

DACORUM BOROUGH COUNCIL

FOOD SERVICE PLAN

2022-2023

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COVID 19 Statement

The following food service plan is what the council would generally intend to deliver if we were not recovering from the ongoing Covid 19 Pandemic. It has reviewed the progress made in 2021/2022 while the food team have been following the Covid 19 Local Authority Plan.

The Food Service Plan objectives for 2022-2023 follow that of the recovery plan, where the food team can move at a faster pace they will. Resources have been diverted during the pandemic to activities related to reducing the spread of COVID-19. The lifting of restrictions in early 2022 has seen resources that were diverted to reducing the spread of COVID -19 re-diverted back to the Food team.

The role of the Council and Environmental Health changed significantly during 2020/2021 and continued into 2021/2022. The priority has been given to local contact tracing, investigation of workplace outbreaks of COVID-19 and following up on COVID -19 complaints. These priorities changed slightly in early 2022 in line with government guidance issued in February 2022 Covid 19: Response: Living with Covid-19

<https://www.gov.uk/government/publications/covid-19-response-living-with-covid-19>

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

The Council is now continuing to follow the 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. This guidance covers the period from 1 July 2021 to 2023/24.

There is still a small level of uncertainty at this current time due to the ongoing pandemic and resource planning has still been particularly difficult. This may require that objectives change throughout the year, however the general trend at the time of writing was that the food team were moving back to a more business as usual approach to the delivery of food controls and the focus was on recovery

The Dacorum Food Service Recovery Plan can be found below or in appendix 4



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 UK Health Security Agency (UKHSA) previously known as Public Health England during the ongoing COVID 19 pandemic and with any other emerging/ existing infectious diseases if required e.g. Monkey Pox.

The Food team are currently assisting with all types of contact tracing, workplace outbreaks and infectious disease complaints as and when they arise. The demand for this compared to the beginning of the pandemic has dropped considerably and this has enabled the food team to focus most resources back to delivering the FSA Covid -19 Local Authority Recovery Plan.

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 FHR 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 currently charge a fee £185 for this, payable after the request has been accepted and carried out within 3 months of the request/payment.

Of the 1374 registered food premises in Dacorum 1045 are currently rated and the remaining 329 are either awaiting inspection or fall outside the scope of the scheme (sensitive, excluded or exempt) or not yet operating.

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, verification visits, Sampling, etc. In broadly compliant premises rated 3 or above we alternate between full and partial inspections and this helps us focus our resources where they are needed most.

FSA Achieving Business Compliance (ABC) Programme

The Achieving Business Compliance (ABC) programme was set up in January 2020 to modernise how food businesses are regulated by the Food Standards Agency (FSA) and local authorities. This programme is an evolution of The Regulating Our Future Change Programme. Work on this programme slowed due to the pandemic but started to move forward again in September 2021.

The programme has three key work streams:

- 1) Enterprise level regulatory approaches - designing new regulatory models for a set of large businesses that are compliant with regulation and influential in the food chain
- 2) Assurance of online food sales - exploring what type of regulatory approaches will be most suitable for different online food businesses
- 3) Targeted and proportionate regulation for food businesses – making sure local authorities can target their resources to the businesses that need it most including the modernisation of the food hygiene delivery model.

This is a long-term, agile programme of work, expected to take around five years to deliver for the FSA to deliver their objectives. The main work stream that will impact on Dacorum’s food team is the proposed modernisation of the food hygiene delivery model.

Food hygiene delivery model project:

“The food hygiene delivery model, particularly the intervention rating scheme that drives planned interventions, has remained, for the most part, fit for purpose in terms of protecting public health. However, it has created challenges over recent years as the pace of change in the food industry has increased and against the backdrop of reducing local authority resources. This highlights the need to modernise the system to ensure that it is sustainable, drives continuous improvements in business compliance, provides the assurance needed to facilitate trade and export and maintains public health now and in the future.” (FSA, June 2022)

The FSA are currently working closely with local authorities to undertake work to modernise the current food hygiene delivery model in England, Wales and Northern Ireland and a local authority/ FSA working group has been established. The FSA anticipate the modernised model being agreed in 2023/24 with full implementation in 2024/25.

To achieve this, the FSA have developed, in collaboration with LAs on the LA/FSA Working Group, a set of proposed principles to evaluate the success of the modernised model.

