

# Report of the Director of Health and Wellbeing to the meeting of Regeneration and Environment Overview Scrutiny Committee to be held on 18 September 2018

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**Subject: Food Safety in the Bradford District**

**Summary statement:** The Council is required by the Food Standards Agency to have a documented and approved Food Safety Service Plan in place. This report is brought to members to seek support for that plan.

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**Overview & Scrutiny Area:**  
**Regeneration and Environment**

## **1. SUMMARY**

The Council is required by the Food Standards Agency to have a documented and approved Food Safety Service Plan in place. This report is brought to members to seek support for that plan.

The Service Plan sets out the measures the Council will implement to safeguard food and drink which is produced, prepared or sold within the district. The plan reflects the work required of food authorities by the Food Standards Agency (FSA) in its national Food Law Code of Practice and guidance documents.

The Service Plan is a document that:

- identifies how these services fit in with the Corporate Priorities;
- details the demands on the service;
- gives information about the services provided;
- the means by which these services will be provided;
- the resources available to deliver these services;
- details the risk based programme of work for the year ahead;
- the means by which the service will achieve any relevant performance standards/targets;
- identifies potential risk to the service and where it may fall short of statutory requirements
- a review of performance in order to address any variance from meeting the requirements of the service plan.

## **2. BACKGROUND**

2.1 Food Safety is one element of the Council's Environmental Health Service (EHS). The Food Safety Team (FST) carry out a programme of inspections, sampling, advice, education and where necessary enforcement work which is delivered to tackle food safety issues. This is a statutory obligation placed on the Council which is monitored by the Food Standards Agency (FSA).

2.2 One of the requirements placed on the Council is to have an approved documented service plan in place which sets out how the Council intends to meet its statutory obligations. The format of the plan is prescribed by the FSA. The plan is contained in appendix 1. Members are asked to consider the contents of the plan.

2.3 As part of the policy framework the Food Service Plan does have to go through the process of being approved at Full Council.

## **3. OTHER CONSIDERATIONS**

There are no other matters for consideration at this time.

## **4. FINANCIAL & RESOURCE APPRAISAL**

The service plan, as set out, has been drafted to be accommodated within existing resources.

## **5. RISK MANAGEMENT AND GOVERNANCE ISSUES**

There are no significant risks arising out of the implementation of the proposed recommendations.

## **6. LEGAL APPRAISAL**

The functions carried out by the Food Safety Team as identified within the Food Safety Service Plan are statutory functions required under the provisions of various statutes including the Food Safety Act 1990 and associated regulations.

## **7. OTHER IMPLICATIONS**

None

### **7.1 EQUALITY & DIVERSITY**

The inspection programme and Food Hygiene Rating Scheme (FHRS) follows a strict Code of Practice and brand standard and as such it is applied equally to all businesses.

### **7.2 SUSTAINABILITY IMPLICATIONS**

The climate predictions for Yorkshire & Humber describe higher than average summer temperatures and above average winter rainfall. The impact in terms of public health will likely result in increased risks from heat and flooding. There will be a role for local authorities in increasing public awareness of how to cope during a heat wave. Food hygiene will be a key aspect of awareness raising and advice for businesses and households.

The Food Service Plan and Food Safety & Animal Health work actively supports the priorities for the District and contributes to personal, community and District well-being, prosperity and resilience, including avoiding significant adverse incidents and events. The Council investment of public funds and resources in this area, working with citizens, communities, business and other partners can be seen as fundamental to such essential areas of a healthy and vibrant society.

Promotion of the FHRS (Food Hygiene Rating Scheme), undertaking food hygiene inspections and early interventions leads to wider legal compliance and cost avoidance by businesses in the District.

### **7.3 GREENHOUSE GAS EMISSIONS IMPACTS**

Greenhouse gas impacts would be from office accommodation and transport i.e. energy and fuel consumption. This will be directly, through heat and power in Council buildings or indirectly, via the combustion of fuel in officer's vehicles.

There is a programme of energy efficiency improvements aimed at reducing emissions from corporate buildings managed by the Council's Environment and Climate Change Unit. Currently site visits are carried out in private vehicles and are planned to minimise journeys. Officers maximise flexibility by working flexibly from home, offices and touch down points.

The Food Safety Team has direct contact with food businesses, faced with the costs and risks associated with climate change. Food businesses are burdened with energy bills associated with heating and chilling of food and as such stand to benefit from Council recommendations that will improve energy efficiency.

#### **7.4 COMMUNITY SAFETY IMPLICATIONS**

The regular visits by officers and advice given about waste storage and disposal at the site contributes to a feeling of safety within the District.

#### **7.5 HUMAN RIGHTS ACT**

There are no Human Rights Act implications.

#### **7.6 TRADE UNION**

There are no Trade Union implications

#### **7.7 WARD IMPLICATIONS**

The inspection programme, FHRS rating scheme and service plan apply equally across all wards within the District.

#### **7.8 AREA COMMITTEE ACTION PLAN IMPLICATIONS (for reports to Area Committees only)**

Not Applicable

#### **7.9 IMPLICATIONS FOR CORPORATE PARENTING**

The inspection programme will ensure that care homes etc are inspected and comply with relevant legislation.

#### **7.10 ISSUES ARISING FROM PRIVACY IMPACT ASSESMENT**

Not applicable.

#### **8. NOT FOR PUBLICATION DOCUMENTS**

None

## **9. OPTIONS**

Not Applicable

## **10. RECOMMENDATIONS**

10.1. The views and comments of Members are sought in relation to the contents of this report.

10.2. The work of the Food Safety Team as documented in the Food Safety Service Plan be supported.

## **11. APPENDICES**

Appendix 1 - The City of Bradford MDC Food Safety Service Plan 2018/19

**Department of Health and Wellbeing**

**FOOD SAFETY SERVICE PLAN  
2018 / 2019**

**FOOD SAFETY SERVICE PLAN  
2018/2019**

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## Introduction

This service plan covers the food safety and animal health work of the Council's Environmental Health service for 2018/9. The Food Standards Agency (FSA) requires each local authority to produce an annual plan that sets out what measures we will take to safeguard food safety and to review our achievement of the targets we set last year.

## Section 1 - Service Aims and Objectives

### **1.1 Aims and Objectives**

Our aims are:-

- 1) To ensure that all food produced, prepared and sold in the Bradford District is safe to eat.
- 2) To increase the awareness of food safety amongst the residents of the Bradford District.
- 3) To support the role of Public Health England in relation to communicable disease control within the city.
- 4) To assist in the delivery of the relevant outcomes within the Public Health Outcomes framework.

To achieve this we will operate a system of inspection, sampling, advice and other initiatives to ensure safety in the production and sale of food.

Using these methods and through other promotional activities and partnership work we aim to ensure the safety of food and thereby contribute to the health and well-being of the whole population. These activities include;

- To deliver an annual programme of food hygiene interventions, this includes inspections, audits, and alternative intervention strategies.
- Promote best practice in food production and sale in Bradford through the national food hygiene rating scheme (FHRS).
- Provide support and advice to local businesses, so they can comply with legal requirements and best practice.
- Improving food safety right through the food chain including improving hygiene on the farm.
- Publicise food safety issues, by working with partners, through a number of activities as part of local and national campaigns.
- Act as Primary Authority for our partner businesses and deal with enquiries referred on by other authorities and agencies.
- Investigate food poisoning notifications and outbreaks in association with the Consultant for Communicable Disease Control (CCDC), based within Public Health England (PHE).
- Investigate complaints about food and food premises.
- Implement an annual sampling programme to include participation in national and regional sampling surveys
- Approve and register special high risk food premises as required by law.
- Enforce food legislation and take proportionate action to secure compliance.
- Take prompt and effective action in response to food alerts and other threats to food safety in the Bradford District.
- Provide training and development opportunities for staff to ensure they are competent, professional and fair.

## **1.2 Links to Corporate Objectives and Plans**

### **Corporate priorities 2018/19**

#### ***Better skills, more good jobs and a growing economy***

The team's involvement in primary authority partnerships and 1:1 business coaching helps to support local businesses. Participation in the national food hygiene rating scheme also allows the promotion of food businesses with good hygiene ratings. Our work ensures a level playing field thus supporting legitimate business to compete and expand. We are currently working in partnership with the Office for Product Safety and Standards (formerly Regulatory Delivery Office) part of Department for Business, Energy & Industrial Strategy on an initiative with businesses registering for the first time to enable them to get things right at the offset. We are also involved with the North East Region Better Business for All group that links in with the Council's Growth Hub and the Leeds City Region Enterprise Partnership (LEP).

#### ***Good Schools and a great start for all our children***

Participation in Positive Lifestyle Centre sessions based at Bradford City Football Club helps to deliver key messages on food safety in the home and hand washing to school children. Work undertaken for food safety week also targets relevant groups with various initiatives.

#### ***Better health and better lives***

We work with Public Health looking at various initiatives for example to combat obesity and encourage healthy eating. Work undertaken for food safety week uses key messages to members of the public to produce safe food in the home. We liaise regularly with Public Health England and review our service in relation to communicable disease control to ensure that we get outcomes for the work we do.

