

SOLIHULL METROPOLITAN BOROUGH COUNCIL



**Food and Safety Service Plan  
2024-2025**

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# INTRODUCTION

This Service Plan covers the work of the Food and Safety Team.

The Food Standards Agency (FSA), which regulates the enforcement of food legislation, requires service plans to be submitted to a relevant Member forum for approval. The standard of work carried out is in accordance with national legislation, codes of practice and guidance.

The FSA monitoring system – Local Authority Enforcement Monitoring System (LAEMS) - enabled local authority data to be transferred electronically to the Food Standards database annually. The FSA monitoring system LAEMS is now suspended. Local Authorities now submit their monitoring data to the FSA in accordance with the FSAs Food Law Code of Practice (FLCOP). The FSA continue to undertake half yearly monitoring to gauge local authority's food interventions in accordance with the FLCOP.

Additional responsibilities in respect to Official Feed and Food Controls, including animal feed, are currently dealt with by the Trading Standards and Environment Team.

# SECTION 1 – FOOD SERVICE AIMS AND OBJECTIVES

## 1.1 AIMS AND OBJECTIVES

- 1.1.1 To maintain and improve food hygiene, protecting the public and minimising the risks of food poisoning and infectious diseases.
- 1.1.2 To maintain and improve food quality standards and labelling and to advise and educate food businesses and members of the public on food safety matters.
- 1.1.3 The key objectives of the Food and Safety Team in relation to food safety and food standards enforcement during 2024/25 are:
- to inspect the premises programmed for food hygiene legislation inspections, in accordance with the FSA the FLCOP.
  - to inspect the premises programmed for food standards inspections, in accordance with the FSA FLCOP.
  - to approve, register and licence relevant premises in accordance with relevant legislation, statutory code of practice and guidance.
  - to investigate food complaints in accordance with the service's food complaint procedure.
  - to provide advice to businesses and members of the public in the Borough with respect to food safety and food standards with particular focus on unrated food businesses that have not yet received their initial food hygiene intervention.
  - to promote national food safety campaigns which aim to raise awareness of food issues among food businesses and the public.
  - to produce and implement a sampling programme based on the national sampling programme, and local sampling needs.
  - to investigate all food poisoning notifications (except campylobacter) and outbreaks in association with the Consultant in Communicable Disease Control (CCDC) and UK Health Security Agency (UKHSA).
  - to respond to all food alerts in accordance with the relevant instructions and, where necessary, notify food incidents to the relevant national body in accordance with the statutory code of practice.
  - ensure that the Service's authorised officers adhere to the Regulatory Services Food Enforcement policies when making enforcement decisions.

- continue to ensure that the Service’s authorised officers are suitably qualified, experienced, and competent to carry out the range of tasks and duties they are authorised to perform, including providing additional training where required. Having regard to the revised FLCOP and officer competency requirements.
- continue to support the Primary Authority Principle, including consulting with authorities, where appropriate, following inspections and when dealing with food complaints.
- to liaise with other local authorities, and associated organisations, to help achieve consistent enforcement.
- continue to implement a quality system, review the procedures on a regular basis.
- to participate in the operation of the West Midlands Food Liaison Group. The chair of the food group is currently provided by Coventry CC. The Central England Trading Standards Authorities (CEnTSA) food group is also attended by a Team member.

## 1.2 **LINKS TO CORPORATE OBJECTIVES AND PLANS**

- 1.2.1 The Team supports and contributes to the common themes and principles that underpin the work and the Vision of the Council “Solihull: Where everyone has an equal chance to be healthier, happier, safer and prosperous through growth that creates opportunities for all”.
- 1.2.2 The Team’s Statutory Service Plan is designed to contribute to the delivery of this target and the Council’s priorities. Appendix 3
- 1.2.3 Underpinning the Corporate priorities are the Directorate’s own priority areas:
- Take action to improve life chances and health outcomes in our most disadvantaged communities
    - Improvements in skills and access to good work
  - Develop and promote the borough’s economy, revitalise our town and local centres and maximise the opportunities of UK Central and HS2
  - Growth that creates opportunities for all
    - Effective early help prevents issues from escalating
    - Safe, welcoming town and local centres where businesses can thrive

## **SECTION 2 – SERVICE BACKGROUND**

### **2.1 PROFILE OF THE LOCAL AUTHORITY**

- 2.1.1 Solihull Metropolitan Borough Council (SMBC) is a metropolitan authority in the West Midlands providing a range of community services to a population of approximately 216,240 (2021 census). The organisation employs approximately 8,000 people and, as a unitary authority, provides the full range of council services.
- 2.1.2 The Food and Safety Team recognises the importance of working with businesses and details of how it proposes to achieve this in the forthcoming year is detailed in the service delivery section of this Service Plan.
- 2.1.3 SMBC is part of the West Midlands Combined Authority which has the clear purpose of improving the prosperity of the region for its people and businesses.

### **2.2 ORGANISATIONAL STRUCTURE**

- 2.2.1 The Food and Safety Team is located within Regulatory Services in the Economy and Infrastructure Directorate. Following a restructure in April 2020 the Food and Safety Team Leader reports directly to the Head of Regulatory Services who in turn reports to the Assistant Director-Economy and Infrastructure. The corporate leadership structure is shown in **Appendix 4** and the structure of Regulatory Services is shown in **Appendix 5**.
- 2.2.2 The Head of Service is the lead officer responsible for food hygiene and food standards. Officers in the Trading Standards and the Environment Team are responsible for feeding-stuffs including feed-stuff sampling. Food matters are reported to the Cabinet Member for Communities.
- 2.2.3 Sampling analysis is undertaken by the Public Analysts. The UKHSA laboratory is located at Colindale Laboratory in London.
- 2.2.4 The Team also enforces the Food and Environment Protection Act (pesticide legislation).

### **2.3 SCOPE OF THE FOOD SERVICE**

#### **2.3.1 Food Safety and Standards**

1. To inspect all food premises and their food safety and food standards systems, to ensure compliance with food safety and standards legislation in accordance with the FLCOP.
2. To carry out inspections and enforcement procedures in accordance with the FLCOP (revised June 23).

