



HEALTH PROTECTION TEAM SERVICE PLAN 2020/21

Housing & Environmental Health
Service

Approved By: Portfolio Holder for
Housing & Environmental Health

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CONTENTS

Section		Page
1.0	Executive Summary	2
2.0	Introduction	3
3.0	Policy Context and Regulatory Framework	10
4.0	Background	11
5.0	Objectives of the Health Protection Team	12
6.0	Resources	14
7.0	Monitoring and Evaluation	17
	Appendix 1 – Food Hygiene Intervention Plan	19
	Appendix 2 – Health and Safety at Work Intervention Plan	23

Health Protection Team Service Plan 2020/21

1.0 Executive Summary

- 1.1 This annual Health Protection Team Service Plan is produced in accordance with the requirements of the Food Standards Agency and the Health and Safety Executive. It reflects on the achievements and performance of the Team for the year 2019/20, and identifies the work currently being undertaken and planned for 2020/21. Whilst the focus of this plan is food hygiene and health and safety regulatory work to satisfy the overseeing national authorities, for completeness it covers other competing functions of the Team also.
- 1.2 During 2019/20 the Health Protection Team **completed 95% of all programmed food hygiene interventions that were due in the year.** This represents a **decrease of 4%** from the previous year and is explained by the Food Standards Agency asking local authorities to suspend routine interventions in March due to the COVID-19 global pandemic. Without that suspension the Team would have matched the previous year's performance. However, completing 95% did **match the corporate performance target.** The year saw the **number of food businesses that are 'broadly compliant' with legal requirements remain similar.** The proportion of food businesses awarded either a high (i.e. 4 or 5) or low (i.e. 2 or below) rating under the national food hygiene rating scheme has remained very similar to last year too.
- 1.3 In addition to the programmed food hygiene interventions, an **additional 111 unplanned food hygiene inspections** were undertaken.
- 1.4 The Team **took 158 food, water or environmental samples** from food businesses (almost exactly the same as 2019/20) of which **22% were unsatisfactory** for microbiological contamination. Of the 158 samples taken, **14% were of imported food from non-EU countries**, the latter exceeding the target of 10% set for this work.
- 1.5 The Team also worked hard to **support relevant businesses to help ensure their practices were compliant with workplace health and safety.** This was in particular **achieved** by continuing with a **project checking the management of gas safety at 27 catering establishments**, including mobile catering vehicles. The Team continued to be **represented at two Safety Advisory Groups for major public events** held in the borough.
- 1.6 The **public health project on raising the awareness of infectious disease control in childcare establishments** was also continued and 11 such visits were undertaken.

2.0 Introduction

2.1 Scope and Aims of the Health Protection Team

- 2.2 The work of the Team is principally focused around statutory duties and powers, to protect, maintain and improve standards of food hygiene and health, safety and welfare for workers, visitors and residents of the borough. The work also covers a variety of licensing and registration functions, including street trading, skin piercing, hairdressing, and some animal welfare licensing. The scope of the work covers all businesses for which the Council is the statutory enforcement authority. For example, food businesses, offices, warehouses, leisure facilities, care establishments, shops, builders merchants, and animal boarding establishments.
- 2.3 The aim of the food hygiene regulatory service is to ensure that food businesses operating in Test Valley produce and sell safe food, by complying with legislation and adopting best practice to control the risks to health that may be associated with food storage, preparation, processing, and handling. In so doing, this helps promote a high level of public confidence in the safety of food prepared, handled and sold in the borough, including by participating in the national food hygiene rating scheme (www.food.gov.uk/ratings) and encouraging businesses to display their rating.
- 2.4 The aim of the health and safety regulatory service is to protect and improve the health, safety and welfare of those affected by work activities (whether as employees, volunteers, or the public) in the borough, by ensuring risks in the changing workplace are managed properly. This is in line with the 'Statement of commitment between: Local Authority and HSE Regulatory Services' published at: <https://www.hse.gov.uk/lau/statement-commitment-local-authority-and-hse.pdf>
- 2.5 In meeting the aims set out in paragraphs 2.3 and 2.4 above, the Team supports the Council's Corporate Plan 2019 to 2023, to "grow the potential" of the borough. This approach feeds into our corporate ambitions in a range of ways, including within the corporate priorities to grow the potential of our town centres, our communities, our people and our local environment. The Team also delivers its statutory functions in accordance with the Council's values. This is achieved through trying to work with businesses to educate and support them in the first instance, and ensuring any regulatory action is taken in a proportionate way. This Service Plan contributes directly to the corporate aims of the Council.

2.6 Achievements in 2019/2020

2.7 The Team completed 95% of programmed food hygiene interventions (402 in total) by the end of the year, matching the corporate target of 95%. This target figure was achieved despite disruption to the planned programme in March 2020 due to COVID-19 restrictions. An intervention is either a physical inspection or, in the case of a proportion of low risk establishments, a review against a self assessment questionnaire. Such interventions were undertaken mainly by permanent staff, but also with contractors covering a long term vacancy.

2.8 The Team worked flexibly to undertake an additional 111 unplanned food hygiene inspections. These were either where a new business opened, or there was a change of food business operator at an existing business, or where a business requested a re-inspection under the national Food Hygiene Rating Scheme.

2.9 By working with businesses, the Team has maintained the percentage of food businesses 'broadly compliant' with food hygiene law at a high level of 95%. This demonstrates the success of the supportive and educative approach to delivering this regulatory function. The Team always aims to grow the potential of local food businesses through the course of our work, encouraging all local food establishments to strive for excellence in their standards.

NB: Officers use a national scoring scheme in the Food Standards Agency's Food Law Code of Practice to score food businesses depending on what type of food they handle, the type of establishment they are, their customer base, and how compliant they are with food hygiene legislation. The score determines when the business is next inspected. The compliance scores are divided into hygiene, structure and confidence in management. Businesses are 'broadly compliant' where they score 10 or fewer points for each of these criteria. The scoring scheme can be found using the web link https://signin.riams.org/files/display_inline/45497.

