



Stroud District Council

Food Service Plan

2023-2024

A Service Plan for the Food Safety Section of the Environmental Health Service based on the Food Standards Agency's Framework Agreement on Local Authority Food Law Enforcement.

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Stroud District Council

Food Service Plan

1. Service Aims and Objectives

1.1 Aims and Objectives

The over-riding goal of the Commercial Services Unit, in line with the Council's Corporate Aims, is to maintain and improve the community's health. To this end the Commercial Services Unit will effectively utilise its resources to ensure that food and drink for human consumption which is supplied in the District is safe and without risks to health. Moreover, the Commercial Services Unit will use its influence, when appropriate, to promote awareness of the importance of diet and nutrition in ensuring a healthy lifestyle.

The Commercial Services Unit will achieve this aim by: -

- ensuring that food premises are regularly inspected in accordance with national inspection frequency criteria and that legislative controls are consistently and effectively applied in all the premises it inspects.
- giving encouragement to food business proprietors to adopt and implement the principles of hazard analysis with suitable controls at critical points. The Section will develop or support initiatives to improve the understanding of the principles of hazard analysis and hence increase the likelihood of their successful adoption by food businesses.
- recognising the importance of the legal requirement for food handlers to be properly trained or given instruction and supervised commensurate with their duties. Officers will actively enforce this requirement and promote or offer hygiene training courses locally and at reasonable cost.
- implementing a local programme of food sampling and participating in national food sampling schemes in an effort to identify potentially dangerous levels of bacterial contamination in locally produced foods.
- investigating reports of food contamination, food poisoning or food borne illness and endeavouring to prevent the continuance or recurrence of any factors giving rise to the reported incident.
- promoting the development of a wider understanding of ill-health issues associated with food allergy and hypersensitivity and encouraging proprietors to implement sensible controls in the preparation and sale of foods.
- promoting the availability of healthy food choices on the menus of catering establishments in the District.
- responding quickly and appropriately to national food hazard warnings.

1.2 Links to Corporate Objectives and Plans.

The [Council Plan 2021-26](#) sets out 3 distinct priorities: -

- Environment and climate change
- Community resilience and wellbeing
- Economy recovery and regeneration

Ensuring high standards of food safety is an important means of maintaining and improving the community's health and wellbeing and, as the Food Standards Agency maintains, safer food is better for business too. By helping food businesses achieve high standards of food safety and, at the same time, ensuring a level playing field the food safety team plays an important part in economic recovery.

The Council recognises that regulation can have a significant influence on the profitability of small and medium sized enterprises and the Council has adopted enforcement policies, which incorporate the principles of good enforcement set out in the [Regulators' Code](#). For example, the Council has undertaken to minimise the cost of compliance for businesses and individuals by ensuring that any action taken is proportionate to the risks or wider public benefit and the Council will carryout its duties in a fair and equitable and consistent manner.

The Council's objectives are enabled through various strategies and service plans, of which this Food Service Plan forms part. Local performance indicators are used to measure key service objectives set out in the service plans.

2. Background

2.1 Profile of the Local Authority

The District Council covers an area of 45,318 hectares and has a population of approximately 112,000. It is bounded on the west by the River Severn rising to the Cotswold escarpment to the east. To the North the district borders Gloucester City and to the South it extends to Berkeley and Wotton-under-Edge.

It is a mixed urban and rural area with 5 main towns - Stroud, Stonehouse, Wotton-under-Edge, Dursley and Nailsworth - numerous villages and a number of industrial estates. Many of the towns and villages lie within the Cotswold area of outstanding natural beauty. There are 42 conservation areas, including an industrial conservation area.

2.2 Political and Organisational Structure

There are 51 District Councillors who represent 30 wards. Stroud District Council is led by a cooperative alliance of the Labour, Green and Liberal Democrat parties.

Food safety enforcement work falls within the remit of the environment committee.

The Commercial Services Unit is part of the Environmental Health Service which is divided into 4 functional sections – Commercial Services, Environmental Protection, Housing Renewal and Licensing – supported by an administration team.

Sarah Clark, Head of Environmental Health has overall control of the Service, which deals with most of the traditional environmental health core functions, including private sector housing, pollution control, food safety, health and safety, the dog warden service and licensing. He is responsible for control of budgets and resource allocation for the food safety service.

Phil Park, Commercial Services Manager (CSM) is responsible for the management of the Commercial Services Unit and is the Council's appointed food safety lead officer for the purposes of the Food Safety Act 1990. As well as dealing with food safety enforcement and promotion the team is also responsible for health and safety in both food and non-food premises, communicable disease control and registration of skin piercing establishments. The CSM also manages the Council's pest control service and provides an in-house health and safety advisory service to the Council.

1.5 FTE Principal Environmental Health Officer posts and 1.5 Food and Safety Officer posts are designated to carry out the functions of the Section. Officers hold a variety of qualifications and their responsibilities vary accordingly – see table 1 below. In April 2023 all the posts were filled by fully qualified officers, although the part time food safety officer had handed in her notice.