3. To carry out risk assessments of all food premises to determine food safety and standards hazard ratings and consequent inspection frequency in accordance with the FLCOP.
4. To maintain an up-to-date database of food premises.
5. To participate in the West Midlands Food Liaison Group.
6. To participate in the CEnTSA sampling programme for food safety and standards.
7. To respond to valid food complaints relating to food safety and food standards on a risk related basis.
8. To promptly investigate sporadic cases and outbreaks of food poisoning / suspected food poisoning, in conjunction with CCDC, Communicable Disease Surveillance Centre (CDSC) and UKHSA to identify the cause and to introduce effective control measures.
9. To carry out the statutory duties required in the control of disease and infectious diseases legislation, including the exclusion from work of affected food handlers.
10. To continue to review outputs and outcomes of duties and monitor cost effectiveness to provide a value for money service.
11. To have regard to local demands to ensure the wholesomeness of food and water and that compositional standards are adhered to.
12. To supervise and assist in the training of newly qualified Environmental Health Officers (EHOs) and Food Safety Officers (FSOs).
13. To promote good practice in food businesses and increase consumer confidence by operating the National Food Hygiene Rating Scheme.
14. To identify and signpost, as necessary, health and safety contraventions in catering premises.
15. To liaise, as necessary, with planners / developers / businesses to ensure that new food premises are constructed and equipped to ensure compliance with food safety legislation.
16. To assist food handlers / businesses by providing advice and guidance in order that they comply with food law.
17. To participate in local, regional, and national investigations to advance understanding of infectious disease transmission paths and controls.
18. To participate in the West Midlands Food Liaison Group and CEnTSA food group to promote consistency of enforcement actions and to share good practice.

19. To develop working relationships with existing Primary Authority companies to promote good practice and consistency.
20. To inspect imported fruit and vegetables arriving at BHX and undertake the inland control of illegally imported foodstuffs of animal origin.



## 2.4 **DEMANDS ON THE FOOD SERVICE**

- 2.4.1 Premises are risk rated in accordance with the FLCOP in respect of food hygiene and food standards. On 1st April 2024 there were 1796 food businesses on the Team's database. Approximately a quarter of these premises are rated as high risk for food hygiene (Categories A - C). Premises are also risk rated for food standards in accordance with the FLCOP.
- 2.4.2 In 2024/25, the Team will continue to operate the National Food Hygiene Rating Scheme (FHRS). The scheme helps customers choose where to eat or shop for food by giving them information about the hygiene standards in food premises. The scheme also promotes trade for compliant businesses. A key message of the FHRS is "Good Hygiene is Good for Business" supporting the business growth agenda.
- 2.4.3 The Food and Safety Team will continue to support Primary Authority Partnerships (PAPs). The primary authority initiative is a statutory scheme for businesses trading across local authority boundaries. Once a PAP is set up with a business the primary authority provides advice on regulatory matters which must be considered by other enforcing authorities. A PAP results in fewer inspections for the business and reduces regulatory burden and consequently business costs.
- 2.4.4 The Team has established a primary authority agreement with Amadeus the outside catering division of the NEC.
- 2.4.5 The Service maintains a database of food premises in the Borough on its IDOX computer software system. The computer software system transferred to IDOX in January 2022. The database is regularly updated by notifications received from new businesses, premises registrations and observations by officers undertaking their normal duties. Transfer to IDOX has continued to impose an operational pressure on the service delivery of the team.
- 2.4.6 As of 1<sup>st</sup> April 2024, there are 7 businesses within the Authority that are approved under product specific legislation.
- 2.4.7 In addition, there is one FSA regulated premises within the Borough, which produces poultry meat and products. This business only receives food standards inspections from the Team.
- 2.4.8 BHX is not an authorised Border Inspection Post for products of animal origin. In 2023/24 there were 38 service requests in relation to the importation of fruit and vegetables through the airport. Officers carry out 100% documentary checks on airway bills and will carry out physical checks on consignments of imported food if the officer deems necessary, e.g., if intelligence has been received that goods may have been imported illegally. In addition, food officers attend the cargo sheds on a weekly basis to undertake inspection of food consignments.
- 2.4.9 UK Border Force (UKBF) are responsible for detecting "smuggled" Products of Animal Origin.

- 2.4.10 Food and Safety Team officers are responsible for identifying and dealing with illegally imported products of animal origin in retail/catering premises. The Team imposes cost recovery for the detention and destruction of illegally imported food at BHX.
- 2.4.11 The current database of External Temporary Storage Facilities Enhanced Remote Transit Sheds (ETSF) within Solihull is periodically reviewed and maintained to ensure that they are included in the programmed inspection regime. ETSF's are warehouses used for the storage of goods under Customs bond.
- 2.4.12 Airline manifesto checks are periodically carried out to ensure that all imported food is correctly notified to the Authority.

### **Resources 1589 hours**

- 2.4.13 Dnata Catering UK supplies food to aircraft leaving the airport and are based within the Borough.
- 2.4.14 The NEC hosts exhibitions and events throughout the year. There are 17 exhibition halls, Arena and Pavilion, each with at least 2 restaurants and burger bars, which prepare food to order. Certain shows require particular attention because of the nature of the exhibitors, in particular the Good Food Show, which has some 350 stands handling and preparing a wide range of foods. Contract concessionaires also complement the fixed catering at certain events with mobile vehicles.
- 2.4.15 There is one seasonal poultry slaughterhouse within the Borough which slaughters and dresses turkeys for Christmas.
- 2.4.16 It is estimated that 5% of food businesses within the Borough are run by proprietors whose first language is not English.
- 2.4.17 The FSA's, Safer Food, Better Business DVD (used to assist with food safety legislation compliance) is available in English and Chinese.
- 2.4.18 The Food and Safety Team are based in The Core, Homer Road, Solihull, a satellite office of the main Council House. Service requests are received via Solihull Connect. Connect agents are available to offer some advice and log service requests Monday to Friday.
- 2.4.19 Officers work in the evenings and at weekends as required, to inspect businesses which are only open at those times. No formal out of hour's system operates. There is an emergency number on the Council's website, which covers a range of the Council's services. If a food or safety related issue is reported on this line, Team Leader and/or the Head of Service would be contacted as necessary.
- 2.4.20 In addition, information is provided through a series of web pages on the Council's website. The pages were designed by the Team and provide information on all aspects of the Team's work, ([www.solihull.gov.uk](http://www.solihull.gov.uk)).