2.10 The Team administered the national Food Hygiene Rating Scheme to ensure that the national web site remained as up-to-date as possible. The last year saw the levels of high rated businesses maintained, with 92.5% included in the scheme rated as either 4 (good) or 5 (very good) which are the top two ratings. It has also seen the proportion of businesses rated 2 (improvement necessary), 1 (major improvement necessary) or 0 (urgent improvement necessary), which are the lowest ratings, maintained at a very low level of 3.1%. This enables local residents and others who wish to dine out in Test Valley to identify those businesses that are offering the highest food hygiene standards, and perhaps more importantly, those found not to be upholding the highest standards.

2.11 In terms of delivering responsive customer service, the Team contributed to the Environmental Health Service exceeding the corporate target for making a first response to service requests within three working days in at least 95% of cases.

2.12 The Team took 158 food, water and environmental (i.e. swab) samples from food businesses to monitor the microbiological safety of foods and food contact surfaces. Samples were taken mainly for routine surveillance from high risk establishments. Of the samples taken, 34 were unsatisfactory for microbiological contamination resulting in re-sampling and advice being given to the food businesses. The majority of these unsatisfactory results were swabs of food contact surfaces and cleaning equipment. Of the 158 samples, 14% were of imported food from non-EU countries which exceeded the target of 10% for that element.

2.13 The Team continued with the health and safety project on gas safety in catering establishments (27 such interventions were made), and a public health project on infectious disease management in child care facilities (11 such interventions were

made). A further 8 public health interventions were made with tattooists. Both these projects will be continued into 2020/21 and represent initiatives that will have a positive impact on the wellbeing of local residents and employees.

2.14 The Team maintained the health and safety Primary Authority Agreement between the Council and Merityre (Specialists) Ltd of Andover.

2.15 The Team actively supported the Council's emergency out of hours service with officers responding on behalf of the Council when out of hours calls relating to Environmental Health matters were received. The Team also supported the Council's Emergency Planning process with three officers fulfilling the role of Incident Liaison Officer in case of a major emergency in the borough.

2.16 Key Challenges for 2020/21

2.17 The ability to respond with the resources available to new legislation and the statutory guidance issued, whilst continuing to provide a high quality service to businesses and members of the public, will remain an ongoing challenge. In particular meeting the very prescriptive requirements of the Food Law Code of Practice.

2.18 At 1st April 2020 there were 531 programmed food hygiene interventions scheduled to be completed by 31st March 2021 (including the 21 carried forward from 2019/20). This is 48 more than last year.

2.19 The start of the inspection programme has already been disrupted very substantially due to the COVID-19 restrictions. It is anticipated that delivery of the full programme as scheduled will not be possible because of the COVID-19 pandemic crisis. Staff resources will largely be diverted to other work as part of the response to the COVID-19 pandemic.

2.20 Table 1 below shows the change in the number of food businesses over the last 5 years, the number of programmed and unplanned inspections completed, and the number of programmed inspections due at the beginning of each year.

	2015/16	2016/17	2017/18	2018/19	2019/20
Total number of registered food businesses	1,142	1,132	1,137	1,146	1,184
Programmed and unplanned inspections and audits completed (excluding low risk self assessment questionnaires)	493	439	512	446	495
Number of programmed food hygiene interventions due at 1 st April each year	483	481	536	456	483

2.21 The national Food Hygiene Rating Scheme web site requires regular updating following inspections so as to reflect the results of the visit. In addition, requests from food business operators for re-visits (with the intention of achieving an improved food hygiene rating) and appeals against food hygiene ratings generates some added

work for the Team. In 2019/20 there were 40 revisits requested and 5 appeals against ratings given in the year. In 3 of the appeal cases the original rating was improved by one grade, and in the other 2 cases it was kept the same. This rate of revisit requests and appeals is not expected to change significantly in 2020/21. The experience of being on the Food Hygiene Rating Scheme has been that publication of the ratings has provided a positive incentive for businesses to achieve and maintain high standards. Resources will continue to be put into trying to further reduce the number of food businesses rated 2 or worse under the scheme, and in so doing increasing the percentage of broadly compliant businesses. However, as can be seen from Table 3 on page 8 the number of businesses with a low rating remains very low.

2.22 There will be occasional challenges in responding to any developments from the Food Standards Agency's national review of food law regulatory services ('Regulating our Future') and any that may result from Brexit. The potential resource implications of these significant issues are, as yet, unpredictable and therefore it is not possible to set in place specific or detailed plans to tackle them. One related thing that will be done is implementing their on-line food premises registration scheme which should happen during the summer.

2.23 Whilst the Team's priority has been, and remains, focusing on statutory food and health safety work, the aspiration remains to undertake further projects aimed at improving public health.

2.24 Maintaining an acceptable health and safety service, in accordance with the Health and Safety Executive's National Local Authority Enforcement Code, due to the demands presented by the amount of food hygiene work remains a priority area for the Team.

2.25 Performance for 2019/20

2.26 Programmed Food Hygiene Intervention Rates (corporate target 95%)

Quarter 1: 91% completed in the quarter
Quarter 2: 70% completed in the quarter
Quarter 3: 100% completed in the quarter
Quarter 4: 84% completed in the quarter

Annual Rate: The shortfalls in any quarter were eventually done such that 95.0% of inspections due in 2019/20 were completed by 31 March 2020.

Therefore, despite a set back in March 2020 linked to COVID-19 restrictions, the target was still met. In the absence of such restrictions then it is reasonable to assume that the figure would have been much closer to 100%.

2.27 Enforcement

Food Hygiene: No Hygiene Improvement Notices nor Hygiene Emergency Prohibition Notices were served. One Detention Notice was served on an imported consignment that was referred to Border Force. One prosecution was taken which was successful in Court. The low level of regulatory enforcement serves to underscore the effectiveness of a supportive approach that seeks to help local businesses. This is good for local business and good for residents and visitors. It also results in the delivery of more cost effective services for the Council by reducing the amount of legal action necessary to ensure standards are being met. Statistically, we can demonstrate the approach is working.

