



Food Safety Service Plan

2019 – 2021

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INTRODUCTION	3
1. SERVICE AIMS AND OBJECTIVES	3
1.1 Aims	3
1.2 Objectives	4
1.3 Links to National & Regional Priorities and Corporate Aims & Objectives	4
2. BACKGROUND INFORMATION	5
2.1 Profile of the Local Authority	5
2.2 Organisational Structure	6
2.3 Scope of the Food Service	9
2.4 Demands on the Food Service	10
2.5 Access and Equal Opportunities	15
2.6 Enforcement Policy	16
3. SERVICE DELIVERY	16
3.1 Food Premises Interventions	16
3.2 Food Hygiene Intervention Rating of Premises	16
3.3 Food Complaints	19
3.4 Advice to Business	20
3.5 Food Inspection and Sampling	20
3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease	20
3.7 Food Safety Incidents	22
3.8 Liaison with Other Organisations	22
4. RESOURCES	23
4.1 Financial Allocation	23
4.2 Staffing Resources	23
4.3 Officer Development	23
5. ASSESSMENT AND PERFORMANCE MANAGEMENT	24
5.1 Quality Assessment	24
6. REVIEW	24
6.1 Review against the Service Plan	24
6.2 Identification of Variations	24
6.3 Areas of Improvement	24
Appendix 1 Performance Indicators & LAEMS Return)	25
Appendix 2 Performance Targets	27
Appendix 3 List of Proper Officers	28
Appendix 4 Authorised Officer Competency Assessment Guidance	29
Appendix 5 Council Enforcement Policy	31
Appendix 6 FSA's 'The Regulating Our Future (RoF) Change Programme	34

INTRODUCTION

This Service Plan sets out how North Devon Council intends to provide an effective food safety service that meets the requirements of the Food Standards Agency (FSA) Framework Agreement. It covers the functions carried out by authorised officers of the Food, Health & Safety Team under the provisions of the Food Safety Act 1990, the Food Safety and Hygiene (England) Regulations 2013 and relevant regulations made under the European Communities Act 1992.

The FSA requires the Food Service Plan to be submitted to the relevant Member forum for approval to ensure local transparency and accountability. On approval, the 'Plan' will be published in the public arena via the Council's website.

1. SERVICE AIMS AND OBJECTIVES

1.1 Aims

1.1.1. The Food Safety Service Plan is an expression of the Councils' continuing commitment to the provision of the Food Safety Service. It covers the key areas of Food Safety enforcement and the relevant management arrangements and objectives against which North Devon Council will monitor service delivery.

1.1.2. The Plan has been compiled in accordance with the guidance issued by the FSA and includes the information required by the Framework Agreement on Local Authority Food Law Enforcement.

1.1.3. Food businesses are central to the economy of the North Devon district and food safety is vitally important to the wellbeing of residents, visitors and other consumers of food produced in the area. Consequently, one of the fundamental purposes of the Food and Safety service is to ensure that the food and drink manufactured, prepared, stored and sold in the borough, including imported food, is safe to eat, free from contamination, is supplied in a hygienic manner from premises that are clean and hygienic. The service seeks to improve and sustain the standards of food safety in the area. To achieve this, the service works to support individual food businesses and provides a level regulatory playing field for them through inspection, advice, complaint investigation, and a programme of sampling as well as through the use of formal enforcement when this proves necessary.

1.1.4 The main aim of the Plan is to ensure that all food and drink intended for sale for human consumption that is produced, stored, distributed, handled or consumed in North Devon is safe, hygienic and compliant with food hygiene legislation and that all food premises and food handlers comply with the Food Hygiene Regulations. This will be achieved by focusing the Council's efforts on businesses which present the greatest risk by undertaking the initiatives below which will aim to reduce the risk rating of our whole population of food businesses:

- Programmed inspections
- Targeted interventions
- Investigation of complaints
- Investigation and control of infectious diseases
- Sampling initiatives
- Advice
- Publication of Newsletters

1.2 Objectives

The objectives of the Food Safety Enforcement Service are:

1. To achieve a consistent and risk-based enforcement approach
2. To ensure consumer protection by ensuring that food and drink manufactured, prepared, stored and sold in North Devon, including imported food, is safe to eat, free from contamination and is supplied in a hygienic manner from premises that are clean and hygienic.
2. To ensure that the percentage of broadly compliant businesses remains at 95% or above. *(An establishment that has an intervention rating score of not more than ten points under each level of compliance for structure, hygiene and confidence in management/control systems.)*
3. To maximise opportunities for full cost recovery. For example charging for Primary Authority Partnership work and Export Health Certificates and introducing charging for Food Hygiene Rating rescoring visits and advisory visits.
4. To attain >90% compliance with the Council's service standards for efficiency in dealing with requests for service.
5. To provide to support and encourage growth of local food businesses

1.3 Links to National and Regional Priorities and Corporate Aims and Objectives

<p>National and Regional priorities Food Standards Agency 2018/19</p>	<p>The stated aim of the FSA is to make food law enforcement more effective and to be undertaken by the various agencies in a more effective, comprehensive and collaborative manner.</p> <ul style="list-style-type: none"> • Maintain a level playing field for honest and diligent FBOs, which is in the interests of the food industry as a whole; • Reduce unnecessary burdens on business by focusing LA activity on agreed areas of greatest threat to public and animal health; • Create a flexible and intelligence-led approach to interventions, placing an increased focus on outcomes while maintaining appropriate levels of monitoring of compliance; • Realise the FSA's strategic goal of 'Food We Can Trust'; and • Drive up the quality and consistency of official controls.
<p>Devon Health & Wellbeing Board JSNA Devon Overview 2018 Public Health Outcomes Framework for England National and regional priorities 2018 North Devon Health Profile for 2018</p>	<p>"Significantly Worse", (than national average) Killed and seriously injured on roads Hospital stays for self-harm Dementia diagnoses (aged 65+) Alcohol related harm hospital stays Deprivation score Smoking prevalence in routine and manual occupations. Admission episodes for intentional self-poisoning by and exposure to alcohol condition</p>

	<p>Admission episodes for mental and behavioural disorders due to alcohol</p> <p>People reporting at least two long term conditions, at least one of which is Musculo-skeletal related.</p>
Corporate Priorities	<p>Organisational Transformation</p> <ul style="list-style-type: none"> • To develop a robust and flexible organisation • Determine our own future/destiny • Maintain or improve our services by flexing council structures and activities delivering resilience in the short to medium term <p>Growing North Devon</p> <ul style="list-style-type: none"> • To create and protect a resilient North Devon • Promote Barnstaple and its uniqueness as the sub-regional centre for growth but consider all opportunities • Use the increase in the local tax base from predicted housing and/or businesses to deliver resilience • Support and develop low carbon opportunities including the tidal demonstration zone

2. BACKGROUND INFORMATION

2.1 Profile of the Local Authority

North Devon Council covers an area of 1,086 km² with a population of 93,976. The area is coastal and rural with the major populations found in Barnstaple (31,616), and the villages and towns of Ilfracombe (11,184), Braunton (7,353), South Molton,(5,108) Fremington, (4,310), Lynton and Lynmouth (1,441) (*Census 2011*)

2.1.1 The local authority's food safety service is delivered from Brynsworthy Environment Centre and The Ilfracombe Centre, 44 High Street, Ilfracombe EX34 9QB, with an officer presence in both locations.

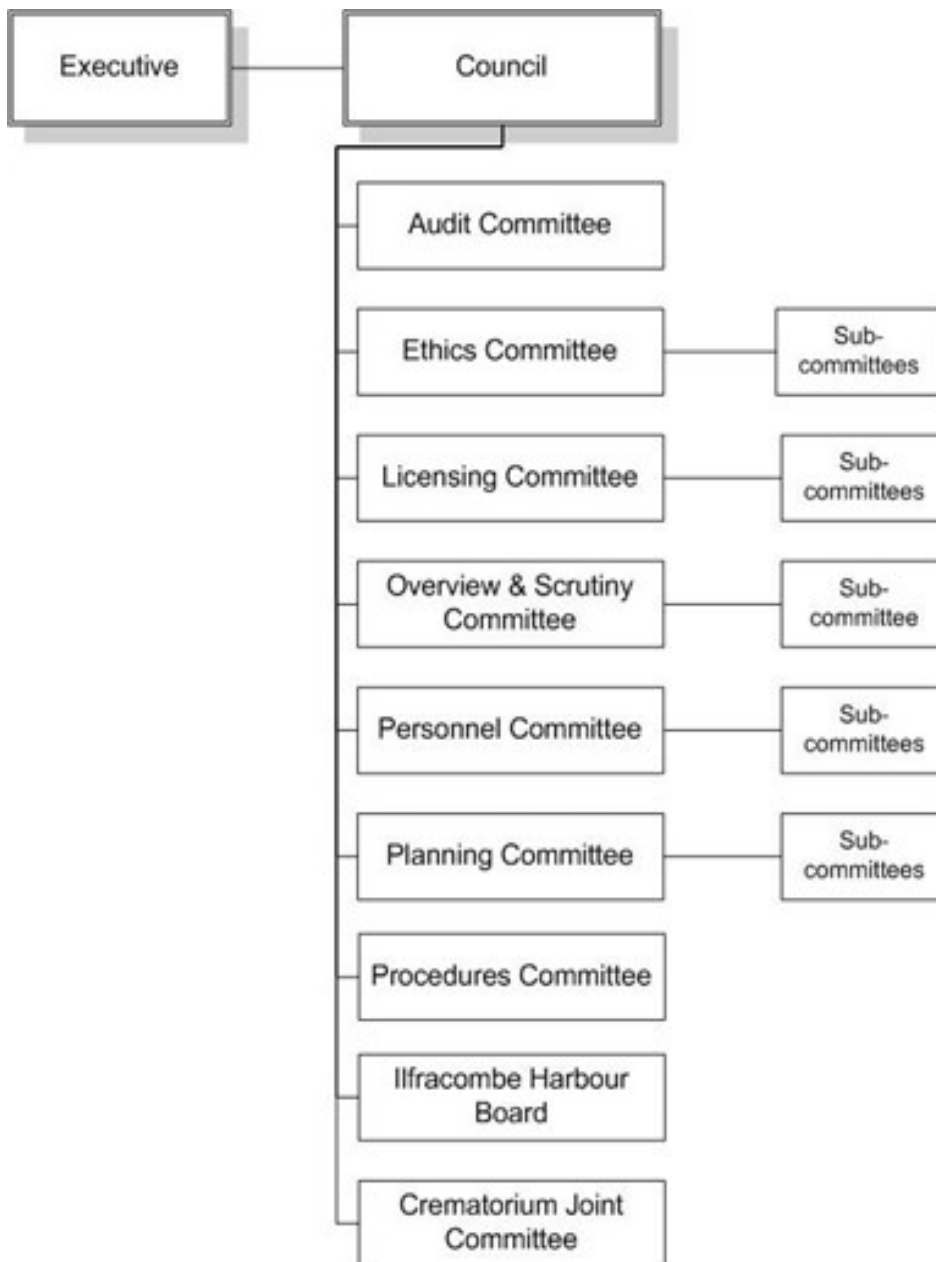
2.1.2 North Devon has 1611 businesses that come under the Council's food safety enforcement. The majority of food businesses in North Devon fall within the catering and retail sectors, with a large number of hotels, bed & breakfasts, cafés and restaurants, as well as markets and mobile food caterers.