2.4.21 Regulatory Services actively seek out matrix working opportunities across teams within the Council and partners, including WM Police and WM Fire Service, to ensure effective use of resources.

## 2.5 **ENFORCEMENT POLICY**

2.5.1 Regulatory Services has an Enforcement and Prosecution Policy (reviewed July 2023) controlled within its Quality System. The policy encourages the following approach:

- **proportionality** in the application of the law and in securing compliance.
- **consistency** of approach.
- **openness** in how the service operates and what those who are regulated can expect from the service.
- setting **standards** of service and performance.
- **helpfulness** in how to comply with the law.
- having a system for making **complaints** about the service.

2.5.2 In addition, the Food and Safety Team has a specific Food Safety Enforcement Policy controlled within the Quality Assurance System. When undertaking food safety and food standards enforcement, the Team aims to:

- ensure that we enforce the law in a fair, equitable and consistent manner.
- assist businesses and others in meeting their legal obligations without unnecessary expense.
- focus on prevention rather than cure.
- take firm action against those who flout the law or act irresponsibly.

## SECTION 3 – FOOD SERVICE DELIVERY

### 3.1 FOOD HYGIENE AND FOOD STANDARDS PREMISES INSPECTIONS

3.1.1 There are 1796 food businesses on the premises' database which are subject to inspection. Premises outside the inspection regime are excluded from this figure. As required by the FSA the premises are profiled in accordance with the risk in respect of food hygiene issues where A is the highest and E the lowest.

There are currently 10 registered food businesses which fall outside of the inspection regime. This can be for several reasons; they may be a head office of a food business where food is not actually produced or stored, or a mobile caterer based in Solihull who trades solely outside the Borough and is inspected by a different Authority. It could also be that the registration relates to a low risk vending machine only.

3.1.2 The profile of the premises due a food hygiene inspection - 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025 is:

- A rated - 6
- B rated - 55
- C rated - 182
- D rated – 127
- E rated Alternative Enforcement Strategy (AES) - 663
- U unrated – 210

3.1.3 Food hygiene and food standards inspections are usually carried out together in accordance with the FLCOP. The Code is reviewed by the FSA on a regular basis. The Code of Practice was reviewed and reissued in June 2023. In 2024/25 food hygiene inspection and food standards inspections will be carried out in accordance with the FSA FLCOP.

3.1.4 There are currently 348 unrated food standards premises on the database. These premises will be initially subject to an Alternative Strategy to prioritise those of highest risk. Higher risk businesses will be subject to inspection.

3.1.5 The Food Information Regulations 2014 require officers to provide advice and guidance to businesses on the implementation of the regulations particularly with reference to allergens. The Team enforce Natasha's Law which requires the allergen labelling of products that are prepacked for direct sale (PPDS). An inspection pro-forma is utilised for food hygiene and food standards.

3.1.6 The Team has reviewed its approach to alternative strategies for low-risk premises. Overdue/due E rated premises will be subject to an online Alternative Enforcement Strategy (AES) food hygiene questionnaire that has been devised and will be completed online by the food business.

- 3.1.7 There continues to be an increase in the number of new food businesses and business churn. This continues to result in a back log of new businesses that are awaiting an initial inspection. Prioritising and inspecting of high-risk new food businesses is one of the priorities of the Team in parallel with the FSA FLCOP requirements.
- 3.1.8 New businesses are required to register with the local authority 28 days before commencement. The new businesses are added to the database and included in the annual inspection programme as unrated premises until their initial rating inspection. A revised procedure has been devised to prioritise higher risk premises for initial inspection.
- 3.1.9 In accordance with the flexibility allowed by the Code of Practice, broadly compliant Category C and D premises may be subject to official controls that are not full inspections, i.e., partial topic focused interventions. The team will make use of these flexibilities. New partial inspection aide memories for broadly compliant C and D rated premises have been devised and will be implemented from 1st April 24.
- 3.1.10 The following feeding stuffs interventions were carried out in 2023/24
- |  |   |
|--|---|
| Bulk Feed Store                          | 0 |
| Feed mixer using compounds and additives | 1 |
| Supermarket                              | 2 |
| Livestock                                | 0 |
| Arable                                   | 0 |
- 3.1.11 Approved premises will be inspected in accordance with to the FLCOP.
- 3.1.12 Officers who inspect approved premises have undertaken additional training in the relevant areas. A competency scheme for officers operates to address this issue.
- 3.1.13 Revisits will continue to be undertaken when necessary and in accordance with the 'Revisit Decision Tree'.

## **Inspection Resources 2100 hours**

### **3.2 FOOD & PREMISES COMPLAINTS**

- 3.2.1 Complaints are dealt with according to the Quality System Procedure F-02, which were developed in accordance with the Food Law Code of Practice.
- 3.2.2 67 food complaints were received in 2023/24.
- 3.2.3 45 hygiene of premises complaints were received in 2023/24
- 3.2.4 The responses to food complaints vary from using the information as "intelligence", to the provision of advice to the complainant, or liaison with the retailer / manufacturer through to formal action in line with the Enforcement and Prosecution Policies. All food complaints will be assessed by a Team

member to determine action to be taken. If the complaint warrants further investigation on the basis that it is likely to present a risk to health and/or non-compliance with food standards and labelling requirements it will be dealt with by the Team. Some complaints that have no public health significance will be dealt with more effectively by referring the complainant directly back to the manufacturer/retailer.

### **Resources 685 hrs**

#### **3.3 PRIMARY / HOME AUTHORITY PRINCIPLE**

- 3.3.1 Solihull welcomes the opportunity to work closely with food businesses recognising the benefits to both the business and officers in gaining detailed experience of companies' food safety management systems. Solihull will maintain its existing primary authority agreement. Solihull entered its first primary authority partnership in November 2013 with the company Amadeus which is the catering arm of the NEC group. The partnership covers both food hygiene and food standards. The Food and Safety Team recover costs for this work based on officer's hourly rates as per the Council's scale of fees and charges.