Health and Safety: No regulatory Notices were served this year, again reflecting the overall supportive approach to regulation in this area, and recognising the shift towards more safety awareness visits and promotional work.

2.28 Service Demands

The profile of businesses for both food hygiene and health and safety is detailed in Tables 2, 3 and 4 below and overleaf respectively. Table 5 then details the programmed and reactive work undertaken in 2019/20.

Table 2 – Profile of food businesses (as at 31st March 2020)			
Premises Category	No. of Premises	No. Broadly Compliant with FH law *	Minimum Inspection Frequency set by FSA
Premises rating A	3	1	6 months
Premises rating B	47	31	12 months
Premises rating C	209	197	18 months
Premises rating D	367	362	24 months
Premises rating E	403	403	36 months – either inspected or self-assessment questionnaire sent.
Unrated – new businesses that have started trading and await an inspection	21		
Premises outside the inspection programme – businesses that are so low risk they do not require to be inspected.	134		
TOTAL	1,184		
<p><i>NB: If a food business is rated category A or B, and so inspected more frequently, it can be a reflection of very poor food hygiene standards. However, it may reflect that a particular type of high risk food processing is being done, or that vulnerable groups are being served, and so is not simply a measure of standards, but a reflection of risk. Incorporated in the 1,184 businesses are 10 establishments approved under EC Regulation 853/2004 (e.g. manufacturers of dairy products, fishery products etc). These can require a higher resource input than caterers/retailers. This is because of the more specialist nature of the inspection and additional sampling demands.</i></p>			

Table 3 – Profile of food businesses included in the national Food Hygiene Rating Scheme (as at 16th April 2020)		
Food Hygiene Rating	Number of Businesses	%
5 (very good)	656	75.9
4 (good)	143	16.6
3 (generally satisfactory)	38	4.4
2 (improvement necessary)	9	1.0
1 (major improvement necessary)	16	1.9
0 (urgent improvement necessary)	2	0.2
<p><i>NB: Not all food businesses are included in the scope of the food hygiene rating scheme. Businesses who do not serve the final consumer are excluded, such as some manufacturers, packers, importers etc. The table above profiles the number of businesses that are included in the food hygiene rating scheme and have been rated. Businesses not included in this profile are those excluded or exempt from the scheme, and those unrated awaiting inspection either because they are new businesses, or because they are an existing business where there is a new food business operator.</i></p>		

Table 4 – Profile of health and safety businesses (as at 31st March 2020)		
Premises Category	No. of Premises	Inspection Frequency
A (highest risk)	0	Premises will be chosen for intervention based upon the HSE National Local Authority Enforcement Code which lists activities and sectors that local authorities should target for intervention. This is reflected in the detailed work in Appendix 2.
B1	21	
B2	326	
C (lowest risk)	1,275	
TOTAL	1,622	

Table 5 - Proactive/reactive activities and interventions in 2019/20		
Work Activity	Food Hygiene	Health & Safety
Food hygiene programmed interventions completed	402	
Number of food businesses programmed for inspection found to no longer be operating	52	
Unplanned food hygiene inspections	111	
Complaints received about hygiene of premises/practices	72	
Allegations of food poisoning	51	
Food complaints received (i.e. where extraneous matter was alleged to have been found in food)	15	
Labelling complaints about food	5	
Infectious disease notifications received	237	
Food/water/environmental samples taken	158	
Sampling visits	17	
Advisory visits	14	
Enforcement notices served	1	0
Prosecutions taken	1	0
Simple cautions issued	0	0
Food health certificates issued for exported food	147	
Appeals against a food hygiene rating	5	
Requests for a re-visit under the food hygiene rating scheme	40	
Referrals from a Border Inspection Post that illegal consignments of products of animal origin have entered the borough	1	

Proactive inspections and any other health and safety visit/face to face contact to educate, advise or engage duty holders, employees etc.		32
Any other targeted health and safety contact with businesses (i.e. not face to face) to educate, advise or engage duty holders.		0
Reactive visits to investigate health and safety complaints		17
Notifications under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)		79
Reactive visits to investigate notified health and safety incidents under RIDDOR		8
Revisits following an earlier intervention to confirm action previously required has been completed	53	5
Number of annual street trading consents issued (NB: a small number of one off consents are also issued for one day events)	15	
Animal welfare licensing visits	23	

2.29 Work for 2020/2021

The work for 2020/21 is detailed in the Food Hygiene Intervention Plan (Appendix 1) and Health and Safety at Work Intervention Plan (Appendix 2).

3.0 Policy Context and Regulatory Framework

- 3.1 This Health Protection Team Service Plan reflects the priority the Council places on the health and safety of residents and visitors to the borough. It is produced to outline the work of the Council in respect of food safety and workplace health and safety, setting out a clear plan that demonstrates how statutory obligations will be delivered.
- 3.2 The Service Plan has been produced with due regard to the requirements of the Food Standards Agency's Framework Agreement on Official Feed and Food Controls, the Food Law Code of Practice (England), the Health and Safety at Work etc Act 1974, and the Health & Safety Executive's National Local Authority Enforcement Code.
- 3.3 The plan reflects the role of the Health Protection Team, which provides the Council's food safety, occupational health and safety, and infectious disease control regulatory

services through the use of multi-skilled officers. By combining disciplines this Service Plan illustrates the effective use of resources through integration, yet at the same time satisfying the needs of the two key central authority stakeholders. Whilst the primary function may be regulatory, the service is delivered in a customer focused, customer friendly way, with an emphasis on supporting local businesses while holding residents' needs at the heart of our forward planning.

3.4 The Service Plan feeds into the Council's Corporate Plan and supports the Council to meet a number of corporate aims, including within the growing potential of our town centres, communities, people and the local environment priorities.

3.5 In addition to this Service Plan, other published documentation relating to the work of the Team is available at the links below.

3.6 Environmental Health Enforcement Policy

<http://www.testvalley.gov.uk/business/licensingandregulation/enforcement-policy-environmental-health>

This document also sets out how the Team reflects the requirements set out in the Regulators' Code.