There are many small and medium sized food manufacturers in the area providing a range of specialist and complex food processes, for example, sous vide, cook chill, and ready to eat food which may be consumed without further preparation other than re-heating. We also have a number of premises that manufacture meat, fish, (including caviar) and egg products, vacuum packaging (including butchers' shops that vacuum pack raw meat) and a large shell fish processor that exports to China and European Countries.

All interventions with businesses are carried out with regard to the local authority's commitment to equality of opportunity for local people as stated in the Equal Opportunities Policy.

2.2 Organisational Structure.

2.2.1 Committee Structure



2.2.2 Council Structure

CHART TO BE INCLUDED WHEN UPDATED VERSION AVAILABLE

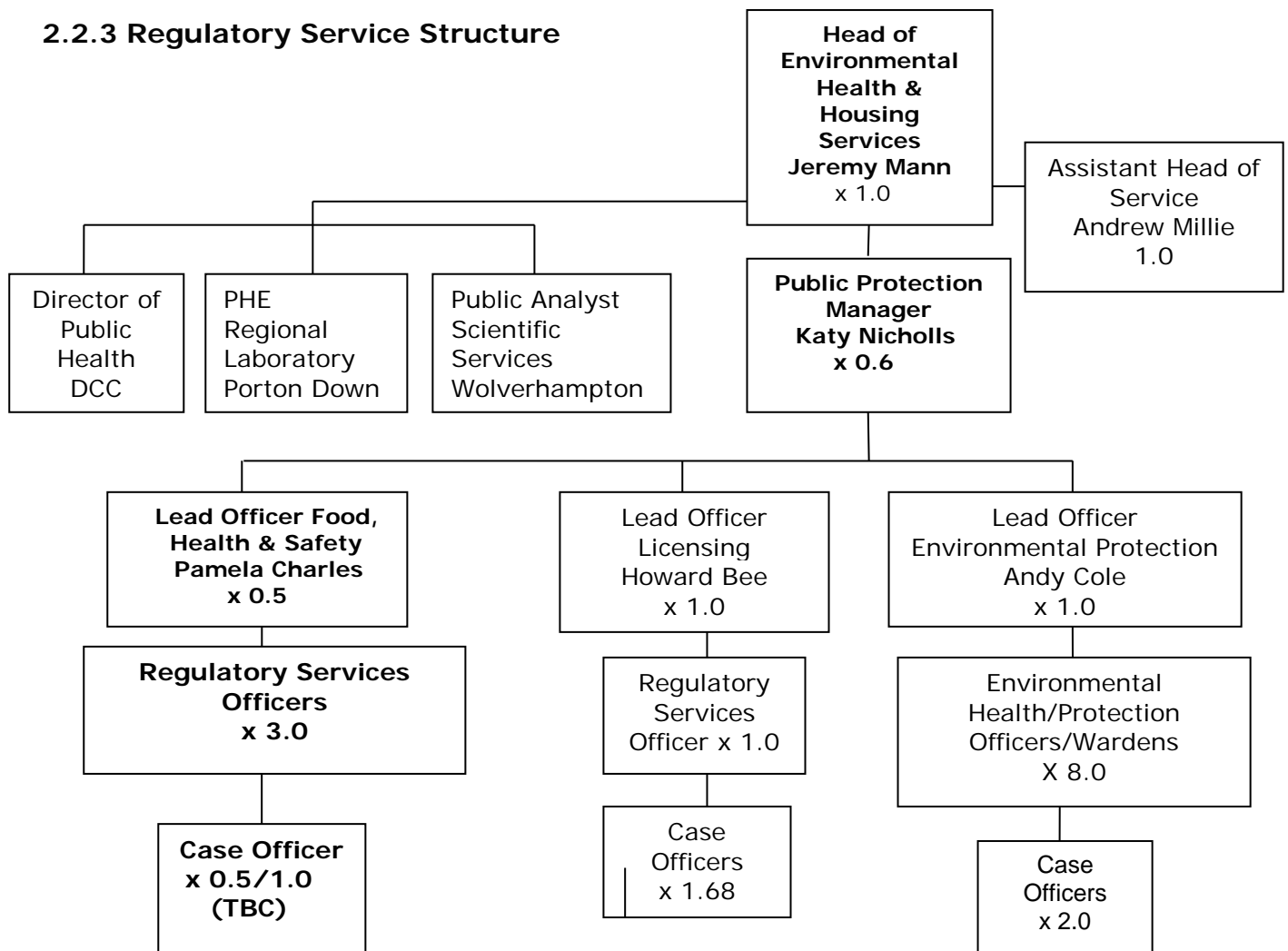
CHIEF EXECUTIVE- Mike Mansell

- Head of Resources- Jon Triggs
- Head of Corporate and Community- Ken Miles
- Head of Environmental Health and Housing Services- Jeremy Mann
- Head of Operational Services- Ricky McCormack
 - Bereavement
 - Parking
- Head of Place -Mike Tichford
 - Economic Development
 - Strategic Development and Planning

Also Manages:

- Building Control- Mike Tucker
- Elections- Judith Dark
- Harbour- Georgina Carlo-Paat
- Human Resources- Nikki Gordon
- ICT-Nina Lake

2.2.3 Regulatory Service Structure



The above structure is indicative of those staff employed by the Council as full time equivalents and not the amount of time spent on health and safety. See paragraph 2.2.5 and 4.2 for time allocated to the Council's health and safety function.

2.2.4 The Food, Health & Safety Team comprises of a Lead Officer (0.5 FTE), Regulatory Services Officers /Environmental Health Officers (3.0 FTE) and a Case Officer (vacant temp cover 0.5/1.0 FTE to be confirmed)

2.2.5 All officers in the Food, Health and Safety team have duties beyond those they carry out for Food Safety. All Officers also carry out duties under the Health & Safety at Work etc. Act 1974, which involves accident investigations, responding to health and safety complaints regarding premises and carrying out topic specific inspections as determined by the Health & Safety Executive (HSE) and the Devon Health & Safety Liaison Group. They also enforce the Health Act 2006 (smoke free legislation), and attendance at Safety Advisory Group for large scale licensed events.

2.2.6 All team Officers are contactable out of hours, by one of the designated Silver Control Officers, if deemed necessary to assist with an emergency or major incident, such as a food poisoning outbreak.

2.2.7 North Devon Council is supported by Public Health England, South West Centre Health Protection Team, Follaton House, Plymouth Road, Totnes, TQ9 5NE in its infectious disease role.

2.2.8 Public Health England's Regional Laboratory at Porton Down is the Council's appointed Food Examiner and Public Analyst Scientific Services (PASS) of Wolverhampton is our Public Analyst.

2.3.Scope of the Food Service

2.3.1.Under Regulation 5 of the Food Safety and Hygiene (England) Regulations 2013 the Council has a statutory duty to enforce the food safety provisions of the European Communities Act 1972 and regulations made there under, the Food Safety Act 1990 and The Food Safety and Hygiene (England) Regulations 2013.

Whilst the duty to comply with food safety legislation rests with the Food Business Operator, the Council, as a designated Food Authority, has the regulatory enforcement role to ensure compliance is achieved. Enforcement of food standards legislation (quality, composition and labelling) is the responsibility of the Devon, Somerset & Torbay Trading Standards Service.

Our Food Safety Service is currently responsible for ensuring compliance in 1611 food premises in North Devon, together with controlling imported food arriving at inland locations within the district.

2.3.2 The work of the service may be split into two broad areas – Proactive and Reactive.

Proactive work:

- Carrying out a programme of planned interventions e.g. inspections, audits, sampling at food establishments
- Law Enforcement- e.g.Emergency Prohibition/Detention and Seizure of food
- Administering the Food Hygiene Rating Scheme
- Providing advice to food business operators including help on implementing the Food Standards Agency's Safer Food, Better Business food safety management system or their own Food Safety Management System
- Operating inland imported food control at retail and catering establishments etc.
- Systematic review and updating of food safety policies and procedures
- Prosecutions, simple cautions and other enforcement actions
- Registration and Approval of food businesses
- Maintenance of a database and register of food businesses
- Servicing Primary Authority Partnerships
- Training of new staff and students
- Team meetings
- Attendance at Liaison Group Meetings
- Undertaking food sampling including monthly bivalve mollusc sampling
- Attendance at training courses for Continuing Professional Development
- Keeping abreast of changes in legislation and FSA guidance such as 'risky foods'

Reactive work

- Investigation of complaints concerning food establishments and food handling practices
- Investigation of complaints regarding food items.
- Registration of food establishments
- Investigation and control of cases of infectious disease and suspected and confirmed food poisoning
- Issuing Export Health Certificates

- Dealing with unfit food
- Responding to FSA Food Alerts

The graph below (**Fig.1**) shows the number of requests for service received by the Food Team year on year. The number tends to fluctuate throughout the year and In 2017/18 there was a higher than expected number of requests for service in August and November although lower numbers than usual in July, September and February.