Table 1: Officers authorised to carryout official controls

Post	Qualifications Required	Food Safety Responsibilities and authorisation	Comments
Area 1			
Principal Environmental Health Officer (Part time 0.8 FTE)	Degree in Environmental Health.	Day to day management of Area 1. Inspection of full range of food premises, including specialist processes. Service of Statutory Notices. Deputises for CSM.	
Food and Safety Officer Part time 0.5 FTE	Higher Certificate in Food Premises Inspection or Degree in Environmental Health.	Inspection of full range of food premises, including specialist processes. Service of Statutory Notices. Food sampling.	
Area 2			
Principal Environmental Health Officer (Part-time 0.7 FTE)	Degree in Environmental Health. CIEH registered.	Day to day management of Area 2. Inspection of full range of food premises, including specialist processes. Service of Statutory Notices. Deputises for CSM.	
Food and Safety Officer (full time)	Higher Certificate in Food Premises Inspection. (CIEH registered for food safety inspection)	Inspection of full range of food premises, including specialist processes. Service of Statutory Notices. Food sampling.	

The Commercial Services Unit is supported by a Business Support Officer and a team of 3 administrative assistants, who also provide support services to the rest of the Environmental Health Service.

The Commercial Services Unit is represented on the Gloucestershire Food Safety Group (GFSG) by the CSM. Meetings are regularly attended by colleagues from the other 5 District Councils in the County, the Gloucestershire County Council Trading Standards Department, the UKHSA Laboratory Service and FSA representatives.

The Council has arranged to use the United Kingdom Health Security Agency Laboratory Services located in Porton Down for microbiological examination of food and Public Analyst Scientific Services Limited (Wolverhampton) for other food analysis.

2.3 Scope of the Service.

As the Council is not a Unitary Authority, functions such as food standards and animal feed do not form part of its remit. Otherwise the Council aims to provide a full range of services offering a balanced approach between education and enforcement.

The Commercial Services Unit is responsible for carrying out the functions described in Table 2 below.

Table 2: Food Related and Other Services undertaken by the Commercial Services Unit.

Food Related Services	Other Activities
Food Premises Inspections in accordance with FSA Code of Practice	Health and Safety inspection of Commercial Premises.
Investigation of complaints relating to food and food premises.	Investigation of health and safety complaints and accidents arising at those premises.
Food sampling (including participation in national sampling programmes).	Provision of health and safety training courses and seminars.
Investigation of food poisoning cases.	Provision of a Public Burial Service.
Initiating and responding to national food hazard warnings.	Participation in the Council's emergency planning arrangements.
Liaison with other local authorities with respect to food produced outside the District.	Investigation of drainage and nuisance complaints arising from commercial premises.
Application of the Primary Authority Partnership scheme.	Provision of an in-house health and safety advisory service.
Provision of advice and guidance to food businesses.	Responding to relevant planning and building applications.
Provision of food hygiene training courses and seminars.	Administration of Street Trading Consents and licensing of skin piercing businesses.
Administration of the FSA Food Hygiene Rating scheme	Responding to land registry enquiries.
Liaison with food business proprietors, consumers and other health professionals.	Pest Control Services
Approval of product specific food premises.	Investigation and control of communicable diseases (e.g. legionnaires disease; Part 2A orders)
Port Health – Ship inspections; verification of organic feed imports, docks water supply.	Port health – rabies control; waste disposal arrangements, infectious disease controls.
Promotion of food safety messages to consumers and participation in national schemes (e.g. food safety week).	Promotion of public health messages in food businesses (e.g. healthy eating)

2.4 Demands on the Food Service.

The profile of food premises in the District on 1st April 2023 is outlined in Table 3 below.

The majority of food premises in the District are small or medium sized enterprises (SMEs) employing less than 50 staff. Nevertheless, many of them are involved in the preparation of high-risk foods and require frequent monitoring. Inevitably SMEs have fewer resources to carryout in-house monitoring and do not have the access to technical assistance available to larger food businesses or multi-national groups. Food Safety Officers may, therefore, find themselves spending a disproportionate amount of time working with smaller businesses than with much larger companies.

Leisure and tourism are important contributors to the local economy and the hotel and catering industry account for 71% of the food premises in the District. A small proportion of these are seasonal guesthouses.

Table 3: Profile of 1219 Food Premises in the District on 1st April 2023.

	Category of premises	Primary producers	Manufacturers & Packers	Importers & exporters	Distributors & Transporters	Retailers	Restaurants & Caterers	Total
Premises ratings	Cat A	0	1	0	0	0	4	5
	Cat B	0	11	0	0	8	44	63
	Cat C	1	10	0	0	17	158	185
	Cat D	2	21	2	5	51	307	388
	Cat E	7	49	4	9	180	258	507
	Unrated	4	9	1	0	10	44	68
	Outside programme	0	0	0	0	1	2	3
	Total	13	101	7	14	267	817	1219

11 businesses are currently approved under specific regulations (Regulation EC 853/2004). These premises are listed in Table 4.

Table 4: Premises Approved under Regulation EC 853/2004).