3.7 Food and Food Premises Complaints Policy

<http://www.testvalley.gov.uk/business/licensingandregulation/foodsafety/making-food-complaint/>

3.8 Food, Water and Environmental Sampling from Food Businesses Policy

<http://www.testvalley.gov.uk/business/licensingandregulation/foodsafety/food-sampling/>

3.9 Fees and charges

<https://www.testvalley.gov.uk/business/licensingandregulation/licensing/adviceinformation/schedule-fees-charges>

4.0 Background

4.1 Profile of the Borough of Test Valley

4.2 The population of Test Valley is estimated to be 123,162 (Hampshire County Council, Small Area Population Forecast, 2015) and the borough encompasses 62,758 hectares. It is rural with two principal towns - Andover in the north and Romsey in the south. The ethnic minority population in the Borough is lower than the national average. The Council has a Cabinet structure with a Leader of the Council, Deputy Leader and Portfolio Holders. The activities of the Health Protection Team are represented by the Housing and Environmental Health Portfolio Holder.

4.3 The Health Protection Team

4.4 The team is based at the Council's offices at Beech Hurst, Weyhill Road, Andover, Hampshire SP10 3AJ. Office hours are Monday – Friday 08:30 – 17:00 (16:30 on Friday), although due to the nature of the food hygiene work in particular, evening and weekend working is routinely undertaken. Some of the Team also participate in the Environmental Health emergency out of hours service which is accessible out of office hours every day of the year. Access to the Council Offices is not routinely possible outside of office hours, particularly at weekends. However, officers do have remote electronic access to the Environmental Health database.

4.5 The Team is part of the Environmental Health Business Unit headed by the

Environmental Health Manager within the Housing and Environmental Health Service. The Principal Environmental Health Officer (Health Protection) leads the Team and is the Council's designated Lead Food Officer under the Food Law Code of Practice (England) reporting to the Environmental Health Manager. Managed by the Principal Environmental Health Officer are three full-time Senior/Environmental Health Officer posts. Two of these are only filled part-time, and one full-time. In addition, there is a full-time Senior Health Protection Officer post.

5.0 Objectives of the Health Protection Team

5.1 The Team aims to carry out an annual programme of targeted food hygiene interventions of businesses in accordance with the Food Standards Agency's Food Law Code of Practice.

5.2 Food businesses are rated under the Code of Practice from A to E which determines when the next inspection is due. Category A is the highest risk and inspected at least every 6 months. Category E is the lowest risk and subject to an intervention at least every 3 years which may be by use of an alternative enforcement strategy allowed for in the Code (see 5.5 below). There is a corporate performance target to complete at least 95% of all programmed food hygiene interventions due per quarter and each year. Programmed interventions may be deferred with the authority of the Principal EHO when there are circumstances beyond control that mean the visit cannot be made when due, e.g. businesses that only open seasonally.

5.3 Approach to Food Hygiene Re-visits

5.4 Businesses will be re-visited in accordance with the broad criteria set out in the Environmental Health Enforcement Policy. In particular, a re-visit will be undertaken where there is a compliance score of 15 or higher for hygiene and/or structure, and/or a score of 20 or higher for confidence in management/control procedures.

5.5 Alternative Enforcement Strategies

5.6 Instead of being physically inspected category E low risk businesses may be sent a self assessment questionnaire instead. The Team will use this approach for the majority of category E food businesses in order to free up officer time to enable greater focus on higher risk and low rated businesses. It is at the authorised officer's discretion whether to use the alternative enforcement strategy, or do a full or partial inspection or an audit of the business. The exception to this will be for low risk food businesses where there may still be a public expectation that the business would be inspected (e.g. schools).

5.7 Approach for New Food Business Establishments

5.8 When information is received that a new food business establishment has, or is about to open (e.g. receipt of a food premises registration form) the business will be entered on to the commercial premises database and allocated for an unplanned inspection. The aim is to inspect new establishments within 28 days of opening, but this will be dependent on resources, and the volume and public health priorities of other work at the time.

5.9 The Team will investigate all complaints regarding food safety and food hygiene in businesses, with a first response target of within three working days.

5.10 The Team will investigate all complaints about workplace health and safety, and smoking in contravention of public health legislation, with a first response target of within three working days.

- 5.11 A food, water and environmental (i.e. swabs) sampling programme in food businesses will be implemented. Some of this is through participating in regionally and nationally co-ordinated work, some is focussed on manufacturers/processors in the borough, and some on businesses with a low rating under the national Food Hygiene Rating Scheme. The aim is for at least 10% of samples to be of imported food from non-EU countries. Samples are examined or analysed by the laboratory at Public Health England Porton Down, or Hampshire Scientific Services respectively.
- 5.12 The Team will keep an as up-to-date as possible food premises register and database of commercial premises within the borough for which the Council has enforcement responsibility.
- 5.13 The national Food Hygiene Rating Scheme will be administered and the web site www.food.gov.uk/ratings updated at least every two weeks.
- 5.1.4 The Team will participate in the national Food Standards Agency food alert scheme to ensure that contaminated food is withdrawn from sale.
- 5.15 Cases of notifiable infectious disease under the Public Health (Control of Disease) Act 1984 (as amended), and other health protection legislation for which the Council is the lead authority, will be investigated as agreed with Public Health England.
- 5.16 The Team will undertake imported food investigations within the scope of an inland authority. This will include taking samples of food imported from non-EU countries and also investigating cases of illegally imported food referred by other agencies such as the Food Standards Agency or a border inspection post. There are a number of warehouses in the borough in which imported food is stored beyond leaving the border inspection post and before onward distribution. If notification is received of a suspected illegal consignment, action will be taken to either detain and refer to Border Force, or destroy or return to the country of origin.
- 5.17 Statutorily notifiable accidents, dangerous occurrences and cases of occupational disease will be investigated subject to a set of incident selection criteria. These criteria have been based upon those published by the Health and Safety Executive. The first response target is within three working days except for work-related fatalities which will be responded to on the day of the notification.
- 5.18 The Team will manage the issuing of registrations under the Local Government (Miscellaneous Provisions) Act 1982 to those businesses and persons who undertake one of more of the following functions: ear piercing, electrolysis, acupuncture, and tattooing. Hairdressers are also required to register under the Hampshire Act 1983 and relevant Byelaws. This registration service is charged for.
- 5.19 The Team will also manage the street trading consent scheme for both food and non-food businesses. All the streets in the borough are designated as consent streets so anyone wishing to trade on them requires the Council's consent. All interested parties are consulted on applications and if there are no objections then licences are issued for either six months (new applications), or twelve months (renewals). This service is charged for.
- 5.20 Health certificates will be provided to food businesses who export food to non-EU countries. This service is charged for.
- 5.21 The Team will act as a consultee in three ways. Firstly, as the statutory consultee

Health Protection Team Service Plan 2020/21

for premises licence applications under the Licensing Act 2003. Secondly, as a consultee for certain planning applications. Thirdly, as a consultee for street trading applications.