There are five proposed principles:

- **Effective** – protects public health and provides the assurance needed to maintain consumer confidence, reduce regulatory burdens on compliant and/or low-risk businesses, and facilitate trade and export now and in the future.
- **Risk-based** – provides a proportionate, risk-based and consistent approach for dealing with new and existing food businesses that is compliant with existing legislation and makes effective use of data, information, and intelligence.
- **Adaptable** – adapts to different types of food businesses and takes account of current, emerging, and future risks (local, regional, national and international) in the food system, changing business models and innovation in the food industry.
- **Sustainable** – facilitates resilience and capability within local authorities by providing flexibility, enabling and encouraging them to target their resources effectively to ensure every intervention adds value and drives continuous improvements in business compliance.
- **Considered** – takes account of the food hygiene rating scheme so that it can continue to operate successfully and maintain consumer confidence; and, where appropriate, the food standards delivery model, other ABC programme work streams, and the animal feed intervention rating scheme (where applicable).

In relation to sustainability, the modernisation of the food hygiene delivery model is not about reducing the level of resource required by local authorities, rather it is looking to make the most effective use of resources by ensuring that official controls are focused on the highest risk and/or non-compliant businesses.

- **Considered** – takes account of the food hygiene rating scheme so that it can continue to operate successfully and maintain consumer confidence; and, where appropriate, the food standards delivery model, other ABC programme work streams, and the animal feed intervention rating scheme (where applicable).

At the time of writing of this service plan the FSA have outlined the proposed 'Headline' policy for developing the modernised model which includes:

➤ **A targeted intervention rating scheme:**

- focus official controls on the highest risk and/or non-compliant establishments
- reduce regulatory burdens on those that are compliant and/or low risk, including recognition of sustained compliance
- require follow-up interventions to be undertaken, where appropriate, until compliance is achieved
- reflect current and future risk management practices and business models
- align, where appropriate, to the review of the food standards model (recently piloted in England and Northern Ireland)
- clarify the role of food safety culture
- clarify the aspects of allergens to be considered within the food hygiene intervention rating scheme and the division of responsibility for allergens in two-tier local authority areas

➤ **More proportionate approach** – risk-based to timescales for initial official controls of new establishments and due interventions of existing ones.

➤ **Increased flexibility** – as to:

- the methods/techniques of official controls, including use of remote assessment
- who can undertake official controls and other official activities
- **Effective use of data** – enable intelligence (including industry assurance data, where appropriate) to be used when risk rating establishments
- **Appropriate performance management** – framework for monitoring delivery of official controls which recognises all activities used to achieve compliance

Next steps include:

- Refine the proposed ‘headline’ policy and principles
- Paper to FSA Board in September 2022
- Develop and engage on ‘initial’ policy proposals with local authorities (January 2023)

The guidance and advice in the FSA Covid 19 Recovery Plan for Phase 2 will apply in England until decisions are made in relation to the new proposed revised food hygiene delivery model, and subject to these decisions, until the new model is rolled out.

Local authorities will continue to report to the FSA on performance management. Please see section 4.10 below.

Health Certificates

We have had a steady request for health certificates in 21/2022. In total 134 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. However we are expecting the number of requests to significantly fall in 2022/2023 due to the relocation in March 2022 of the main food business that utilised this service.

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. . All members of the food team have completed OCQ (CO) – FCCO Food Competent Certification Officer revalidation training in May 2022.

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 date 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 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 until late 2023.

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 continued to see an increase in revisit requests in 2021/2022.
- 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 2021/2022 with food businesses opting to request a rescore revisit instead once a conversation has been had with the inspecting officer or Lead Food officer and the reasons for the low ratings explained in full

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 1 provides a link to DBC's organisational structure.) The Food Safety function sits within Neighbourhood Delivery. It operates under the direction of the Team Leader (Environmental Health) who reports to the Head of Regulatory Services, ECP, who in turn reports to the Assistant Director for Neighbourhood Delivery. (Annex 2 shows the 2022 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 Head of Regulatory Services ECP. Specialist services for the food function are provided by external organisations, namely UKHSA 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 UKHSA, 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 3 relevant to their role at Dacorum and meet all CPD (continuing professional development) requirements set by the Chartered Institute of Environmental Health (CIEH) which all members of the food team are a member of.