### **Resources 30 hours**

#### **3.4 ADVICE TO BUSINESS**

- 3.4.1 Failure to make advice available can lead to food safety being compromised. This aspect of Solihull's service is therefore seen as important, despite it being a non-statutory function.
- 3.4.2 Preliminary food hygiene advice is provided to unrated local food businesses. This involves providing some initial food business advice providing advice and guidance in relation to food safety management systems, food hygiene training and structural requirements. The Team Leader assesses the food hygiene risk of the operation and prioritises those as higher risk for inspection.
- 3.4.3 Preliminary food standards advice is provided to local food businesses. This involves providing some initial food labelling advice and referral for product analysis to the Public Analyst, if appropriate. The charges for the Public Analyst are incurred by the business.
- 3.4.4 Advice to businesses is also available via the food web pages. These pages are reviewed and updated according to the needs of our customers. Other methods of providing advice will continue to be used as appropriate, e.g. newsletters, press releases and social media when appropriate.

### **Resources 1484 hours**

#### **3.5 FOOD SAMPLING**

- 3.5.1 The Food and Safety Team undertakes sampling in accordance with the Sampling Policy and Quality System Sampling Guideline F-03. 20 samples were taken.
- 3.5.2 A local sampling plan is devised based on intelligence and relevance to local issues and need. In the forthcoming year the sampling programme will continue at a low level due to limited resource.
- 3.5.3 The Team usually participates in the UKHSA annual sampling programmes and sampling exercises agreed by the CEnTSA. The FSA may also direct sampling activities from time to time in accordance with national priorities.
- 3.5.4 Samples relating to food complaints are submitted for analysis as necessary. Results of milk samples provided to Eurofins by the local dairy are monitored by the team. Sampling of private water supplies will be undertaken, as required, by the Private Water Supplies Regulations 2018 (as amended). Private water supply sampling will be undertaken by Worcester Regulatory Services (WRS) authorised officers. Sampling of swimming pools may be undertaken as required or if requested (for which there is a charge).
- 3.5.5 Samples of imported food from BHX will continue to be taken as required. In addition, samples of imported foods from inland premises will be taken as a result of food standards inspections if deemed necessary.
- 3.5.6 Analysis and examination of food and water samples are undertaken by the Public Analyst and by the Consultant Microbiologist at Colindale. (**Appendix 2**)

**Resources 30 hours for food sampling - see below for water.**

### **3.6 CONTROL AND INVESTIGATION OF OUTBREAKS AND FOOD RELATED INFECTIOUS DISEASES**

- 3.6.1 Solihull investigates notified cases of food borne illness as directed by the CCDC. The Team's target is to investigate all notified cases, other than Campylobacter, within 2 working days of notification and this is usually undertaken by telephone. We received and investigated 78 cases.
- 3.6.2 Suspected cases of food borne illness are investigated as appropriate.
- 3.6.3 Food borne illness (F-04) - to determine their source, prevent further spread of infection and to provide advice to patients. UKHSA has devised a "Roles and Responsibilities for Investigation of Gastrointestinal Infectious Diseases" document. The document outlines the division of responsibility between Regulatory Services and UKHSA in the investigation of infectious/communicable diseases. The aim of the document is to ensure a consistent approach to the investigation of infectious disease and clearly define roles. This has been adopted by regional local authorities and the UKHSA.

**Resources 329 hours**

### **3.7 FOOD SAFETY INCIDENTS**

- 3.7.1 The Team has a policy for dealing with food safety incidents. Product Withdrawal Information Notices or Product Recall Information Notices are issued by the FSA via email. Food Alerts are dealt with in accordance with the FSA Code of Practice. No specific out of hours cover is provided.

**Resource 4 hours**

### **3.8 LIAISON WITH OTHER ORGANISATIONS**

- 3.8.1 We are committed to liaising with other local authorities, and national organisations to achieve consistency and to maintain our level of knowledge and understanding in a rapidly developing area of work. This is achieved by being actively involved in several groups and agencies including:

- Regional Food Liaison Group.
- Food Standards Agency – Update days are attended – Imported food meetings attended and liaison with the National Food Crime Agency.
- CEnTSA - Central England Trading Standards Authorities.
- SMBC Public Health.
- UK Health Security Agency (UKHSA) – meet with LAs through regional Food Liaison Groups.
- UKBF - United Kingdom Border Force.
- APHA - Association of Port Health Authorities.
- BID – Business Improvement District.
- West Midlands Fire Service.
- CSCI – Care and Social Services Inspectorate.
- West Midlands Police.
- Ofsted - Office for Standards in Education.
- CQC - Care Quality Commission.
- UK Immigration Agency.

**Resource 323 hours**

### **3.9 FOOD SAFETY AND STANDARDS PROMOTION**

- 3.9.1 The Food and Safety Team use social media to promote a range of relevant topics during the year.
- 3.9.2 Additional grants from the FSA occasionally become available to fund additional food safety and food standards initiatives. The Team may bid for funding through such grants as and when they arise.

**Resources 10 hours**

### **3.10 PRIVATE WATER SUPPLIES**

- 3.10.1 A private water supply is any water supply which is not provided by a water company i.e., it is not a mains supply. Most private supplies are situated in rural parts of the Borough. The source of the supply may be a well, borehole, spring, river, or stream.



- 3.10.2 Private water supplies need to be properly protected and treated as they can potentially be contaminated with bacteria, parasites or chemicals and other substances.
- 3.10.3 The Regulations require local authorities to inspect the supply, conduct a risk assessment and take and analyse samples in relation to private water supplies to ensure they meet statutory requirements. The risk assessment assesses the source of the supply and the surrounding area to see if contamination is possible. It also involves checks of any storage tanks, any treatment systems and pipework. The assessment identifies actual and potential hazards that may affect the health of those drinking the water. Where the water is found to be unsafe, action must be taken by the owners of the supply to ensure the supply is safe.
- 3.10.4 Improvements to the system may include:
- Repairing the system to prevent dirty water, animals or their droppings from entering the water.
  - Installing an appropriate water treatment system to ensure satisfactory microbiological quality.
  - Replacing lead pipes throughout the property to reduce lead levels in the drinking water supply.
- 3.10.5 The frequency of the risk assessment and monitoring depends on the size of the supply. The regulations permit the authority to charge for this work up to a statutory maximum.
- 3.10.6 The authority is required to make an annual return to the Drinking Water Inspectorate (DWI) and from the figures submitted to DWI at the end January 2024 Solihull had:
- 16 single dwellings with private water supplies.
  - 3 commercial premises with private water supplies.
  - 1 premises classed as having private distribution systems.