#### ***Safe, clean and active communities***

We link in with the Neighbourhood's Enforcement Team on refuse control and on all of our inspections we assess waste food storage facilities and give advice regarding recycling of waste oil. We take part in joint initiatives with the police and other agencies to identify any links with child sex exploitation / criminal activity in commercial businesses.

#### ***A well run council, using all our resources to deliver our priorities***

We constantly review our service to identify improvements to service delivery and in addition we regularly monitor performance against service standards and targets set both internally and by external organisations. We work in partnership with other organisations to produce an effective and efficient service and in a way which enables us to use our resources wisely for example project work with the Regulatory Delivery Office. We are also working with the FSA as part of their regulatory review and are involved in a primary authority project and other initiatives.

## **Section 2 – Background**

### **2.1 Profile of the Authority**

The latest population estimate for Bradford District is 534,279 (Office for National Statistics ONS June 2016) making it the fourth largest local authority in England in terms of population. Bradford has the third largest proportion of Black and Minority Ethnic people outside of the London

Boroughs and also has a relatively young population structure. The District has a high proportion of non-white residents at 25.89%. Within the ethnic minority population, the proportion of Asian or British Asians is 21.09% which is significantly higher than the national average and twice as much as the West Yorkshire average. The latest figures from ONS state that the largest proportion of the districts population (63.9%) identifies themselves as white British. The district has the largest proportion of people of Pakistani ethnic origin (20.3%) in England. By 2031 the population is expected to rise to 655,100 an increase of 27.8% since 2009. Population projections suggest that the largest growth will be within the Asian population. However with the white population expected to remain fairly static, it will continue to account for more than half the population in 2031. The district covers 141 square miles comprising the City of Bradford and four towns. It has a mix of densely populated urban centres with more rural and semi-rural areas to the west and north, making up 2/3 of the district but the same proportion of the population live in urban areas, mostly in the city.

(Source: The State of The District – Bradford District’s Intelligence & Evidence Base Set. 2010))

## **2.2 Organisational Structure**

The Food Safety function is located in the Environmental Health Service of the Council which is incorporated in the Department of Health and Wellbeing. An organisational structure for the department is attached at **Appendix 1**.

The Food Standards Service is delivered on a county-wide basis by West Yorkshire Joint Services (Trading Standards - WYTS). Close links exist with this service.

## **2.3 Scope of the Food Service**

The Food Safety Team carries out all of the food safety, public health and animal health duties that the Authority is legally required to discharge.

The Food Safety Team comprises Environmental Health Officers, technical staff, and an Animal Health Officer.

The team undertakes statutory programmed food hygiene inspections. Part of this includes identifying any food which has been imported from a third country.

An annual food sampling programme is carried out to ensure microbiological standards are met. This includes participation in national and regionally co-ordinated surveys.

Health and safety initiatives are also carried out in food premises whilst officers are on site.

Food standards issues are referred to WYTS.

The Food Safety Team investigates reported outbreaks and individual notifications of food poisoning and other infectious diseases.

Officers inspect farms for primary food production, animal health issues and investigate matters relating to the safe disposal of animal by-products.

All officers are now based at one single point of access at Britannia House, Bradford, albeit working remotely and flexibly. The service can be accessed via the Council’s Contact Centre or by using the online contact forms on the Bradford Council website. Core operating hours are 9.00am to 5.00pm; however officers frequently work out of normal operating hours to visit premises when they are open.

Additionally the FSA has a web based on line reporting system and they redirect enquiries from members of the public to the relevant LA.

Emergency out of hours cover is provided throughout the year by officers who are contactable through the EH Service emergency call out team.

## 2.4 Demands on the Food Service

The following tables detail the breakdown and profiles of food businesses in the Bradford District.

**Table1. Categories of Food Businesses**

<b>FSA Category</b>	<b>Number</b>
Primary producers	4 (601 farms)
Manufacturers and packers	117
Importers/Exporters	6
Distributors / transporters	98
Supermarket/ hypermarket	96
Small retailer	771
Retailer – other	193
Restaurant/café/canteen	721
Hotel/guest House	56
Pub/club	474
Take-away	709
Caring premises	633
School /college	239
Mobile Food Unit	126
Restaurants / caterers – other	234
<b>Total</b>	<b>4477 (5078)</b>

To deliver an equitable service in our multi-cultural district, we signpost businesses to information on food hygiene training and advice. There is a high turnover in the restaurant and catering sector of both food businesses and food business operators. This places a strain on the team in terms of premises inspection as an inspection with a new owner takes longer and involves a lot of help and support. In 2017 / 2018 we identified approximately 500 new business owners at the inspection.

The district has a wide variety of businesses including high risk sectors such as importers, manufactures and packers. There are 30 butchers in the district selling raw and ready to eat foods, including the production of cooked meats and pies.

There are 60 premises that manufacture or process products of animal origin that require statutory approval. This also includes 7 on farm pasteurising dairies and we have two specifically trained officers to deal with these.

There are 13 approved cold stores in the district, in the past these have been perceived to be low risk food hygiene premises but the horse meat scandal of 2013 highlighted the need to reconsider the risk associated with this type of business and food fraud continues to be a national issue.

There are 4 primary producers in the District for example egg producers and an additional 601 farms with livestock. The livestock farms are inspected by the Animal Health Officer and are not risk rated in the same way that food premises are.

As well as rated premises, we receive on average 250 registrations from new businesses every year, which require inspection and risk rating. In addition, we have engaged with Neighbourhood Services to provide intelligence about closed and newly opened businesses in the District.

**Table 2. Rated premises profile by Risk Category**

Risk category	No. of premises 1/4/18	Inspection Frequency
A (highest risk)	14	Every 6 months
B	182	Every 12 months
C	875	Every 18 months
D	1503	Every 2 years
E (lowest risk)	1755	Initial inspection followed by alternative intervention
unrated	146	Within 28 days of registration

## **2.5 Enforcement Policy**

The Environmental Health Service has published an Enforcement Policy in line with the National Compliance Code, statutory codes of practice and relevant guidelines issued by central government departments and other bodies. Work carried out by the team is in accordance with that policy.

The table below details the enforcement action undertaken during 2017/2018.

<b>Enforcement Action</b>	<b>Number</b>
Voluntary Closure	11
Emergency prohibition order	0
Prohibited person	0
Simple caution	5
Improvement notices	27
Prosecutions	2
Seizure of Food	0
Remedial Action Notice	1

## **Section 3 - Service Delivery**

### **3.1 Food Premises Interventions**

The Food Safety Intervention Programme undertaken by the Council operates in accordance with the Food Standards Agency's (FSA) statutory Local Authority Framework Agreement and Food Safety Code of Practice (CoP). The CoP sets out a range of interventions that local authorities may adopt in addition to food safety inspections. These are official controls that include inspections, audits, sampling, monitoring and verification; non-official controls include advice, coaching, education and training, and questionnaires.

Premises are risk rated on inspection using the defined criteria in the CoP and given a risk rating category A to E, A being the highest risk category. This risk rating determines the frequency of inspection, category A premises are inspected every 6 months, category B every 12 months, C premises every 18 months and D premises every 2 years. Priority is given to the inspection of high risk and approved premises over low risk businesses. This means priority is given to the inspection of highest risk premises, (categories A-C). Low risk businesses (D-E) that fall within the scope of the FHRS website, will however, receive an inspection when resources facilitate this.

A Food intervention programme was developed by the West Yorkshire Food Officers Group and ratified by the west Yorkshire Chief Officers Group, see **Appendix 2**. This aimed to provide the best use of resources and seek a consistent approach across West Yorkshire.

The FSA require local authorities to include inspection of imported food during routine food hygiene inspections. This activity forms part of the overall inspection process.

Where it is the local authority's responsibility to enforce health and safety in food premises, officers from the food safety team may undertake health and safety interventions in food premises.

### 3.2 Performance Data for the Service

The performance targets for 2018/19 and outcomes for 2017/18 are detailed in **Appendix 3**.

### 3.3 Food Hygiene Rating Scheme (FHRS)

The FHRS provides consumers with information on food hygiene standards to help them to choose where to eat out or shop for food. Food outlets, such as restaurants, takeaways, pubs and supermarkets, are inspected by the food safety team to check their hygiene standards meet legal requirements. The standards found at these inspections are rated on a scale ranging from '0' at the bottom to a top rating of '5'. The aim is to encourage businesses to improve standards and reduce the incidence of food borne illness. Since the adoption of the scheme we have seen an increase in the number of premises achieving a rating of 3 and above. However we fall short of the FSA target of 96% of premises having a rating of 3 or above.