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 in wholesale businesses supplying food of animal origin.
- 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, UKHSA 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. This ceased in late December 2021 and was replaced with carrying out Self-Isolation welfare checks until the legal requirement to do so was revoked.

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 6
- Food Manufacturers and packers 32
- Importers and exporters 6
- Distributors/ Transporters 29
- Retailers 229
- Restaurants and Caterers 1072
- 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.

FHRS rating	Restaurant/ Cafe/ Canteen	Hotel/ Guest House	Small Retailer	Superm arket/ Hypermar ket	Caring Premises	Restaura nts and Caterers Other	Distribut ors/ Transp orters	Pub/ Club	Retailer - Other	Take- Away	School/ College	Mobile Food Unit	Manufa cturers and Packers	Importers / Exporters	Primary Producers
5 - Very good	183	7	76	26	83	160	4	96	17	74	75	35	10	1	2
4 - Good	38		19	3	9	10		18	5	18	9	3	4		1
3 - Generally satisfactory	12		6		4	2		5	1	13		1			
2 - Improvement required	2		3			3		2		4					
1 - Major improvement required	3		3					1		5		1			1
0 - Urgent improvement										1					
Total rated establishments	238	7	107	29	96	175	4	122	23	115	84	40	14	1	4

3.5 Enforcement policy

Dacorum Borough Council has a documented Environmental Health Enforcement Policy that was approved by cabinet in 2021. 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.

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. As mentioned above the food team are currently working towards the FSA Covid 19 Recovery Plan. The milestones that the LA are required to meet are set out in this separate plan. However where resources have allowed the food team have been operating at a faster pace and have reached some of the deadlines more quickly allowing us to carrying out some inspections sooner than anticipated. This is reflected in the table below.

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 2021/2022 – These figures include outstanding inspections from 2020/2021

	Interventions Due	Interventions Outstanding on 31/3/2022	Percentage Achieved
Premise Rating - A	5	0	100%
Premise Rating - B	41	2	95%
Premise Rating - C	124	21	83%
Premise Rating - D	286	144	49.7%
Premise Rating - E	224	130	42%
Totals	680	*297	56%

**The pandemic, subsequent lockdowns and government restrictions significantly impacted on the council's ability to carry out all planned inspections in 2021-2022 which also included a number of outstanding inspections from the previous year. The FSA guidance issued 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. We have also met the Covid 19 Local Authority recovery plan deadline for B rated premises before the deadline of June 2022.*

In addition to the programmed interventions, new businesses and those trading occasionally in Dacorum are inspected during the year. In 2021/2022 the council received 213 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 and this continued during 2021/2022. These were reviewed on a risk basis

The council was fortunate enough to receive funding from the FSA to assist us with prioritising these new businesses for inspection in the summer of 2021. The use of the PPI contractors above have also been fundamental in inspecting these premises. A majority of the premises that have yet to be inspected are low risk or where not

currently operating when contacted despite giving a specific opening date on the food premises registration form. A number of the businesses contacted to arrange an inspection had never started trading or had ceased trading at that point.

The move back to business as usual as restrictions have lifted in early 2022 and ongoing use of PPI contractor's will enable the council to clear the remaining back log in due course. In the meantime the food premises registration acknowledgement letter sent to food businesses provides lots of information and advice about operating a food business safely and what is required to comply with the law. This is still a key area for prioritisation in line with the Covid 19 LA Recovery Plan.

There are a number of premises that fall outside of the inspection programme where the risk is considered to be so low, regulation is unnecessary, 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.

We made successful bids to Hertfordshire County Council Public Health for funding to appoint a contractors to help backfill the occupied roles who were redeployed/ diverted to assist with the COVID -19 response in 2020. The council also engaged another contractors 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. This resulted in number of outstanding inspections going into 2021/2022. One of the contractors appointed finished in September 2021, but the PPI contractors remained and continued to assist the council with inspecting predominantly new businesses but as quickly as these were inspected new food premises applications were received.

The main focus throughout 2021/2022 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 and food premises registration application forms received throughout 2021/2022 the food team has also received a steady number of general food service requests, 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.

Due to the amount of work that using remote assessments generated in the initial lockdown and the level of unsatisfactory responses received, this is an intervention option that the council has decided not to use in 2021/2022.

The food team 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 and PACE interviews by post.

