

DRAFT SHEFFIELD CITY COUNCIL FOOD SERVICE PLAN 2023/24

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1.0 INTRODUCTION

1.1 Sheffield's Food Plan 2023/24

Food quality, safety and choice are fundamental to everybody and the maintenance of standards from production and handling of crops or animal feed on a farm through manufacture to sale in a shop or café is the responsibility of Sheffield City Council through its environmental health and trading standards teams.

This plan is drawn up in compliance with Food Standards Agency (FSA) guidance. The FSA is the lead national food regulator and are responsible for guiding and monitoring local authority performance to ensure LA's work in accordance with published codes of practice. Sheffield city council is a statutory food authority for this purpose, and we are required to have regard to the FSA guidance and that includes the production of an annual food plan. Additional information about SCC food services can be found on the Sheffield City Council web site and areas covered are indicated throughout this document.

1.2 Aim

The aim of the service is to protect the health of the public by ensuring food control is maintained in the city; to raise standards of food hygiene and food standards; and to provide information to businesses to help them comply and grow and for the public to help with healthy choices and improved diet.

1.3 National Context

The delivery of the food plan, although a local issue, has a national and even international context in that food moves around the country and is imported from all around the world and controls must be in place to ensure that safety is achieved for all citizens of the United Kingdom.

1.4 Strategic Context

The Food Plan links directly to key issues for the City, particularly issues concerning health, education, and skills, and supporting economic growth. This Food Plan supports the 22/23 delivery plan in the following way:

- Healthy lives and wellbeing for all
- Clean economic growth

Specifically

- * Integrating service delivery to improve wellbeing by disseminating information on food inspection, hygiene, safety & standards promotion etc.
- * Contributing to sustained clean economic growth by both creating and increasing demand for healthier foods and ensuring a standard that encourages businesses to trade.
- * Improving business profitability through improving hygiene standards and increasing customer satisfaction.

- * Promoting healthier communities by breaking down cycles of poor eating behaviour
- * Increasing the opportunity for all to have a healthier lifestyle.

Ensuring that standards are maintained in all food businesses gives encouragement to growth of existing business, and the advice element is crucial in helping new or current businesses flourish in Sheffield, supporting the priority of economic growth.

To attract food businesses, Sheffield City needs a trained and skilled workforce,

There are significant health related elements contained in the Food Plan since food is fundamental to all. Wholesome food is necessary for survival and healthy diet choices can have a significant impact on overall health, including obesity levels and associated illnesses. The Food Plan enforcement aspect addresses the issues around the wholesomeness of food, and the promotional arm looks at informing people in order that they can make the right choices.

2.0 LOCAL OVERVIEW

2.1 Sheffield Context

Sheffield has a population of approximately 590,000 within an area of 36,795 hectares.

There is a large range of food establishments throughout the city. Sheffield has a very diverse population, and this is reflected in the food offer and nature of the local businesses. We have large numbers of independent small businesses, and the current cost of living crisis is badly affecting many of them with huge increases in costs and reduced custom. The service relating to food and feedstuffs for Sheffield City Council is part of the Environmental Regulation and Licensing Service (ER&L), within Street Scene and Regulation with the Neighbourhoods Directorate.

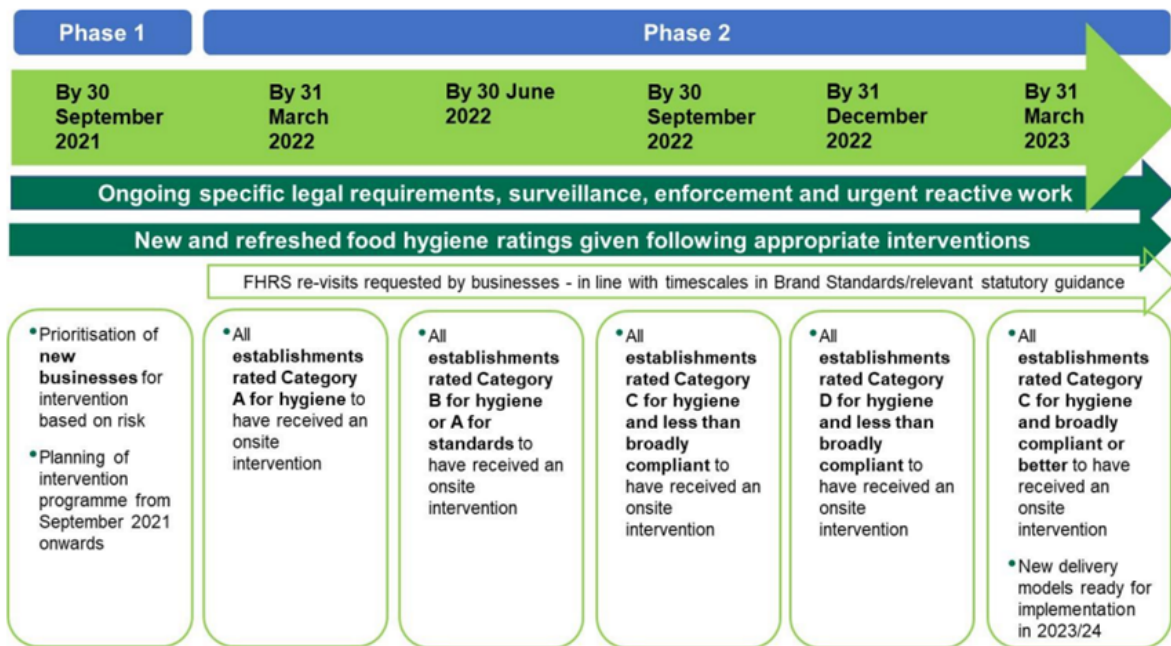
There are a range of enforcement services within ER&L , including Health and Safety in businesses, Trading Standards, Environmental Services, Environmental Protection and General Licensing. The management team meet regularly to consider effective, appropriate, and joined up working practices and information sharing.

This document is the 2023/24 Food Plan for Sheffield City Council's with regard to its ongoing obligations for the statutory delivery of Food Hygiene and Food Standards protections.

Food hygiene (use of food safety and food hygiene interchangeably) covers the microbiological safety of food and water and potential cross contamination (of allergens). Food standards includes composition, labelling (including allergens and dates) and nutritional content and was traditionally linked to trading standards work on metrology (weights and measures) and pricing.

The Food Standards Agency recognised the work undertaken by local authority food officers during the Pandemic, and the difficulties in completing inspection/intervention programmes with seconded staff and business closures. They therefore produced recovery plans for both Food Standards and Hygiene teams, allowing us to concentrate on the highest risk aspects of our work. We have been required to report our compliance with the required milestones quarterly to the FSA. These milestones set out the FSA expectations on Local Authorities work plans up until 31st March 2023. The milestones set by the FSA are shown in Figure 1.

Figure 1. FSA Covid-19 Recovery Plan Milestones (Source: Food Standards Agency)



We have largely met the milestones for Food Standards, we met all but the final milestones for Food Hygiene, carrying a deficit of 207 establishments rated C and broadly compliant. These are generally good businesses, presenting a medium to low risk so are usually conducted by our contractors. Our contractors failed to meet their targets during the year, due to a lack of staff caused by a slow post pandemic return to the profession by many self-employed specialists. We have since procured a new 4 year contract for medium to lower risk interventions which is intended to address the risks we face by carrying backlogs, and we have already allocated the outstanding work. Staffing levels are now increasing.