**Resources 115 hours**

## SECTION 4 – TEAM RESOURCE

### 4.1 FINANCIAL ALLOCATION

4.1.1 The allocated budget for the Food and Safety Team Food Safety is £379,600.

### 4.2 STAFFING ALLOCATION

4.2.1 As of 1<sup>st</sup> April 2024 the Food and Safety Team has the following allocated establishment resource:

	Assignment FTE	Post FTE	
Team Leader - Food & Safety	0.50	0.50	
Environmental Health Officer	1.00	1.00	
Environmental Health Officer	1.00	1.00	
Environmental Health Officer	1.00	1.00	
Environmental Health Officer	0.60	0.60	
Environmental Health Officer	1.00	1.00	seconded to events management.
Food Safety Officer	0.88	0.88	
Food Safety Officer	1.00	1.00	

As of 1<sup>st</sup> April 2024

FTE allocated for food hygiene 3.0.

FTE allocated for food standards 1.4.

FTE allocated for health and safety/skin piercing/PWS 2.0

### Occupied Post Resource

	FTE	=	Hours
Food Team Leader	0.5 x 1560	=	780
EHO	3.60 x 1560	=	5616
FSO (Higher Certificate)	1.0 x 1560	=	1560
FSO (Higher Certificate)	0.8 x 1560	=	1248
Administrative Support	0.33 x 1560	=	515

**Total Occupied as of 1<sup>st</sup> April 2024 = 9,719 hours**

### Additional Resource –

1 FTE contractor to undertake due/overdue businesses/ unrated premises until 7/6/24.

Resource allocation within the current team covers areas outlined within this service plan, however to fully comply with the FLCOP, review of resource allocation will be required and additional resource may need to be allocated.

### 4.3 **STAFF DEVELOPMENT PLANS**

- 4.3.1 Annual staff appraisals and performance reviews are undertaken in accordance with the Corporate Performance and Development Review Framework. Training needs are identified through the completion of an individual training matrix and dependent on need, training is undertaken as necessary.
- 4.3.2 All Council staff are assessed in line with the Corporate Performance and Development Review Framework (Fit for the Future). Targets are set at the beginning of the review year and throughout the year progress is monitored monthly with prearranged one to one meetings. At the end of the year an assessment is made, which may directly affect an individual's pay.
- 4.3.3 Officer competency in the Food Team is essential to comply with the requirements of the FLCOP. To ensure all officers are competent and adequately trained and authorised to perform their duties a local competency scheme exists. The scheme documents areas of experience and expertise which are linked to the schedule of authorisations detailed in Regulatory Service's Quality System (QS-01). The competency scheme covers all Food and Safety Team officers including newly qualified officers, and any officers with breaks in experience. In addition to this a monitoring system to ensure inspection quality and uniformity has also been introduced. The competency framework was reviewed and revised in 2021 in accordance with the revised FLCOP. The revision broadened the baseline qualifications required and is competence based.
- 4.3.4 Staff training and development needs are assessed on an annual basis. Completion of the competency matrix identifies training needs. Development needs are also identified through completion of a training matrix; monitoring of officer's work, accompanied inspections, staff appraisals and one to ones. Following this, individual action plans are developed and implemented.
- 4.3.5 Before officers are authorised to undertake food hygiene or food standards enforcement activities, they are assessed to ensure that they hold the appropriate qualifications, have sufficient experience in food law enforcement and are properly trained and competent. Records of qualifications, training and experience are documented and link directly to the officer authorisation procedure.

#### **Resource 100 hours**

- 4.3.6 Staff training is delivered in the following ways:
- externally provided training courses.
  - in-house training days scheduled throughout the year.
  - SMBC mandatory training.
  - training courses arranged through CEnTSA, West Midlands Food Liaison Group and UKHSA.
  - on-going in-house training at team meetings, to include the following issues:

- discuss new legislation, Code of Practice, Guidance etc. and agree consistent interpretation / approach.
- discuss in-house procedures and policies.
- consistency issues.
- disseminate information; (cascade training).
- opportunity for officers to learn from each other.
- induction training for new staff.
- accompanied / joint visits.
- training and instruction provided on-the-job or on a one-to-one basis.

**Resource 270 hours**

## SECTION 5 – TEAM QUALITY ASSESSMENT

### 5.1 QUALITY ASSESSMENT

- 5.1.1 The Food and Safety Team used to operate a quality assurance system (originally BS EN ISO 9001:1994) which was first certified in 1992 by DNV (a company accredited to assess and verify quality assurance systems). The quality system is currently monitored by internal review. The food and safety quality system policies are reviewed periodically.
- 5.1.2 Accompanied visits are undertaken by peers, (to complex or poor performing businesses). Team leader undertakes review of inspection reports, records, and all other correspondence, including the work of any contractors when used
- 5.1.3 The Team undertakes FSA standardisation exercises annually.