**Table 3. % Distribution of rated premises under the FHRS**

FHRS	1/4/2013 %	1/4/2014 %	1/4/2015 %	1/4/2016 %	1/4/2017 %	1/4/2018%
5	58.8	60.5	60.4	62.2	64.7	65.4
4	18	17.1	19.2	19.3	19.4	18.0
3	9.1	9.1	9.9	9.9	9.4	9.6
2	3.5	3.9	3.9	3.8	3.5	3.8
1	9.3	8.3	6.3	4.6	3.0	3.0
0	1.3	1.0	0.2	0.2	0.0	0.2
3 or better	85.9	86.8	89.6	91.4	93.5	93.0

### 3.4 Food Premises Complaints

The Food Safety Service investigates complaints regarding poor hygiene in premises, and complaints about unfit food and foreign bodies in food. The utility companies also notify us of supply cut offs that usually require an urgent response. It also responds to requests for advice from businesses and the public.

Food complaints and service requests are dealt with in accordance with actual risk. Where the complaint presents no risk to health, complainants are encouraged to contact the vendor or manufacturer directly to resolve the matter. Where possible we also direct businesses to self-help sources of information such as the FSA website.



### **3.5 Primary Authority**

The Service supports the Primary Authority Partnership (PAP) scheme which is run by Regulatory Delivery. This is a formal partnership arrangement between a local authority and a national food business based in the District. The Local Authority becomes the national point of contact to advise the business on food / health and safety matters. We have a PAP with:

- Caterleisure
- National Federation of Fish Friers Association

All work carried out as part of the PAP arrangement is funded by the business with whom the partnership has been entered into.

Bradford is also the “originating authority” for several large manufacturers supplying food nationally.

### **3.6 Advice to Business**

We provide help and advice to new and existing businesses during inspections or following an enquiry. Leaflets and documents for use in running a safe food business are provided either on request or as part of a follow up to an inspection.

We are taking part in a project led by Regulatory Delivery looking at the style and content of advice letters to new businesses to ensure that they get it right first time and to help the sustainability of new businesses.

Information is also available on the Bradford Council website which also provides links to other sites.

We provide 1:1 coaching for a fee on the Safer Food Better Business pack for those businesses that are struggling to comply with Article 5 of Regulation (EC) No. 852/2004, which requires businesses to have a documented food safety management system in place. We also offer a fee paying service for new businesses to help them get things right from the start.

We have for many years produced a business focused newsletter ‘Feeders Digest’ that includes mainly food safety information but also covers health and safety and trading standards articles. This is sent out to all registered food businesses in the District, however due to funding cuts by the council the last newsletter was issued in March 2018. From April 2018 we will use the Council’s ‘Stay Connected’ system on the council website and will be sending out regular emails to those who subscribe to ‘Food Advice for Businesses’. The new system will enable us to send out updates on a more frequent basis and in a timely manner.

### **3.7 Food and Environmental Sampling**

An effective food sampling programme is an important part of a well-balanced food enforcement service. Our microbiological food sampling is undertaken in accordance with a sampling programme produced annually and in response to food complaints/investigations. The sampling programme includes taking part in national surveys determined by national co-ordinating bodies. It also includes a commitment to allocate 10% of the Authorities annual credit allocation to be used to take samples of food which have been imported from third countries, as required by the Food Standards Agency.

Environmental sampling is also considered an essential part of the service. Environmental swabs are taken in businesses to assess both the cleanliness and the safety of the food preparation environment. This usually includes taking swabs of food and hand contact surfaces.

The Public Health England Food Water and Environmental Microbiology Laboratory, York allocates local authorities with an annual sampling “credit” based on population size and

historical sampling patterns. We are required to carefully manage this to ensure we do not “overspend” our sampling allowance. Likewise if we do not use our credit allocation then this could be reduced by the laboratory. **Appendix 4** provides a full report on the sampling programme. **Appendix 5: Food Sampling Policy.**

### **3.8 Control of Infectious Disease**

The Food Safety Team works closely with Public Health England and liaises with the CCDC in the investigation of outbreaks and individual cases of food-borne disease. The ‘Protocol for investigation and management of sporadic cases and outbreaks’ details the West Yorkshire authorities policies and method of investigation of notified infectious diseases.

**Appendix 6** outlines the demands on this part of the service for 2017/2018

### **3.9 Animal Health & Welfare**

The Animal Health Officer within the Food Safety team undertakes primary production inspections at farms and works in liaison with Defra, RSPCA, veterinary surgeons and other local authorities. Improving hygiene on the farm is a key part of the FSA’s farm to fork approach.

Inspection frequencies are risk based and make full use of available evidence from a variety of sources. Membership of a recognised farm assurance scheme will be used as positive evidence, resulting in less frequent inspections. Recognised schemes are considered to meet the requirements of the legislation in a clear and credible way; for example, scheme members will already undergo regular inspections by the certifying body used by the scheme.

### **3.10 Food Safety Incidents**

The service responds to food alerts notified by the FSA in accordance with the Code of Practice and our Procedural document. We always deal with them as detailed by the FSA. The reactive nature of this activity makes it difficult to estimate the resource necessary.

### **3.11 Liaison with Other Organisations**

The service is committed to liaising with other local authorities and associated organisations to ensure consistency and fairness. This is achieved by being actively involved in a number of groups, including

- West Yorkshire Principal Food Officers Group (includes Trading Standards) WYPFOG
- West Yorkshire Gastro Intestinal Group
- West Yorkshire Animal Health Liaison Group
- Yorkshire and Humberside Animal Health Liaison Group

These groups have produced standard inspection forms that are used across West Yorkshire and also undertake inter authority audits to ensure consistency of approach.

We also work closely with Public Health and Public Health England. In addition we are currently involved in an initiative for new businesses working with Regulatory Delivery.

### **3.12 Food Safety Promotion**

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



- Support for 'Food Safety Week'
- Email updates via the Council's Stay Connected email system to distribute information that matters to food businesses and to consumers.
- Maintenance of the Food Safety website.
- Participation in Positive Lifestyle Centre sessions based at Bradford City Football Club to deliver key messages on food safety in the home and hand washing to school children.
- Publication of articles in the local press and community publications.
- Publishing the food hygiene ratings of food businesses on the national website.
- Presentations and or attendance at community events and schools upon request.
- 1:1 coaching on the SFBB pack (fee applicable)
- Fee paying service for businesses seeking bespoke advice
- Joint training sessions with WYTS to promote good food hygiene and the Good Food Award
- Identification of opportunities for engaging in the Public Health Agenda and nutrition.

**Appendix 7** details other work that we had planned for 2017/2018 and the priorities for 2018/19.

## **Section 4 – Resources**

### **4.1 Staffing Allocation**

The service has seen a reduction of staff due to non-replacement of staff that have left and reductions in hours and retirements. As a result the number of full time equivalent officers engaged in food safety and communicable disease control for 2017/18 was 11.4. However we had 3 vacancies and had an officer on maternity leave for much of 2017. We have recently recruited to those posts, except one, but due to the unavailability of fully qualified officers have taken on 3 trainee EHO's who have completed the degree but have yet to gain full registration with the Environmental Health Officers Registration Board and so will have restrictions on the range of duties that they can undertake. We use contractors to undertake some low risk food hygiene inspections using the money from vacant posts that we hold. To manage the delivery of the service as required by statute increasingly alternative interventions are being utilised and revisits are only carried out when serious issues have been identified. The national average for 2017 was one officer per 312 premises; on this basis we would require an additional 4.0 officers.

### **4.2 Staff Development Plan**

Training and development needs are assessed on a yearly basis through staff appraisals. Training needs are met by:-

- Courses to achieve specific qualifications.
- Attendance at technical seminars.
- In-house training on specific issues.
- Cascade training by staff that have attended relevant courses.
- Accompanied visits.
- Peer Review
- On-line training provided by the Food Standards Agency.

The FSA issued a revised Food Law Code of Practice on 7 April 2015 which introduced new requirements for officer competency and continual professional development (CPD). Officers are now required to undertake 20 CPD hours which has increased from 10. The service has made a commitment to ensure it provides 10 CPD hours in core training requirements for all officers.

The competency of all food officers has been reviewed against the competency requirements in the CoP and their authorisations.

The training programme for 2018 is attached in **Appendix 8**.

## **Section 5 - Quality Assessment**

The service has systems to maintain performance and quality. Reviews of performance are undertaken quarterly at managers meetings. Reports against the food plan enable monitoring of progress against the targets.

The Quality Management System (QMS) includes a series of procedural documents that state the minimum standards for our food safety enforcement activities. Work is monitored via peer review and random checks by the manager on inspection files. We also participate in national risk rating consistency exercises to ensure consistency in awarding the food hygiene rating to businesses.

Monthly customer surveys of our re-active and pro-active services are used to review and improve our standards of service delivery.

## **Section 6 - Review of Work**

### **6.1 Review against Service Plan**

The Environmental Health Management Team monitors performance on a quarterly basis. The information is also made available to the Senior Management Team and the Assistant Director. A review against the plan is undertaken at manager's one-to-one meetings with the Principal Manager.

In 2017/18 we carried out 2621 interventions, which were a mix of inspections, sampling and other visits to food premises. 100% of our high risk category A and B premises that needed an inspection received an inspection. We also achieved 98.93 % of the total interventions required.