The current backlog includes 603 new businesses (as yet unrated) which need urgent visits.

All of these have been triaged re risk level by one of our senior qualified staff and contacted by phone or on site by an Enforcement Officer to provide information on hygiene and standards controls and what they need to do in preparation for their first formal inspection. The triage process separates them into high risk to be inspected by in-house officers and low risk for Contractors.

From April 2023 the FSA ended the post covid recovery plan and their requirement on LA's reverted back to SCC needing to complete each years' inspection programme including any backlog, given the risk presented by those food businesses which have remained without an inspection for an extended time. Our plan for 2023/24 sets out how we would achieve this for hygiene work, with most of the outstanding medium and low risk premises allocated to the contractor. However that would require full delivery and staffing availability by our contractors which is unlikely and presents a risk, mitigation for which we set out.

The FSA recovery plan did not require low and medium risk inspections to be carried out however they now require them to be completed. We have reduced the outstanding amount from 4000, to 3000 during 2022/23, but have seen a steady decline in overall standards since the Pandemic. The risks in the backlog businesses are likely to have increased over time, given the delay in official controls. Our capacity to undertake both the backlog of inspections and the new yearly intervention programmes with the current resources is heavily dependent on the ability of the contractor to fulfil their commitments. Work will be allocated to them in a risk based schedule.

We acknowledge that businesses have been severely impacted by the Pandemic and the subsequent cost of living situation and have seen a significant decline in the levels of compliance, with business closures at a record level. (see section 5.2)

We are recruiting in both teams, to provide an additional Environmental Health Officer (1fte increased resource), and a part time Trading Standards Officer (current vacant posts). We will also need to recruit an additional 2 food qualified staff to deliver the programme given the contractors are expected to be unable to cover all their allocation.

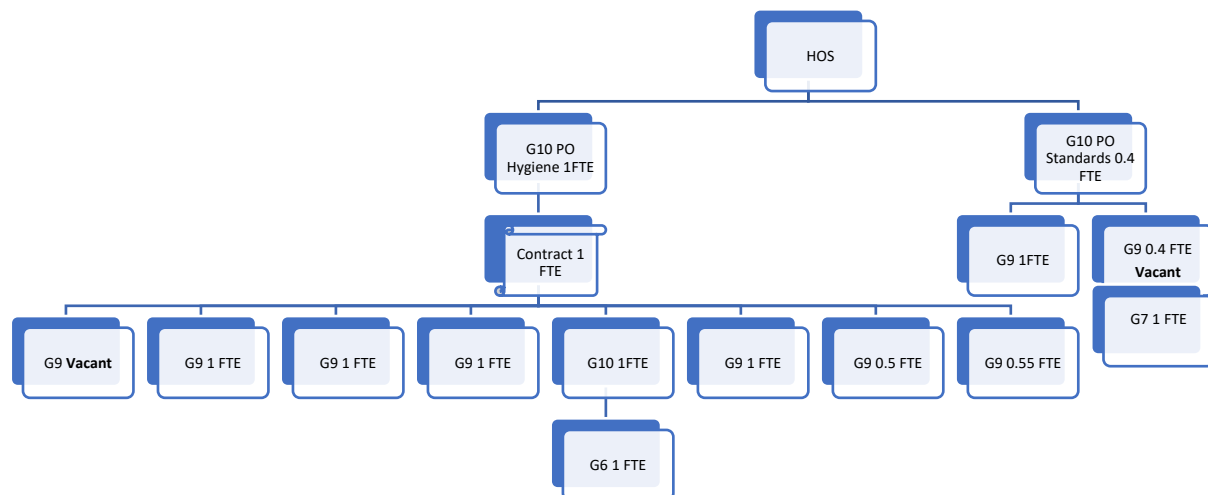
There is a local and national shortage of qualified, competent officers to undertake food interventions. Many private contractors failed to return to the profession post pandemic. It is unlikely that there will be sufficient resource available to cope with our backlogs during this plan, We therefore need to take a robust risk based approach to the work we undertake, targeting the highest risk and utilising any flexibilities available to us.

The Standards team have particularly limited resources, and currently both teams have responsibilities for different aspects of allergens work with one responsible for cross contamination and the other responsible for food the provision of food information to consumers. Allergens remain the greatest risk to the health of our residents statistically.

All hygiene visits include questions relating to cross contamination of allergens and provide allergen advice and appropriate signposting to free staff training packages and information. Where concerns remain on standards issues, a referral to the Standards team for a follow up intervention is made although these have reduced as the wider allergen issues are tackled first time. Consideration is being given to provide further training for officers to upskill to perform both hygiene and standards interventions to provide a more integrated service for our businesses.

There is a legacy caused by previous cuts that trainee posts have been removed from our structure, in common with many authorities. Our professions are now facing a skill shortage. Our own workforce is aging. This has been recognised nationally, and appropriate courses are now included in the apprenticeship scheme. We have asked the FSA to support the inclusion of Food Safety Officer training in this scheme as this is a shorter course than a full multidisciplinary EH course and have received a positive response. We have already funded an internal officer to retrain as a food officer, and subject to funding, will be offering this training pathway again, together with Apprentices in both Standards and Hygiene in 2023/24.

Figure 2. Food Standards and Hygiene Team Structure



NB: 1 officers with a food qualification in a different TS team here, has now been redeployed to cover an officer that retired. The Head of Service (HOS) for Environmental Regulation and Licensing has a number of other direct reports.

Due to historic relatively low levels of funding and staffing for food work, for many years we have contracted out lower risk hygiene inspections to specialist firms who under our monitoring have delivered large numbers of visits. These firms only do the initial inspection; follow up work, legal action and high risk work is undertaken by inhouse colleagues.

3.0 FSA: Changes in Food Delivery 2023-24

The FSA delivery model for Food Standards is changing in 2023/24. The new Food Law Code of Practice is anticipated in June 2023 for implementation from quarter 3 (October 2023) onwards as described in the Food Standards plan. The new model is risk based and is likely to reflect the measures we have in place already. We therefore propose to continue our risk-based Food Standards approach.

The FSA have only just started the process for changing the Food Hygiene aspect of the code of practice, and the delivery model for 2023-24 remains the same. We are required to fulfil our entire programme each year, with flexibilities only in respect of the very lowest risk interventions. It is anticipated that the new delivery model for Hygiene will be implemented from 2025, and the plan for that year will reflect this. However, we will apply to be a Pilot Authority for the new delivery model following the Local Authority engagement sessions in May 2023, with a view to use a more flexible model for the 2023/24 plan. We expect that our triage and risk-based programme will align with the new model.

We propose to use all flexibilities currently available to us and increase our numbers of contracted interventions to medium/lower risk establishments and aim to remove the backlogs caused during the Pandemic by the end of 2024/2025. We will continue to actively triage all new businesses on receipt, and provide suitable advice and information, to assist our businesses in complying with Standards and Hygiene law.

