 pandemic, with increased visits related to covid-19 risk assessments, safe operating procedures and general risks. Therefore, no specific recovery plan is required for this element.

There is also the overarching MHCLG January 2021 priority list for regulation, which sets out the overall priorities based on the following:

Category	Definition
A	Covid-19, Transition and highest priority reactive work: please focus effort and resource on these activities.
B	High priority: please continue to deliver these activities wherever possible, recognising that activities in Category A may take precedence.
C	Recognition that elements of these activities may be paused or deprioritised following a risk-based approach, and that activity in Categories A and B may take priority.

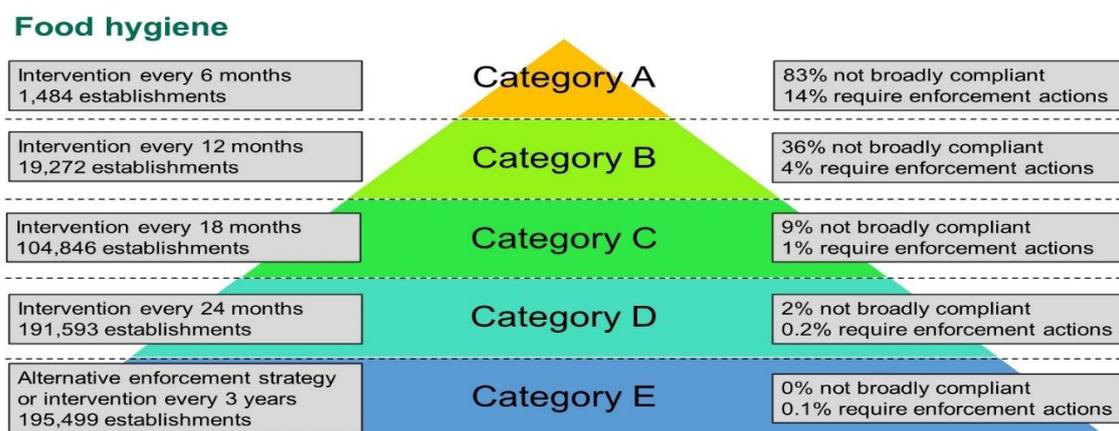
1. Food Safety Inspections

1.1 Food Standards Agency Approach

The Food Standards Agency (FSA) have set out in June 2021 their proposal for LA recovery around statutory inspections. The following have shaped their approach:

- the number of 'new' food businesses has significantly increased – a large proportion of which are home-based – and although some of these may cease trading when the hospitality sector starts to recover, and lockdown restrictions are otherwise lifted, the risks associated with them remain largely unknown as initial inspections have not been undertaken
 - **Dacorum has over 196 new food businesses started in the last 12 months alone**
- the number of 'new' food businesses on the 'high street' may increase as some existing businesses may change hands while others may start up to capitalise on potential additional trade from staycations etc over the coming months
- existing businesses will gradually be re-opening, many after prolonged closure, as restrictions in the hospitality sector on eating onsite are lifted, while other businesses will continue to diversify activities to adapt to ongoing changes in the market
- LA resources have been diverted from delivery of food official controls during the pandemic to activities related to reducing the spread of COVID
- the highest risk establishments may have missed one, two or potentially three planned interventions
- LAs are anecdotally reporting that significant resource is currently being used for non-statutory but important wider government priorities such as export certification and support for businesses navigating the new arrangements
- LAs are anecdotally reporting a general trend of reducing hygiene standards in food establishments since the onset of the pandemic.

The FSA approach is also mindful of the profile of establishments across the risk categories, the levels of compliance and the typical annual percentages for enforcement actions within each pre-pandemic. The diagram below shows the national picture pre-pandemic as the basis for the recovery approach.



1.2 Objectives and Assumptions of the FSA recovery plan

The approach by the FSA takes on board the following objectives:

- ensure that LAs:
 - return diverted resources to food teams
 - can identify and focus on those businesses that are trading by continuing to undertake ongoing proactive surveillance
 - revert to the expected inspection frequencies in the Food Law Codes of Practice for those businesses posing the greatest risk to public health/consumer protection

- improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action
- Ensure more routine operation of the Food Hygiene Rating Scheme (FHRS).