We responded to 1408 service requests these include advisory requests from businesses, and complaints from members of the public, this is an 8.3% increase in number of requests received in the previous year.

5 businesses were issued with a simple caution.

Our sampling credit allocation for the year was 20,500 and we used 14950 credits of this taking a mixture of food, dairy, water and environmental samples. We underperformed on our sampling programme for the year due to other competing demands on the service.

We dealt with 6 outbreaks; 1 was associated with a wedding caterer and was a probable *Clostridium perfringens* outbreak which resulted in a simple caution for hygiene offences. Another outbreak associated with a buffet lunch was most likely viral. No cause was identified for the other 4 outbreaks; lack of cooperation from the original complainants in 3 of those was the main factor in not being able to attribute a cause.

At the end of 2017/18 our figure for all food establishments broadly compliant with food hygiene law dropped slightly from 93% to 91%. This is an area of work that has been identified in the 2018/19 work plan to focus on the premises with a food hygiene rating of 2 and below to improve the rating.

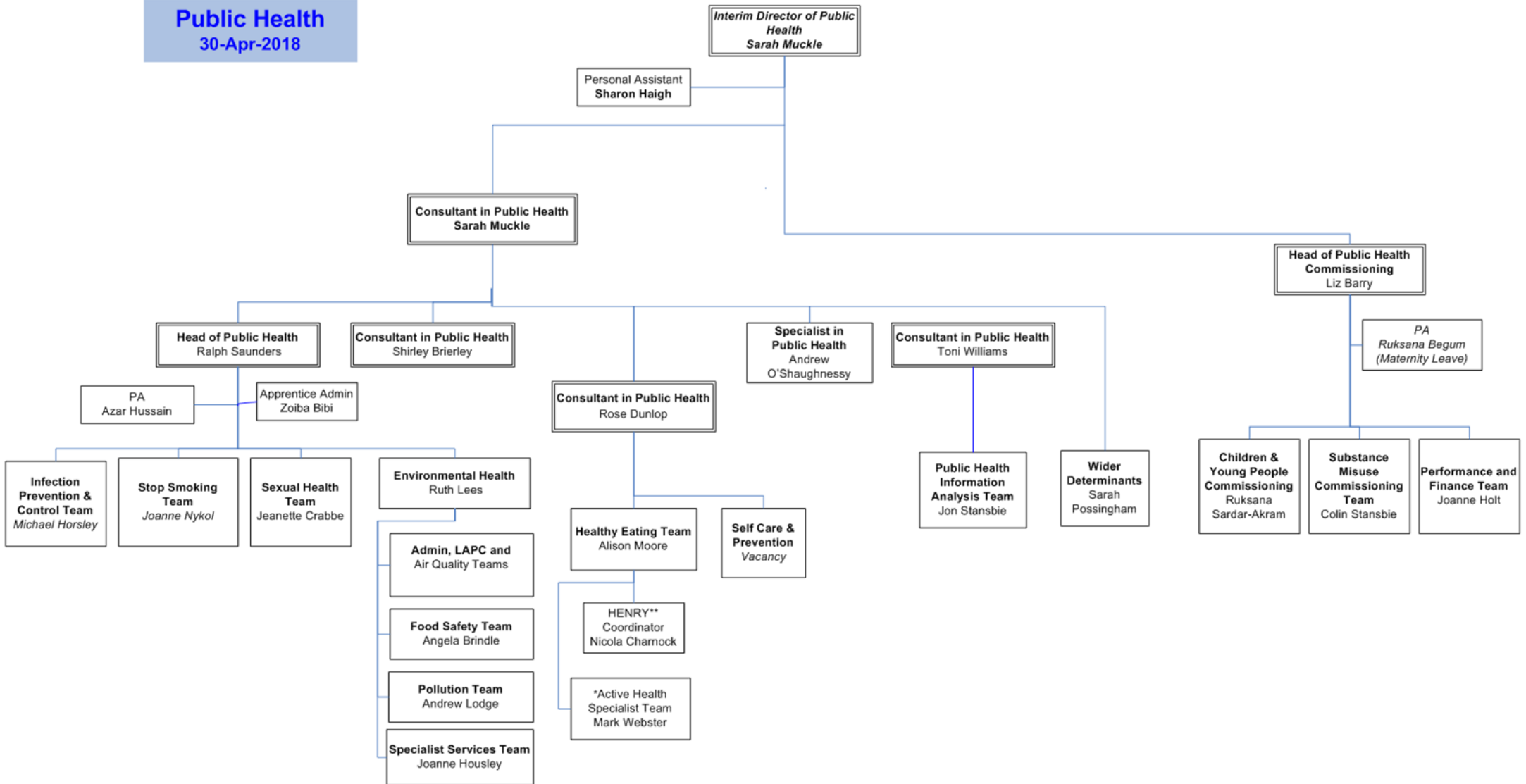
## 6.2 Variation from 2017/18 Plan

Issues that have arisen that have placed extra demands on the service include:

- The FSA is currently undertaking a regulatory review of the way that the FSA and local authorities regulate food businesses referred to as the Regulating Our Future project (RoF). The new model will move away from a 'one size fits all' approach to regulation. We are participating in the consultation exercises and are taking part in a least two reviews of the way we work. The first is a trial assessing how new businesses react to different interventions in order to get things right at the offset. The second is looking at how primary authority partnerships can work with different approaches to regulatory interventions. It is expected that the new model will come fully into force from 2020 onwards. However BREXIT came about after RoF was proposed and has taken priority particularly with regards to sorting out for example import / export issues, and ensuring that their remains an effective and robust regulatory regime/ framework in place.
- The Environmental Health Department together with Wakefield EH Department and WYTS was tasked with the development of an Options Appraisal considering all approaches from enhanced collaboration up to and including a shared services model with a single management structure. This work involved data collection and attendance at a number of meetings. This has involved considerable resource from the EH management team in collecting data and attending meetings. All staff have also attended one of three workshop to discuss the proposals. It was ultimately determined that a shared service would not result in any savings and indeed that any potential merger would require significant outlay particularly in terms of IT systems.
- Allergens: We continue to work closely with WYTS to ensure that new allergen requirements that came into force 13 December 2014, requiring that all food businesses (e.g. restaurants, takeaways, bakeries and delicatessens) declare any of 14 identified allergenic ingredients which are used in non-prepacked or loose foods are being complied with. We also need to advise businesses on how to avoid cross- contamination of allergens in food preparation and have started to produce additional guidance for businesses to enable them to comply with this issue.

# APPENDIX 1 – Departmental Structure

**Public Health**  
30-Apr-2018



## **APPENDIX 2 – Food Intervention Programme**

### **FOOD HYGIENE INTERVENTION PROGRAMME 2018/2019**

This document sets out the type of interventions to be applied within the premises for which we have enforcement responsibilities. The intervention programme is based upon;

- The Food Safety Code of Practice, which allows local authorities flexibility to introduce a mixture of interventions.
- Implementation of an intervention-based programme enabling the food safety service to reduce the level of burden on compliant businesses and focus more resources on those with poorer standards.
- Reduction in staff numbers
- A risk -based approach, aimed at directing greater resource to those food businesses that present the greatest risk.
- The implementation of the FHRS.

#### **Category A & B**

Inspection, Partial Inspection or Audit

#### **Category C**

**Fully compliant premises** (Hygiene: 5 or less; Structure: 5 or less; Confidence in management : 5 or less)

If achieved the FHRS 5 rating for 2 consecutive years: questionnaire to be sent.

If not achieved the above – follow system for broadly compliant.

**Broadly compliant premises** (Hygiene: 10 or less; Structure: 10 or less; Confidence in management: 10 or less)

Alternate between:

Inspection - Re-rate a business

And

An official control: e.g. Sampling visits – Do not re-rate

#### **Not broadly compliant**

Full Inspection

#### **Category D**

If the business does not have a FHRS rating, then the officer must undertake an inspection to rate the business.

Officers may then alternate between official controls and other interventions.

FHRS rating of 5 for 2 consecutive years – Alternative Enforcement Strategy questionnaire to be carried out.

#### **Category E**

If a Category E has not received a FHRS, then a visit must be made to the premises and an inspection carried out to rate the business.

Once rated, Category Es will receive a postal or telephone questionnaire. The business will be expected to return the questionnaire. Contingencies will be in place to

follow up on those businesses that have not responded. This will be documented but is likely to include either a visit, solely to complete the questionnaire or possibly a telephone call to complete the questionnaire.

### **Additional Premises Specific interventions**

#### **Butchers selling raw and ready to eat food**

All butchers, regardless of risk rating shall be subject to an official control in the form of an inspection (full/partial/audit).

#### **Approved Premises**

All premises requiring approval regardless of risk rating shall be subject to an official control in the form of an inspection (full/partial/audit).

#### **Childminders**

Childminders are required to register and are included in the inspection programme. However we are not required to visit. We would respond to requests for advice.

#### **New Premises**

All new premises shall receive an official control in the form of a full inspection to allow them to be accurately rated for entry into the Intervention Programme.