Table: Enforcement Action Taken 2021/2022

Voluntary closure	3
Seizure, detention & surrender of food	0
Improvement notices	5
Written warnings	227
Simple Cautions	1
Prosecutions concluded	0

Compliance revisits are undertaken in less than broadly compliant businesses 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 and delivering the Covid 19 LA recovery plan

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 2022/2023, but there has been a slight increase since restrictions have lifted and people are able to eat out again.

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. Depending on the nature, 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

	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022
Food Hygiene Complaint	20	3	10	10	11	7
Hygiene of premises complaint	106	124	81	60	46	53

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 inspection, 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 once the inspection has concluded

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 £85 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 £125 (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.

218 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.)

608 total Food Service requests (Including General Food Safety Requests, Hygiene of Premises Complaints, Food Alerts, Food Hygiene Rating System Requests and Health Certificate Requests) were received in 2021/2022

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	2015-16	2016-17	2017-18	2018-19	2019-2020	2020/2021	2021/2022
Total Samples	38	24	6	0	0	0	7

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 UKHSA for sampling.

2021/2022

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 many National or Local sampling studies, but as restrictions lifted in early 2022 the food team were able to participate in National Study 73: Salmonella and Listeria in pork, lamb, chicken and duck scratchings/crackling. All samples submitted returned satisfactory results.

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

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 UK Health Security Agency (UKHAA). 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 2022/2023

Salmonella	0
Campylobacter	0
Cryptosporidium	0
E.coli O157	1
ID/FP Enquiries	1

UKHSA 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 UKHSA 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 pre-pandemic 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	2016-17	2017-18	2018-19	2019-20	2020/2021	2021/2022
No of Food Alerts For Action	3	1	2	3	1	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
- Ofsted (child care and nurseries)
- UK Health Security Agency (UKHSA)
- 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, Community Safety, 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.

4.10 – Local Authority Enforcement Monitoring System (LAEMS)

The annual Local Authority Enforcement Monitoring System return 2021/2022 (due May 2022) provides a summary of local authority activity in relation to food law enforcement at food establishments. The completion of the LAEMS return is the mechanism in which the LA feedback to the FSA on annual performance.

In 2021/2022 a bespoke Food Hygiene – Local authority end of year return was devised by the FSA to take in to account Covid-19's impact on Local Authorities Food delivery service. The purpose of the return was to provide information on resources and on the delivery of food controls in 2021/22, including the ability of local authorities to meet the minimum expectations of the Covid 19 LA Recovery Plan, or as evidence that the local authority has been able to move at a faster pace. The information provided would also be used to inform the FSA's ongoing review of the Recovery Roadmap and guidance.

Due to the ABC programme and the development of the new food hygiene delivery model and the implementation of the Covid 19 LA Recovery plan that covers the period of the 1st July 2021 to 2023/24 the bespoke end year return will remain in place until the new food hygiene delivery model is implemented.

In order to monitor the progress against the milestones in the Covid 19 LA recovery plan all local authorities are required to complete short interim surveys at certain times throughout the year. The first one is expected at the end of June 2022.

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. Based on this 3.75 FTE professional posts are allocated to undertake food hygiene controls for 2022/2023.

Approximately 5% of the Head of Regulatory Services work time is directly attributed to food safety work. The 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
Head of Regulatory Services Emma Walker	Inspections Hygiene improvement Notices Emergency Prohibition Notices Remedial Action Notices Food Seizure/ Detention
Team Leader (Environmental Health) Sarah Stefano Newly appointed in January 2022. Undergoing refresher competency training due to complete in November 2022.	Inspections
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	Hygiene improvement Notices Inspections Food Seizure/ Detention

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 and Lead Officers 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 DORIS.

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

In addition to staff appraisals, the Team Leader (Environmental Health) and Lead Officer 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).

6. Quality Assessment

Quarterly/ Monthly performance reviews are based on the Intervention Strategy. The Head of Regulatory Services will then report to overview and scrutiny committee, on a quarterly/monthly 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 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. This has not

been relevant during the pandemic as we have followed the FSA guidance at all times and are now implementing the Covid 19 LA recovery plan that contains its own milestones and deadlines that we are aiming to meet until 2023/24. The Lead Officer currently reports performance figures based on this plan to the Team Leader who in turn reports to the Head of Regulatory Services to monitor compliance with the plan.

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 usual food service plan in 2021/2022.