Business Name & Ref Number	Location	Description	Approval No
Godsell's Cheese CP2825	Church Rd, Leonard Stanley, GL10 3NP	Dairy products manufacture (cheese)	GS009
Jess's Ladies Organic Milk CP2882	Longney Road, Hardwicke, GL2 3SQ	Dairy products manufacture (cheese)	GS019
Muller Milk and Ingredients CP4000	Oldends lane Stonehouse, GL10 2DG	Dairy products manufacture.	GS003
Dairy Partners CP2416	Stroudwater Business Park, Stonehouse, GL10 3SX	Dairy products manufacture	GS006
FA Gill Ltd CP0596	Oldends lane, Stonehouse GL10 2DG	Cold store	GS020
Plenty Pastry Ltd CP4137	Unit N3/4, Inchbrook TE, Woodchester, GL5 5EY	Meat products manufacture	GS022
Taste Connection Ltd CP4319	Alderley Wotton-Under-Edge GL12 7QT	Meat products manufacture	GS024
Jonathon Crump CP2397	Standish Park, Standish, Stonehouse GL10 3DG	Dairy products manufacture	GS025
Woodland Valley Eggs CP3338	Ganzell Lane, Dursley,	Egg packer	N/A
Oakbrook Farm Eggs CP4413	Oakbrook Farm, Wick Street, GL6 7QN	Egg Packer	N/A
Tudor Rose International CP4497	Kingfisher Business Park, London Road, Thrupp, GL5 2BY	Cold Store	GS021
Wholly Gelato and Milk	Barhouse Farm, Elmore, Gloucester, GL2 3NT	Dairy products	GS031

There are also a wide variety of food manufacturers and specialised food producers in the District which do not require product specific approval. Examples of these are listed in Table 5 below.

Table 5: Examples of Food Manufacturers and Specialist Producers

Business Name & Ref Number	Location	Description of products
Kerry Ingredients & Flavours Ltd cp0395	Draycott, Cam, GL11 5NA	Dried flavouring ingredients.
Bottle Green Drinks Co Ltd. Cp2591	Frogmarsh Mills, South Woodchester, GL5 5ET	Flavoured soft drinks and cordials
Woefuldane Organic Dairy cp2446	Woefuldane Farm, Minchinhampton, GL6 9AT	Organic dairy products
Cotswold Handmade Meringues cp2660	Terretts Mill, Nailsworth, GL6 0RF	Meringue nests
Winstones Ice Cream Ltd	Greenacres, Rodborough, GL5 5BX	Ice Cream manufacturer.

Establishments operated by ethnic minorities, whose first language is not English, account for a relatively small proportion of the food businesses in the District. Nevertheless, access to foreign language food hygiene courses locally is poor and the nearest translation service is in Gloucester.

The Council's Services are delivered exclusively from the Council Offices, Ebley Mill, Stroud. There are currently no "area offices". Information about food safety services is also posted on the Stroud District Council web-site www.stroud.gov.uk and includes a wide range of "frequently asked questions".

2.5 Enforcement Policy

The Commercial Services Unit carries out its duties in accordance with the Environmental Health Enforcement Policy. The general enforcement policy incorporates principles of good enforcement practice. A guidance leaflet, summarising the enforcement policy, is made available to business proprietors whenever enforcement action is taken.

[Ref. Commercial Services Unit Manual, Policy No 1.1 "Enforcement Policy"]

3. Service Delivery

Food Premises Interventions

3.1 Introduction

The enforcement of food hygiene regulations is governed by the [Food Law Code of Practice](#) (FLCoP) and associated practice guidance issued by the Food Standards Agency. The Code of Practice allows authorities some flexibility in how to secure compliance with food safety legislation, particularly in lower risk premises. For example, it permits local authorities to replace standard inspections, in certain categories of premises, with a range of alternative interventions.

3.2 The Impact of the Covid-19 Pandemic

In March 2020 food safety interventions were severely interrupted by the Covid-19 pandemic. In 2020/21 most members of the commercial services team were redeployed to tasks associated with the enforcement of the various regulations introduced during lockdown and restrictions on business activity. In 2021 officers also helped the local NHS Track and Trace team follow up covid cases and their contacts. Moreover, at times, it was not possible to inspect businesses either because they were not trading or because of the risk of transmitting infection. The Food Standards Agency recognised these difficulties and, to ensure that resources could be focused on wider public health concerns, permitted local authorities to defer planned interventions and other routine food safety work. The highest priority work continued, albeit sometimes by remote contact.

The pandemic led to a rapidly changing risk landscape and the FSA issued numerous circulars to local authorities to guide enforcement activities. In the Autumn of 2020 and throughout 2021/22 local authorities in Gloucestershire were provided with government grants from the Contain Outbreak Management Fund (COMF), which enabled Stroud District Council to employ contractors to carry out covid support work and allow some food safety officers to return to normal duties. Officers were therefore able to meet and often exceed the expectations of the FSA during this period.

The FSA published a recovery plan for the period 1st July 2021 to end of 2022/23 which aimed to ensure that, during the period of recovery from the Covid-18 pandemic, local authority resources were targeted where they added greatest value in providing safeguards for public health and consumer protection in relation to food. The Commercial Services Team have no significant backlog of high or medium risk premises and aim to implement the inspection frequencies set out in the FLCoP during 2023/24.

3.2 Interventions

The FLCoP defines the different types of interventions that Food Authorities may use and the circumstances in which they should be applied.