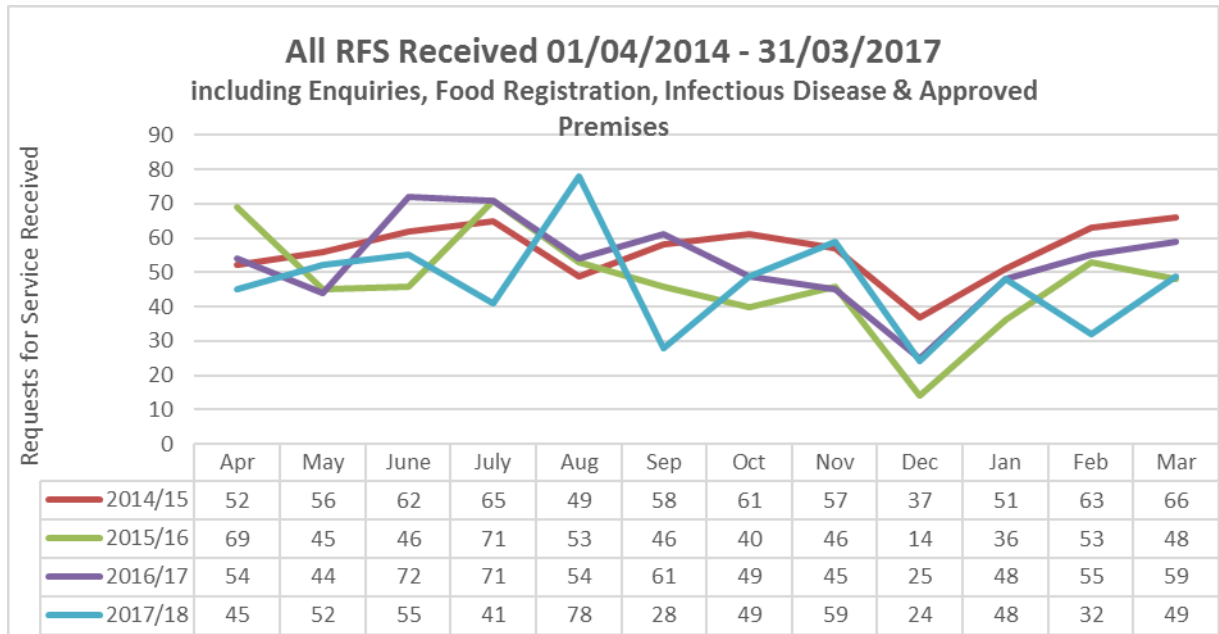


Fig.1

2.4 Demands on the Food Service

North Devon Council (NDC) is not a Port Health Authority, but fish landings are made at Ilfracombe, Instow and Lynmouth.

2.4.1 The Taw Estuary accommodates commercial Mussel and Oyster beds, and monthly sampling of bi-valve molluscs (mussels) is a statutory duty. Samples are taken from five production areas as designated by the Centre for Environment, Fisheries and Aquaculture Science, (CEFAS). Sampling is carried out by Officers in accordance with the controls laid down in Annex II of Regulation 854/2006.

The cost of mussel sampling is borne by the Council and in 2017/18 the cost was £3575 North Devon Council collects samples on behalf of Torrington Council and charges £180 per year for this service.

2.4.2 Officers of the Food, Health & Safety team also carry out other appropriate interventions such as health and safety (gas safety, asbestos safety), and smoke-free compliance interventions in a range of food premises, which are delivered alongside food hygiene interventions.

2.4.3 Dr Nick Young is the Council's Consultant in Communicable Disease Control and a further seven Doctors and five Health Protection Consultants have been authorised as Proper Officers as detailed in Appendix 3. In addition, two Environmental Health Officers in the team have been authorised as 'Proper Officers' under the Public Health (Control of Disease) Act 1984 to allow them powers of entry in the case of an infectious disease outbreak.

2.4.4 There is one licensed slaughterhouse and two meat-cutting plants in the district, which come under the enforcement of the FSA.

2.4.5 Establishments approved under EC Regulation No.853/2004 by NDC include dairy product premises, meat establishments, fish product premises and egg packing premises.

2.4.6 Mobile food businesses, Farm shops, Farmers Markets and people setting up food business in their homes are continuing to be popular and more business operators are taking advantage of running a food business via internet sales.

2.4.7 Local issues include: the seasonal and transient nature of a significant number of premises catering for the tourist trade, support for the local shellfish industry in monitoring the cleanliness of the shellfish beds in the Taw Estuary, the high turnover of food businesses and food business operators within business and the number of businesses being run from domestic premises.

2.4.8 Due to the nature of the North Devon area, there are always a number of festivals and events, where the team have to spend time away from programmed inspections, to ensure for example that mobile vendors visiting North Devon from other parts of the country are complying with food hygiene legislation. In 2017/18, staff visited the a Street Food Festival and dealt with several problem food buisnesses to ensure they operated safely at the festival.

2.4.9 The Servicies computer system used to record all the work carried out by officers has been undergoing transformation during 2017/18. This has created problems for officers in terms of learning how to use the new system and because there were a number of technial problems, which meant tasks took longer to perform than previously. These issues have now been resolved and officers are finding the system to be efficient in terms of their user time.

2.4.10 Key Issues for 2019 –2021:

2.4.10.1 The FSA “Regulating our Future Programme” (RoF) which is currently underway and will be complete in 2020. This programme aims to deliver a new regulatory model for food which will change the way Local Authorities enforce the food hygiene legislation. The programme will modernise the way food businesses are regulated and create a system that is modern, risk-based, proportionate, robust and resilient.

The existing approach has been in place for thirty years and has served consumers well but has not kept pace with technological change in the food industry, and is not flexible enough to adapt to the changing environment

The current model is financially unsustainable, with taxpayers bearing the cost of food regulation in a way that is incompatible with wider regulatory policy. At the same time, local authorities who deliver most of the current activity are under increasing financial pressure, such that some are struggling to fully discharge their functions.

The Food Safety Team will need to embrace the changes and move the service forward in line with the FSAs RoF programme.

2.4.10 .2 The main changes to be brought about by RoF are:

- Central On line Food Business Registration
- Segmentation of food businesses
- Primary authority national inspection strategies
- Sustainable fnding
- Stautory dipslay of food hygiene ratings

2.4.10.3 Brexit. Whist the effects of Brexit are yet unkonwn, it is expected that the regulatory environment will change with the UK leaving the EU. For the UK to continue to be a strong, credible player in the global food economy, the regulatory regime needs to keep pace with the change. Leaving the European Union will change patterns of food production, trade and consumption Control of food imports and businesses that export food will be critical.This will require a flexible and responsive regulatory system.

2.4.11 Allergen Enforcement. Following some high profile deaths in other parts of the country, enforcement of the Food Information Regulations 2014 remains important work for the enforcement officers.Enforcement falls to both Environmental Health Officers of the District Council and also Trading Standards Officers of the County Council.The Food, Health and Safety Team Officers will enforce the regulatons during their programmed food hygeine inspections. The Lead Officer belongs to the Allergy Sub Group of the Devon & Cornwall Food Liaison Group.

2.4.12 Premises Profile

As at April 2018, there were a total of 1649 food premises in the district. 1611 registered and 38 Approved by the Council that are subject to programmed food hygiene inspections. However, the overall number of businesses fluctuates as new businesses open or existing ones close down. These premises range from manufacturers of high-risk meat and dairy products to local shops, restaurants and take-aways, mobile businesses and home producers. The profile of premises is always changing, but the greatest number of premises fall in to the catering and retail sectors. The current premises profile is indicated in the following table: **Fig 2**

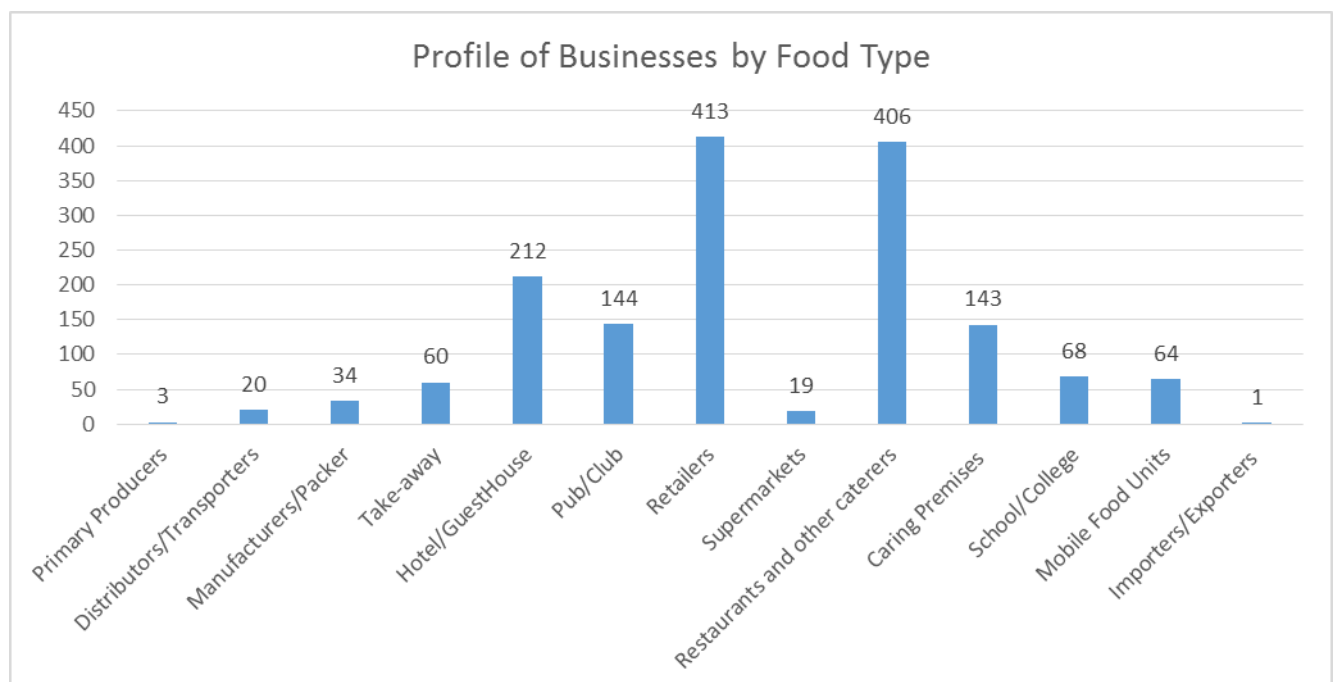


Fig 2.