**Resource 50 hours**

## SECTION 6 – FOOD SERVICE REVIEW

### 6.1 REVIEW AGAINST THE SERVICE PLAN

- 6.1.1 On 1<sup>st</sup> April 2024 the backlog of inspections from 2023/24 was 2 C rated (seasonal businesses), 50 D rated and 102 unrated businesses.
- 6.1.2 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024 the following food hygiene interventions were undertaken.
- A 18
  - B 54
  - C 291
  - D 249
  - E 593
- 6.1.3 The FHRS helps consumers to choose where to eat out or shop for food by giving them information about the hygiene standards in food premises at the time they were last inspected. The more compliant the business is, the better the score they achieve, encouraging businesses to improve their standards. Data is uploaded onto the FSA portal on a weekly basis. A FHRS revisit procedure was operated in accordance with the brand standard. 38 revisit requests were received in 2023/24. 77% of food businesses in Solihull are broadly compliant with food hygiene legislation as opposed to 97% in 2023/24.
- 6.1.4 FSA requirement for 2024/25 will be to undertake all interventions due in accordance with the FLCOP.
- 6.1.5 Ensuring that the premises' database is current and accurate has been prioritised with a concerted effort taken to contact new businesses at the earliest opportunity. In addition, officers contact unrated premises to ensure that they are trading. Businesses that are no longer trading are removed from the database.
- 6.1.6 The Team continued to receive many enquiries from home-based caterers.
- 6.1.7 The Food and Safety Team has adopted Smarter Ways of Working (SWOW) techniques. This includes hot-desking, working from home and other Council locations.
- 6.1.8 FSA monitoring returns were submitted to the FSA within the deadlines.
- 6.1.9 Officers received training in:
- FHRS Consistency
  - FSA Food Standards delivery model
  - GI questionnaire workshop - UKHSA

- Imported Food webinar – DEFRA.
- CIEH HEPN – Hygiene Emergency Prohibitions
- CIEH Introduction to approved premises
- Higher risk foods
- Botched cosmetic procedures on the rise
- Protecting information
- GDPR
- Fire Awareness
- Regulating the beauty and aesthetic Industry
- Food hygiene sampling training (Chartered Trading Standards Institute)
- Illegal meats training course
- Food allergen enforcement (CIEH)
- Assertiveness
- Future of aesthetics
- Sharepoint training
- Environmental Health & Microbiology
- Internal CPD sessions

6.1.10 Training for individual officers is maintained centrally using a shared database. Qualifications and CPD records for all officers are maintained centrally by individual officers.

6.1.11 Weekly team meetings undertaken.

#### 6.1.12 **Primary Authority Partnerships (PAPs)**

The Team continued to support Amadeus Catering through their Primary Authority partnership.

#### 6.1.13 **Communications**

The Team maintained good communication links with the management of BHX, the NEC and the FSA. Biweekly update is provided to the Director of Economy and Infrastructure highlighting key work areas, risks and mitigations.

The Team continues to embrace social media as a means of communication.

#### 6.1.14 **Competency**

The Team has worked to ensure joint competencies in food and health and safety thereby allowing combined interventions of premises for food and health and safety by one officer when appropriate. Officers continue to receive health and safety training to ensure that there is flexibility and resilience across the Team. The quality system document, QS -15 outlines the competency scheme.

#### 6.1.15 **Alternative Enforcement Strategies (AES)**

Overdue/due E rated premises will be subject to an online Alternative Enforcement Strategy (AES) food hygiene questionnaire that has been devised and will be completed online by the food business. Overdue/due C rated

premises for food standards will be subject to an online Alternative Enforcement Strategy (AES) questionnaire that will be devised and will be completed online by the food business.

## **6.2 Identification of Any Variation from the Statutory Service Plan**

6.2.1 Variations are monitored through management review and are escalated within the management structure as necessary. Regular one to ones are scheduled to monitor service plan objectives with team members.

## **6.3 Proposed Areas of Improvement**

6.3.1 The following points are actions that the Team aims to improve during the year:

1. The Quality System will continue to be reviewed - ongoing.
2. Ensure that all authorised officers complete the required 20 hours of Continual Professional Development.
3. Inspections/interventions to be carried out in accordance with the FSA FLCOP.
4. Produce accurate reports for FSA monitoring returns, FOI and HMRC data requests from Idox/Uniform.
5. Officers to continue to be up skilled to enable them to cover hygiene, standards, and safety together during interventions.
6. Inspect (unrated) premises within the 28 days as detailed in the FSA (FLCoP).
7. Sample of imported food taken at BHX to assist in the detection of illegal produce dependent on perceived risk.
8. Continue to promote the work of the Team by using social media to communicate key messages.
9. Review resources in line with FSA letter and guidance received by CEO of SMBC in order to complete inspections required by FSA.

## **SECTION 7 – SCOPE OF THE HEALTH & SAFETY SERVICE**

### **7.1 SCOPE OF THE HEALTH & SAFETY SERVICE**

7.1.1 SMBC carry out interventions relating to health and safety matters in those premises for which it has enforcement responsibility including:

- Proactive inspections - used to target the high-risk activities in those sectors specified by HSE or where intelligence suggests risks are not being effectively managed.
- engagement with event organisers in partnership with other agencies via the Safety Advisory Group (SAG) to address public safety at events.
- Investigation of complaints concerning work premises and practices.
- Investigation of accidents and dangerous occurrences reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR).
- Registration of skin piercing activities including tattooists and micro bladers.



## **SECTION 8 – DEMANDS ON THE HEALTH AND SAFETY SERVICE**

### **8.1 DEMANDS ON THE HEALTH & SAFETY SERVICE**

#### **8.1.1 HEALTH & SAFETY PREMISES INSPECTION AND OTHER INTERVENTIONS**

##### **8.1.2 Inspections**

The responsibility for the enforcement of the Health and Safety at Work Act etc. 1974 and relevant statutory provisions is governed by the Health and Safety (Enforcing Authority) Regulations 1998 which allocates enforcement to either the HSE or LA according to the main work activity. Local authorities are responsible for enforcement of the health and safety laws in places such as shops, retail and wholesale warehouses, offices, catering, restaurants, bars, hotels, some activities in care homes (without nursing care), leisure and cultural services such as golf courses and horse-riding establishments together with consumer services such as undertakers and centres fitting tyres and exhausts.

The HSE is responsible for the remainder of activities e.g., factories, building sites, farms, vehicle repair workshops, railways, power stations, care homes providing nursing care, docks, fairgrounds, schools, colleges, and council run services.

The National Local Authority Enforcement Code ensures that local authority health and safety regulators take a more consistent and proportionate approach to their regulatory interventions. It sets out the Government's expectations of a risk-based approach to targeting and had fundamentally affected the way health and safety is enforced and based on the "no inspection without reason" principle.