Interventions are key to improving compliance with food law by food business operators. The range of interventions allows authorised officers to use their professional judgement to apply a proportionate level of regulatory and enforcement activities to each food business.

Interventions should be applied in a risk-based manner such that more intensive regulation is directed at those food businesses that present the greatest risk to public health.

In delivering their regulatory services the Commercial Services team have regard to the [Regulators' Code](#) (issued by the Department of Business Innovation and Skills in 2014) and the statutory principles of regulation required by Section 21 of the [Legislative and Regulatory Reform Act 2006](#) i.e. that regulatory functions are carried out in a way which is transparent, accountable, proportionate and consistent and targeted only at cases in which action is needed.

Interventions are defined as activities that are designed to monitor, support and increase food law compliance with a food establishment.

3.3 Official Controls

Interventions that are Official Controls [as specified by Article 10 of Regulation 882/2004] include:

- Inspections;
- Monitoring;
- Surveillance;
- Verification;
- Audit; and
- Sampling where the analysis/examination is to be carried out by an Official Laboratory

The intervention must provide sufficient information to establish that food-related activities carried out at food establishments comply with the law. The intervention must be carried out at all stages of production, processing and distribution.

3.4 Other Interventions

In addition to 'official controls', interventions also include other activities that are effective in supporting food businesses to achieve compliance with food law such as:

- education, advice, and coaching provided at a food establishment; and
- information and intelligence gathering.

More than one type of intervention may be carried out during a single visit to a food business.

Officers should record the basis for the choice of intervention(s) used in the premises file. Where more than one intervention is carried out at the same time Officers should ensure that the most appropriate intervention for monitoring purposes is recorded on the computer system.

3.5 Intervention Rating Scheme

The risk assessment scheme in Part 5 of the FLCoP is used to determine the type of interventions appropriate to each category of premises.

The risk assessment profile for food premises in Stroud District Council together with the estimated number of interventions to be completed in 2022/23 is detailed in Table 6 below.

Premises with an intervention rating of A or B should be subjected to an inspection; partial inspection or audit at the prescribed interval.

Where a premises is rated C and is considered to be broadly compliant² planned interventions can alternate between inspection/partial inspection, audit and other official controls. However, the use of alternative interventions for Category C premises can only be used when a premises is judged to be "broadly compliant". Broad compliance is based on the specific ratings given for compliance using criteria in Annex 5 of the statutory code of practice, i.e. how well the operator is complying with food safety standards at the time of the inspection. For the time being all Cat C premises will receive an inspection, partial inspection or audit.

Category D premises should be subject to an intervention at intervals prescribed in the code of practice. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control (unless the premises

are also rated 30 or 40 for “type of food and method of handling”). The commercial services team occasionally make use of this flexibility.

Category E premises need not be included in the planned intervention programme but must be subject to an alternative intervention every 3 years. Premises that have not been the subject of an intervention within the previous 3 years will be sent a self-assessment questionnaire together with advisory material. Resources permitting, category E premises will be subject to an official control every 10 years.

Broadly Compliant Premises: An establishment that has an intervention rating score of not more than ten points under each of the following compliance based criteria set out in the FLCoP:-

- Level of (Current) Compliance - Hygiene and
- Level of (Current) Compliance – Structure; and
- Confidence in Management.

This equates to a food hygiene rating of 3 “satisfactory” or higher under the Food Standards Agency’s Food Hygiene Rating Scheme.

Self-Assessment Questionnaires: enable officers to determine whether or not a business has changed significantly since the last intervention and decide whether or not an inspection is required. Respondents are also asked to identify how they manage key food safety hazards in their business and vague or inadequate responses may also trigger an inspection. In the past the response rate has been around 50-60%. Businesses that do not respond need to be followed up by telephone or by making a visit (which may comprise a partial inspection or “spot check” of key hazards).

Table 6: Intervention Plan for 2023/24.

Intervention Risk Category & min' intervention frequency (examples of types of premises)	Number of Interventions due in 2023/24	Over-due interventions c/fwd from previous years	Total Number of Interventions due in 2023/24	Type of interventions applicable
<p>A (6 months)</p> <p><i>High risk premises such as restaurants, which have a very poor compliance record.</i></p> <p>9 premises</p>	8	1	9	Inspection, partial inspection or audit
<p>B (12 months)</p> <p><i>Larger residential care homes and manufacturers of high risk foods. High risk premises with fair to poor compliance record.</i></p> <p>62 premises</p>	59	2	61	Inspection, partial inspection or audit
<p>C (18 months)</p> <p><i>High risk premises with good to fair compliance record (public houses, schools or restaurant etc).</i></p> <p>193 premises</p>	115	22	137	Not broadly compliant: Inspection, partial inspection or audit Broadly compliant: Alternate with other official controls
<p>D (2 years)</p> <p><i>Lower risk premises such as general grocers and public houses with snacks only.</i></p> <p>380 premises</p>	222	24	246	Not Broadly Compliant: Inspection, partial inspection or audit Broadly compliant: Alternate with other interventions
<p>E (3 years)</p> <p><i>Low risk premises such village shops and clubs.</i></p> <p>493 premises</p>	21	118	139	Self- assessment questionnaire or inspection. NB: 40 community buildings removed from database.
<p>Un-rated/Outside Programme (includes newly registered businesses not yet inspected)</p> <p>89 premises</p>	0	85	85	To be inspected as soon as possible.
1226 premises	425	252	677	

On 1st April 2023, 207 inspections were due in the year in order to meet the prescribed inspection frequencies for high risk, Cat' A to C premises. [Note: Category A premises require 2 inspections per year]. The "percentage of higher risk premises due for inspection that were inspected" has been adopted as a local performance indicator for 2023/24.