## Food hygiene scoring system

**Part 1: The potential hazard** - Three factors determine the potential hazard:

### A. Type of food and method of handling

Score	Guidance on the scoring system
40	Manufacturers of high-risk food, wholesalers and packers who re-wrap or re-pack high-risk foods. In this context, high-risk foods may be regarded as foods which support the growth of micro-organisms, and are ready to eat without further treatment that would destroy pathogenic micro organisms or their toxins.
30	Preparation, cooking or handling of open high-risk foods by caterers and retailers, except caterers that prepare typically less than 20 meals a day (see below).
10	Preparation, cooking or handling by small caterers of open high-risk foods but serve less than 20 meals on a single day ; Handling of pre-packed high-risk foods; Other wholesalers and distributors not included in the categories above; Manufacture or packing of foods other than high-risk; Establishments involved in the filleting, salting of fish for retail sale to final consumer.
5	Retail handling of foods other than high-risk, and other ambient shelf stable products. Any other businesses not included in the categories above.

Score:

### B. Method of processing

Establishments that undertake a specific method of processing (including those that extend the shelf life of the product) that has the potential to increase the risk to public health beyond that of the normal cooking or storage, should be given an additional score under this section. However, it may only be allocated once, i.e. the maximum score under this section is 20.

Score	Guidance on the scoring system
20	<p>The overriding principle to assess is whether the process itself creates an increased risk and /or the intention is to increase the shelf life of the product by applying it.</p> <p>Below is a non-exhaustive list of processing types that should be allocated an additional score of 20. Authorised officers will need to make a judgement regarding additional processing types not listed below.</p> <ul style="list-style-type: none"> <li>• Canning or other aseptic packing of low-acid foods;</li> <li>• Vacuum packing;</li> <li>• Sous-vide cooking;</li> <li>• Manufacture of cook/chill food, i.e. cooked and prepared meals or foods which may be eaten cold or after reheating. (The simple reheating of cook-chill meals is excluded from the scope of this paragraph.);</li> <li>• Fermentation of meats e.g. to produce salamis and other fermented sausages;</li> <li>• Air drying e.g. dried hams, biltong, jerky;</li> <li>• Freeze drying;</li> <li>• Addition of salt and/ or other preserving agents;</li> <li>• The cooking and cooling of meat products prior to service e.g. production of hams by retailers, including butchers; This is not intended to be applied to simple catering operations where foods may often be pre prepared and subsequently re heated.</li> <li>• Establishments that manufacture, prepare, or serve high risk uncooked or lightly cooked ready to eat food of animal origin whose nature poses a residual microbiological food safety hazard. This is intended to include caterers/manufacturers producing foods such as steak tartare and other raw meat dishes, fish and meat carpaccio, types of sushi or sashimi, ceviche, and burgers less than thoroughly cooked.</li> </ul>
0	Any other case not included above.

Score:

### C. Consumers at risk

This factor is intended to reflect the number of consumers likely to be at risk and the potential geographical extent of any incident if there is a failure of food hygiene and safety procedures.

Score	Guidance on the scoring system
15	Food businesses involved in either the manufacture, distribution, packing or wrapping operations of food which is distributed nationally or internationally.



10	Businesses serving a substantial number of customers, including a significant proportion from outside the local area, e.g. superstore, airport caterer, motorway service area caterer; Manufacturers not included in the category above.
5	Businesses, most of whose customers are likely to be living, staying or working in the local area, e.g. supermarket or shop, local convenience store or high street or local restaurant.
0	Businesses typically supplying less than 20 consumers each day.

Score:

### PLUS

An **additional** score of 22 (in addition to the score above) should be included for establishments involved in the production or service of food **intended specifically** for consumption by consumers which are likely to include a vulnerable risk group of more than 20 persons.

In this context, vulnerable risk groups are those that include people likely to be more susceptible to the effects of poor food hygiene such as those who are under 5 or over 65, people who are sick or immuno-compromised.

Score	Guidance on the scoring system
22	Production and/or service of high-risk foods in establishments where the ultimate consumers of the product produced include a vulnerable risk group of more than 20 persons.
0	Any other case not included above.

Score:

### Part 2: Level of (current) compliance

The food hygiene and safety procedures (including food handling practices and procedures, and temperature control), and the structure of the establishment (including cleanliness, layout, condition of structure, lighting, ventilation, facilities etc.), should be assessed separately using the scoring system below.

The score should reflect compliance observed during the inspection according to the guidance set out below.

In circumstances where the failure to comply involves both elements of the establishment's structure and procedures, this non-compliance should be reflected in the scores awarded for both the 'hygiene' and 'structural' factors.

Score	Guidance on the scoring system
25	Almost total non-compliance with statutory obligations.
20	General failure to satisfy statutory obligations – standards generally low.
15	Some major non-compliance with statutory obligations – more work required to prevent fall in standards.

10	Some non-compliance with statutory obligations and industry codes of recommended practice* that are not considered significant in terms of risk (but may become significant if not addressed). Standards are being maintained or improved.
5	Good standard of compliance with statutory obligations and industry codes of recommended practice* with only minor contraventions.
0	High standard of compliance with statutory obligations and industry codes of recommended practice*; conforms to accepted good practices in the trade.

\*where a relevant code/ industry guide has been published.

Score – hygiene:

Score – structural:

### Part 3: Confidence in management/control procedures

The Confidence in Management score should assess whether a business's food safety management/control procedures are appropriate, with the identification of the correct hazards and controls, whilst the assessment of the level of current compliance achieved as a result of practices being carried out should be considered as part of the compliance with food hygiene and safety procedures element in Part 2.

Where management has an effective food safety management system in place which is well understood by the workforce, they should achieve a good standard in Part 2, and consequently a low score for that risk factor.

Confidence in management is not meant to reconsider this aspect. It is to elicit a judgement on the likelihood of satisfactory compliance being maintained in the future. Assessment of "Management" may include two elements; corporate management (any company-wide systems and processes for food controls) and local management (implementation by local management of corporate systems and separate branch or "in store" systems and processes).

Where the establishment has a Primary Authority, the Primary Authority may provide guidance via an Inspection Plan to assist with scoring for Confidence in Management based on corporate management systems being properly implemented where this is the case. Officers should not attempt to reassess the corporate management element but should consider the score based upon the degree of local implementation by local management.

Officers should also reflect the level of reassurance provided by checks undertaken on the food safety management systems directly at an individual establishment via an independent third party as part of an assurance scheme which address applicable legislation.

The confidence in management / control procedures score is not solely about documented procedures and their implementation. Factors that will influence the officer's judgement include:

- the "track record" of the company, its willingness to act on previous advice and enforcement, and the complaint history;
- the attitude of the present management towards hygiene and food safety; and
- hygiene and food safety knowledge, including hazard analysis/HACCP and the control of critical points;

- satisfactory food safety management based procedures.

In determining ‘satisfactory’ in respect of HACCP based procedures, officers should consider, based on the principle of proportionality, the need for a permanent procedure or procedures based on HACCP principles<sup>27</sup>, i.e. commensurate with the nature and

<sup>27</sup>  
[The European Commission Notice 2016/C/278/01 - Guidance document on the implementation of procedures based on the HACCP principles, and on the facilitation of the implementation of the HACCP principles in certain food businesses](#)

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size of the food business. In some food businesses there are not critical control points and in some cases good hygiene practices can replace the monitoring of critical control points. The requirement for businesses to retain records also needs to be flexible in order to avoid undue burdens for very small businesses.

For small businesses which present only basic hygiene hazards, it may be sufficient that the business has in place good hygiene practices and understands and applies it i.e. meets the prerequisites. The requirement for records needs to be balanced with the nature and size of the business. Documentation and record keeping may not be necessary under the flexibility afforded by Article 5 of Regulation (EC) 852/2004.

Officers should consider guidance in relation to the application of Article 5 in order to make a judgement on whether the business requires documented food safety management procedures, and if so on the level of documentation required. The level of documentation will vary between businesses depending on the types and complexity of operations being undertaken and on the level of controls being implemented.

Score	Guidance on the scoring system
30	Poor track record of compliance. Little or no food safety knowledge and understanding. Little or no appreciation of hazards, risks or quality control. No food safety management procedures. Does not recognise or accept the need for food safety and hygiene controls.
20	Significantly varying record of compliance. Insufficient food safety knowledge and understanding. Poor appreciation of hazards and control measures. No food safety management procedures or unsatisfactory progress in terms of developing, documenting and implementing food safety management procedures, commensurate with type of business, since the last intervention rating. Some reluctance in recognising or accepting the need for food safety and hygiene control procedures.