2.4.12.1 Specialist/Complex Processes

We have a number of premises within the district that carry out a wide range of specialist and complex food processes, for example, sous vide, cook chill, vacuum packaging (including butchers' shops that vacuum pack raw meat) and ready to eat food which may be consumed without further preparation other than re-heating. We also have a number of premises that manufacture meat, fish, (including caviar) and egg products, The FSA Code of Practice specifies that the above types of premises should only be inspected by officers who have received specific training in the processes involved. In order to address this, all officers have received structured training in these processes but there is a need to maintain officers' competency in these areas by making provision for officers to continue to attend relevant training courses.

2.4.12.2 Approved Premises

North Devon also has 38 Approved premises. These are premises approved under EC Regulation No.853/2004 that manufacture and sell largely to non-final consumers, (such as retailers and restaurants), products of animal origin, such as dairy, meat and fish products and egg packing premises.

2.4.13 Imported Food Control

All local authorities have responsibility for imported food controls. Through port health authorities at sea and airports and international rail links and Border Inspection Posts, the UK has effective imported food controls at point of entry. However, in spite of effective border controls, illegal imports will still arrive at point of sale due to international smuggling of illegal goods or failure to declare items due to lack of knowledge on behalf of the importer. It is, therefore, important that inland controls are also in place. The identification of food not of animal origin and products of animal origin that have not been physically checked at point of entry or have been illegally imported, and any subsequent enforcement will normally be made during routine food hygiene inspections.

North Devon has no border controls or transit sheds and so inspections are only made during routine visits to businesses.

2.4.14 Primary Authority Partnerships

The Primary Authority Principle was launched in 2009 to make the local regulation of businesses operating at multiple premises across the UK more consistent. In October 2017 the scheme was expanded to include all businesses, not just those with multiple premises. The operation of the Primary Authority scheme is a statutory responsibility of the Department for Business, Energy & Industrial Strategy, BEIS, whose role is to register partnerships, issue guidance and resolve disputes.

Businesses have the right to form a statutory partnership with a single local authority, which then provides robust and reliable advice for other councils to take into account when carrying out inspections or dealing with non-compliance. It is the gateway to simpler, more successful local regulation.

North Devon Council fully endorses the Primary Authority principle and currently acts as the Primary Authority for the following four businesses:

- Parkdean Resorts Ltd
- Mole Valley Farmer
- Rawle Gammon and Baker (RGB)
- John Fowlers

The Council charges for Primary Authority work at a rate of £50 per hour which creates a income of approximately £700 per year. This comes from a combination of food safety work and health and safety work.

Income gained from this work:

2016/17 - 14 hours, income, £700

2017/18 - 10.2 hours income, £510

2018/19 (to Dec 2018) –18 hrs, income, £916

During 2019-21 the Council will continue to operate as Primary Authority Partner with the above businesses, providing advice to the companies and responding to requests for information from other local authorities.

2.4.15 The National Food Hygiene Rating Scheme

North Devon Council implements the FSA's national Food Hygiene Rating Scheme. The scheme includes all business types, such as schools, nurseries, retail shops, restaurants, public houses, care homes, home caterers. Businesses such as Childminders and Approved Premises or premises which the public would not deem to be a food business, such as a hairdresser offering a cup of tea to clients, or shops who offer a very small range of confectionery as an extra to their main retail purpose, are excluded from the scheme. Businesses are given a score between 0-5 based on their risk rating. 0 being the least compliant, 5 being the most compliant. Businesses receive a sticker with their score on, the display of which remains voluntary. Safeguards exist to enable businesses to request a revisit for a re-score, to appeal the score and/or publish a 'right to reply'.

Ratings are published on the FSA's website with a link from North Devon Councils website. This enables members of the public to make informed choices about where they eat food. Businesses that fail to comply with any legal requirements are required to make improvements through an informal written notice, advice and education with revisits and formal enforcement action if necessary.

Under the Localism Act 2011, The Food Standard's Agency guidance on the Food Hygiene Rating Scheme, the 'Brand Standard' March 2017, allows for the charging of revisits requested by the food business operator. North Devon Council does not receive many food business operator requests for revisits, however consideration should be given to introducing a charge for such visits, based on officer time.

The continued use of the National Food Hygiene Rating System (FHRS) gives well run food businesses the opportunity to demonstrate how compliant they are in relation to others and this has helped to raise standards generally. Although the displaying of the rating is still not currently a legal requirement, ratings are published on a publicly accessible website. The FHRS helps consumers make more educated choices over where they buy their food and where they go out to eat.

2.4.16 Safer Food Better Business

Safer Food Better Business (SFBB) was designed by the FSA to assist small and medium businesses in meeting the requirement of having a documented food safety management system. Officers actively encourage food business operators to adopt SFBB in the absence of any other food safety management system.

2.4.17 New Registrations

In addition to businesses that form part of the programme, the local authority inspects around 170 newly registered food businesses each year.

The Food Law Code of Practice requires newly registered food premises to be inspected within 28 days of this authority receiving the registration. This forms an additional demand on officers. The number of new registrations each year is shown in the table on the next page.

Year	Total No of New Registrations
2014/15	155
2015/16	176
2016/17	201
2017/18	171

The graph below (**Fig 3.**) shows the trend in new registrations received through out the year.

June, August, November and March saw the highest number of registrations received in 2017/18

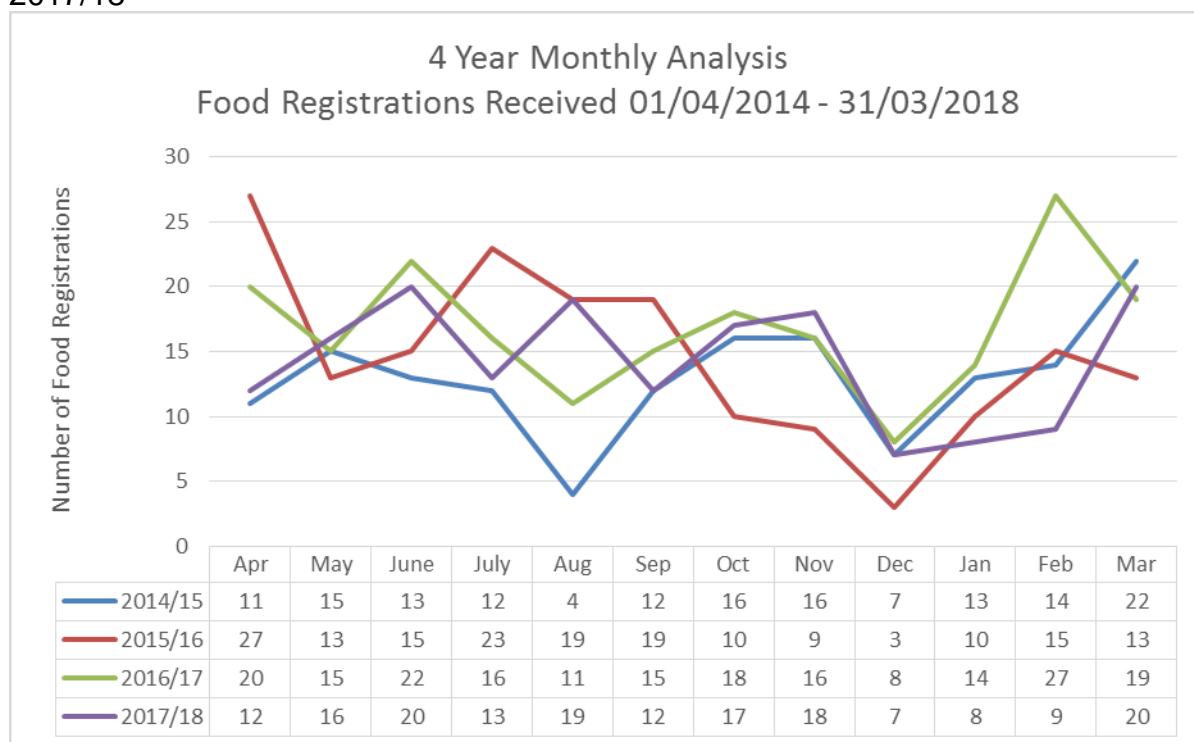


Fig 3

2.5 Access and Equal Opportunities

2.5.1 Accessing Services

Officers of the The Food, Health and Safety Team are located at Brynsworthy Environment Centre and The Ilfracombe Centre,

Requests for service may be received by:

- Telephone
- Personal visit to Lynton House, Barnstaple, The Ilfracombe Centre or Amory House, South Molton
- Email
- Letter

Office hours are 9.00am to 5.00 pm Monday to Friday.

Staff visit commercial and residential premises to carry out their normal duties. During out of office hours the duty officer can be contacted by telephone in an emergency.

Visits are made to premises outside of normal office hours where necessary. All our offices are accessible to people with disabilities. The Council website (www.northdevon.gov.uk) provides access to all services and links to the Government website for an on-line food premises registration form and information and advice on Food Safety.

2.6 Enforcement Policy

The Food, Health & Safety Team adopt the principles laid down in the Enforcement Concordat, which states that enforcement must be fair, consistent and equitable. The North Devon Council Enforcement Policy considers the requirements of the Regulators' Compliance Code and has regard to Crown Prosecution guidelines. The Policy outlines the enforcement options available for dealing with problems relating to non-compliance with the legislation and can be found at Appendix 4 (This policy is currently under review)

3. SERVICE DELIVERY

3.1 Food Premises Interventions.

The Food, Health & Safety Team follow a risk based intervention strategy with a graduated enforcement approach when dealing with food businesses. Initial action if required would take the form of an Informal Notice issued to the Food Business Operator. Failure to comply with this notice would result in service of a formal Hygiene Improvement Notice. Failure to comply with the formal notice would result in prosecution. Officers work hard to assist food business operators to comply with the legal requirements and fortunately, in most cases food business operators do comply at the informal stage and prosecution for failure to comply is rarely necessary. Occasionally formal action is necessary and in 2017/18 a local food business operator was prosecuted for failure to comply with the hygiene regulations and Detention and Seizure notices were also served on the same person to prevent unfit food entering the food chain.

3.2 Food Hygiene Intervention Rating of Premises

3.2.1. All food premises are rated according to their level of risk, as defined by the FSA Food Law Code of Practice (England), Chapter 5, Organisation of Official Controls. There are five risk categories of food premises (A – E), with each class of risk group having a specific minimum frequency of intervention. The risk rating determines the frequency and nature of the interventions that are classed as official controls (see chart, page 19).