4.0 FOOD STANDARDS

4.1 Inspections

Figure 3

Food Inspections Achieved 1.4.22 to 31.3.23 (see explanation below)						
High (33 due at 1.4.22)	Upper Medium	Low Medium	Low	Unrated	Outside the programme	New Registrations Risked as High 1.4.22-31.3.23
18* (94%)	15	27	27	0	0	7 (64%)

*N.B. 33 High risk inspections were due on 1.4.23. 31 of those premises were visited. Of those, 13 were either re-risk rated or removed from the programme (e.g. because they had ceased trading) and the remaining 18 premises remain on the programme as high risk in 2023-24.

Full FSA food standards inspection targets have not been achievable for a number of years due to decreasing staffing levels.

Resources are prioritised towards high risk premises. Where other categories of premises are inspected, this is generally due to complaints or other intelligence received from within or outside the service.

The service was further affected in 2022/23 by staff vacancies and sickness absence, as shown in figure 2. At 1.4.23, the service had 1.4 FTE posts occupied and actively carrying out food standards activities, out of a possible 2.8 FTE. Since then we have redeployed 1fte back into food work to cover a vacancy to mitigate some of the gap, particularly in respect of allergen non-compliance.

In 2023/24, until implementation of the new food standards delivery model and or internal changes to how we work/resources, the service will adopt targets for food standards as follows:

FSA Recovery Plan Activity	Category/Timeline	Expectation
High risk for standards	1.4.23 to 31.3.24	All establishments to receive an onsite intervention in accordance with the Food Law Codes of Practice
Medium risk for standards	Ongoing until new food standards delivery model	No intervention unless intelligence/information suggests that risks have increased or if the establishment is otherwise considered a priority for intervention due to the risk posed or because of the impact on the establishment of the new requirements on allergen labelling for products prepacked for direct sale
Low risk for standards	Ongoing until new food standards delivery model	No intervention unless intelligence/information suggests that risks have increased or if the establishment is otherwise considered a priority for intervention due to the risk posed or because of the impact on the establishment of the new requirements on allergen labelling for products pre-packed for direct sale.

4.2 Unrated premises

In 2022/23, new food businesses were subject to ‘desktop’ risk rating for food standards to allocate an initial risk. In this way, we were able to identify new businesses likely to be ‘high risk’, and to prioritise these for initial inspection. This method is not in line with the requirements of the Food Law Code of Practice, which state that all new premises must be visited within 28 days of registration, but it enabled us to effectively triage premises and target limited officer resources at those food business most likely to be high risk.

In 2023/24 we will continue with this strategy of initial risk rating. We will interrogate new business registrations for the purposes of surveillance and monitoring, to fulfil the following FSA expectations:

FSA Recovery Plan Activity	Category/Timeline	Expectation
Proactive surveillance to obtain an accurate picture of the local business landscape and to identify: - open/closed/recently re-opened/new businesses - change of operation, activities or FBO	Ongoing	Consideration of registration information and intelligence on the food business establishment identified through surveillance Undertake appropriate onsite interventions where there are concerns around public health/consumer protection
New food business establishments where consideration of registration information/intelligence indicates low risk	Ongoing	Initial visits should be prioritised and undertaken in accordance with the Food Law Codes of Practice*

*N.B. We currently deviate from the Food Law Code of Practice as described above.

4.3 Allergens

A major concern for the authority is the risk to public health of a death or serious injury from an undeclared allergen present in food supplied in the city. In 2022/23, 26% of all complaints and referrals made to the food standards service were about allergens and many more problems were identified on environmental health visits. The authority has prioritised this area of work since changes to the law in 2014, for example, by sending information on allergen information to all food businesses in the city in 2014 and again in 2018. This has continued in recent years following changes to labelling requirements for Pre-Packed for Direct Sale food (known as Natasha’s Law). These legislative changes have arisen from allergen related deaths nationwide.

The food enforcement teams have worked closely over the years to inform businesses of their obligations, and this continued in 2022/23 with joint work on implementing Natasha’s Law.

To provide the best protections for Sheffield consumers, the trading standards and environmental health teams have worked together to produce a Memorandum of Understanding (MOU) to agree enforcement responsibilities and procedures for allergen work. In the MOU, we have reviewed and refined the system for referrals between the teams to try to prevent enforcement gaps where there is joint responsibility, and to identify those businesses which present the most risk to consumers. In addition, the environmental health team employed two non-food qualified (but experienced enforcement officers) in 2022/23, to distribute information to new businesses, including basic allergen advice. In this way, we aim to ensure that all new businesses are in receipt of basic advice on allergens.

We have a backlog of 487 premises identified as non-compliant for allergens arising out of food hygiene inspections which have been referred to trading standards and a further 154 premises which are partially compliant. We are working on these referrals to assess the level of risk posed by these premises. Our recent visits to these premises suggests many (but not all) have rectified their problems, with around 6% still in need of further enforcement action. Our visits are identifying the common issues affecting business’ ability to comply with the legislation. We are considering the most effective way of engaging with businesses to ensure they are equipped with the information they need to comply with legal requirements.

There are a range of tools available to us, including enforcement visits, information packs, website information, testing and sampling. In 2022/23, we prioritised for inspection 70 premises which were non-compliant on more than one occasion. We have visited more than 40 of those premises and removed a further 10 from the list as they are no longer trading. We will continue to prioritise these visits in 2023/24, and expect to have completed the remaining visits by the end of June 2023

Figure 5. Allergen referral premises awaiting inspection

Priority inspections	where >1 environmental health visit to trader, information given and cross contamination issues tackled but where other allergen non-compliance identified, referred to trading standards and awaiting an intervention:	June :Less than 20 July: 0
Allergen non-confident – trading standards visit required (APP Coded AMB)	where 1 environmental health visit to trader and information given and cross contamination issues tackled but where allergen non-compliance identified, referred to trading standards and awaiting an intervention.	467

Allergen partial compliance (APP Coded AMC)	A/A and where partial allergen compliance identified.	154
	TOTAL	641