The level of inspection activity required in 2023/24 [677] includes 139 premises that can be dealt with by alternative interventions (although inspections will be required if food business operators do not respond to alternative interventions) and this could be achieved with a full establishment (i.e. approximately 2.2 FTE officers available for food safety enforcement work).

Table 7 summarises the inspection performance in 2022/23.

Table 7: Food Premises Inspection Performance in 2022/23

Risk Cat'	No inspections due by 01/04/2023	Inspection frequency	Interventions Achieved	Due Interventions Outstanding	Comments
A	18	6 months	26	0	Notes: Some premises can be difficult to inspect due to seasonal or irregular opening times. Missed inspections may not necessarily be significant (e.g. an inspection due on 31 st March but carried out on 1 st April would still be classed as a missed inspection).
B	62	12 months	112	2	
C	136	18 months	127	18	
D	138	2 years	137	21	
E	203	3 years*	64	118	
Unrated	89	asap	136	65	
Total	846		602	224	

* AES = alternative enforcement strategy

In 2022/23 216 interventions of Cat' A-C premises were required of which 22 were outstanding on 01/04/23 i.e. 89% of due, high-risk premises were inspected.

If inspections reveal significant food safety risks or contraventions of legislation officers will revisit to ensure compliance. Inspections are generally unannounced and Officers also revisit, at a mutually convenient time, to discuss complex issues such as hazard analysis. It is estimated that the above inspection program will involve approximately 100 revisits to premises to check compliance and to discuss issues with the proprietor.

[Ref. Commercial Services Unit Procedure Note 2.1 "Food Hygiene Inspections].

3.2 Food Complaints

Complaints from the public generally fall into two categories – complaints about hygiene in food premises and complaints from customers who have purchased defective food. Hygiene complaints are dealt with in accordance with the Councils policy, which requires a response within 3 working days. However, because the evidence relating to food complaints can deteriorate very quickly officers try to respond on the same day.

Food complaints can be very time consuming and often involve liaison with other local authorities when food has been manufactured outside the District. Similarly, officers are expected to respond to requests from other local authorities about food manufactured locally but sold elsewhere.

Table 8: Food Service Requests in 2022/23

Job Type	Sub-Type	2022/23
Food Complaint	All categories	24
Food Hygiene	Hygiene Complaint	51
Food Hygiene	Training/advice	0
Food Hygiene	New Business Advice	48
Food Hygiene	Tuberculosis in Cattle	50
Food Hygiene	FSA Food Alerts	92
Food Hygiene	Food Export Certificates	71
Food Hygiene	Other (e.g. consumer advice, FHRS revisits)	14
Total		292

In 2022/23 the Commercial Services Unit dealt with 24 food complaints and 51 complaints about food hygiene in premises in the District.

Demand for the Service can be met from within existing resources.

[Ref. Commercial Services Unit Procedure Note 2.2 "Procedure for Dealing with Food Complaints"].

3.3 The Primary Authority Partnership Scheme

[Primary Authority](#) enables businesses to form a legal partnership with one local authority, which then provides assured and tailored advice on complying with environmental health, trading standards or fire safety regulations that other local regulators must respect.

The Council has adopted the primary authority scheme wherever possible and takes steps to liaise with the primary authority for local business when appropriate. The Council does not currently act as primary authority for any multiple, national business. No such business has its head office in the Stroud District at the present time. However, the rules concerning primary authority partnerships allow all businesses to benefit from Primary Authority Partnership. Officers are working with Trading Standards colleagues to explore opportunities for partnerships with local businesses. The Council assumes the role of "originating authority" for a number of large manufacturers and always responds to reasonable requests for information from other food authorities. Officers would be able to make the necessary resources available to act as primary authority should the need arise and a fee would be charged for this service.

3.4 Advice to Business

The Council recognises that it has an important role to play in giving advice to small businesses and in helping them understand their legal obligations. Every new business that registers with the authority is offered an advisory visit before they start trading. 48 new business sought advice in 2022/23 which was higher than previous 2 years, probably due to the Covid-19 pandemic. A charge is levied for advisory visits. Appropriate free advice is given at every inspection and during every investigation.

Food Business Operators are required to put in place management procedures to control food safety that are based on Hazard Analysis Critical Control Point (HACCP) principles. The Regulations require appropriate food safety management

arrangements rather than HACCP systems. The Food Standards Agency has used the flexibility in the Regulation to develop a toolkit for caterers and retailers known as 'Safer food, better business' (SFBB). The Food Safety team will continue to support SME's in the implementation of this requirement and to take enforcement action if it is necessary to ensure food safety.