Risk A is the highest risk and Risk E is the lowest risk. The table below provides a summary of the type of intervention and frequency of intervention for each risk category. In most cases North Devon Council chooses the official control of a full inspection for all categories of premises except those in category E.

Category	Intervention Type	Frequency
A	Inspection, Partial Inspection or Audit	6 months
B	Inspection, Partial Inspection or Audit	12 months
C non-broadly compliant	Inspection, Partial inspection or Audit	18 months
C broadly	Official controls as appropriate every 18	18 months

compliant	months	
D	Option to alternate between Official controls and other interventions (NDC chooses to carry out only official controls)	24 months
E	Alternative Enforcement Strategy	36 months

3.2.2 The risk score is determined not only by the standards of hygiene, structure and confidence in management, but also on elements that cannot alter, for example, type of food produced and the number of consumers at risk..

Public perception is that officers are visiting premises far more frequently than is determined by the Code of Practice and many people are surprised to learn of the long intervals between inspections.

The table below indicates the number of premises in each risk category at April 2018

Risk rating	Number
A	0
B	16
C	169
D	600
E	826

The graph below, (**Fig 4**), shows the risk profile of food premises over the past three years, with most registered premises falling in to the lower risk categories.

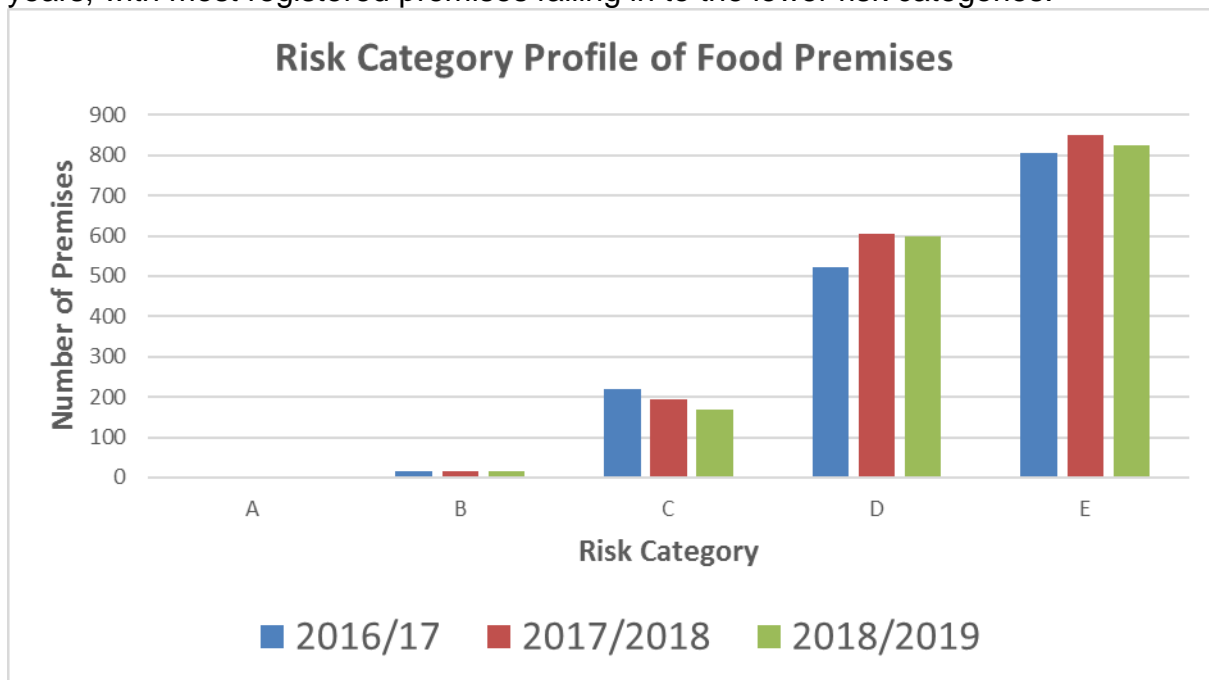


Fig.4

The number of food hygiene interventions due throughout the year is shown in the graph on the next page (**Fig.5**). Interventions are allocated at intervals of 6, 12, 18, 24, or 36 months since the previous inspection. North Devon has a large number of seasonal food businesses, which can make for busy periods of work in the Summer as these need to be visited whilst they are open for trading.

The interventions due at 36-month intervals will be subject to the Alternative Enforcement Strategy. 160 inspections due in 2017/18 fell in to this category.

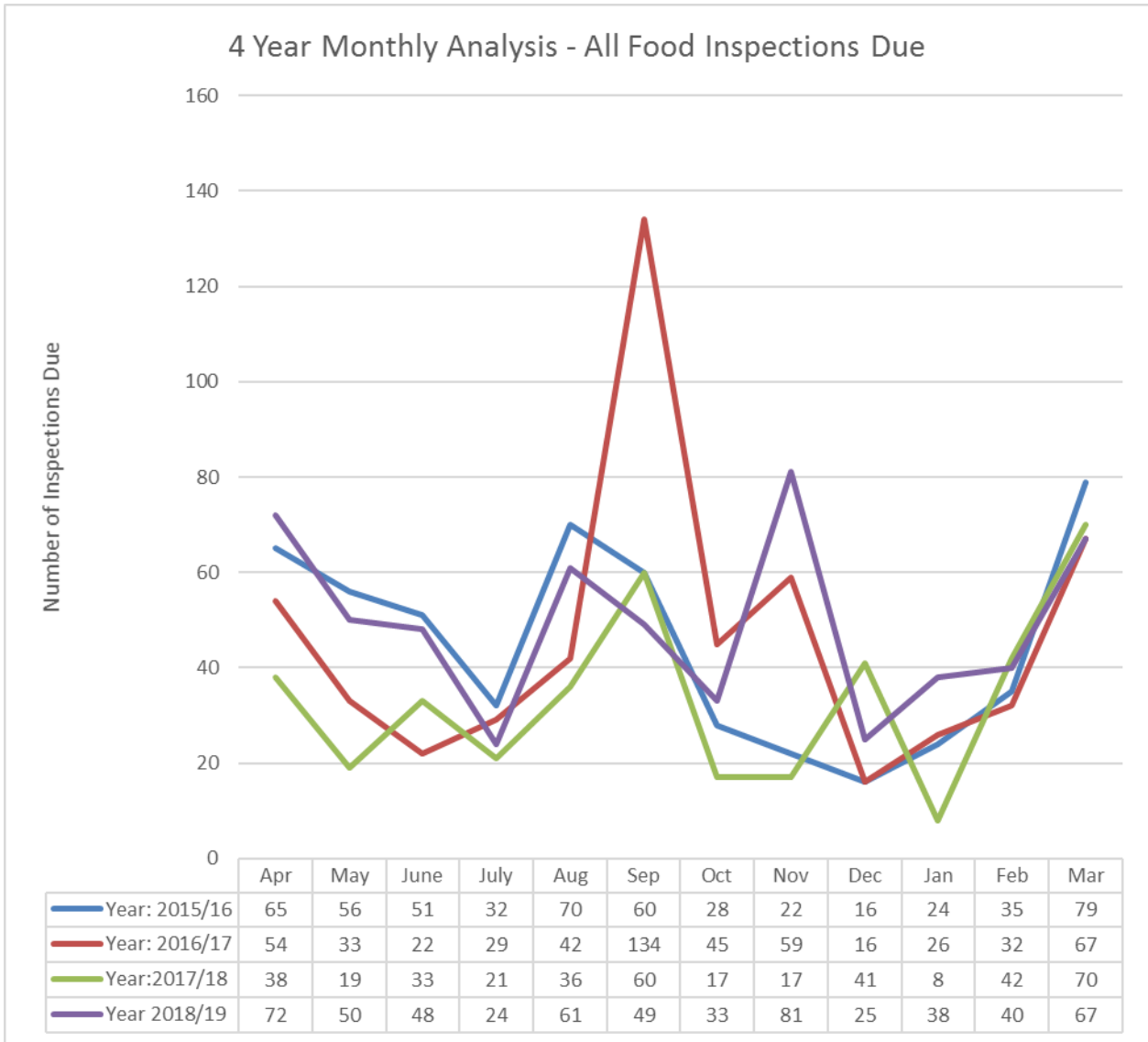
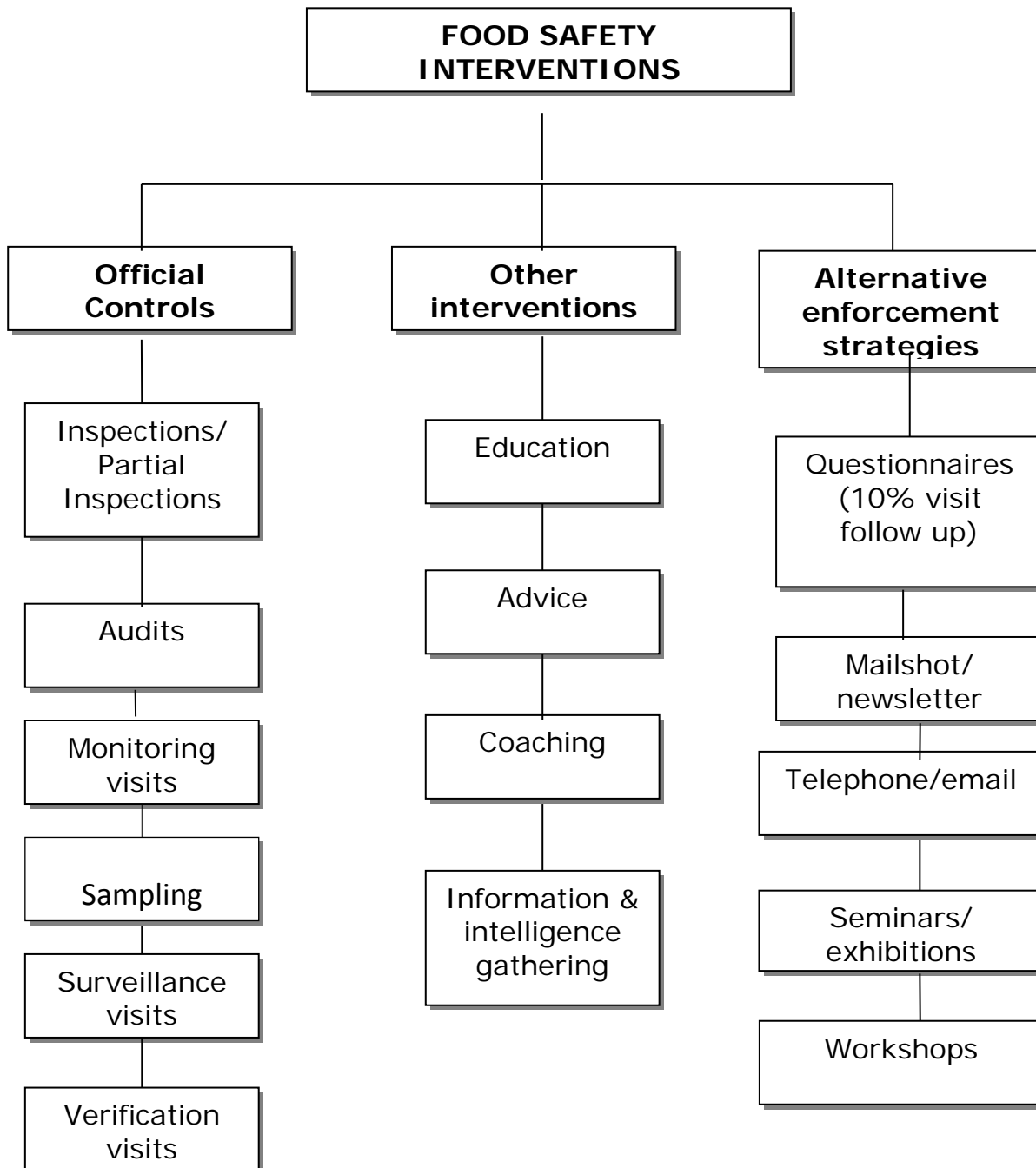