The FSA has assumed the following:

- there will be additional demands and expectations on LAs in relation to compliance and enforcement of COVID rules as sectors re-open over the next few months
- urgent reactive food safety work will increase as restrictions in the hospitality sector are lifted
- planned interventions for food hygiene and food standards will be more complex to undertake and will take longer as they must be undertaken in a COVID safe way
- compliance standards have dropped so levels of required follow-up and enforcement action needed to address the risks to public health/consumer protection will be greater

1.3 Timelines

The proposed plan covers 1 July 2021 to April 2023 and beyond with recovery in two phases:

- Phase 1 - 1 July to 30 September 2021
- Phase 2 – 1 October 2021 to April 2023 (until the revised food hygiene intervention rating scheme are in place)

There will be a focus on securing compliance in persistently non-compliant businesses. The proposal for recovery aims to reflect that direction of travel.

1.4 Plan in summary

The key elements of the plan are summarised below:



1.5 Principles underpinning the recovery plan

We propose that the following principles underpin both phases of the recovery plan:

- when intelligence suggests risks have increased – and irrespective of the risk category – interventions should be undertaken to assess and address those risks
- when an onsite intervention is undertaken, subsequent interventions should be programmed as per the Codes of Practice requirements
- new food hygiene ratings should be given where appropriate interventions are undertaken
- where non-compliance is found at any intervention, appropriate enforcement action should be taken
- The use of remote assessments will not be used at Dacorum as it duplicated a lot of the work and didn't yield the results expected when tried after Lockdown 1.

1.6 Impact on Dacorum

Based on the FSA Phase 1 plan, the priority up to the end of the 2021/22 financial year will be:

- conditional and full approval visits (limited for Dacorum - 7 approved premises in total)
- management of food incidents and hazards (including outbreaks of foodborne illness)
- investigation and management of complaints
- enforcement action in case of non-compliance
- ongoing proactive surveillance to obtain an accurate picture of the local business landscape and identify: open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities or FBO.

Dacorum will also have to:

- Manage the expected increase in necessary reactive work resulting from the lifting of restrictions in the hospitality sector, which will include carrying out some of the overdue planned interventions. The table 1.1 below shows the number of premises that are overdue by 30th September 2021.

Table 1.1

Risk Band	Number overdue at 30 th September 2021
A	0
B	13
C	31
D	185

This does not include the total number of interventions due this year, new premises or category E premises, which are dealt with by alternative enforcement interventions. This is shown in Table 1.2 below. The implementation of this recovery plan will stagger the March 2022 due dates in line with FSA guidance.

Table 1.2

Risk Band	Total number of inspections due by March 2022
A	2
B	25
C	63
D	219
E	144
Unrated	218

- assess new businesses and those with change in operation, activities or FBOs so that onsite visits can be undertaken where there are concerns around public health/consumer protection and, for others, the initial inspection can be prioritised and undertaken in accordance with the Codes of Practice.
- plan for resumption of planned intervention programmes for high risk category and non-compliant establishments in Phase 2.

Based on the FSA **Phase 2 plan**, the priority from April 2022 to April 2023 will likely be:

- a) implementing planned intervention programmes for high risk category and non-compliant establishments, and
- b) implementing an intelligence-based approach for low risk category establishments.
- c) official controls where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance that are undertaken to support trade and enable export
- d) reactive work including, enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints
- e) sampling in accordance with the local authority sampling programme or as required in the context of assessing food business compliance, and any follow-up necessary in relation to the FSA Surveillance Sampling Programme
- f) ongoing proactive surveillance to obtain an accurate picture of the local business landscape and also to identify open/closed/recently re-opened/new businesses, as well as businesses where there has been a change of operation, activities or FBO
- g) for 'new businesses', consideration of registration information and intelligence with appropriate onsite interventions carried out where there are concerns around public health/consumer protection
- h) for 'new businesses' where consideration of registration information and intelligence does not raise concerns about public health/consumer protection, initial visits should be prioritised and undertaken in accordance with the Codes of Practice and Practice Guidance taking account of the flexibilities provided
- i) implementing planned intervention programmes for high-risk category and non-compliant establishments in line with the timelines set out in the Recovery Plan
- j) implementing an intelligence/information based approach for lower risk category establishments

It is to be noted by members that this is the plan to recover the Food Service from the effects of Covid 19. The department is very much still involved in the Local Outbreak Plan response, it is envisaged that this workload will decrease in 22/23. However if it does not this plan will need to be revised to take into account the number of available staff that can deliver this project and their important role in dealing with the Outbreak phase of the pandemic response.