- 5.22 An officer will be provided as necessary to cover for the absence of the Animal Welfare Officer for the collection of stray dogs. The same officer will also undertake all licensing work in connection with zoos, pet shops, dangerous wild animals, riding establishments, and the keeping or training of animals for exhibition.
- 5.23 Officers will also be provided to support the Environmental Health emergency out of hours service, and act as Incident Liaison Officers in the event of a major emergency.
- 5.24 The Team will provide advice and information to the public, and meet the needs of businesses, regarding health protection work.
- 5.25 The Team will enforce the law fairly in accordance with the Environmental Health Enforcement Policy.

6.0 Resources

- 6.1 As at 1st April 2020 the Health Protection Team had 5 posts as below.
- 1 full time equivalent Principal Environmental Health Officer – occupied full-time and responsible for the day to day management of the Team. The officer is also the Council's designated Lead Food Officer under the Food Law Code of Practice.
 - 3 full time equivalent Senior Environmental Health Officers - two of these are occupied on a part-time basis and one full-time. One of these posts was partially vacant during 2019/20 and another completely vacant. These were partially covered by contractors undertaking some food hygiene inspections.
 - 1 full time equivalent Senior Health Protection Officer - occupied full-time. In addition to food and health and safety law enforcement duties, this post acts as cover for the Animal Welfare Officer collecting stray dogs, and undertakes some animal welfare licensing work.
- 6.2 Tables 6 and 7 overleaf provide an estimate of the working days allocated for the work in 2020/21.
- 6.3 The full time equivalent (FTE) breakdown for food, health and safety, licensing and animal welfare work, including the managerial element, in 2020/21 is as below.
- Food hygiene allocated – 3.9
- Food hygiene occupied – 3.45
- Health and safety, licensing and animal welfare work allocated – 1.1
- Health and safety, licensing and animal welfare work occupied – 0.95

Activity	Officer Days	Manager Days
Programmed food hygiene inspections & re-visits	423	120
Food, food premises complaints & general requests (including infectious disease notifications)	150	20
Unplanned food hygiene inspections	82	10
Sampling	50	2
Responding to FSA requests for action e.g. food alerts	2	1
National Food Hygiene Rating Scheme (FHRS) administration	0	2
Statutory returns	0	2
Food health certificates	0	1
Street trading consents	5	5

Activity	Officer Days	Manager Days
Primary Authority Agreement work	1	1
Accident/incident investigations	15	2
Complaints & other service requests	20	1
Planning & licence consultations	2	0.25
Adverse engineering reports	2	0.25
Monitoring asbestos works	2	0.25
Carbon monoxide in commercial catering businesses project	5	1
Infectious disease control at childcare facilities project	2	0.5
Safety Advisory Group work	2	4
Reviewing and updating the register of skin piercers and hairdressers	10	1
Visitor attractions to control ill health from animal contact	1	0.25
Animal welfare work	30	1
Statutory returns	0	1

- 6.4 The overall net service controlled expenditure of the Health Protection Team for 2019/20 was £269,100 and an income of £23,900 was generated. The estimated service controlled budget for 2020/2021 is £320,600 with an estimated income of £16,000.
- 6.5 The authority remains committed to providing funds for laboratory analysis, equipment, information resources, and the training of officers to enable effective food and health and safety regulation.
- 6.6 Section 19(1) of the Health and Safety at Work etc. Act 1974 provides that any local authority, which is an enforcing authority under the Act, must appoint officers who have suitable qualifications for their duties. Likewise the FSA Framework Agreement and Food Law Code of Practice define the experience and qualifications needed for officers to be authorised to undertake food hygiene enforcement work.
- 6.7 The Council is committed to ensuring that officers undertaking the above responsibilities have the required qualifications, skills, experience and competencies commensurate with their work requirements. Competence will be assessed on an on-going basis. Officers will receive on-going annual training (both external and internal) to ensure consistent interpretation of legislation, codes of practice and national guidance. In addition, their work will be monitored by a combination of accompanied inspections, file monitoring and other case reviews by the Principal EHO.

- 6.8 The Council ensures that all officers authorised to carry out food hygiene and health and safety regulatory work receive structured on-going training, which is managed, assessed and recorded. The training received includes new legislation, policies, procedures and practices, and relevant technological developments. The aim is to provide a minimum on-going training of at least 10 hours per year based on the principles of continuing professional development (CPD). Registered Environmental Health Practitioners of the Chartered Institute of Environmental Health are obliged to undertake at least 20 hours CPD per year, with Chartered Environmental Health Practitioners 30 hours CPD per year. Officer training needs may be delivered by both external courses and in-house training and are identified in the bi-annual Performance and Development Discussion (PDD).
- 6.9 Health Protection Team officers have a range of competencies as reflected in Table 8 below. To ensure the continued provision of a trained and competent inspectorate through appropriate training to ensure consistency, improved and continued knowledge of food safety, public health and health and safety legislation and related issues.