Score	Guidance on the scoring system
10	<p>Satisfactory record of compliance.  Access to relevant food safety advice source and/or Guides to Good Practice or assurance schemes commensurate with type of business.  Understanding of significant hazards and control measures in place.  Has implemented satisfactory food safety management procedures or is making satisfactory progress towards documented food safety management procedures, commensurate with type of food business.  Officers will need to ensure that a business is demonstrating it is actually 'making satisfactory progress' towards food safety management procedures. A score of 10 can be awarded for more than one intervention cycle if:</p> <ul style="list-style-type: none"> <li>• the previous non-compliances have been addressed but different non-compliances have arisen; <b>and</b></li> <li>• the overall risk has not increased.</li> </ul>
5	<p>Good record of compliance.  Food safety advice available in-house or access to, and use of, technical advice from a Primary or Home Authority, trade associations and/or from Guides to Good Practice or assurance scheme commensurate with type of business.  Effective management control of hazards.  Having effective self-checks with satisfactory documented food safety management procedures commensurate with type of business.  Audit by Competent Authority confirms general compliance with procedures with minor non-conformities not identified as critical to food safety.</p>
0	<p>Excellent record of compliance.  Food safety advice available in-house or access to, and use of, technical advice from a Primary Authority or Home Authority, trade associations and/or from Guides to Good Practice or assurance schemes commensurate with type of business  Food Business Operator/ Manager knowledgeable and competent.  Has effective self-checks with satisfactory documented food safety management procedures commensurate with type of business, and may have external audit processes in place.  Audit by Competent Authority confirms good compliance with food safety procedures.</p>
Score:	

**PLUS**

An **additional** score of 20 (in addition to the score above) should be included where there is a significant risk:

- of food being contaminated with *Clostridium botulinum* and the micro-organism surviving any processing and multiplying; or
- of ready-to-eat food being or becoming contaminated with micro-organisms or their toxins that are pathogenic to humans, e.g. *E.coli* O157 or other VTEC, *Salmonella* sp.; *Bacillus cereus*.

In this context, significant risk means the probability that an incident is likely to occur.

The following matters should be considered when assessing this factor:

- the potential for contamination or cross-contamination by the specified micro-organisms;
- the likelihood of survival and growth of the specified micro-organisms;
- the existence of procedures based on HACCP principles and confidence in their implementation, including documentation and records of monitoring of controls;
- the extent and relevance of training undertaken by managers, supervisors and food handlers; and
- whether intervention by the Competent Authority is necessary to reduce the probability of an incident occurring.

The additional score must only be applied on a case-by-case basis, must not be applied generically to whole categories of food business establishments, and must be removed at the next inspection if the significant risk no longer exists.

The additional score must also be consistent with the baseline assessment of Confidence in Management/Control Systems. If confidence in management is assessed as 0 or 5, and there is also assessed to be a significant risk of contamination of food with one of the specified micro-organisms, then one of the assessments cannot be correct, and each should be reviewed. Establishments should not pose a significant risk if there is high or moderate Confidence in Management/Control Systems.

Score	Guidance on the scoring system
20	Significant risk of food being contaminated with <i>Cl. botulinum</i> , and the organism surviving any processing and multiplying; or Significant risk of ready-to-eat food being contaminated with micro organisms or their toxins that are pathogenic to humans.
0	Any other case not included above.

Score:

Inspection Ratings:  Total:

### Food hygiene intervention frequencies

Category	Score	Minimum intervention frequency
A	92 or higher	At least every 6 months
B	72 to 91	At least every 12 months
C	52 to 71	At least every 18 months
D	31 to 51	At least every 24 months
E	0 to 30	A programme of alternative enforcement strategies or interventions every three years

Establishments rated as low-risk (30 or less) need not be included in the planned inspection programme, but must be subject to an alternative enforcement strategy at least once in every 3 years.

### APPENDIX 3 – Performance Management

Activity	Number of inspections required 2017/18	Number of Inspections Undertaken	Comments	Target 2018/19
<b><u>Food Hygiene Interventions</u></b>				
A (high risk)	20	20	100 % completed	16 in first 6 months
B	177	177	100 % completed	182 (100%)
C	578	569	98.4 % completed.	563 (100%)
D	674	649	97.7 % completed	822 (100%)
E (low risk)	420	420	100 % completed	451 (100%)
Unrated (newly registered businesses)	197	197	100 % completed	146 (100%)
Revisits		Total 433	These are visits to check that work required has been completed	Target cannot be set.
NI 184 (broadly compliant)	91%			Target 90%
<b><u>Imported food</u></b>				
Samples	10% of credit allocation	89 samples taken	13.7 % of samples	10% of allocation
<b><u>Food and water Sampling</u></b>				
Number of food samples and environmental swabs	80% of credit allocation	Total 672	73% of credit allocation	80% of credit allocation
<b><u>Service Requests</u></b>				
Total number received		1408	A 8.3% increase on 2017/18	Unable to set target.

## **APPENDIX 4 – Sampling report 2017 - 2018**

In the Year 2017 – 2018, the Food Safety section within Environmental Health undertook food sampling and environmental swabbing using a credit allocation of 20,500 for the year. In total 14950 credits were used i.e. 73% spend for the year.

Sampling undertaken by officers included routine sampling, local and national co-ordinated sampling projects, sampling undertaken as part of outbreak investigations and specific sampling tasks allocated to designated officers including undertaking formal sampling to maintain competence.

This Authority participated in the following regional sampling projects co-ordinated by Public Health England's Food, Water and Environment Laboratory at Sand Hutton, York.

### **XR29 Cooked Meat Products Including Black Pudding.**

#### **Background:**

Food and Environmental sampling has been shown to be a valuable tool, with the potential to provide information about food quality and safety, and has the potential to prevent outbreaks of food borne illness. This survey recognises that there is a wide range of cooked meat products and black pudding available to the consumer. Some products are made in large approved manufacturing premises, while other products are manufactured in smaller premises that produce and supply directly to the final consumer, or possibly to other outlets. The microbiological safety of RTE cooked meats and black pudding is of importance to the consumer and the food industry. Experience shows that verification of HACCP plans using microbiological sampling and demonstration of legislative compliance using the sampling plans defined in EC 2073/2005 (as amended) is not consistently performed by FBO's.

These products are ready to eat and do not require further cooking. As such, the absence of potentially pathogenic microorganisms is paramount.

Both product types should be compliant with EC2073/2005 (as amended). Samples will be taken with due consideration of food safety management systems, HACCP and an assessment of compliance at the premises.

#### **Aim:**

To assess cooked meats and black pudding against the legislative standards defined in EC 2073/2005 (as amended) and collect information about food safety management and in-house testing and challenge testing of meat products.

### **XR32 Hygiene in Bakeries**

#### **Background:**

Anecdotal information and cases of food poisoning/food borne illness suggests that there may be failures in the food safety management system within bakery premises, including cross contamination. This survey takes a holistic approach to considering food safety management and microbiological safety of food and the environment. The survey includes the sampling of cold ready-to-eat foods that are not undergoing further



heating/cooking. Foods containing eggs, (including those containing raw shell eggs and pasteurised eggs) and foods containing meat/meat products are of particular interest.

**Aim:**

The aim of the study is to investigate the microbiological quality and safety of food being produced and sold in bakeries, with a focus on products being made, baked or finished-off on the premises. The survey will also assess hygiene standards in these premises.

This authority took part in the following National PHE Study 2017-18

**Study 63 Ovens used for cooking meat joints in Catering Premises, with a specific focus on slow cooking ovens and Salmonella**

**Background:**

Food and Environmental sampling has been shown to be a valuable tool when investigating outbreaks of *Salmonella* associated with food premises. Incidents have arisen where complex cooking equipment, food production practices and/or defects in the structure of the food areas has resulted in contamination of food. This study is in response to recent outbreaks of salmonellosis that have occurred over a protracted period as opposed to a single point source episode involving a contaminated food for example. Complex cooking equipment that is not being effectively cleaned can lead to a wider low level contamination of the kitchen environment that leads to sporadic cases.

**Aim:**

To provide microbiological data on ovens used for the cooking of meat joints in catering premises

**Imported Food Sampling**

The FSA expects local authorities to use 10% of their annual credit allocation to take and test imported food samples i.e. foods which come from countries outside the EU. In 2017/18 Bradford submitted 91 food samples from Third countries, equivalent to 13.7 % of the samples taken. Of these samples 5 (5.5%) were considered to be unsatisfactory.

**Dairy Sampling at Approved Premises**

Officers continued to visit the on-farm pasteurisers and took samples at those designated premises.

**Other Approved Premises**

Sampling continued to be undertaken at other approved premises, mainly those producing meat products. Not all approved premises were subject to a sampling visit during the financial year.

**Formal Sampling**

All officers within the service are expected to undertake a formal food sampling during the financial year to ensure that skills required when taking samples which may be subject to legal action, are maintained. This involves sampling using aseptic technique. Officers use sterile sampling equipment and follow practices which ensure the sample does not become contaminated by the process of sampling itself. Most officers within

the service achieved this requirement, some doing this as part of formal food borne outbreak investigation work.

### **Investigative sampling**

Officers use routine sampling to assess cleanliness of premises, investigation of isolated complaints of suspected food poisoning and to assess shelf life and cooking processes.

### **Recommendations**

1. That the department continues to participate in both national and cross regional sampling projects, as workloads allow.
2. The department continues to target businesses which import food, to give specific priority to products of animal origin.
3. That all environmental swabbing is focused and based upon risk.
4. That all officers continue to undertake sampling to ensure competence in this area of work.