##### **8.2.2 Safety Advisory Groups**

Public safety, in particular crowd safety, has been identified by HSE as a priority and in Solihull there has been a growth in commercial and community events that might pose a risk to those who attend them. Local multi-agency

Safety Advisory Groups (SAGs) meet when necessary and are made up of representatives from local authorities, emergency services and other relevant bodies. A member of the Team may attend and provides advice in respect of environmental health related issues.

Whilst the majority of health and safety regulatory activities are reactive our involvement with Solihull Moors Football Club, is a proactive partnership. A member of the Team, currently seconded to the Events Management has been an instrumental member of the SAG working with the club to ensure the safety of staff and spectators.

#### **Resource 400 hours**

##### **8.2.3 West Midlands Health and Safety Liaison Group**

This meeting is held quarterly, and attendance continues to be a valuable way of sharing intelligence and best practice. This is also attended by the HSE's Enforcement Liaison Officer (ELO).

##### **8.2.4 Investigation of Accidents and Dangerous Occurrences**

The Team will have regard to the Incident Selection Criteria Guidance to deliver a common, proportionate, transparent, and targeted approach for the selection and investigation of accidents and incidents. When deciding which incidents to investigate, the level of resource to be allocated to the investigation is assessed and account will be taken of the:

- severity and scale of potential or actual harm.
- seriousness of any potential breach of the law.
- duty holder's known past health and safety performance.
- enforcement priorities.
- practicality of achieving results.
- wider relevance of the event, including serious public concern; and
- national guidance on targeting interventions.

#### **Resource 1000 hours**

##### **8.2.5 Service Requests**

The Team will investigate all relevant service requests, From 1st April 2024 to 31st March 2025.

Service requests include complaints regarding working conditions; LOLER notifications; skin piercing registrations and complaints and legionella notifications.

There has been a significant increase in the number of skin piercing licence applications. Since 1<sup>st</sup> January 2024 there have been 50 person and 15 premises skin piercing applications which require inspection and processing to ensure correct infection control.

## **Resource 500 hours**

### **8.2.6 Funeral Director Project**

Following the recent distressing incident at Legacy Independent Funeral Directors in Hull and East Riding there is a need to reassure the public that funeral directors are treating their loved ones with the dignity and respect they would expect.

There is currently no statutory inspection regime in relation to the services provided by funeral directors, which are unregulated in England and Wales beyond health and safety regulations and pre-paid funeral plans. Quality standards in the provision of funeral director services are not prescribed by law, and there is no requirement for a funeral director to be registered or affiliated with a representative body. Government has been looking at what a suitable regulatory framework should be and is considering next steps.

After the initial investigations into Legacy Independent Funeral Directors, councils in Hull and East Riding visited all funeral directors' premises within their areas. This approach was supported by the sector and all firms in the areas complied.

Given the gravity of the situation in Hull and East Riding and the need to reassure that the failings which led to this incident are not more widespread, Government has been working on a more immediate response.

The Government has written to all councils in England requesting that they undertake visits to all funeral directors. This is to reassure the public that the sector is safe, professional, and cares for loved ones in the way that we would all want.

Food and Safety team officers will be undertaking these inspections of Funeral Directors premises within Solihull and providing feedback and guidance to the businesses.

This project is **not** being resourced by Government.

## **Resource 100 hours**

## **SECTION 9 – HEALTH AND SAFETY SERVICE DELIVERY**

### **9.1 HEALTH & SAFETY SERVICE DELIVERY**

#### **9.1.1 Advice to Businesses & Public**

The Food and Safety Team no longer give advice on health and safety matters but to signpost businesses and the public to the HSE website.

#### **9.1.2 Lifting Equipment Defects/Pressure Systems Defects**

Statutory reports are assessed by a competent officer and relevant action taken to follow up to ensure that issues are addressed. Where there are indications that action has not been taken, further formal action would be considered.

#### **9.1.3 Cooling Towers Register**

The Notification of Cooling Towers and Evaporative Condensers Regulations 1992 require that the local authority is notified of all “cooling towers and modifiable devices within its area. The Team maintains, reviews and updates this register annually.

#### **9.1.4 Sunday Trading Act**

The Sunday Trading Act 1994 restricts the opening of certain types of shops (larger than 280 m<sup>2</sup> retail floor area), to six hours between 10.00 hrs and 18.00 hrs on a Sunday. Officers respond appropriately to any complaints made regarding trading hours.

#### **9.1.5 Asbestos Notifications**

Officers will respond to all notifications of asbestos removal from premises for which the Council has enforcement responsibility and monitors arrangements in accordance with documented procedures.

#### **9.1.6 Skin Piercing**

Registrations of persons carrying out body piercing, electrolysis, tattooing (including semi-permanent make-up) and acupuncture, are granted under the Local Government (Miscellaneous Provisions) Act 1982. SMBC has adopted by-laws for these activities that must be complied with by the business/person registered. Premises are visited on first registration or any subsequent complaint. Officers are responsible for the enforcement of the Local Government Miscellaneous Provisions Act 1982 in respect of the registration of cosmetic piercers.

**Resource 600 hours**

## **SECTION 10 – HEALTH AND SAFETY SERVICE REVIEW**

### **10.1 HEALTH & SAFETY SERVICE REVIEW**

#### **10.1.1 Health & Safety Interventions Delivered during 2023-2024**

Local authorities should use a full range of interventions available to influence behaviours and manage risk. During 2023/24 the following interventions were achieved:

#### **10.1.2 Machinery Guarding in Food Premises**

In 2023/24, during food hygiene visits officers continued to discuss machinery guarding with food business operators where necessary, to ensure that all catering equipment is correctly guarded.

#### **10.1.3 Machinery Guarding in Food Premises**

During 2024/25 officers will continue to deliver the machinery guarding intervention involving discussing the issue when relevant with business operators. Prohibition notices will be considered if dangerous equipment is found being used without guarding.

#### **10.1.4 Gas Safety -** The HSE has requested that Local Authorities monitor gas safety in catering premises and feedback their findings. This issue has been a focus for SMBC officers during food inspections for some time following a local intervention.