The SFBB management tool can be freely downloaded by local businesses and is promoted during inspection. The SFBB pack is offered to every new caterer and retailer in the District and, where proprietors are willing, officers will demonstrate the use of the pack.

The Commercial Services Unit no longer offers face to face Food Hygiene courses for local food handlers due to a shift to on-line training. The team do arrange other training and promotional activities from time to time. See Section 3.9.

[Ref. Commercial Services Unit Procedure Note 2.1 Food Hygiene Inspections]

3.5 Food Sampling and Inspection

The Council is committed to participation in national and local food sampling programmes and works closely with the other District Council's and the UKHSA laboratory in this respect. Officers also carry out routine sampling of locally produced, high-risk foods particularly if businesses do not have robust monitoring systems in place.

Last year a total of 115 samples of food and water were taken from premises in the District, of which 14 were found to be unsatisfactory or unacceptable. Unsatisfactory samples are followed up either by further sampling and/or investigation into possible failures of control.

Samples were also taken by the Environmental Protection Unit from private water supplies serving food businesses. Samples are routinely taken from over 200 private water supplies serving both domestic and commercial premises in the District and food safety officers are notified if problems are found in food establishments.

Food Sampling Plan 2023/24

In 2023/24 officers expect to fully participate in any national sampling initiatives arranged by the United Kingdom Health Security Agency's (UKHSA) Laboratory Service.

or the FSA. Officers also regularly to take samples of high-risk foods from local outlets – priority is given to premises producing or preparing high-risk foods where there is the potential for survival of pathogens (i.e. lack of a kill step in the manufacture of raw or unpasteurised products) or opportunities for cross-contamination of product after preparation. Representative samples are taken from the premises in consultation with the UKHSA.

In certain circumstances food complaints received by the Council are sent for analysis or examination. The Council has made arrangements with Public Analyst Scientific Services Limited (Wolverhampton), to act as analyst and the UKHSA Laboratory, Porton to carry out microbiological examination of foods. Most complaints can be dealt with by drawing on the experience and expertise of officers within the Section.

Procedures have been drawn up for taking formal samples in accordance with FSA Code of Practice, to ensure that samples are representative and that the results will stand up to legal scrutiny.

The UKHSA provides funding to local authorities to cover the laboratory costs for a limited number of samples. Adequate resources are available in the budget for 2023/24 to cover the anticipated cost of food analysis and examination.

[Ref: Commercial Services Unit Procedure Note 2.7 “Sampling Procedure”].

3.6 Outbreak Control and Infectious Disease Control

The Section receives notifications of notifiable diseases and also deals with allegations of food poisoning from alleged victims. Most cases, or suspected cases, of food borne infectious disease are investigated and appropriate advice is given. Last year the Section received 127 notifications of actual or suspected food borne infections. Members of the public may also contact officers with their own “diagnosis” of food poisoning symptoms; 21 reports were investigated last year. Cases of campylobacter infections are not usually investigated as it has a long incubation period and can be contracted from sources other than food.

The Commercial Services Manager also meets with UKHSA infection control staff approximately twice a year. Meetings are chaired by the Consultant in Communicable Disease Control [CCDC]. The Committee has drawn up a County wide “Outbreak Control Plan” and a memorandum of understanding for the investigation of single cases of infectious disease (this is currently under review)

[Ref. Commercial Services Unit Procedure Note 2.5 “Food Poisoning Outbreak Control” and 2.6 “Exclusion of Food Handlers Suffering from Food Poisoning”].

The Section also receives notifications from the Animal Health and Veterinary Laboratories Agency concerning tuberculosis infection of cattle in dairy herds. Steps are taken to ensure that all milk from herds which have lost their “TB free” status is heat treated before it can be used for human consumption. Farmers are also given advice on controlling human infection. The Stroud District has one of the highest incidences of TB in cattle in the UK. 50 cases were reported to the Commercial Services Unit in 2022/23. NB: testing was suspended during the Covid-19 pandemic.

[Ref. Commercial Services Unit Procedure Note 2.18 “Controlling the Sale of Milk from Dairy Herds Which Have Lost Official Tuberculosis Free Status”

3.7 Food Safety Incidents

The Food Section has a system in place to receive and action all food alerts issued by the Food Standards Agency. The FSA issues a 'Product Withdrawal Information Notice' or a 'Product Recall Information Notice' to let local authorities and consumers know about problems associated with food. In some cases, a 'Food Alert for Action' is issued. This provides local authorities with details of specific action to be taken on behalf of consumers.

A Product Withdrawal Information Notice or a Product Recall Information Notice is issued where a solution to the problem has been put in place – the product has been, or is being, withdrawn from sale or recalled from consumers, for example. A Food Alert for Action is issued where intervention by enforcement authorities is required.

These notices and alerts are often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor.

A senior officer considers the implications of food alerts immediately. If necessary, resources will be diverted from other functions to ensure that serious emergencies are properly dealt with. 96 alerts were issued in 2022/23, the majority of these were for information only. Gloucestershire Trading Standards department is the lead authority for chemical contamination incidents, nevertheless, food safety officers do work with colleagues in the County Council during major product recalls.