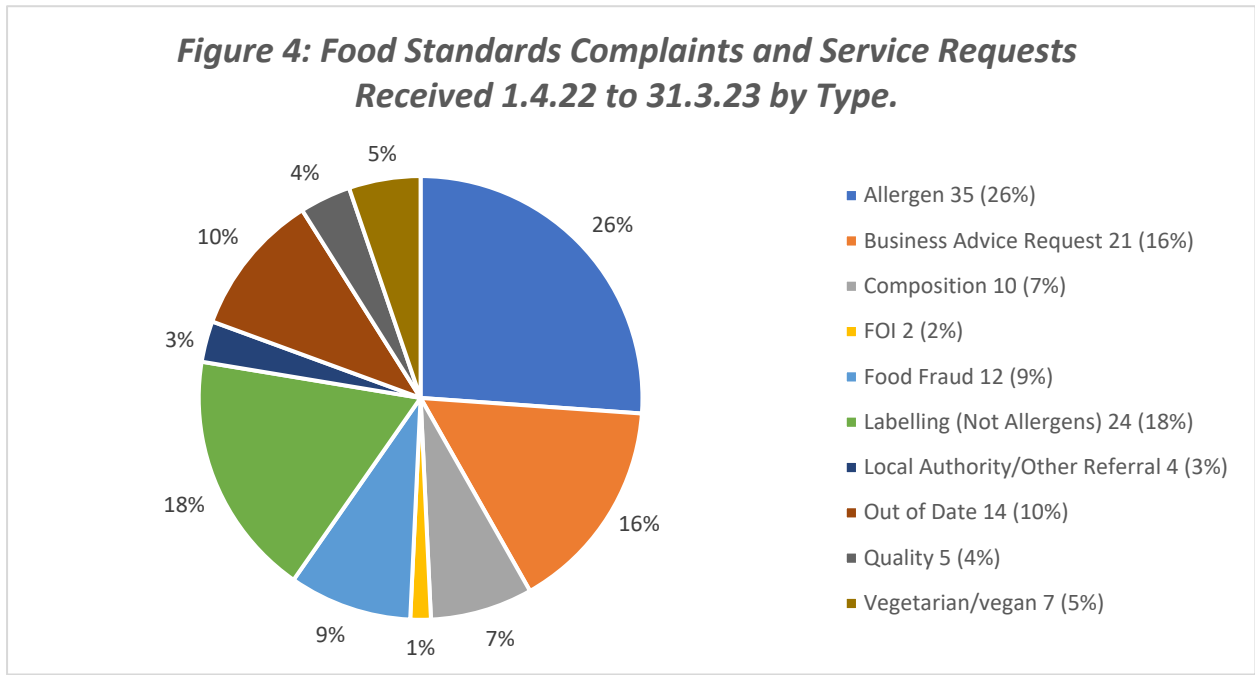
There remains a significant risk to consumers from any premises where the risk from allergens is not fully understood and appropriate measures are not in place to inform and protect consumers (whether this is from cross-contamination , allergen control or food information).

Our work on allergen information compliance will fulfil the following FSA expectations:

FSA Recovery Plan Activity	Category/Timeline	Expectation
Proactive surveillance to obtain an accurate picture of the local business landscape and to identify: - open/closed/recently re-opened/new businesses - change of operation, activities or FBO	Ongoing	Consideration of registration information and intelligence on the food business establishment identified through surveillance Undertake appropriate onsite interventions where there are concerns around public health/consumer protection
New food business establishments where consideration of registration information/intelligence indicates low risk	Ongoing	Initial visits should be prioritised and undertaken in accordance with the Food Law Codes of Practice
Management of food incidents and hazards (including outbreaks of foodborne illness)	Ongoing	In accordance with the Food Law Codes of Practice
Investigation and management of complaints	Ongoing	In accordance with the Food Law Codes of Practice
Enforcement action in case of non-compliance	Ongoing	In accordance with the Food Law Codes of Practice and the local authority's enforcement policy

4.4 Complaints

We received 134 complaints and requests for service in the year. These are categorised as follows:



Complaints are risk assessed and either investigated or recorded for intelligence purposes. All service requests are responded to. Any intelligence arising from complaints and service requests, may be used to inform future enforcement projects. In 2023/24 we will continue to respond to complaints and service requests to meet the following FSA expectations:

FSA Recovery Plan Activity	Category/Timeline	Expectation
Proactive surveillance to obtain an accurate picture of the local business landscape and to identify: - open/closed/recently reopened/new businesses - change of operation, activities or FBO	Ongoing	Consideration of registration information and intelligence on the food business establishment identified through surveillance Undertake appropriate onsite interventions where there are concerns around public health/consumer protection
Management of food incidents and hazards	Ongoing	In accordance with the Food Law Codes of Practice

(including outbreaks of foodborne illness)		
Investigation and management of complaints	Ongoing	In accordance with the Food Law Codes of Practice
Enforcement action in case of non-compliance	Ongoing	In accordance with the Food Law Codes of Practice and the local authority's enforcement policy

4.5 Samples

Sampling forms part of our responsibility towards ongoing market surveillance. We took 17 food samples in 2022-23 to check labelling and composition issues.

Two food fraud prosecutions were successful this year following adverse sample results. One of the prosecutions concerned the sale of counterfeit wine, and the other with passing off beef as lamb in a take-away meal. Both types of offences demonstrate a lack of regard for public safety as they circumvent food chain controls for financial gain.

We also participated in the FSA national sampling programme on imported soft drinks to determine levels of additives and whether they contain non-permitted ingredients.

In 2023/24 we will continue to support national, regional and local sampling initiatives:

FSA Recovery Plan Activity	Category/Timeline	Expectation
Sampling	Ongoing	In line with local authority sampling programme or as required in the context of assessing food business compliance, and any follow up necessary in relation to the FSA Surveillance Sampling Programme

5.0 FOOD HYGIENE

Local authorities are now expected to realign their work in accordance with the published codes of practice from 1st of April 2023. SCC has amassed 2922 overdue interventions during this time and will have a new programme of added, to give a total due during plan span of 4182 interventions.

Based on previous experience, more than 800 new registrations are likely to be added to this during the year.

The legacy from the suspension of routine work for periods during the Pandemic, of overdue food interventions in addition to the new yearly programmes, which we are required to clear was recognised by the Food Standards Agency and they provided a recovery plan to allow Local Authorities to concentrate on the highest risk businesses (Figure 1)

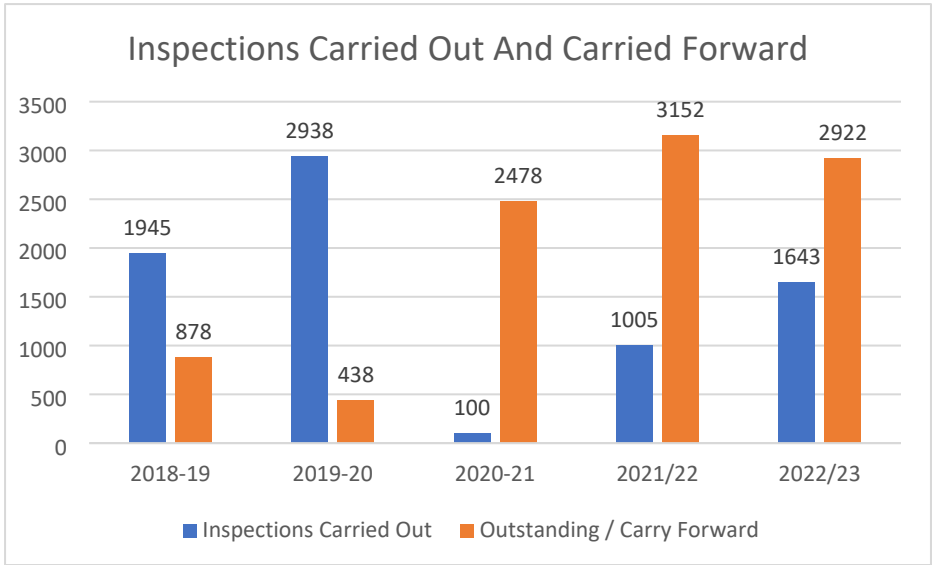
For lower risk establishments not shown in the figure, local authorities had the flexibility to defer planned interventions and only undertake intervention where information/intelligence suggests that risks have increased/standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed.