Table 8 – Matrix of Health Protection Team officer competencies 2020/21					
Officer Competency	Principal EHO	Senior EHO	Senior EHO	Senior EHO (from 1st May 2020)	Senior HPO
Prosecution Experience	Yes	Yes	Yes	Yes	Limited
Food Safety Act 1990 (as amended) & Food Safety and Hygiene (England) Regulations 2013 – full authorisation	Yes	Yes	Yes	Limited	Yes
Hazard analysis and critical control points (HACCP)	Yes	Yes	Yes	Yes	Yes
Imported Foods Training	Yes	Yes	Yes	Yes	Yes
Health & Safety at Work etc Act 1974 – full authorisation	Yes	Yes	Yes	Limited	Yes
Public Health (Control of Disease) Act 1984 (as amended) and Health Protection (Local Authority Powers) Regulations 2010	Yes	Yes	Yes	Yes	Yes

7.0 Monitoring and Evaluation

7.1 Internal Monitoring of Health Protection Team Work

7.2 The Principal EHO monitors the work of the Team by:

- Direct daily supervision of all officers;
- Monthly 1:1 meetings with officers reviewing all their current cases and forthcoming work;
- Regular team meetings;
- Bi-annual performance and development discussions, identifying training and development issues and setting work objectives;
- A planned programme of internal monitoring activities, principally consisting of accompanied inspections, file and database monitoring, checking of statutory notices and investigation cases;
- In-house training sessions.

7.3 Corporate Monitoring/Performance Management

7.4 The Team performance contributes to performance indicators which are reported to the Environmental Health Manager, Head of Service and the Council's Performance Board which monitors them quarterly. These indicators are as below.

- Responding to complaints/service requests within 3 working days –

In 2019/20 over 95% of service requests were responded to within 3 working days (Corporate Target 95%);
- Food hygiene programmed inspection rate – in 2019/20, once accounting for 52 businesses that were due an inspection but which ceased trading during the year, 423 programmed inspections were due to be done. Of the 423 due 402 were completed – 95.0% achieved.
- Health and safety inspection rate for high risk premises and completion of project inspections. Due to significant resource constraints only a small amount of health and safety project work was completed.

7.5 When variations from the Service Plan are identified they are routinely reported by the Principal EHO to the Environmental Health Manager, and when quarterly performance indicator statistics are being collated.

7.6 Where performance is identified as below target, this is discussed as part of exception reporting at the quarterly Performance Board including identified strategies and plans to get performance back on track.

7.7 External Peer Review/Audit/Liaison Groups

7.8 The Team takes part in peer review activities co-ordinated through the Hampshire and Isle of Wight Food Advisory Committee, and Health and Safety Advisory Group.

7.9 The Team's performance is also assessed through the annual statistical monitoring returns made to the Food Standards Agency and the Health and Safety Executive.

7.10 The Principal EHO represents the Team at the Hampshire and Isle of Wight Food Advisory Committee (approximately four meetings per year). Either the Principal EHO or a Senior EHO represents the Team at the Hampshire and Isle of Wight Health and Safety Advisory Group (approximately four meetings per year). The Senior Health Protection Officer represents the Team at the Hampshire and Isle of

Wight Infectious Disease Forum (approximately three meetings per year) and ad hoc meetings of the Hampshire and Isle of Wight Sampling Group. The purpose of these groups is, in part, to try and ensure that work is undertaken consistently across neighbouring authorities.

Test Valley Borough Council: Food Hygiene Intervention Plan 2020/21**Appendix 1****Proactive Interventions**

Work Area	Reason/s	Estimated Resources	Output/Outcomes
<p>Food Hygiene Intervention Programme</p> <p>531 programmed interventions to be undertaken by 31st March 2020 in accordance with the inspection rating scheme.</p>	<p>Statutory Code of Practice requirement identified by the FSA.</p>	<p>Inspectors: 398 days for preparing for and undertaking inspections, and post inspection administration.</p> <p>Manager: 115 days management time to allocate and monitor programme.</p>	<p>* 531 completed inspections.</p> <p>* Increased compliance with food hygiene legislation.</p> <p>* Greater awareness of food hygiene legislation amongst food business operators and food handlers.</p>
<p>Re-visits to Food Businesses following a Programmed Inspection</p> <p>Estimated 50 re-visits to check upon compliance, including follow up to statutory notices</p>	<p>Statutory Code of Practice requirement identified by the FSA.</p>	<p>Inspectors: 25 days for preparing for and undertaking re-visits, and post re-visit administration.</p> <p>Manager: 5 days management time to monitor.</p>	<p>* 50 completed re-visits.</p> <p>* Ensuring that written warnings and statutory Notices are complied with to improve food hygiene standards at businesses.</p>
<p>Food, Water and Environmental Sampling</p> <p>Implementing a sampling programme, and taking additional reactive samples as necessary, of approximately 150 samples.</p>	<p>Statutory Code of Practice requirement identified by the FSA.</p>	<p>Inspectors: 50 days for preparing for the sampling, taking the samples and delivering to the PHE/PA laboratory, and post sampling administration.</p> <p>Manager: 2 days to draw up programme and monitor.</p>	<p>* 150 food, water and environmental samples.</p> <p>* Greater awareness of food hygiene legislation amongst food business operators and food handlers.</p>

<p>National Food Hygiene Rating Scheme (FHRS)</p> <p>Administration of the FHRS to ensure that it remains as up-to-date as possible, and make changes to the scheme as required by the FSA.</p>	<p>Implementation of the Food Standards Agency's 'The Food Hygiene Rating Scheme: Guidance for local authorities on implementation and operation – the "Brand Standard".</p>	<p>Manager: 2 days</p>	<ul style="list-style-type: none"> * Ensuring that the FHRS web site is as up-to-date as possible. * Ensuring that the Council fulfils it's obligations under the FHRS Brand Standard Agreement with the FSA. * Ensuring businesses are rated fairly in accordance with the FHRS Brand Standard Agreement.
<p>Statutory Returns to the FSA</p> <p>Compilation and submission of the annual Local Authority Enforcement Monitoring System return, and any other returns as requested by the FSA.</p>	<p>Statutory Code of Practice requirement identified by the FSA.</p>	<p>Manager: 2 days</p>	<ul style="list-style-type: none"> * Ensuring that the Council fulfils it's obligations to respond to requests for information from the FSA.
<p>Total Estimated Resources for Proactive Interventions in 2020/21</p>		<p>Inspectors: 473 days</p> <p>Management: 126 days</p> <p>Business Support Administration: 2 days</p> <p>Total: 601 days</p>	