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 concluded in September 2021 both defendants pleaded guilty to charges under Section 2 & 3 of the Health and Safety at Work etc. Act 1974 and was fined £80,000 and £19,600 respectively. .

The second case concluded in December 2021. The council successfully defended a Prohibition Notice and Improvement Notice served in January 2020 at the Employment Tribunal in July 2021. As a result of this outcome the defendant changed their earlier not guilty plea to guilty to charges under the Section 3 of the Health and Safety at Work etc. Act 1974 and was fined £33,333.

The council were awarded legal costs in both prosecution cases (£60,000 and £41,953.70)

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 one officer undertaking training to become qualified Environmental Health Officers in the Environmental Health Team. Predicted completion date is August 2025.

- Recovery Roadmap

As mentioned above the focus for the Food, Health and Safety team in 2022/2023 is the recovery roadmap and making sure that all of the milestones outlined in the Covid 19 LA recovery plan are met and in the event that they will not be immediate contact with the FSA will be made to inform them of that.

The use of PPI contractors will assist in house staff in achieving this.

8. Health & Safety Service Plan 2021/2022

Dacorum follows the HSE document LAC 67-2 (Revision 11) – Setting Local Authority Priorities and Targeting Interventions when planning proactive health and safety inspections.

However in 2021/2022 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

Non-essential Retail:

Environmental Health Officers carried out over 73 Covid -19 business advisory visits in April 2021 when non-essential retail was allowed to re-open to ensure businesses were complying with the law and to offer help and advice.

General Business Intervention visits:

The councils Covid Advisors carried out 2631 business intervention visits across Dacorum in 2021/2022 to ensure compliance levels were maintained and to offer continued guidance and advice in line with Government guidance. Any issues of non-compliance were passed to the Environmental health Team to follow up.

2. Service requests

In addition to the above proactive work, the Council's Environmental Health team have responded to 91 service requests including complaints of non-compliance to businesses asking for advice with regards to Covid regulations.

3. Workplaces visited

Officers from the Council's Environmental Health team have also carried out visits to 113 workplaces where there have been cases of Coronavirus to provide support and guidance to ensure the workplace is safe.

Health and Safety general service requests received 2021/2022

Type	Number
Skin Piercing Operator/ Premises Assessments	22
LOLER Lift Defect Reports	3
Asbestos Notification	0
General HASWA requests	24
Total	49

Accident Investigations

Reporting of Injuries, Diseases & Dangerous Occurrences (RIDDOR) notifications investigated	13
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Health & Safety Notices served 2021/2022

Type	Number
Section 20 Request for information	38
Section 21 Improvement Notice	4
Prosecutions Concluded	2

2022 -2023

The Food, Health & Safety team will continue to respond to Health & Safety service requests/ complaints received, follow up on any RIDDOR notifications requiring further investigation and should resources allow through the recovery period undertake proactive engagement/inspections with businesses particularly in relation to the follow areas:

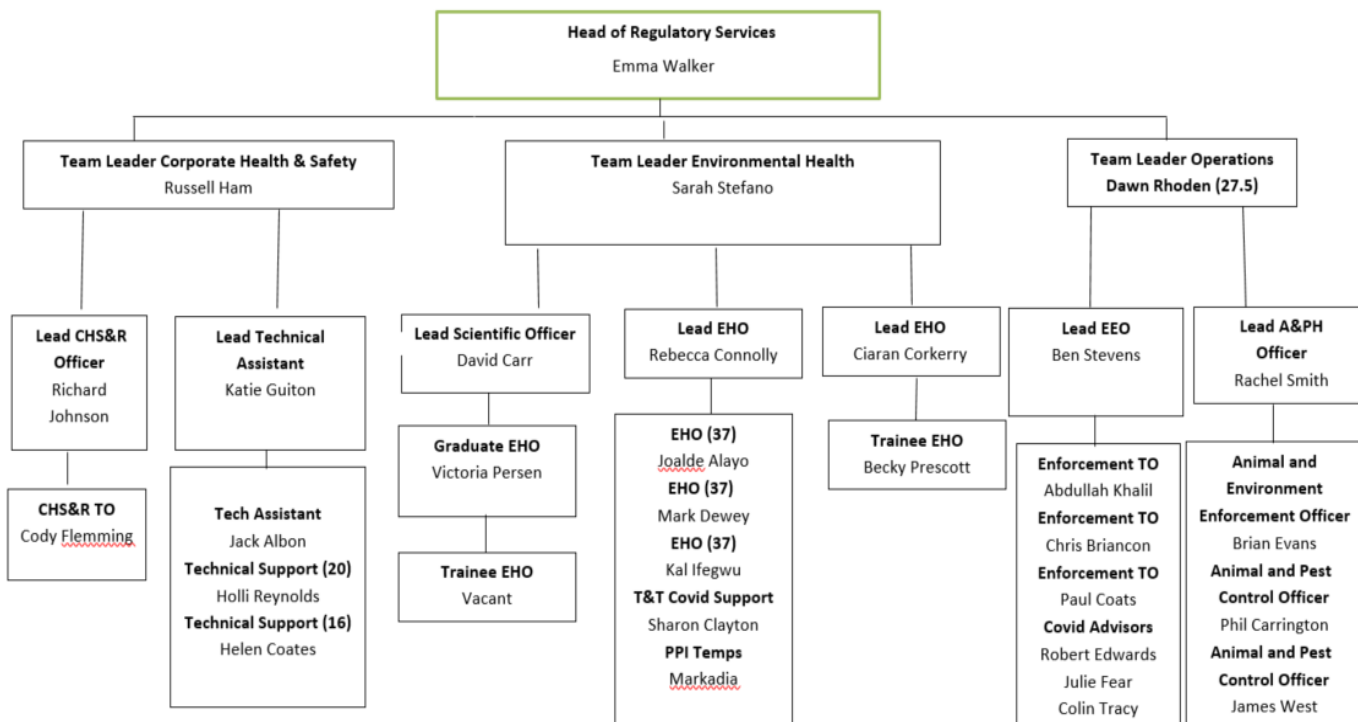
- Raising awareness of the work-related stress and mental health campaign ‘Working Minds’ with businesses
- Electrical safety in hospitality settings
- Inflatable amusement devices

Annex 1 – DBC Structure Chart

[Dacorum Borough Council senior leadership organisation chart](#)

Annex 2. ECP Structure Chart June 2022

Chart. 1 Structure of ECP 2022/2023





Competency
Framework 2021

Appendix 4 – Dacorum Food Recovery Plan

Dacorum Food Safety Recovery Plan 2022/2023

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.

1. Food Safety Inspections

1.1 Food Standards Agency Approach

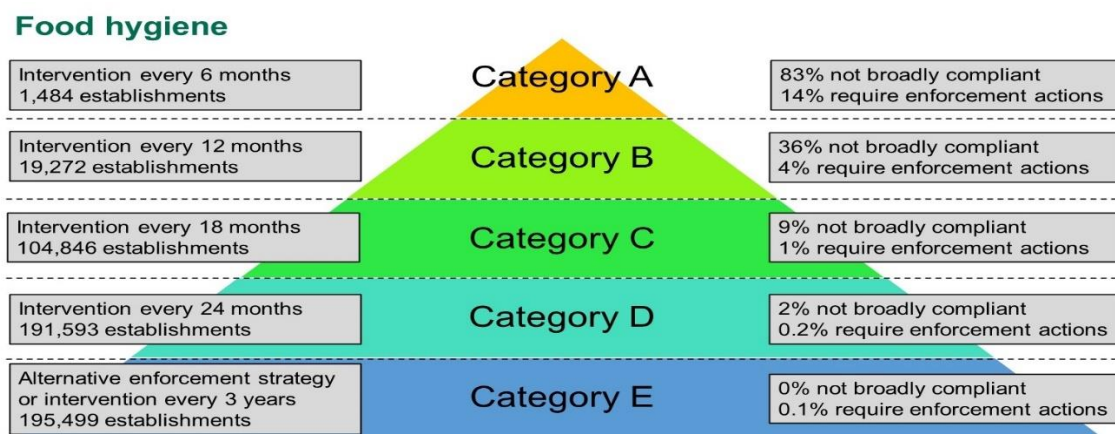
The Food Standards Agency (FSA) set out in June 2021 their proposal for LA recovery around statutory inspections. Dacorum Borough Council made a decision to adopt this plan from the 1st July 2021 as the Food Service Plan as the targets outlined for food delivery controls were more realistic during the ongoing pandemic. This plan continues to cover the period from 1 July 2021 to 2023/2024.