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## **Appendix 1 – Council Political Composition**

The party-political composition of the Council is currently:

■ Conservatives	30
■ Green	10
■ Liberal Democrat	8
■ Independent	2
■ Labour	1

**Appendix 2 - Public Analyst**

Eurofins

154 Business Park

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# Solihull Council Plan 2020-25

Updated June 2024



**Children are central to our work as a Council**

- People and Communities**
- Improvements in early childhood development and school readiness, particularly in disadvantaged communities
  - Effective early help prevents issues from escalating
  - Children and vulnerable adults are safeguarded
  - The Council is a good corporate parent to children in care and care experienced young people
  - Improvements in skills and access to good work
  - Connected, resourceful communities where people find solutions to local issues

- A Strong Economy**
- People, business and the environment benefit from UKC and HS2, including increased access to good work
  - More environmentally sustainable affordable and social housing is built
  - Safe, welcoming town and local centres where businesses can thrive
  - More visitors to the borough
  - The local economy is more resilient to economic shocks
  - Improve transport across the borough

- Actioning our Climate Change Declaration**
- Community, environment and business benefiting from actions on climate change and more resilient to its impacts
  - The council is net zero carbon by 2030
  - The borough is net zero carbon by 2041
  - An enhanced, well connected natural environment
  - More people using public transport, walking and cycling
  - Air quality has improved

**Here2Help: Coordinates information, advice and help for all residents**

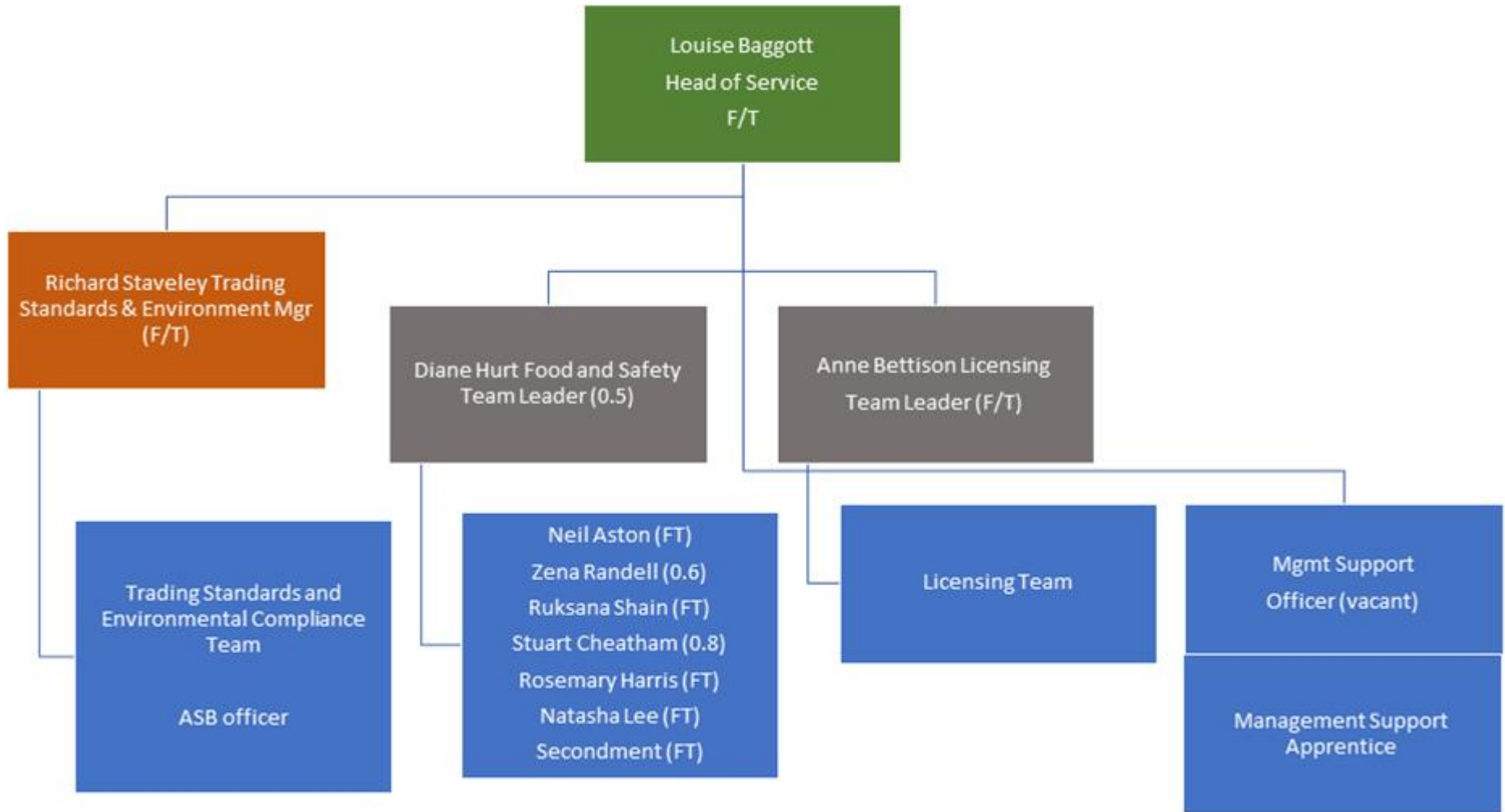
**Strong Foundations:**  
 Developing a New Operating Model (Fit for the future) | Our People | Digital and Customer Services Transformation |  
 Achieve a Sustainable Financial Position | Asset Masterplan | Analysis and Insight | Engaging Our Citizens



**Appendix 4 - Solihull MBC Corporate Leadership Team**

[Corporate-Leadership-Team---2](#)

**Appendix 5 – Regulatory Services Structure**



## Appendix 6 – 2024/2025 Sampling Programme

**Sampling timetable 2024-25**

Project No	Organising body	No	Survey	Detail	A	M	J	J	A	S	O	N	D	J	F	M
1	FWEM		80	Pasteurised/unpasteurised milk cheese												
2	FWEM		81	Expected to be announced Oct												
3&4	FWEM	9	Victoria Farm	Milk, Cream, Water, Bottles												
5	PWS		Lady Lane Wharf	PWS - sampling carried out by external body												
6	PWS		Bentley Manor	PWS - sampling carried out by external body												
7	SMBC		Imported Food	Where necessary following checks												