Reactive Interventions

Work Area	Reason/s	Estimated Resources	Output/Outcomes
<p>Unplanned inspections of new food businesses (including changes to the food business operator of existing businesses), and including requested re-visits</p> <p>Undertaking approximately 110 unplanned inspections of newly registered businesses, or where there are changes to the food business operator at an existing business, including follow up re-visits to check compliance.</p>	<p>Statutory Code of Practice requirement identified by the FSA.</p> <p>To ensure that new food businesses register with the Council and are inspected as soon as possible afterwards.</p>	<p>Approximately 110 unplanned food hygiene inspections per year.</p> <p>Inspectors: 82 days preparing for and undertaking the inspections, and post inspection administration.</p> <p>Manager: 10 days to allocate and monitor.</p>	<ul style="list-style-type: none"> * 110 completed inspections. * Increased compliance with food hygiene legislation. * Greater awareness of food hygiene legislation amongst food business operators and food handlers. * Ensuring that written warnings and statutory Notices are complied with to improve food hygiene at businesses. * Ensuring that the Food Hygiene Rating Scheme is as up-to-date as possible.
<p>Complaints and other Service Requests including Infectious Disease Notifications</p> <p>Investigating approximately 250 complaints/service requests (including 40 requests for re-visits under the FHRS and 5 appeals against ratings) and responding to approximately 150 infectious disease notifications.</p>	<p>Statutory Code of Practice requirement identified by the FSA.</p> <p>Investigations in response to information received from a complaint or other service request, suggesting poor duty holder performance, potentially significant breaches of law and/or existence of an infectious disease. Also investigations into possible improved performance under the FHRS.</p>	<p>Approximately 250 complaints/service requests received per year with a target first response time of 3 days.</p> <p>Responding to approximately 150 infectious disease notifications.</p> <p>Inspectors: 150 inspector days to investigate.</p> <p>Manager: 20 days to allocate and monitor.</p>	<ul style="list-style-type: none"> * 250 service requests and 150 infectious diseases responded to. * Positive response to service request raised by the business, food handler/other staff, or member of the public. * Improved business compliance and greater food hygiene awareness. * Ensuring that the FHRS web site is as up-to-date as possible.

<p>Food Health Certificates</p> <p>Issuing approximately 150 food health certificates to allow businesses to export food consignments to third countries.</p>	<p>To allow export of food.</p>	<p>Approximately 150 health certificates issued per year.</p> <p>Manager: 1 day issuing certificates and dealing with queries.</p>	<p>* Approximately 150 health certificates issued raising up to approximately £7,000 of income.</p>
<p>Street Trading Consents</p> <p>Responding to approximately 12-15 new and renewal applications for street trading consents.</p>	<p>To ensure compliance with the Local Government (Miscellaneous Provisions) Act 1982, Council Policy and conditions relating to street trading.</p>	<p>Approximately 12 - 15 applications received per year.</p> <p>Inspectors: 5 days dealing with administration, consultation inspection and enquiries.</p> <p>Manager: 5 days dealing with consultation and complaints.</p>	<p>* 12 - 15 applications processed per year raising up to approximately £10,000 of income.</p>
<p>Responding to FSA Food Alerts or other Emergency Requests from the FSA</p> <p>Responding to food alerts for action, or other emergency requests, issued by the FSA regarding the withdrawal or recall of contaminated and/or illegal food.</p>	<p>Statutory Code of Practice requirement identified by the FSA.</p>	<p>Inspectors: 2 days but could be more depending upon the type of food alerts issued.</p> <p>Manager: 1 day to allocate and monitor.</p>	<p>* Ensuring that food alerts for action are responded to in a timely fashion to remove contaminated and/or illegal products from the market to protect public health.</p>
<p>Total Estimated Resources for Reactive Interventions in 2020/21</p>		<p>Inspectors: 239 days</p> <p>Management: 37 days</p> <p>Business Support Administration: 35 days</p> <p>Total: 311 days</p>	

Test Valley Borough Council: Health and Safety at Work Intervention Plan 2020/21**Appendix 2****Proactive Interventions**

Work Area	Reason/s	Estimated Resources	Output/Outcomes
<p>Carbon monoxide poisoning from commercial catering businesses</p> <p>To visit 30 catering businesses as part of the food hygiene inspection programme to check that appliances are safe and well maintained.</p>	<p>Lack of suitable ventilation and/or unsafe gas appliances is one of the areas in the HSE's National Local Authority Enforcement Code that local authorities should target for intervention.</p>	<p>Inspectors: 5 days for undertaking the interventions, re-visits and post intervention administration.</p> <p>Manager: 1 day to draw up the project, allocate and monitor the work programme and provide in-house training.</p>	<p>* Advisory visits to 30 businesses.</p> <p>* Ensure that gas appliances are safe and well maintained.</p>
<p>Register of skin piercers and hairdressers</p> <p>To review the register of skin piercers and hairdressers and undertake a sample of 15 inspections.</p>	<p>To ensure that the register is up-to-date and that good hygiene practices are being followed at a sample of high risk skin piercers.</p>	<p>Inspectors: 10 days for undertaking the review and inspections.</p> <p>Manager: 1 day to allocate the work and monitor.</p>	<p>* Advisory visits to 15 businesses.</p> <p>* Ensure that good hygiene practices to ensure infectious disease control are being maintained.</p>
<p>Visitor Attractions to Control Ill Health Arising from Animal Contact</p> <p>To visit the animal petting farm in the borough and check arrangements for managing the risks of infection from animal handling.</p>	<p>HSE national priority following high profile outbreak at a petting farm in Surrey.</p> <p>E. coli/Cryptosporidium infection especially in children is one of the areas in the HSE's National Local Authority Enforcement Code that local authorities should target for intervention at open farms/animal visitor attractions.</p>	<p>Inspectors: 1 day</p> <p>Manager: 0.25 day to allocate and monitor.</p>	<p>* 1 advisory visit</p> <p>* Ensure compliance with the legislation and HSE Code of Practice.</p>