## Guide to Micro-organisms

Organism Name	Nature of Organism	About the Organism
Aerobic Colony Count (ACC)/Plate Count	General bacteria count at 30°C	<p>The ACC is an indicator of quality, not safety, and cannot directly contribute towards a safety assessment of a ready-to-eat food.</p> <p>Immediate action in response to high ACCs is not usually warranted.</p>
Enterobacteriaceae	Hygiene Indicator Organism	<p>These organisms are used to assess the general hygiene status of a food product. Some of these organisms originate from the intestinal tract of humans and animals. These bacteria are readily killed by heat processing and should be removed from equipment and surfaces by appropriate cleaning. Presence in heat treated food signifies inadequate cooking or post processing contamination.</p>
Escherichia coli (E.coli)	Hygiene Indicator Organism	<p>This organism belongs to the Enterobacteriaceae family. It is a faecal indicator used to assess the hygiene status of a food product. It is killed by heat and should readily be removed from the food production area by appropriate cleaning. Some strains may be pathogenic but these pathogenic strains are rarely found in ready-to-eat foods.</p>
Coliforms	Hygiene Indicator Organism	Similar to Enterobacteriaceae (See above)
Bacillus species	Pathogen	<p>This group does not include <i>Bacillus cereus</i> which is the common pathogenic <i>Bacillus</i>. The <i>Bacillus subtilis</i> group can be pathogenic. Illness with these organisms includes acute-onset vomiting often followed by diarrhoea. Illness usually follows consumption of poorly stored cooked foods. It is associated with many foods but is particularly associated with foods prepared from poultry, meat, vegetables, rice, bread, spices and spice products.</p>

Organism Name	Nature of Organism	About the Organism
Pseudomonas aeruginosa	Opportunistic pathogen	This organism is commonly found in soil and ground water. It rarely affects healthy people and most infections are associated with long exposure to contaminated water.
Phosphatase Test	Chemical test	This test is undertaken on pasteurised milk to check that a suitable pasteurisation process has taken place. The pasteurisation process should be sufficient to destroy the enzyme phosphatase in milk. If phosphatase remains in the milk after pasteurisation, then pathogenic organisms may also have survived the pasteurisation process.

## End of year Statistics by Food Groups

Food group	No Samples Taken	No Samples Unsatisfactory	Any other information	Action taken by Authority
Confectionary	25	7	ACC Enterobacteriaceae	Advise to business
Herbs & Spices	26	4	Enterobacteriaceae failure Bacillus species	It is not unusual for fresh herbs to have enterobacteriaceae Notified originating authority for imported products
Soups and sauces	5	2	ACC	Advise to business
Dairy products (inc milk)	65	9	On farm produced milk samples Enterobacteriaceae failure	Visit to farm to discuss potential areas of post pasteurisation contamination.
Fish & Shellfish	5	2	Enterobacteriaceae failure ACC	Advice to business
Fruit & Veg	42	2	Enterobacteriaceae ACC	Advice to business
Bakery	7	1	Enterobacteriaceae ACC	Advice to business
Meat	81	28	ACC failures Enterobacteriaceae failures	Businesses advised and advice given re stock control and hygiene
Nuts	19	0		
Prepared dishes	43	3	ACC	Advice to Business
Eggs	7	1		
Swabs	317	67	ACC Enterobacteriaceae failures Listeria	Action taken according to risk

## **APPENDIX 5 – Food Sampling Policy**

### **1. Introduction**

- It is a requirement of the Food Law Code of Practice that local authorities publish a sampling policy.
- The City of Bradford Metropolitan District Council (CBMDC) recognises the important contribution sampling has in assisting food law enforcement and the protection of public health. Effective sampling is an essential part of a well balanced enforcement service.
- CBMDC aims to ensure that all food, drink and environmental samples are taken in accordance with the statutory Food Law Code of Practice and Practice guidance issued by the Food Standards Agency.
- All authorised officers undertaking food sampling will be qualified and trained to ensure that they are competent in the skills required for taking food, milk, water sampling and environmental swabbing. Other staff will be trained to enable them to assist or carry out informal sampling.
- Our policy is to participate in centrally co-ordinated food sampling programmes for the United Kingdom. Food sampling will also be undertaken in accordance with locally devised programmes. Sampling will be undertaken at those premises which require sampling under the Food Law Code of Practice; these will include manufacturers and particularly premises approved under Regulation (EC) No. 853/2004.
- The Authority is fully committed to the Primary/ Originating Authority Principle and will undertake any food sampling which is considered necessary to ensure that standards are being maintained and improved by the company for which we act as either Primary or Originating authority.
- This sampling policy has been prepared in consultation with Public Health England Food Water and Environmental Microbiology Laboratory, York and West Yorkshire Analytical Services.
- The Environmental Health Food team does not have any responsibility for Food Standards issues i.e. food composition or labelling. These matters are the responsibility of West Yorkshire Trading Standards.
- Sampling will be undertaken in accordance with internal procedural documents.

### **2. Aims of Sampling**

- To provide Bradford MDC with a co-ordinated sampling programme
- To provide bacteriological results which can be used to make an assessment of the food safety standards in relation to the handling, sale and manufacture of food within the authority boundaries.
- To address both local and national food safety concerns.

- To act as supporting evidence in the enforcement of food safety where appropriate.
- To act as an educative tool to help inform businesses and the public regarding food safety issues.
- To participate in both local and national food sampling programmes in order to help in the assessment and review of national bacteriological standards.

### **3. Qualifications of Sampling Officer**

- All officers undertaking formal (official) sampling will be qualified and trained as detailed in Food Law Code of Practice.
- New officers will be trained in all the recognised sampling techniques which they can be expected to utilise in the course of their duties, this will include techniques for informal food, milk, water and environmental sampling. Suitably authorised officers will undergo training on aseptic sampling techniques, which may be required in cases where legal proceedings may follow.
- All officers will, from time to time, undergo refresher training, on all sampling techniques, to ensure that sampling skills are maintained within the Authority.

### **4. Sampling Quotas**

- Public Health England sets an annual credit allocation for all local authorities. This is set for any 12 month period and is a free non-negotiable allocation which authorities must work to. The PHE also sets a credit value for all sample types submitted to the laboratory. Each sample submitted to the laboratory will have its equivalent value deducted from the baseline allocation for that year.

### **5. Sampling Programmes**

- All sampling work carried out by the Authority may be limited by the availability of sampling credits, officer availability and officer workloads. The authority is committed to undertaking sampling as part of its programme of work. An annual sampling programme will be produced. This will detail the quantity and areas of sampling to be carried out each year.

### **Routine Food Sampling**

- These visits will usually consist of informal food sampling visits. Routine sampling undertaken by officers will be based upon risk or as directed by the EHM (Food safety). Historical data and risk assessments may be used to direct the food sampling undertaken by officers.

### **PHE Food Sampling Programmes**

- PHE currently devise sampling programmes on an annual basis. These are national programmes to carry out microbiological analysis of samples from a broad spectrum of

business types and for a variety of different food types. The focus for these sampling surveys is to undertake statistical evaluations and to make recommendations on these for national microbiological standards.

### **Food sampling as part of the Programmed Food Hygiene Inspections**

- Officers may undertake informal food sampling visits as part of programmed food hygiene inspections. These sampling visits may include food, water and environmental sampling. These visits will be undertaken as and when is deemed appropriate by the officer or the Environmental Health Manager. Samples may be used to assess the levels of cleanliness prior to an inspection and/or to determine the areas to concentrate on during the food hygiene inspection. Sampling may be used during the inspection process to check on areas of concern or it may be undertaken post inspection to clarify those points of concern raised during the inspection or to check that recommendations made post inspection have been implemented.

### **Imported Food Sampling**

- We will pro-actively undertake food sampling at businesses which have been identified as either importing food directly or displaying food for sale which has been imported. Imported food, in this respect, is any food which has been brought into the UK from outside the European Union. 10% of the annual credit allocation will be used for imported food sampling.

### **Investigation of a Suspected Outbreak**

- Food sampling will be undertaken, as deemed necessary, to determine the source of any suspected outbreak which is thought to originate in the Bradford Metropolitan District.
- The authority will consider any request made by another local authority with a view to officers assisting in an outbreak investigation by sampling in premises within the Bradford District.

### **Investigation of Suspected Food Poisoning in an individual**

- Officers of the authority may undertake any food sampling which is considered necessary to determine the source of any suspected food poisoning in the case of an individual.
- The authority may test any suspect food which has been retained by the individual and may take samples from any premises considered to be the likely source of the individual case. The level and type of sampling will be dependent upon the circumstance of each individual case.

### **Service Requests**

- Officers may undertake any necessary food sampling in the investigation of a food complaint. This may involve taking further samples from the vendor of the food, or, where the manufacturing company is based within the Bradford Metropolitan District.