The large backlog of overdue food hygiene inspections and other food related work present a risk to health and to the reputation of Sheffield City Council.

5.1 Statutory Work Performance

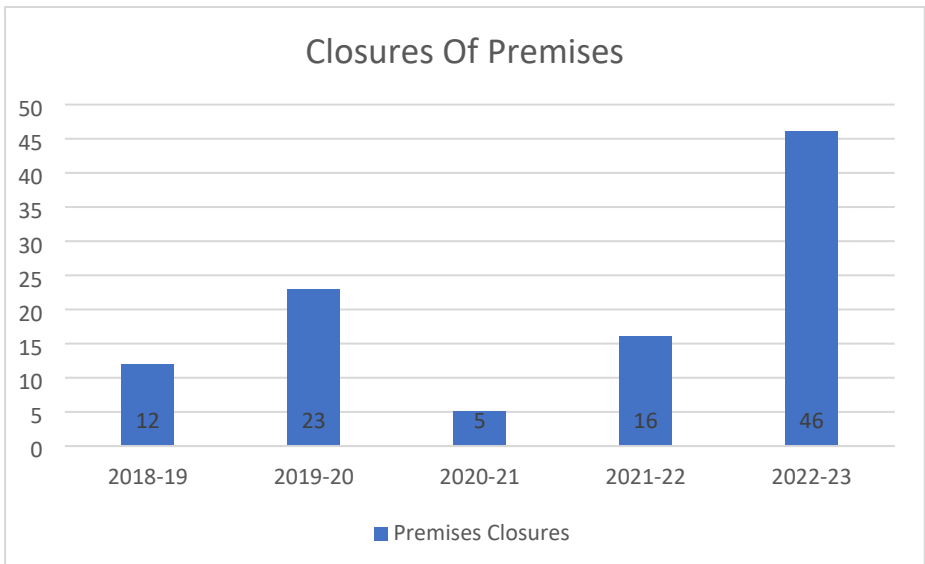
Sheffield City Council has a legal duty to ensure that food safety legislation is enforced throughout the City. This is generally achieved by a schedule of programmed inspections in line with FSA guidance and dealing with any reactive work such as complaints and other intelligence that may be received regarding food safety issues in the City.

Each year we are required to inspect all the existing businesses that are due an inspection that year and all new establishments that register or start up. Prior to the pandemic although our resources had been reduced during austerity, we inspected most of the establishments that were due and had small numbers to carry forward. **In 19/20 we delivered the best results in more than 15 years with the lowest outstanding visits of that period, illustrating that we had a very cost effective business model (see table below).** The Covid pandemic disrupted food related work disproportionately with closures and reduced inspections and so we currently have a correspondingly high backlog of overdue inspections.



5.2 Enforcement Action

Hygiene standards in premises have declined during the pandemic and recovery period. The cost-of-living crisis has now further exacerbated this situation. Most of our inspections focus on providing coaching and advice to businesses. However, when businesses pose an imminent risk to health, we are forced to take emergency action and close the premises. In this current year we have been forced to close a record number of premises to protect public health. The businesses receive advice and support to enable them to reopen as soon as possible.

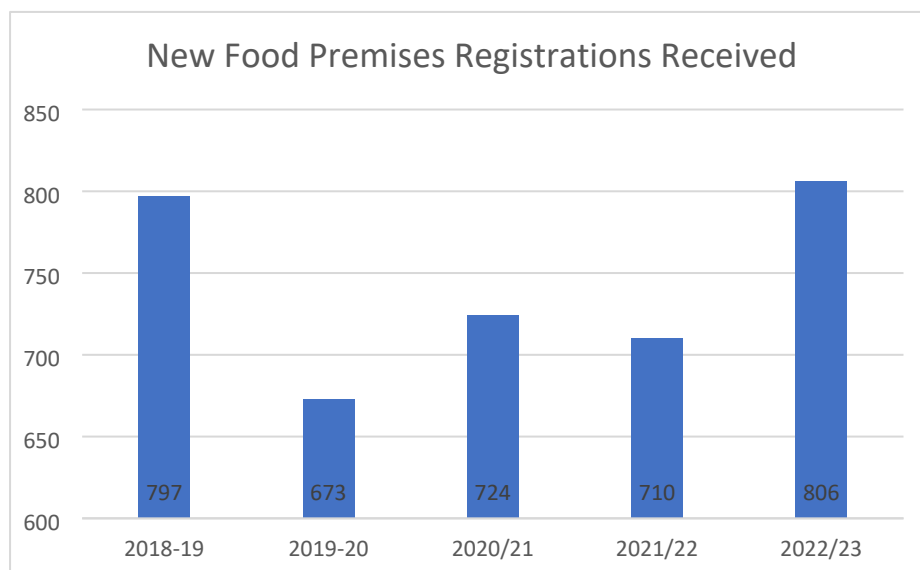


5.3 Unrated Businesses

All food businesses must be either registered or approved by the local authority. We receive over 700 new registrations per year which is often a mixture of new food business establishments and changes of ownership in established businesses. These premises remain unrated until they receive an inspection. We are required to inspect the premises within 28 days. Some businesses trade without registering and so these are picked up by food team and through other local intelligence.

Until an establishment is inspected, its risk is uncertain, and it does not have a food hygiene rating awarded to it. This can cause problems for some businesses if online marketplaces such as Just Eat, Uber Eats or Deliveroo insist on a food hygiene rating before allowing them to trade on their platforms.

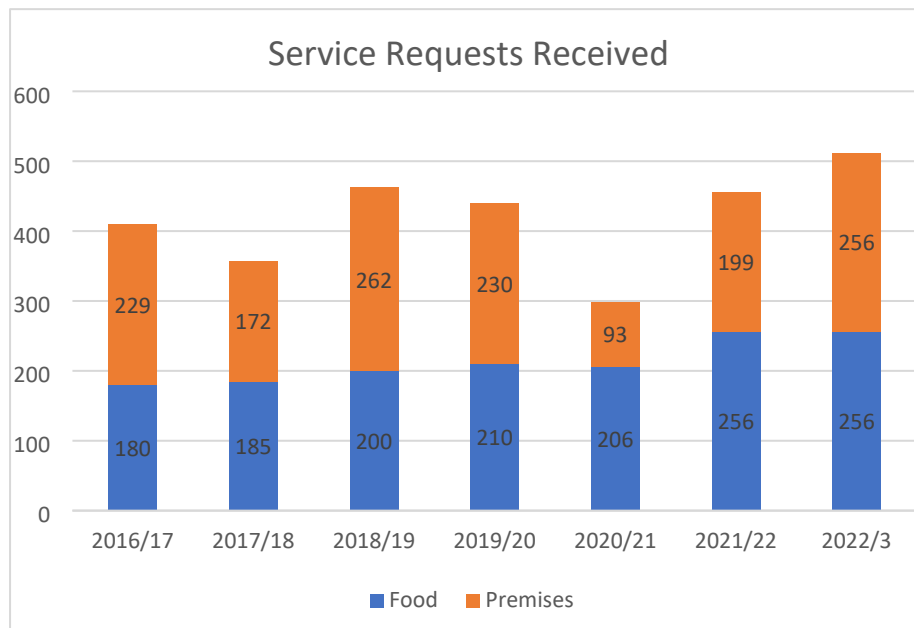
The 2023/24 plan will focus on improving the time taken to visit unrated businesses. To mitigate the risk in carrying unrated businesses, all applicants are contacted on receipt with information and advice to prepare for their inspection. There is a triage system to distinguish high risk applications, which are allocated as a priority to the in-house team. Contractors are allocated low risk businesses and are instructed to prioritise this work.