<p>Infectious Disease Control at Childcare Facilities such as Day Nurseries and Pre-Schools</p> <p>To visit 10 childcare facilities, whilst doing programmed food hygiene inspections, to check general infectious disease control measures.</p>	<p>Public Health England has identified some work on checking standards of general cleaning in childcare facilities to control infectious diseases.</p>	<p>Inspectors: 2 days</p> <p>Manager: 0.5 day to allocate and monitor.</p>	<p>* 10 advisory visits</p> <p>* Ensure that businesses are undertaking thorough general cleaning to control infectious diseases.</p>
<p>Animal Welfare Work</p> <p>To undertake licensing work relevant to zoos, pet shops, riding establishments and dog breeders, and cover for the stray dog collection service.</p>	<p>To ensure that businesses are legally licensed and meeting the terms of their licence.</p> <p>To cover for the absence of the Animal Welfare Officer.</p>	<p>Inspector: 30 days</p> <p>Manager: 1 day to monitor</p>	<p>*30 licensing visits</p>
<p>Safety Advisory Group Work</p> <p>To participate in two Safety Advisory Groups for major public events held throughout the year.</p>	<p>To provide safety advice as needed on Event Safety Plans and also undertake visits during the year to ensure standards are being implemented.</p>	<p>Inspector: 2 days</p> <p>Manager: 3 days</p>	<p>*5 meetings and 2 inspections</p>
<p>Statutory Returns to the HSE</p> <p>Compilation and submission of the half yearly and annual LAE1 return, and any other returns as requested by the HSE.</p>	<p>For the compilation of national statistics.</p>	<p>Manager: 1 day</p>	<p>* Ensuring that the Council fulfils it's obligations to respond to requests for information from the HSE.</p>
<p>Total Estimated Resources for Proactive Interventions in 2020/21</p>		<p>Inspectors: 50 days</p> <p>Management: 7.75 days</p> <p>Business Support/Administration: 2 days</p> <p>Total: 59.75 days</p>	

Reactive Interventions

Priority Work	Reason/s	Estimated Resources	Output/Outcomes
<p>Investigation of Incident Notifications</p> <p>Investigate approximately 20 incidents of injury or ill health that meet the criteria for investigation.</p>	<p>Investigations in response to RIDDOR reports or other accident notifications, suggesting poor duty holder performance and/or potential significant breaches of law, are a national planning priority identified by the HSE.</p>	<p>Inspectors: 15 days based upon approximately 20 incidents to investigate.</p> <p>Manager: 2 days to allocate and monitor.</p>	<ul style="list-style-type: none"> * 20 investigations * Minimise the risk of a similar incident occurring at the business. * Promote sensible risk management.
<p>Complaints and other Service Requests</p> <p>Investigate approximately 45 complaints and responding to other service requests about workplace health and safety.</p>	<p>Investigations in response to information received from a complaint or other service request, suggesting poor duty holder performance and/or potential significant breaches of law, are a national planning priority identified by the HSE.</p>	<p>Approximately 45 complaints/service requests received per year.</p> <p>Inspectors: 20 days to investigate.</p> <p>Manager: 1 day to allocate and monitor.</p>	<ul style="list-style-type: none"> * 45 investigations * Promote sensible risk management. * Improved business compliance and greater health and safety awareness.
<p>Adverse Engineering Reports</p> <p>Investigate approximately 5 adverse engineering reports, primarily notifications of defective lifting equipment under the Lifting Operations and Lifting Equipment Regulations 1998.</p>	<p>Investigations in response to information received from an adverse engineering report, suggesting poor duty holder performance and/or potential significant breaches of law, are a national planning priority identified by the HSE.</p>	<p>Inspectors: 2 days to investigate.</p> <p>Manager: 0.25 day to allocate and monitor.</p>	<ul style="list-style-type: none"> * 5 investigations * To ensure that duty holders take timely action to suspend use of defective equipment and undertake necessary work prior to re-use.

<p>Monitoring of Asbestos Works</p> <p>Investigate approximately 2 notifications of work on asbestos-containing materials.</p>	<p>Asbestos continues to be the biggest occupational killer in Britain, with approximately 4,000 people dying every year due to occupational exposure. Hampshire has high levels of mesothelioma deaths.</p>	<p>Inspectors: 2 days to assess method statements and make site visits.</p> <p>Manager: 0.25 day to allocate and monitor.</p>	<ul style="list-style-type: none"> * 2 investigations * To ensure that those undertaking work with asbestos use safe methods in accordance with their licence conditions.
<p>Premises Licence Consultations</p> <p>Respond to approximately 30 premises licence applications under the Licensing Act 2003 to ensure that public safety considerations are taken into account in determination of the licence.</p>	<p>Statutory consultee for premises licence applications under the Licensing Act 2003.</p>	<p>Inspectors: 2 days to review consultation papers and conduct any necessary site visits.</p> <p>Manager: 0.25 day to allocate and monitor.</p>	<ul style="list-style-type: none"> * 30 consultations * Appropriate responses regarding public safety are made to the Licensing Unit.
<p>Primary Authority Partnership</p> <p>Continue with the Primary Authority Partnership with Merityre Specialists in Andover in order to assist the business in being compliant with health and safety legislation across all of its regional sites.</p>	<p>Primary Authority Partnerships are a national planning priority identified by the HSE and Better Regulation Delivery Office.</p>	<p>Inspectors: 1 day for dealing with enquiries from the business and local authorities.</p> <p>Manager: 1 day for managing and reviewing.</p>	<ul style="list-style-type: none"> * A more competitive, efficient and safe business. * Reduction in incidences of ill health and accidents. * Business better able to demonstrate corporate health and safety responsibility.
<p>Total Estimated Resources for Reactive Interventions in 2020/21</p>		<p>Inspectors: 42 days</p> <p>Management: 4.75 days</p> <p>Business Support/Administration: 1 day</p> <p>Total: 47.75 days</p>	