The following factors initially shaped the FSA's 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
 - In 2021/2022 Dacorum continued to receive a significant number of new Food Premises Applications with a total of 213 received.

- 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 was 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 has taken 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 assumed the following when devising the recovery plan:

- 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.

Going into 2022 the restrictions have been gradually lifted and so this has allowed resources to be slowly diverted back to the Food team.

- urgent reactive food safety work will increase as restrictions in the hospitality sector are lifted.

This was not the case in Dacorum, the reactive work was linked more to non-compliance with Covid 19 regulations the hospitality sector.

- 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.

This was initially the case until the restrictions started to lift in early 2022.

- 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.

This has been observed in Dacorum with an increased number of compliance revisits being undertaken.

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. This has now been completed.
- 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 Outline of the Recovery Plan

The key elements of the plan are summarised below:



1.5 Principles underpinning the recovery plan

The FSA proposed 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 was:

- 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 was able to:

- Manage the expected increase in necessary reactive work resulting from the lifting of restrictions in the hospitality sector, which included carrying out some of the overdue planned interventions. The table 1.1 below shows the number of premises that were 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 did not include the total number of interventions due in 2021/2022, 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. The timeline for each risk band is outlined later in the plan.

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

Table 1.3 Show's the progress made during the period of the 30th September 2021 – 31st March 2022

Risk Band	Total Due (as of the 30/9/2021)	Total Remaining
A	2	0

B	25	1
C	63	21
D	219	144
E	144	130
Unrated	218	122

- b) 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.

This is continuing to happen in 2022/2023 with high risk premises undertaking high risk operations being prioritised for inspection over those deemed to be low risk e.g. takeaway v's home caterer making cakes.

- c) plan for resumption of planned intervention programmes for high risk category and non-compliant establishments in Phase 2.

All inspections currently undertaken by the food team are being integrated back in the planned intervention programme and the next inspection will take place at the appropriate risk rated frequency e.g. A rated premises will be inspected every 6 months, B rated 12 months and so on. In the unlikely event that resources are diverted again the food team will prioritise high risk and non-compliant food businesses for inspection.

Based on the FSA **Phase 2 plan**, the priority for Dacorum from April 2022 to April 2023 will 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 FSA will continue to monitor the progress being made by requesting local authorities to complete regular temperature check surveys at the end of each milestone set to assess how each local authority is recovering. Due to the length of time the length of time recovery plan covers the objectives may change from time to time.

The department is very much still involved in the Local Outbreak Plan response, it is envisaged that this workload will decrease in 22/23 and at the time of writing this does seem to be the case. 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.

Progress Made:

The above phases are detailed in the table below and the progress made as of the time of writing.

Activity/Category	Timeline	Expectation	Progress Made at the End of March 2022
Conditional and full approval visits	Ongoing	In accordance with relevant legislative requirements	All approvals visits made and full approval issued for 1 premises in 2021/2022.
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.
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. From April 2021 until March 2022 142 new businesses have been inspected. PPI contractors are assisting with clearing the backlog of new businesses. Those that remain outstanding have been assessed as low risk.
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	Progress Made at the End of March 2022
Sampling	Ongoing	In line with local authority sampling programme or as required in the context of assessing food business compliance	Participation in Study 73 undertaken in March 2022. The food team are aiming to participate in STUDY 74: Hygiene in Takeaway Sandwich and Salad bars. This survey is running between April and October 22.
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	Target met February 2022.
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 inspected all B rated premises except one that was temporarily closed (Retirement Village Café) by the end of March 2022 ahead of the recovery plan.
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	Target met before deadline. Dacorum inspected all Category C -less than broadly compliant food businesses by April 2022
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	This target will be met.

Activity/Category	Timeline	Expectation	Progress Made at the End of March 2022
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>	<p>At the time of writing All outstanding C rated premises have been inspected except for 3 premises:</p> <ol style="list-style-type: none"> 1. Public house closed for refurbishment. 2. Sports club 3. Church Lunch Club. <p>These are all compliant food businesses with a rating of 3 or 4. Dacorum will meet this deadline ahead of the recovery plan target.</p>
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. This is ongoing in house and with the assistance of PPI officers.
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. Recovery funding has enabled a support officer to start working through our AES premises at the time writing this service plan.