- CBMDC may undertake any sampling as required by a Primary Authority.
- CBMDC acts as a Primary/Originating Authority for some food companies located in the district. The Authority will take samples from these businesses under the umbrella of the agreement. Any samples taken will be taken on a risk assessed basis.
- This Authority is committed to becoming involved in any food sampling programmes as determined by the Food Standards Agency.
- On occasion adverse food results are notified to the FSA for samples which have originated from other LAs. Where such samples have originated within the CBMDC, this authority will undertake any follow up formal sampling as directed by the Food Standards Agency.

### **PHE Laboratory Sampling Programmes (York Laboratory)**

- PHE may propose food sampling programmes for all authorities who use the PHE Food, Water and Environmental Laboratory network lab (York).
- CBMDC will become involved in those food sampling programmes and we will aim to achieve the level of sampling required for these programmes.

### **EU Co-ordinated Food Sampling Programmes**

- Where an EU sampling programme arises which covers any food safety related issue, CBMDC will endeavour to become involved in that food sampling programme, dependent upon resources.

## **7. Laboratories**

### **Public Health England (PHE) Laboratory**

- CBMDC undertakes to submit all food samples for microbiological examination to the PHE Food, Water and Environmental Microbiology Network (York Laboratory).
- The authority will set sampling levels in a service level agreement with the local PHE. The agreement will set the level of sampling for the year and includes food sampling, water sampling, milk and dairy sampling and environmental sampling. The level of sampling is based upon historical sampling levels and is adjusted on an annual basis. CBMDC will endeavour to maintain the level of sampling allocated.
- Payment for food samples submitted to the PHE comes from a central fund which the PHE gains from central government. The service level agreement with the PHE takes into account the level of funding available to the local authority. Should the local authority exceed the sampling levels agreed then the local authority may incur a charge for any further sampling which is undertaken.
- CBMDC will seek advice from the Food Examiners at the PHE Laboratory on any matters with regard to sampling where the product to be sampled is unusual, where the sampling process is complicated, or where it is unclear which microbiological Category the food comes under.

## **West Yorkshire Analytical Services**

- West Yorkshire Analytical Services (WYAS) is an Official Food Control Laboratory based in Morley, Leeds. Senior staff hold Public Analyst appointments on behalf of CBMDC. They are able to deal with a wide range of analysis including foreign body identification, identification of moulds, chemical taints, freshness and quantification of fungal toxins.
- Samples submitted to the WYAS are paid for following the analysis and are charged to the individual local authority.
- CBMDC will only submit food samples to the laboratory if they are the source of a food complaint investigation, or if the samples have the potential to cause injury to health, or the work undertaken by the lab may provide unique and valuable information to the authority or it is envisaged that a prosecution may be undertaken as a result of the information gained from the laboratory.

## APPENDIX 6 – Communicable Diseases

### Bradford Environmental Health - Communicable Diseases

The following notifications have been dealt with by Environmental Health:

Disease		2017/2018
Hepatitis A		5
Hepatitis E		0
Cholera		0
Dysentery	Entamoeba histolytica	0
	Shigella Boydii	1
	Shigella Dysenteriae	0
	Shigella flexneri	3
	Shigella sonnei	8
	Not Typed	2
Food Poisoning	Bloody diarrhoea	0
	B.cereus	0
	C.botulinum	0
	Campylobacter	204
	E.coli 0157	9
	E.coli –other than 0157	0
	Listeria	2
	Salmonella	72
	Suspected Food Poisoning	132
	Yersinia	1
Gastro Enteritis	Cryptosporidium	26
	Giardia	24
Respiratory Disease	Legionella	0
	Tuberculosis	0
	Part 2a order	0
Paratyphoid Fever	Salmonella	2
Typhoid Fever	Salmonella	3
Total		494

## APPENDIX 7 – Action Plan 2017/18 and 2018/19

Topic	Planned 2017/18	Achieved 2017/18	Planned 2018/19	Target 2018/19
Food Law CoP 2015	Continued monitoring of new requirements and CPD log. Align authorisations with competency.	Authorisations completed and updated. Regular reviews of CPD log at team meetings	Continued monitoring of new requirements and CPD log.	20 hours CPD per year
Primary Authority Partnership (PAP)	To continue to promote the PAP and establish partnerships were appropriate. Agree work to be undertaken with each PAP	Produced assured advice for NFFF and worked in partnership with the FSA on the regulatory review of official controls.	To continue to promote the PAP and establish partnerships were appropriate. Agree work to be undertaken with each PAP	
Partnership work with Jamie Oliver Ministry of Food	Partnership Work dependant on continuation of the project		Liaise with The Health Improvement Team to identify ways of collaborating on projects and sharing information	
Good Food Award	Not planned but initiated in 2017/18	2 x Joint training sessions with WYTS for food businesses on improving food safety and advising of the Good Food Award	To take part in joint training sessions when required depending on continuation of project.	
Premises with a FHRs rating of 2 and below			Develop initiatives to improve the rating of businesses	96% of premises to be broadly compliant

<b>Topic</b>	<b>Planned 2017/18</b>	<b>Achieved 2017/18</b>	<b>Planned 2018/19</b>	<b>Target 2018/19</b>
Food Safety Week (FSW)	Participate in Food Safety Week 2017. To engage with local businesses and consumers and raise awareness of food waste and safely using leftovers.	Worked jointly with Ministry of Food in distributing information.  Messages put out through Council Facebook page.	Participate in Food Safety Week 2018. To engage with local businesses and consumers.	
CD procedures	To investigate all cases of CD in line with the agreed protocol. Performance indicators to be produced to demonstrate compliance. To undertake annual review of CD procedures.	CD procedures reviewed including emergency call out kit instructions. 96 % of CD notifications dealt with within GI standards	To investigate all cases of CD in line with the agreed protocol. To undertake annual review of CD procedures.	100%
CD educational initiatives	In conjunction with PHE and Education Dept – To provide a seminar for school staff on prevention and control of communicable diseases.	Event not held due to other PHe commitments		
Communicable Disease Audits	To carry out 1 audit a year on major organisms	Audit not undertaken due to maternity leave of CD officer	To carry out 1 audit a year on major organisms	
Quality Management System (QMS)	On-going review of procedural documents. Amend procedures if required as a result of inter authority audit on approved premises	Reviews undertaken where necessary and in light of legislative changes.	On-going review of procedural documents. Amend procedures if required.	

<b>Topic</b>	<b>Planned 2017/18</b>	<b>Achieved 2017/18</b>	<b>Planned 2018/19</b>	<b>Target 2018/19</b>
Food Team Review	Continue to look at process / service improvement.  Taking part in BRDO project to assess quality of information given to new businesses.	Reviewed response to service requests in light of 19% increase in demand.  BRDO Project started April 2017 to review in 12 months	Continue to look at process / service improvement.  Continued participation in BRDO project to assess quality of information given to new businesses.	
Training for staff	To continue with provision of cascade training for staff. Staff to attend “business critical” training as required.	Micro analysis training Sampling training WYPFOG event (incl. rare burgers, POCA) Not all officers achieved CPD requirements due to sickness.	To continue with provision of cascade training for staff. Staff to attend “business critical” training as required.	All food officers to undertake a minimum of 10 CPD hours in food matters directly related to the delivery of official controls and 10 hours on other professional matters.
FSA led food safety campaigns including promotion of FHRS	To use FSA promotional material produced for various campaigns.	Promoted the 'Christmas and Valentine's day campaigns for consumers' - advising the public to check out the rating before booking a restaurant.	To use other campaigns developed by the FSA throughout the year.	
Positive Lifestyle centre	Support the Centre by providing bespoke food hygiene training at sessions to school children.	Attended 3 sessions at Bradford City and did a presentation on Safe Food and You. Used the UV Glow hand washing box to promote effective hand washing. 25 children attended each session	To continue support for the centre as resources will allow.	Unable to set target as attendance at events is on request from the organisation.

Topic	Planned 2017/18	Achieved 2017/18	Planned 2018/19	Target 2018/19
BREXIT			Act on advice and information from FSA, likely impact for example: Renew all authorisations for all officers for implementation of new legislation. Increased demand for export certificates	
Feeders Digest	To produce and post the newsletters by Sept. 2017 and March 2018. To email the newsletter to businesses where an email address is available.	Two editions of Feeders Digest were published and posted to all registered food businesses in September 2017 and March 2018. Promoted the Stay connected emails to businesses in the last edition of Feeders to encourage subscription.	Develop Stay Connected email system for sending out food advice to business and consumers.	To get 1000 subscribers

## **APPENDIX 8 – Training Programme 2018**

The Environmental Health Service will provide 10 CPD hours relating to food matters directly related to official controls for authorised officers. In addition all authorised officers are required to obtain a further 10 hours on other professional matters.

The training that will be provided for food officers will include:

- Training on Regulation EC 2073 on micro analysis
- Food Fraud
- HACCP
- Outbreak investigation
- FHRS consistency exercises

Lunchtime drop in training sessions will be organised throughout the year. Officers will be encouraged to attend this training. However, these are not compulsory and may only provide supplementary hours as opposed to core training hours. The officers are responsible for ensuring that they achieve the total amount of CPD required.