5.4 Requests for Service and Complaints

The service receives complaints regarding potentially unsafe food and regarding hygiene of premises. In a typical year we receive approximately 400 to 500 complaints.

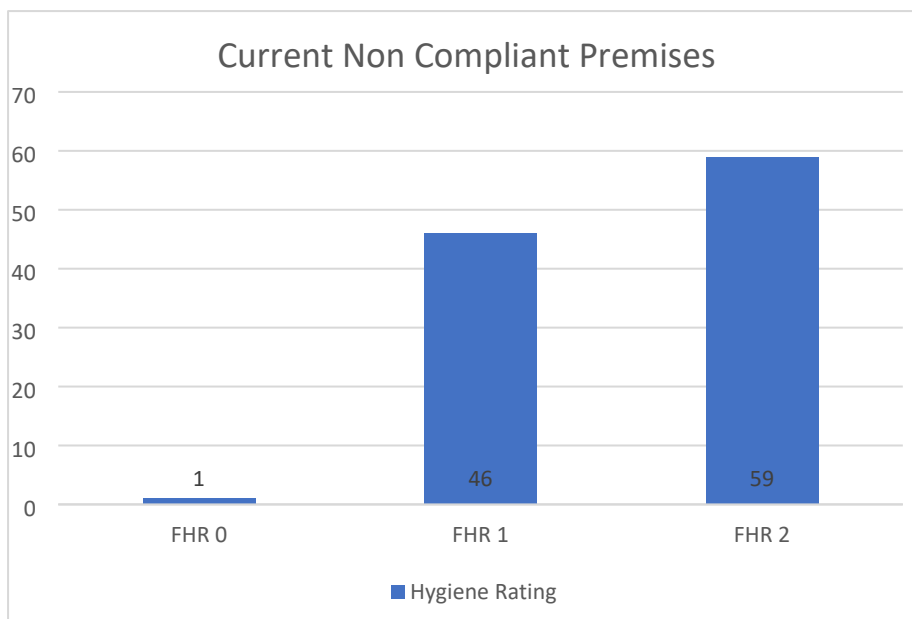
Although they are triaged according to risk, this presents a significant demand on the service, especially considering that these complaints can lead to offences being investigated and enforcement action taken in relation to any offences identified.



5.5 Food Hygiene Rating Scheme

The Food Hygiene Rating Scheme run by the Food Standards Agency, now provides guidance to the public on the hygiene standards found in Sheffield's food premises. Almost every local authority in the UK now uses this scheme. The result of the last inspection is converted into a food hygiene rating. A premises can be ranked between 0 and 5 with the higher the number indicating a better food hygiene rating. All food businesses receive a window sticker indicating their score, but there is currently no legal requirement for this to be displayed on the premises. The scores consider the structure of the premises, the hygiene standards, and the quality of the management of the business. Premises rankings across the country can be viewed by the public to judge the hygiene standards before visiting.

Most food business establishments receive a food hygiene rating of 0-5 upon inspection. The highest rating is 5 and the lowest is 0. Premises that are awarded a rating of 0-2 are deemed as non-broadly compliant and we revisit all of these to improve standards and reduce the risk that they pose. Although many of these now have improved their hygiene rating will not change until the next routine inspection or if they request a paid re-rating inspection. We monitor the businesses until they are broadly compliant.



The Food Hygiene Ratings Scheme can be found on <http://ratings.food.gov.uk/>

5.6 Food Hygiene Intervention Delivery 2023/24

Food safety interventions have previously been completed by a combination of in-house officers performing high risk duties and private contractors undertaking lower risk tasks with support from the Food Team. Historically this cost between 50 and 90 K per annum (1 to 2 FTE) We relied on the external contractors to complete the majority of our yearly interventions. This business model was cost effective and worked very well, enabling us to achieve a high level of compliance with requirements.

This service model of a mix of contract and inhouse staff is relatively common in some of the larger unitary authorities including Leeds, Manchester, Bradford and Wakefield and many councils had used contractors at some time over the last 10 years. However, this once hugely effective business model was unable to provide sufficient resource during and since the Pandemic and there is a question as to whether the contractor market will ever fully recover to meet the needs of local authorities in a reasonable timescale.

The reduction in compliance during the Pandemic has also led to a large increase of businesses found to be an imminent risk to health, necessitating closure, which puts considerable pressure on current resources. The number of food businesses found with conditions of imminent risk to health, increased from a previous high of 16 to 46 during 2022.23. The new Food Intervention Contract is intended to complete the medium to low risk part of our programme. However given the current lack of available competent officers we are taking steps to strengthen the in house team, through training, succession planning, and using all available flexibilities

We have taken considerable steps to mitigate the public health and legal risks associated with not completing high risk interventions.

We are due to interview for an additional Food Officer in early June and in addition we now expect to have to recruit an additional 2 permanent food officers due to the shortage of contractors so we can deliver the programme.

We have trained an enforcement officer, to visit newly registered businesses, providing information to assist them in complying with their subsequent inspection, and signposting them to the services of Business Sheffield, as many are found to be affected by the cost-of-living crisis and at risk of cutting corners.

We have one enforcement officer assisting with the alternative inspection strategy. We are exploring how other regulatory officers in the service who are working near all these businesses can help with business intel and providing basic information checks.

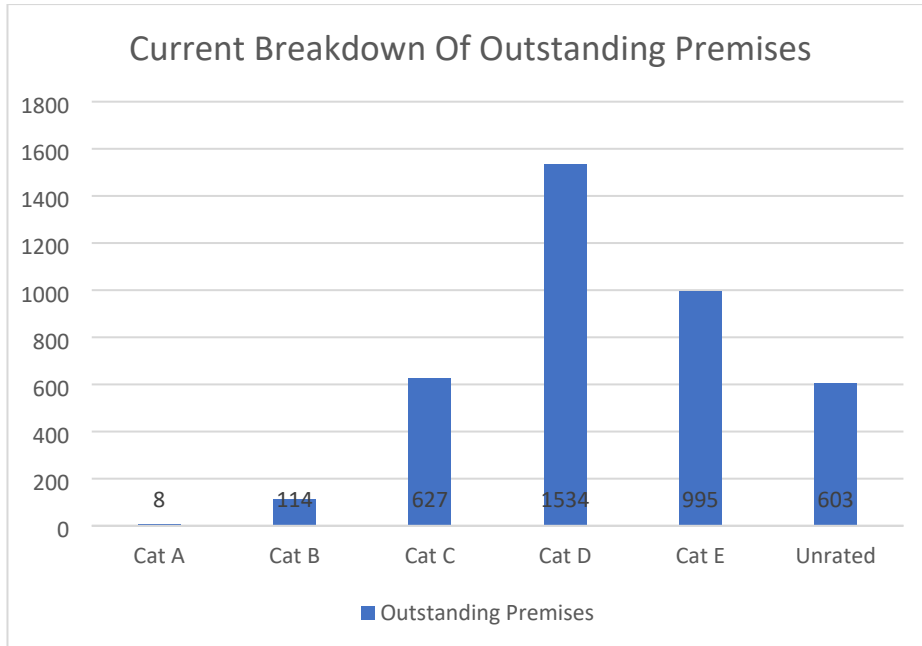
The delivery model used for 2023/24 will include utilising a Regulatory Officer perform low risk tasks to deal with the backlogs of very low risk interventions, not included in the FSA recovery plan, which are required to resume from 01/04/2023. There are flexibilities in the Code of Practice allowing alternative interventions for very low risk establishments and it is not cost effective to outsource these tasks.