[Ref. Commercial Services Unit Procedure Note 2.10 "Food Incidents and Hazards"]

These procedures also deal with the notification of "serious localised incidents and incidents representing a wider problem" to the Food Standards Agency in accordance with the FLCoP. No incidents were reported to the FSA by Stroud District Council officers in 2022/23.

3.7 Allergens

A new law named after a teenager who died from a severe allergic reaction came in to force on 1st October 2021, which changed the requirements for pre-packed for direct sale (PPDS) food labelling.

The legislation, known as Natasha's Law, is named after Natasha Ednan-Laperouse who, at the age of 15, passed away due to a severe allergic reaction. Natasha had a sesame allergy and was not made aware that sesame seeds had been baked into the bread of a sandwich she had purchased. The new labelling helps protect consumers by providing potentially life-saving allergen information on packaging.

Pre-packed for direct sale (PPDS) is food which is packaged at the same place that it is offered or sold to consumers and is in this packaging before it is ordered or selected. Any business that produces PPDS food will be required to label it with the name of the food and a full ingredients list, with allergenic ingredients emphasised within the list.

Officers spent a great deal of time helping food businesses prepare for the new legislation and now incorporate PPDS labelling checks, along with other allergen checks, in their routine inspections.

3.9 Liaison with Other Organisations

Officers in the Commercial Services Unit place great emphasis on shared learning and on ensuring that their actions are consistent with other local authorities and health professionals:-

- The Gloucestershire Food Safety Group

meets approximately 4 times each year and is attended by representatives of the 6 District Councils in the County, Gloucestershire County Council Trading Standards Service; UKHSA Laboratory Service and the Gloucestershire Food Vision project.

- West of England EHO/ UKHSA Liaison Group

The CSM participates in a biannual regional meeting between food safety enforcement officers and United Kingdom Health Security Agency (UKHSA) staff to discuss food poisoning and infectious disease matters. The meeting is chaired by a Consultant in Communicable Disease Control.

- Stroud District Council Services

The Commercial Services Unit has arrangements with the Council's Development Control Division to review all relevant planning and building regulation applications relating to food businesses.

- Gloucestershire Growth Hub

The Health and Well Being Service has been working with the [Growth Hub](#) (located at the University of Gloucestershire) to help small and medium sized enterprises make the best use of the expertise available from the regulatory services in the County. The food safety team offer training, advice and support packages to local businesses at low cost.

3.10 Food Safety Promotion

The Council offers the Chartered Institute of Environmental Health's Foundation Food Hygiene course. 6 courses were run last year, training around 60 food handlers. The team also promotes courses run by other, local, food hygiene training providers. Officers will also deliver food hygiene courses on request to specific businesses. A reasonable fee is charged for these courses.

Officers will give free talks on food hygiene to local primary and secondary school children and other interest groups on request.

The FSA offers a free management tool called Safer Food better Business to caterers and retailers to make it easy to comply with a legal requirement to put in place a documented food safety management system. Established businesses are now quite familiar with this management system but officers continue to offer advice and assistance during their inspections.

3.11 Food Hygiene Rating Scheme (FHRS).

All of the Local Authorities in England have adopted the national Food Hygiene Rating Scheme which is run by the Food Standards Agency through local authorities in England, Wales and Northern Ireland.

Food hygiene rating schemes introduce a real incentive for operators of catering and retail businesses to maintain high standards between inspections. Since their introduction there has been a significant decline in the number of low scoring premises and an increase in the number of high scoring premises (see Table 9). As the risk rating scores also determine the frequency of inspection of food premises food hygiene rating schemes contribute to a reduction in the number of premises inspections required each year.

Table 9: Comparison of Food Hygiene Ratings in 2012 and 2023.

FHRS Rating	April 2012	% Apr 2012	April 2023	% Apr 2023
5 - Very Good	362	52.5	739	79.6

4 - Good	177	25.7	114	12.3
3 - Generally Satisfactory	98	14.2	47	5.1
2 - Improvement Required	19	2.8	15	1.6
1 - Major Improvement Required	32	4.6	12	1.3
0- Urgent Improvement Required	2	0.3	1	0.1
Total rated establishments	690	100.0	928	100
Establishments with rating of 3 +	637	92.3	900	97.0

There are a number of safeguards in place to ensure the rating awarded is fair. In 2022/23 9 food business operators applied for a re-inspection for the purpose of re-evaluating the food hygiene rating. There is no statutory requirement to provide such a re-inspection and there is a charge £203 inc VAT for such a re-inspection.

Businesses may also lodge an appeal and have a right of reply on the FHRS website. No appeals were received in 2022/23.

3.12 Port Health

The Commercial Services team are responsible for carrying out the Council's Port Health functions at Sharpness Docks. This includes the inspection of ships and the issue of Ship Sanitation Certificates as well as general public health and environmental health checks (such as rabies control and monitoring the quality of drinking water provided at the port). The port is not a border inspection post for imported food purposes and very little food from third countries is imported through the docks but officers occasionally monitor shipments of organic grain.

4. Resources

4.1 Staffing Allocation.

The responsibilities of front line staff were identified in Section 2.2 above. The full time equivalent figures in column 3 below are an estimate based on a subjective assessment of officer time spent on the various functions of the team.