The above phases are detailed in the table below with initial impact assessment:

Activity/Category	Timeline	Expectation	Impact for Dacorum
Conditional and full approval visits	Ongoing	In accordance with relevant legislative requirements	Limited due to very few approved premises (7)
Proactive surveillance to obtain an accurate picture of the local business landscape and to identify <ul style="list-style-type: none"> - open/closed/recently re-opened/new businesses - change of operation, activities or FBO 	Ongoing	Consideration of registration information and intelligence on the food business establishment identified through surveillance Undertake appropriate onsite interventions where there are concerns around public health/consumer protection	Basic surveillance conducted as part of LAEMS return. Move to new database by the end of the year will tidy up this area.
New food business establishments where consideration of registration information/intelligence indicates low risk	Ongoing	Initial visits should be prioritised and undertaken in accordance with the Codes of Practice requirements	Fed into the inspection programme. All inspections assigned to officers and initial risk assessment conducted. All new food businesses have been contacted and Pay Per Inspection contractors are due to start week commencing the 4 th October 2021
Management of food incidents and hazards (including outbreaks of foodborne illness)	Ongoing	In accordance with the Food Law Codes of Practice	Business as usual
Investigation and management of complaints	Ongoing	In accordance with the Food Law Codes of Practice	Business as usual
Enforcement action in case of non-compliance	Ongoing	In accordance with the Food Law Codes of Practice and the local authority's enforcement policy	Business as usual
FHRS requested revisits	Ongoing	Within three months of request if a charge is made and within six months of no charge but with use of remote assessment in place of onsite visit in limited circumstances on a trial basis (with evaluation in place)	Business as usual

Activity/Category	Timeline	Expectation	Impact for Dacorum
Sampling	Ongoing	In line with local authority sampling programme or as required in the context of assessing food business compliance	Due to a combination of recent staff retirement and the need to recruit and train staff PHE are no longer accepting samples for National and Local studies for the rest of the year. DBC was due to participate in these studies in October 2021 but this has now been pushed back to early 2022 once PHE start accepting samples again.
Category A for hygiene	Over the period to end of March 2022	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Codes of Practice	This date is achievable.
Category B for hygiene	Over the period to end of June 2022	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Codes of Practice	Dacorum intend to inspect all B rated premises by the end of March 2022.
Category C for hygiene – less than broadly compliant (FHRS 0, 1 or 2)	Over the period to end September 2022	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Codes of Practice	Dacorum are prioritising all C rated premises regardless of FHRS score along with A's and B's. This date should be achievable.
Category D for hygiene – less than broadly compliant (FHRS 0, 1 or 2)	Over the period to the end of December 2022	All establishments should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Codes of Practice	Dacorum do not currently have any that fall within this definition.

Activity/Category	Timeline	Expectation	Impact for Dacorum
Category C for hygiene – broadly complaint or better (FHRS 3, 4 or 5)	Over the period to the end of March 2023	<p>For establishments with two consecutive food hygiene ratings of 5 (or equivalent stands if outside scope of FHRS) one intervention may be missed and then the establishment put back in the system for interventions in accordance with the Codes of Practice</p> <p>For other establishments – those with hygiene ratings of 3 or 4 (or equivalent of outside the scope of FHRS - should have received an onsite intervention and thereafter be back in the system for interventions in accordance with the Codes of Practice</p>	Dacorum are prioritising C rated premises a long with A's and B's and aim to inspect all C rated premises by September 2022.
Category D for hygiene – broadly complaint or better (FHRS 3, 4 or 5)	Ongoing	No interventions will be required unless intelligence suggests that risks have increased	Dacorum will carry out inspections in D rated premises if capacity allows it. If a complaint is received regarding a D rated premises it will be investigated appropriately.
Category E for hygiene	Ongoing	No interventions will be required unless intelligence suggests that risks have increased	As above, Dacorum will follow up any complaints received regarding premises that are E-rated if received.