Our in-house officers will conduct the highest risk interventions. If we fill our vacant posts we will have capacity, together with a Regulatory Officer, to enable us to undertake all of the high-risk tasks programmed for the year (in house column).

Our contractor has projected capacity for 1800 interventions in the period of the plan. They acknowledge that this is optimistic so it is expected they will complete at least half of the 3000 visits allocated to them. Work is allocated on a scale from medium to low risk. It is expected that most outstanding interventions will be the lowest risk visits.

5.7 Food Programme 2023/24

When a food business establishment is inspected it is given a risk rating that determines its frequency of inspection. Category A premises are the highest risk and have to be inspected every 6 months. Category E are the lowest risk and have to be inspected every 3 years. This graph shows that we have targeted our limited resources on the highest risk establishments, but the lower risk premises and the new, unrated premises have significant backlogs.



The Category A and B premises outstanding will be completed by year end together with all high-risk new businesses and any establishments rated C or D which are less than broadly compliant. We carried forward 203 broadly compliant C premises, contrary to the Milestone requirement and 603 unrated businesses. These have all been allocated for priority inspection in 23/24. We were not required to complete our broadly compliant 'D' and 'E' rated interventions in the plan. The category E backlog is programmed to be addressed by Enforcement Officers using flexibilities available to us. The category D businesses will be allocated after higher risk work is complete, in view of their lower risk profile.

Figure 5 2023/24 Food Programme

BAND AS OF 1/4/23	Frequency of Inspection	Total	In house	Outsourced	Notes
A	Minimum 6 monthly	11(22)	22	0	These are generally poor premises providing high risk food sales
B	Minimum 12 Monthly	114	114	0	These are mainly catering premises or takeaways where standards are not very high
C Broadly Compliant	Minimum 18 Monthly	586	0	586	These are premises of a good or reasonable standard providing high risk food
C NON Compliant	Minimum 18 Monthly	42	42	0	These are premises who are failing to comply in one or more of the Hygiene/Structure or Management areas who provide high risk food
D Broadly Compliant	Minimum 24 Monthly	1523	0	1523	These are reasonable or good premises serving some open food, but not preparing and cooking food
D NON Compliant	Minimum 24 Monthly	11	11	0	These are generally poor premises selling only wrapped food
E	Minimum 36 Monthly	897	897	0	These are premises that sell wrapped foods or low risk foods and are unlikely to cause any problems . Identified as able to use a flexibility. Will be contacted and visited by an enforcement officer
E Primary	Minimum 36 Monthly	192	0	192	192 premises required to have a primary intervention

UNRATE High Risk	Required to be inspected within 28 days of opening	388	388	0	Unrated are registered businesses not yet inspected * Food Law Code of practice requires inspection within 28 days. This is not being achieved and presents a risk to Public Health. Aim to improve compliance. Currently provide information and advice on receipt
UNRATE LOW RISK	Required to be inspected within 28 days of opening	215	0	215	All applications are reviewed, and triaged. Information and advice given prior to inspection to include allergens.
Estimated new high risk	Required to be inspected within 28 days of opening	400	300	100	Failure to inspect with within 28 days of opening and represents a risk to Public Health. Aim to improve compliance.
Estimated new low risk	Required to be inspected within 28 days of opening	400	0	400	
Total		4790	1744	3016	

We are actively working with Business Sheffield to assist businesses to give them the best opportunity to provide safe food, be legally compliant and help their businesses to thrive.

5.8 Risks.

Despite our mitigation efforts and largely following the FSA recovery plan and the previous very low backlog for hygiene work prior to the pandemic some risks remain. We need to be realistic about contractor resources, hence the proposal that we will need to overspend and recruit a further 2 food qualified staff. Although food businesses have primary responsibility to follow the law and provide safe food of the quality expected, there are risks to Public Health and to the reputation of Sheffield City Council until we remove backlogs. We have taken considerable steps to mitigate the risks as detailed above, however SCC does have a statutory obligation once again to complete the yearly programme of food interventions, and the plan is likely to fail to accomplish this due to the shortage of contractors unless we recruit more inhouse staff as proposed to provide a more sustainable future for food work.

Other mitigation for lack of contractors is we are offering overtime to inhouse officers and providing refresher training for some previously qualified staff, but this is unlikely to impact the deficit significantly compared to the full recruitment which would give us 3 fte more than last year for food work.

6.0 Control of Food Related Infectious Diseases

The service will investigate all outbreaks of food or water borne disease in accordance with the procedures. All suspected cases will be followed up and confirmed cases will be contacted by telephone or by questionnaire to try and ascertain if there are any common factors. This work is crucial to safeguarding public health and involves dealing with infectious disease outbreaks such as E.coli as well as other notifiable diseases by working in conjunction with the UK Health Security Agency.

In total we made 568 (1040) investigations including 163 (103) significant high-risk cases such as STEC, Listeria and Typhoid. We also investigated 56 (33) outbreaks/clusters of which 7 (3) were significant, involving sampling, interviewing cases, liaison with United Kingdom Health Security Agency (UKHSA) and communications with the businesses involved. All this work also resulted in a significant amount of administration of the outbreaks/clusters. UKHSA Yorkshire and Humber Standard Operating Procedures are continually reviewed and revised during the year and streamlined where possible.