Fig 5

The type of interventions available for officers to use are:



3.2.3 Officers use a hand held tablet device on which to record their Food Hygiene Inspections. The device is compatible with the NDC mainframe computers and the M3 Northgate software used by the Team. Inspections completed on the tablet can be emailed directly to the Food Business Operator and back to the office to be attached to the premises file on the main computer. The use of the hand held has led to a significant increase in efficiency for officers as they can complete the inspection on site and do not need to complete any other paperwork. There is also efficiency for the Case Officer in the office as there is no need to print out, scan or post out any paperwork.

3.3 Food Complaints

The investigation of customer's complaints regarding food safety is an important area of work for the team. The local authority has set response targets of: 1 day for food which is unfit or mouldy.

3 days for food which has chemical or microbiological contamination
5 days for food containing a foreign body.

In 2017/18 North Devon Council dealt with 14 food complaints all relating to foreign bodies in food responded to and completed in compliance with targets. Complaints included two regarding glass found in food, four regarding plastic found in food, and three regarding insects in food.

3.4 Advice to Business

The service provides advice and support for all food businesses by telephone or email. As a rule, the service does not have the capacity to provide advisory visits, however Officers use their discretion in cases where it is deemed that an advisory visit will be in the interest of both the business operator and the Council. Information is available on the local authority website, with links provided to the FSA and other websites. Links to useful information are always sent out to new businesses when they register with the Council.

3.5 Food Inspection and Sampling

The Devon & Cornwall Food Liaison Group co-ordinate the Devon and Cornwall Authorities sampling programme to specific local and national demands. The plan is developed by the group with Public Health England laboratory to incorporate identified priorities.

Microbiological examinations are undertaken by PHE at Porton Down Laboratory.

In 2017/18 the Food, Health & Safety Team took 95 food and environmental samples, 73 of which were mussel samples taken as part of the statutory sampling regime. Of all the samples taken only 5 were reported as being unsatisfactory. Unsatisfactory samples were followed up with advice to food business operators and revisits by officers to take further samples to ensure there had been an improvement in hygiene standards.

Other food samples, such as food complaints, may be sent to the Public Analyst if they are for identification of foreign bodies, for example. These examinations are costly at £100 per analysis, and in 2017/18 only one sample was sent for identification of plastic in a pizza to try and establish the nature and source of the plastic.

3.6 Control and Investigation of Outbreaks and Food-Related Infectious Disease

The Food, Health & Safety Team investigate food-related infectious disease notifications in accordance with procedures agreed with the Consultant in Communicable Disease Control (CCDC). Notifications of alleged food poisoning and confirmed food poisoning and other notifiable diseases, are dealt with the same day by Officers.

Investigation of outbreaks will be in accordance with the Outbreak Control Plan agreed with Public Health England.

The Food, Health & Safety Team's objectives are to: -

- contain the spread of infection
- identify the causative organism/chemical;
- trace carriers and cases;
- trace the source of infection;
- determine the causal factors;

- recommend practices to prevent recurrence of disease;
- determine whether criminal offences have been committed;
- exclude food handlers from work if necessary to protect the public.

The table below summarises the number of cases notified to North Devon Council in 2017/18.

Disease	Number
Campylobacter	58
Salmonella	4
Suspected/Alleged food poisoning	33
Norovirus	0
Hepatitis A	0
Hepatitis E	1
Shigella Dysentery	0
E. coli 0157	0
Cryptosporidium	7
Giardia	1
TOTAL	104

The incidence of confirmed cases of food-borne illness in the District over the past four years is detailed in the graph on the following page (**Fig.5**), showing peaks of reported cases in August and November.

Cases mostly consisted of single Campylobacter cases within a household. There were no outbreaks, (two or more linked cases) and investigation of the cases did not imply that the cases were linked in anyway. In most cases the patient had handled or eaten raw chicken within their own home. Some cases were thought to have been contracted abroad and there were no confirmed cases that could be proven to have originated from eating at a food business or event in the North Devon area.

Figures for 2017/18 show the number of reported cases to be similar to those in previous years. There are always likely to be a number of cases that go unreported by patients.

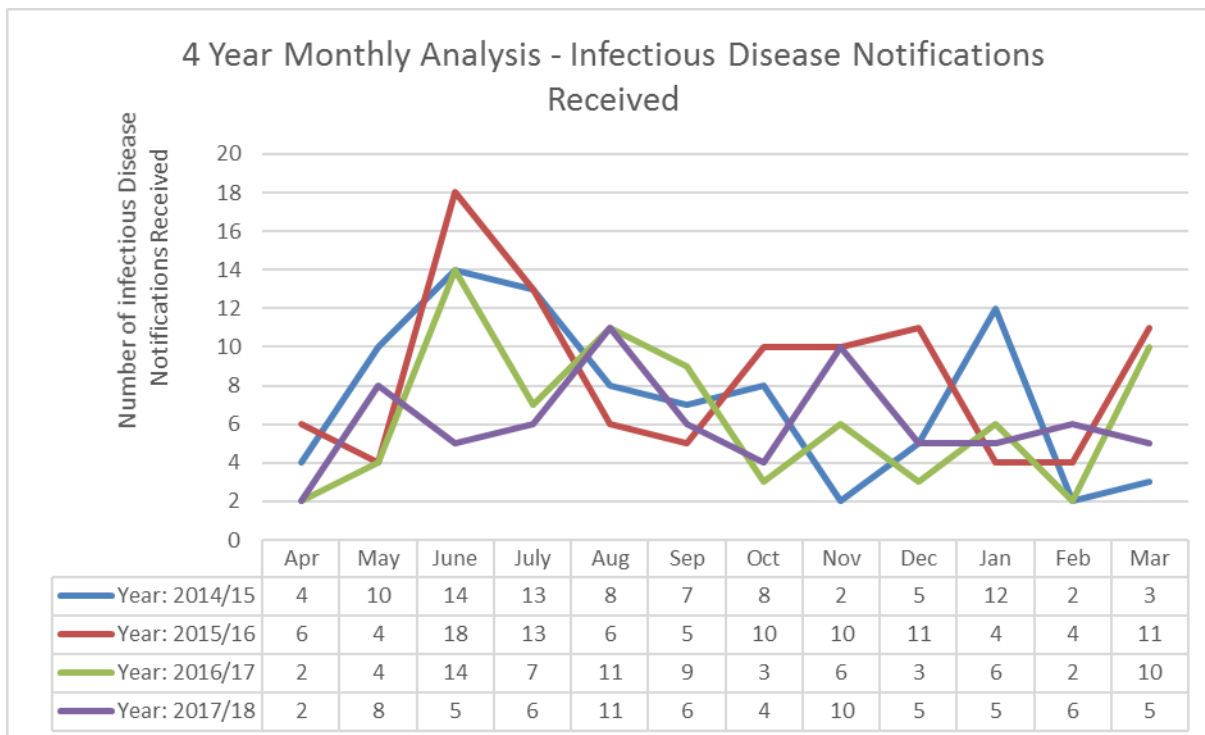


Fig 5

Confirmed cases.	
Year	Total
2014/15	88
2015/16	102
2016/17	77
2017/18	73

3.7 Food Safety Incidents

3.7.1 Food Alerts are issued by the FSA in relation to information on national food issues. The majority are for information only. Some Food Alerts are for action and require officers to undertake a wide variety of courses of action dependent upon the issue at hand. In 2017/18 there was only 1 Food Alert requiring action that was dealt with by the Food, Health & Safety Team. The alert related to Fipronil in eggs following concerns raised in the Netherlands about the insecticide Fipronil, which had been used inappropriately in cleaning products on chicken farms. Fipronil is not authorised for use in food producing animals and it should not be present in eggs at any level. The FSA identified that a number of eggs had been distributed to the UK from the farms affected and a company in North Devon had received an order of egg yolks from the affected eggs, which they bought in for onward distribution to another company in Somerset. The Food, Health and Safety Team contacted the companies and Taunton Deane BC, to ensure withdrawal of their products containing the affected eggs.

3.8 Liaison with Other Organisations

3.8.1 The Food, Health and Safety Team is committed to ensuring that our approach to service delivery and enforcement is consistent with other local authorities and that we develop consistent approaches where appropriate. Regular dialogue on general environmental health and food safety takes place through the following:

- Devon & Cornwall Food Liaison Group
- Devon & Cornwall Allergy Sub Group
- Devon Health Protection Advisory Group
- Public Health England

- Food Standards Agency
- Chartered Institute of Environmental Health
- Department for Business, Energy & Industrial Strategy

3.8.2 Where there is a shared or complimentary enforcement role with other agencies, provision is made to liaise with those agencies. For example:

- Devon, Somerset and Torbay Trading Standards
- Office for Standards in Education (OFSTED)
- FSA
- Care Quality Commission
- Devon and Somerset Fire and Rescue Service
- Devon and Cornwall Police

3.8.3 Formal liaison exists between the Council and the Devon Public Health and Wellbeing Board.

4. RESOURCES

4.1 Financial Allocation

The budget for 2018/19 was £238,610. Figures for 2019/20 are not yet known.