The current FLCoP (revised in March 2021) sets out the necessary baseline qualifications and competencies required of the food lead officer and authorised officers. All officers possess the necessary baseline qualification and the commercial services team have adopted a matrix to record the achievement of competencies by individual officers. Any gaps in competencies are filled by additional training; shadowing officers with the necessary competence and by desk top exercises. Food Safety Officers are not required to inspect approved premises and are not authorised to issue prohibition notices.

Officers within the Commercial Services Unit possess the full range of expertise necessary to carry out enforcement activities in the premises in the District and assistance from specialists from outside the authority is not usually required. Officers are encouraged to attend training courses and seminars to maintain and improve their professional competence.

In 2022 a full-time PEHO resigned which created an opportunity for advancement of other, existing staff. A post remained vacant for a period of time during the recruitment process.

Table 10: Staffing Allocation (on 01/04/22) and Qualifications (2022)

Officer Designation	Qualification/Competency	FTE (food safety)	Staff Development
Commercial Services Man'	Degree in Environmental Health. CIEH registered.	0.20	Lead Food Officer. Full authorisation
PEHO (part time)	Degree in Environmental Health. CIEH registered	0.40	Full authorisation.
PEHO (part time)	Degree in Environmental Health. CIEH registered.	0.50	Full authorisation.
Food and Safety Officer (full time)	Degree in Environmental Health. CIEH registered.	0.70	Partial authorisation. Not authorised re: RANs and prohibition.
Food and Safety Officer (part time)	Degree in Environmental Health. CIEH registered.	0.35	Partial authorisation. Not authorised re: RANs and prohibition.
Health and Safety Officer	Degree in Environmental Health. CIEH registered.	0.05	Partial authorisation. Not authorised re: RANs and prohibition.
Total		2.20	
Administrative Staff (3)	No enforcement responsibility	0.50	None
Total Staff (9)			

4.2 Financial Allocation

In 2022/23 the food safety function of the Commercial Services team had an approved budget of £167,900 with actual expenditure of £150,882 (due to salary savings whilst filling a vacant post). A budget of £176,000 has been approved for 2023/24. This is sufficient to meet the statutory food safety functions of the Council.

5. Quality Assessment

5.1 Quality Assessment

The Food Safety Service was audited by the Food Standards Agency in June 2001 and the Best Value Inspectorate audited the Environmental Health Service in Sept 2003. The food safety unit was subject to a detailed internal audit in 2010, 2014 and 2018.

Officers participate in a system of peer review involving accompanied inspections by colleagues in the team. This enables officers to share experience and improve consistency. The team also participates in an annual consistency exercise, organised by the FSA, to test consistency in the scoring of the Food Hygiene Rating Scheme.

[Ref. Commercial Services Unit Procedure Note No 4.4 "Quality Assurance in the Commercial Services Unit"].

6. Review

6.1 Review Against the Service Delivery Plan

Review against the Service Delivery Plan is carried out at intervals throughout the year. Two service area actions are relevant to the delivery of the food safety enforcement function:-

- The regular inspection of high-risk food establishments in the District in accordance with the Food Standards Agency's inspection frequency targets.
- The regular inspection, or alternative interventions, of lower risk (Category C-E) food establishments in the District in accordance with the Food Standards Agency's inspection frequency targets.

In 2022/23 216 interventions of Cat' A-C premises were required of which 22 were outstanding on 01/04/23 i.e. 89% of due, high-risk premises were inspected (see Table 7). In the same period 341 interventions of Cat D/E premises were required of which 149 were outstanding at the end of the year i.e. 56% of low risk premises had an intervention.

In addition there were 89 unrated premises requiring inspection on 1st April 2022. On 1st April 2023 65 unrated premises required inspection (new businesses are added to the list throughout the year and it is not possible to reduce this figure to zero).

Ideally 100% of premises due for inspection in a given year should be inspected. The Food Standards agency recommends that businesses are inspected within 28 days of the due date. In practice it is virtually impossible to achieve 100% due to the seasonality of some businesses; access difficulties and the fact that a premises due for inspection on, say, 30th March and inspected on 1st April will be counted as "missed" but would still meet the FSA requirements for timely intervention.

6.2 Areas for Improvement

In 2023/24 the Commercial Services Unit will continue to influence businesses in an effort to increase the percentage of premises that are broadly compliant.

- The Commercial Services Unit will continue to focus on the inspection of high and medium risk food premises in accordance with the FLCoP and make full use of the flexibility in the Code of Practice to use alternative interventions in Cat D and E premises.
- Officers will place emphasis on the importance of food hygiene training and the identification and control of food safety hazards.
- In relevant premises officers will continue to emphasis key priority topics such as FSA guidance on E.coli O157; the control of cross-contamination and the need for information for consumers on allergens in food.
- Officers will spend additional time with very low scoring food caterers (i.e. rated 0 or 1) to assist them in becoming broadly compliant with food safety requirements.
- Officers will participate fully in local and national food sampling programmes.
- Actively promote the Food Hygiene Rating Scheme to businesses and consumers in the local media (e.g. through food hygiene Friday Facebook posts).

Lead Food Officer: Philip Park:
Commercial Services Manager



Head of Service: Sarah Clark
Head of Environmental Health

August 2023