Figure 6

INFECTIOUS DISEASE & FOOD POISONING, OUTBREAKS/CLUSTERS

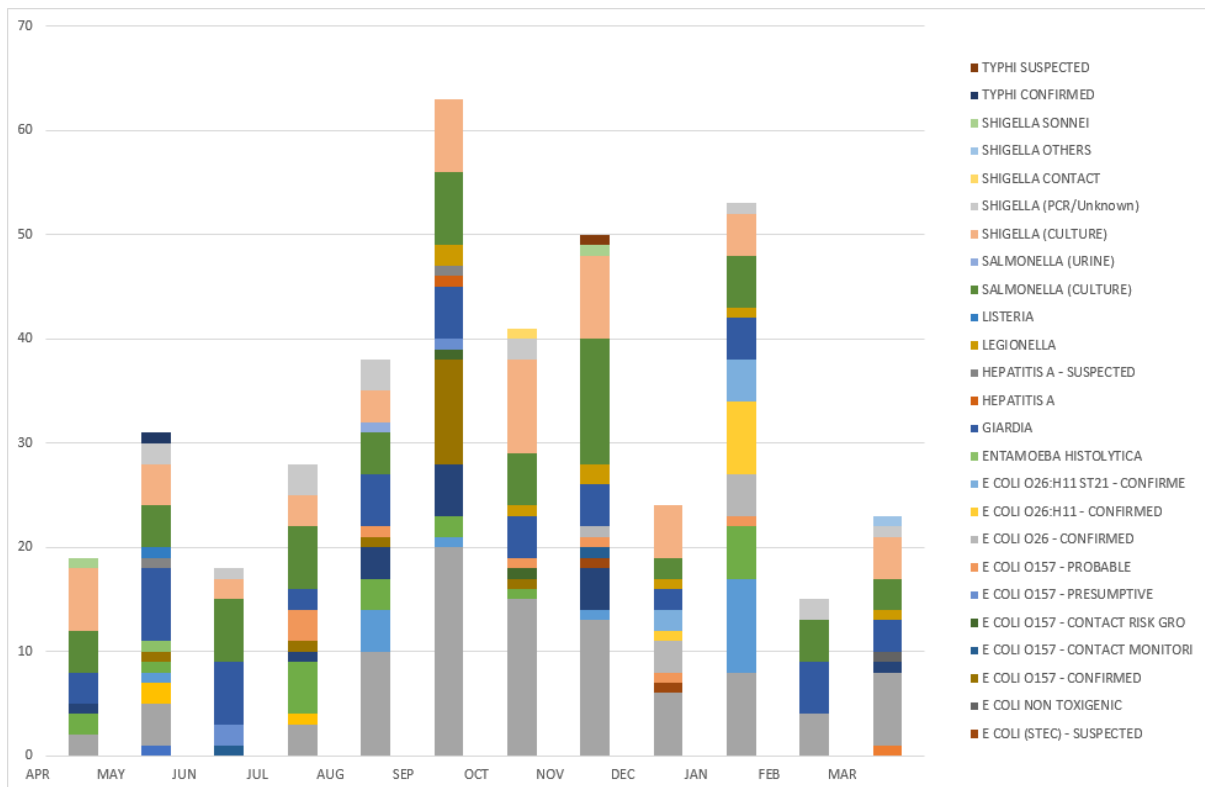
NOTIFIED	IDU	SRU	TOTAL	
NOTIFIED	395	173	568	
INVESTIGATED	395	173	568	100%

CASES/OUTBREAKS/CLUSTERS	IDU	SRU	TOTAL	
HIGH RISK/SIGNIFICANT	163	7	170	30%
LOW/MEDIM RISK	232	166	398	70%
TOTAL	395	173	568	100%

INVESTIGATION		SRU	TOTAL	
OUTBREAKS/CLUSTERS		56	56	32%
SPORADIC		117	117	68%
TOTAL		173	173	100%

INVESTIGATOR	IDU	SRU	TOTAL	
EHO	174	129	303	53%
IO	221	44	265	47%
TOTAL	395	173	568	100%

Figure 7 High Risk Investigations by month



7.0 Samples

We have taken a risk-based decision to not participate in routine regional sampling programmes to allow the team to concentrate on the highest risk interventions. We do however use sampling as an educational tool in assisting non-compliant businesses, during outbreaks of infectious diseases, and in response to complaints.

Figure 8 Sampling results

Column Labels		
SATISFACTORY	UNSATISFACTORY	Grand Total
2		2
2		2
5		5
	1	1
5		5
4		4
10		10
31	3	34
	1	1
59	5	64

64 food and environmental swab samples were taken during the year. 5 of which were unsatisfactory.

8.0 Food Safety Incidents

The authority receives Food Alerts & Allergy Alerts from the Food Standards Agency, via an electronic e-mail system, to inform of warnings being put on the system. Appropriate action is taken in accordance with the guidance contained in the Alert. A call out system which operates 24 hours a day is the initial response to any food issue out of hours. This may involve a visit to an individual premises or setting up an incident response to contact a large number of food outlets that may have the suspect food on their shelves.

9.0 Liaison with other Organisations

The team is represented on a number of bodies as listed below:

- * Sheffield takes a leading role in the South Yorkshire Food Group, which works on consistency issues in the area. This group operates as the Local Government Regulation liaison group and has links into the national liaison groups.

- * The Yorkshire and Humber and South Yorkshire groups chaired by the Consultant in Communicable Diseases Control.
- * Yorkshire and Humber Enforcement Group
- * Food Standards Agency Enforcement Stakeholder Forum.
- * IPC Local Liaison Group (to 31/3/2023)

The membership of these groups allows for the sharing and dissemination of good practice and joint training initiatives as well as ensuring a positive contribution to national debate and policy development.

10.0 Training and Workforce Development

Workforce development is carried out in accordance with training needs identified through Performance and Development Reviews of all staff that also include priorities for delivery. There is a routine training programme and regular updates of staff through cascade training. Courses are assessed and if found to fit into the training needs, staff will be allocated accordingly. All staff are assisted to achieve the 20 hours of Continuing Professional Development training each year as required by the relevant Codes of Practice.

11.0 Quality Assessment

The quality of inspections is checked regularly with both internal and peer authority audits of the work carried out. In addition to this, routine checks are carried out on the work of inspectors to ensure consistency of enforcement. Quarterly and monthly reports against the Food Plan are produced to enable monitoring of progress against targets.

12.0 Consultation

The plan is largely governed by the type of premises in the City and the reactive work. Consultation will take place with the Waste and Street Scene Policy Committee

13.0 CONCLUSION

The Covid-19 pandemic has had a significant impact on the ability of the service to undertake interventions in food businesses, both because of restrictions on certain businesses having to remain closed for significant periods and officer risk assessments restricting the number of visits possible. Contractors, who previously undertook the bulk of our lower risk inspection programme, failed to return post Pandemic. This is a Nationally recognised difficulty. We will allocate all the backlog to our contractors but realistically they will be unlikely to complete them. We have taken a range of mitigation actions outlined above and it is worth reiterating the success of the previous model for hygiene prior to the pandemic.

However times have changed and to deliver the programme this year with reduced contractor availability we have already committed to recruiting 1 fte extra and we are now proposing that will increase to 3 to ensure the full programme can be delivered this year and beyond as well as using all flexibilities and creative behaviour change interventions.

The risks involved in large backlogs are understood, and mitigations are in place to reduce the overall risk. The anticipated changes in the FSA delivery model, is likely to offer flexibilities from 2025 onwards. The training and succession plans we have in place are expected to provide further resilience going forward.

There is a considerable amount of additional work conducted by the in-house team, including high risk infectious disease investigations which have a significant public health implication.

Education and promotion are seen as vital elements in the range of tools the service uses to improve the quality and safety of food produced and consumed within the city and we will increase our education element in 2023/4 with revamped social media approaches. At the other end of the enforcement spectrum, when significant failures in a business have led to a risk to public health, the service has acted in an appropriate and timely manner, to ensure the business ceases trading until the standards have improved.

V5 June 2023