4.2 Staffing Resource

The Food, Health and Safety Team is split in to 3 areas. Each area has a 1.0 FTE officer who carries out all work in their area, whether it be Food Safety or Health and Safety. In reality, the officers spend 0.9 FTE carrying out food safety work. The Lead Officer also works as the Corporate Health and Safety Adviser for the Council and as such is designated as a 0.5 FTE.

A structure chart is available on page 8. The number of full time equivalent (FTE) officers carrying out food, health and safety work is set out in the following table:

Officer Post	FTE
Lead Officer	0.5
Environmental Health/Regulatory Service Officer	3.0
Case Officer (temp)	1.0/0.5 (TBC)

With Officers spending most of their time meeting the demands of the Food Standards Agency driven programme of Food Safety Inspections, food safety work accounts for approximately 0.9 FTE per Officer, equating to 2.7 FTE in total for food safety. The Lead Officer is mostly non-operational in the role of food safety, using the 0.45 FTE to manage the team and deal with issues such as Primary Authority work, rather than carrying out programmed inspections

4.3 Officer Development

4.3.1 A Staff Appraisal Scheme is in place to help identify any training requirements for Officers for their career development. Full support is given to Officers to attend Continuing Professional Development, (CPD), training opportunities in order for them to meet their CPD requirements.

4.3.2 The Food Law Code of Practice (England) March 2017 has detailed competency and authorisation requirements for Lead Food Officers, Authorised Officers and Regulatory Support Officers4.3.4 .The competency matrix of the authorised food law

enforcement officers is provided in Appendix 4. This shows the wide range of knowledge and skills required for officers to carry out food enforcement work.

5. ASSESSMENT AND PERFORMANCE MANAGEMENT

5.1 Quality Assessment

5.1.1 The Lead Officer will monitor intervention records by accessing Northgate M3 files and checking the quality of officers' work. If satisfactory the manager will record a satisfactory action code on the worksheet. If unsatisfactory, the manager will record an unsatisfactory code and discuss the matters that require improvement with the officer concerned.

5.1.2 Once a year the Lead Officer will accompany officers on a visit to monitor the quality of service delivery and record his/her findings on the observational audit form. The monitoring visit will inform the appraisal process.

5.1.3 Any compliments and complaints received about the service are fed back to the Lead Officer to action as appropriate and the action taken is recorded by the Case Officer.

5.1.4 The Devon & Cornwall Food Liaison Group considers topics for Inter Authority Auditing, based on FSA protocols. Peer reviews of a service specific activity and consistency exercises are carried out amongst the group.

5.1.5 The Food, Health and Safety Team participate in the FSA's national consistency exercises (risk rating and food hygiene rating).

5.1.6 We have the following monitoring arrangements in place to assist in the quality assessment of the work carried out:

- Senior Officer Review of a sample of worksheets for each officer throughout the year
- Joint visits with inspectors
- Monthly Team meetings
- Performance appraisals

6. REVIEW

6.1 Review Against the Service Plan

6.1.1 We have developed a number of indicators to assess our food safety performance. Details of the team's performance against the targets set in the Food, Health & Safety Team's 2017/18 work plan can be found at Appendices 1 and 2. Proposed targets for 2019/20 and 2020/21 are also in Appendix 1.

6.1.2 The Service Plan and performance will be reviewed annually by the Lead Officer.

6.2 Identification of Variations

6.2.1 The Lead Officer will identify any variance, from the Service Plan and the reasons and propose an action plan to remedy the situation as appropriate. Work in other areas of the enforcement mix will be reviewed to identify whether or not it has contributed/addressed any apparent deficiencies.

6.3 Areas of Improvement

6.3.1 The Lead Officer will seek to identify opportunities to improve the service and where appropriate, prepare an appropriate action plan to address those service issues.


PERFORMANCE INDICATORS – ACTUAL AND PROPOSED

Performance Indicators		Target 2019/20/21	Actual 2017/18 Figures for 2018/19 not yet available
Structural	Human resource:- Managerial	Public Protection Manager 0.1 FTE	Public Protection Manager 0.2 FTE
	Lead Officer Compliance Officers	0.4 FTE 2.4 FTE 0.4 FTE	0.4 FTE 1.6 FTE Graduate 0.4 FTE
	Administrative		
	Financial resource	£238,610 (2018/19)	£240,290
Process efficiency	No. of service requests	Expected to be similar to 2017/18	511 + 494 TENS Total 1005
	Percentage of requests for service responded to within target time	100%	93.8%
Output	Completion of Intervention plan	100%	95%
	Completion of food sampling programme	100%	100%
	Completion of mussel sampling programme	100%	100%
	Maintaining competence and service support for Primary Authority partnerships.	100%	100%
Outcome	Percentage of food premises broadly compliant	95%	95.83%
	Improving population risk profile.	Possibly levelling out as profile reaches its limits.	Improving
	Customer satisfaction	90% satisfied	94%
Cost effectiveness	Ratio of enforcement officers to regulated businesses	1:671 Not taking account of Lead Officer.	1:827 Not taking account of Lead Officer.
	Fairness of service provision	100%	100%
Equity	Fair distribution of service according to need.	100%	100%
	Percentage of new businesses supported	100%	100%

LOCAL AUTHORITY ENFORCEMENT MONITORING SYSTEM – RETURN 2017/18

<https://laems.foodapps.co.uk/performanceindicator.aspx>
FSA - LAEMS - Performanc... X

[dit](#) [View](#) [Favorites](#) [Tools](#) [Help](#)


Current status: Data checked Authority: North Devon Responsibility: Food Hygiene Financial Year: Current

LAEMS

[Home](#)
[Check/Sign-off](#)
[Data summary](#)
[System/Security](#)
[Logout](#)

Home » Check/Sign-off

Performance Indicator

This page displays the performance indicator for your authority and how the FSA has calculated this figure.

Interventions		
Number of interventions actually achieved	707	(A)
Due interventions outstanding	37	(B)
Number of interventions that should have been achieved	744	(C) = (A) + (B)

Broad compliance		
Number of broadly compliant premises	1540	(D)
Total number of premises	1620	(E)

Performance indicator		
Interventions performance indicator element	0.29	(A) * 0.1 / (C)
Broad compliance performance indicator element	0.67	(D) * 0.1 / (E)
Performance indicator	0.95	(A) + (D) * (B)

REQUEST FOR SERVICE PERFORMANCE TARGETS

Regulatory Services Team *(Working days)*

	First Response Target	Completion Target
Food		
Task: C012 SODS/FHRS Enquiry	5	20
Task: C094 FSA Info/Misc Rqst	2	5
Task: C095 Illegal Slaughter	5	365
Task: C096 Vol Surr Certificate	3	15
Task: C097 Food Premises Unsatis./Hygiene	5	60
Task: C098 Unsatis. Food Premises Mobile	5	60
Task: C099 Alleged Food Poisoning	1	60
Task: C100 Food Poisoning Confirmed	1	60
Task: C101 RFS Food Advice	5	30
Task: C103 Health Certificate	3	15
Task: C105 Food Complaint - Foreign Body	5	60
Task: C106 FD SWW Disconnect Water	3	15
Task: C107 Food Registration Form Sent	3	5
Task: C108 Stat.Incident Report	15	15
Task: C109 Freezer Breakdown	1	15
Task: C110 TB in Cattle	3	15
Task: C111 Food Complaint – Chemical	3	44
Task: C112 Food Complaint Microbiological	3	44
Task: C415 FSA Food Alert For Action	3	60
Task: C457 Food - Unfit/Mouldy	1	60
Task: C466 FSA Allergy Alert	1	15
Task: C536 FD Rqst for Approval	5	60
Task: C542 FSA Product Information Notice	15	15
Task: C543 Food Education/Training	15	60
Task: C546 FHRS Appeal	3	10
Task: C585 Food Info for Consumers Reg's	5	30
Smoke Free		
Task: C462 Smoke Free Request for Advice	5	5
Task: C463 Smoke Free - Alleged Non Compl	5	60
Food Registration		
Task: REG Food Registration	28	28
ID- Infectious Disease		
Task: All Notifications	5	20
Premises		
Task: L011 Appr Egg Prods Estab	5	60
Task: L012 Appr Fishery Product	5	60
Task: L013 Approved Dairy Prods	5	60
Task: L014 Appr Meat Products	5	60

PROPER OFFICERS

Proper Officers under the Public Health (Control of Disease) Act 1984 and the National Assistance Act 1948.

(Reviewed December 2016 re Public Health England.)

Dr Chitra Arumugam	Consultant in Communicable Disease Control
Dr Toyin Ejidokun	Consultant in Communicable Disease Control
Dr Sarah Harrison	Consultant in Communicable Disease Control
Dr Charles Irish	Consultant in Communicable Disease Control
Dr Chaamala Klinger	Consultant in Health Protection
Debra Lapthorne	Centre Director, PHE SW
Dr Alison Mackenzie	Consultant in Public Health
Dominic Mellon	Consultant in Health Protection, PHE
Dr Fiona Neely	Consultant in Health Protection, PHE
Dr Bayad Nozad	Consultant in Health Protection, PHE
Thara Raj	Consultant in Health Protection, PHE
Jenny Taylor	Consultant in Health Protection, PHE
Mike Wade	Deputy Director of Health Protection, PHE
Julie Yates,	Consultant in Public Health , PHE
Dr Nick Young,	Consultant in Communicable Disease Control
Pamela Charles *	Environmental Health Officers, North Devon Council
Aarron Turton*	Environmental Health Officers, North Devon Council

Correct at Jan 2019

*For Public Health (Control of Disease) Act 1984 only.

AUTHORISED OFFICER COMPETENCY ASSESSMENT GUIDANCE

Food Law Practice Guidance - 4.7.4 - Appendix 3

Lead Food Officers will need to ensure that authorised officers achieve the necessary training and experience to enable them to achieve the relevant competencies and that their authorisation is appropriate for their level of competency.

The Authorised Officer framework is made up of 5 clusters with 19 competencies

Name	
Designation	
Date Appointed	

Cluster No.	Official Control / Type of Role
4	Inspection of Food Establishments
5	Use of Enforcement Sanctions
6	Sampling
7	Import and Export controls
8	Reactive investigations

Inspection of Food Establishments:

Cluster No.	Statement of Competence - Authorised Officer	Evidence
4		
4.1	Comprehensive understanding of HACCP-based procedures. Has the ability to apply that knowledge taking account of flexibility principles contained within Article 5 of Regulation (EC) No. 853/2004.	
4.2	Can determine and identify hazards and risks that occur in establishments and products. Understands the principles of risk assessment related to food types; and processing methods and products	
4.3	Understands relevant EU and National Food Hygiene or standards legislation and can advise on their application. Understands how to assess compliance with the requirements of EC and National food hygiene and standards legislation with further reference to the Food Law Code of Practice and Practice Guidance.	
4.4	Able to determine the appropriate course of action to remedy non-compliance, including when it is appropriate to escalate enforcement action.	
4.5	Can make a Food Hygiene/Standards Intervention Rating assessment of risk using section 5.6 of the Food Law Code of Practice	
4.6	Understanding of the common food types and understanding of hazards associated with their use	

Use of Enforcement Sanctions:

Cluster No. 5	Statement of Competence - Authorised Officer	Evidence
5.1	Can clearly differentiate between legal requirements and recommendations of good practice by avoiding 'gold plating' and 'regulatory creep'. Can provide advice and enforce based on levels of compliance with regard to consistency and proportionality based on the hierarchy of risk.	
5.2	Understands levels of authorisation, enforcement policies and procedures for appeal	
5.3	Understands the legal framework with regard to the use of enforcement powers including the role of Primary Authorities and Home Authorities	
5.4	Can demonstrate an understanding of how to serve Notices; gather evidence; prepare cases for prosecution and apply knowledge to comply with the requirements of PACE and RIPA, where appropriate	

Sampling:

Cluster No. 6	Statement of Competence - Authorised Officer	Evidence
6.1	Understands formal /informal sampling methodologies and the role of the Public Analyst and Food Examiner.	
6.2	Is aware of national and local sampling priorities. Can use UKFSS and searchable database, where appropriate.	
6.3	Can interpret sampling results and make a judgement on appropriate action based on risk.	

Import and Export controls:

Cluster No. 7	Statement of Competence - Authorised Officer	Evidence
7.1	Understands the legal framework with regard to Imported / Exported food and how to assess compliance.	
7.2	Can determine the most appropriate course of action and the range of enforcement sanctions available.	
7.3	Can identify food species and comment on fitness at Border Inspection Posts (also see Chapter 4.6)	
7.4	Can demonstrate an understanding of controls at points of entry include carrying out systematic documentary checks, random identity checks and sampling for analysis, as appropriate.	

Reactive investigations:

Cluster No. 8	Statement of Competence - Authorised Officer	Evidence
8.1	Understands how to conduct an investigation and gather evidence in accordance with PACE and RIPA, where appropriate. Is then able to analyse information and determine an appropriate course of action.	
8.2	Can identify when it is appropriate to engage with other agencies and stakeholders in particular when investigating food incidents and or infectious disease outbreaks.	

COUNCIL ENFORCEMENT POLICY *[This Policy is currently under review]***Introduction**

This policy is an “umbrella” policy and is intended to apply to all service areas, though it should be noted that various additional service-specific requirements apply to specific enforcement activities in certain services, i.e. Health and Safety, Food Safety, Environmental Protection/Environmental Crime, Private Sector Housing, Licensing. Information on these may be obtained from the Head of Environmental Health & Housing Services.

The purpose of this policy is to publicly summarise the Council’s intended approach to bring about compliance with regulatory requirements. However, it is ultimately the responsibility of individuals and businesses to comply with the law.

The Council shares the Government’s view that effective and well targeted regulation is essential in promoting fairness and protection from harm and that as regulators we should adopt a positive and pro-active approach towards ensuring compliance by:-

- Helping and encouraging regulated entities to understand and meet regulatory requirements more easily; and
- Responding proportionately to regulatory breaches.

The Council will take a soft brush approach to those who comply with regulatory requirements and those who work with us to achieve compliance. However, we will not hesitate to take all necessary enforcement action against those who, for example, commit serious breaches, flout the law, refuse to work with us to seek compliance, commit offences which are prevalent in the district.

The Council has set out its strategic aims and objectives and our enforcement services will carry out their duties in support of these. These aims and objectives are set out in:-

- Council policy and strategic decisions;
- North Devon Council’s Corporate Business Plan;
- The service-specific service plans and inspection policies, which reflect the above priorities and the core enforcement activities for each service.

The Council’s aims and objectives have been drawn up in consultation with the public. Details of the consultation are available from the PPI on the Council’s website www.northdevon.gov.uk

Compliance

A range of activities will be undertaken to ensure compliance with legislation. Advice and guidance will be provided; proportionate, programmed and intelligence led inspections will be undertaken and, where necessary, inspections will be undertaken in response to complaints from third parties. Some enforcement services will also have officers patrolling the streets.

Where non-compliance is discovered, options to promote/seek compliance will include:

- Undertaking pro-active education programmes;
- Explaining legal requirements and, where appropriate, the means to achieve compliance;
- Providing an opportunity to discuss points in issue, where appropriate;

- Consideration of alternative means and reasonable timescales and to achieve compliance;
- Service of advisory letters, warnings, Statutory Notices or prohibitions detailing non-compliance;
- Enforcement actions including, but not limited to, formal action, seizure of documents or goods, closure of premises, caution, prosecution and/or injunction. Immediate, without Notice, enforcement action may be taken, but only where deemed necessary, reasonable and proportionate.

Enforcement Actions

The decision to use enforcement action will be taken on a case by case basis and to ensure consistency of approach, in accordance with this and any other more specific policies which may be applicable. The action taken, which may be immediate, will be proportionate to the gravity and nature of the non-compliance. Factors that will be taken into consideration include, but are not limited to:-

- The risk that the non-compliance poses to the safety, health or economic welfare of the public at large or to individuals;
- Evidence that suggests that there was pre-mediation in the commission of an offence;
- The alleged offence involved a failure to comply in full or in part with the requirements of a statutory Notice or Order;
- There is a history of previous warnings or the commission of similar offences;
- Aggravated circumstances such as obstruction of an officer or aggressive behaviour towards the public;
- The offence, although not serious itself, is widespread in the area where it is committed;
- Death was a result of a breach of legislation;
- The gravity of an alleged offence, taken together with the seriousness of any actual or potential harm;
- The general record and approach of the offender;
- There has been reckless disregard of health and safety requirements;
- There has been a repetition of a breach that was subject to a formal caution;
- False information has been supplied wilfully, or there has been intent to deceive.

Legal and Policy Context

Enforcement actions are taken within the context of a legal and policy framework. Council enforcement services will carry out their enforcement-related work with due regard to the Enforcement Concordat. This concordat arises from a Central Government initiative and has been adopted by the Council. The Concordat lays out the principles of good enforcement. These are:-

- Publishing clear standards, setting out the level of service and performance that the public and businesses can expect to receive;
- Dealing with the public and the business in an open and honest way;
- Providing a courteous, efficient and helpful service;
- Responding promptly and positively to complaints about the service;
- Ensuring that enforcement action is proportionate to the risks to the public;
- Carrying out duties in a fair, equitable and consistent manner.

A full version of the Enforcement Concordat see <https://webarchive.nationalarchives.gov.uk/http://www.berr.gov.uk/files/file10150.pdf>

In approving this enforcement policy and when setting service-specific enforcement requirements, in respect of those local authorities' functions specified in Part 3 of the Schedule to the Legislative and Regulatory Reform (Regulated Functions) Order 2007, the Council had, and will continue to have, regard to the statutory Regulators Code, issued by the Minister of State for the Department for Business, Enterprise and Regulatory Reform under Section 22 (1) of the Legislative and Regulatory Reform Act 2006. This will also apply to any further functions to which the said code might be applied.

Service-specific risk-rated inspection policies will be set, in respect of those functions which are considered deserving of co-ordinated monitoring.

Any decision to prosecute will be taken in accordance with the Code for Crown Prosecutors. A fully copy of the code is available from:-

CPS Public Enquiries
102 Petty France
London
SW1H 9EA
Telephone: 020 3357 0899
Email: enquiries@cps.gov.uk

Enforcement decisions and actions will be made with due regard to the provisions of:-

- The Human Rights Act;
- The Crime & Disorder Act;
- Equal rights and anti-discrimination legislation;
- Service-specific legislation;
- All other relevant legislation applicable from time to time.

Information concerning non-compliance may be shared with other enforcement agencies. Any such action will only be undertaken in the public interest and in compliance with the Data Protection Act 1998. *{now General Data Protection Act 2018}*

Authorisation of Officers

Only officers who are competent by training, qualification and/or experience will be authorised to take enforcement action. Officers will also have sufficient training and understanding of this enforcement policy to ensure a consistent approach to their duties. Officers are required to show their written authorisation on demand.

Status and Review

This policy was endorsed and adopted by the Council by minute 28 of Full Council on 25th June 2008. This policy is currently under review.

This is a public document and further copies of this and associated documents can be obtained from:

J W Mann, Head of Environmental Health & Housing Services
North Devon Council
E-mail: customerservices@northdevon.gov.uk

Complaints concerning the application of this enforcement policy are dealt with in accordance with the Council's customer complaints' procedure. Details of the procedure are available from Customer Services Unit, tel. no. (01271) 327711

FOOD STANDARDS AGENCY'S THE REGULATING OUR FUTURE (ROF) CHANGE PROGRAMME**Phase One**
Delivery For
EU Exit

- Develop approach to enhanced registration and validate solution against Digital Service Standard
- Develop new approach to segmentation and introduce short term changes to existing approach
- Agree criteria for National Inspection Strategies under Primary Authority scheme and progress pathfinders
- Digital solution for enhanced registration and overview of all establishments in place

March
2019**Phase Two**
Delivery Post
EU Exit

- Develop standards for regulated private assurance and model for use of Certified Regulatory Auditors
- Define future roles of FSA, LAs and private assurance within the delivery model
- Introduce CRAs and other regulated private assurance into the model
- Introduce sustainable funding model
- Progress proposals for mandatory FHRS in England
- Intervention in model informed by new Surveillance Strategy
- Implementation of new official control model for meat

