



DIRECTORATE OF NEIGHBOURHOOD SERVICES
FOOD LAW ENFORCEMENT SERVICE PLAN 2009/10

FOREWORD

Under Food Standards Agency's Framework Agreement, City of York Council is required to produce an annual service plan that covers their various food functions.

The food team, which is part of the food and safety unit, is responsible for food law enforcement. This service plan reviews our performance over the last year, sets out our aims and objectives for 2009/10, and also looks at what demands are placed on the team and what resources are available to meet those demands.

Variance between the 2008/09 planned and actual performance is highlighted. Where necessary, corrective action is recommended and incorporated into the 2009/10 plan.

Resources in the team are limited. However, this plan illustrates the effective use of existing resources to target the highest risk food businesses, while maintaining a balanced enforcement mix.

1. SERVICE OBJECTIVES, AIMS AND POLICIES

1.1 The vision of the Environmental Health and Trading Standards is:

To deliver the highest standards of protection of health, environmental and economic well-being to the people of York, through the provision of a quality customer focused service.

1.2 The Objectives of Environmental Health and Trading Standards are to:

- Protect residents and local businesses from unfair and unsafe business practices
- Protect residents and our environment from pollution and other public health and safety hazards
- Help local businesses achieve compliance with their legal obligations
- Promote healthy living in the city
- Reduce noise nuisance and make an effective contribution to reducing anti social behaviour in York

1.3 The Aims the Food Enforcement Team are:

- To operate a comprehensive regime of interventions (eg inspections), sampling, advice and other methods as appropriate, to ensure the safety, correct composition, description and labelling of foods and animal feeding stuffs and prevent adulteration and fraud in the production and sale of these products.
- To ensure the health and well-being of consumers by the above methods and through promotional activities.
- To promote best practice in food and animal feeding stuffs production and sale in the City of York.
- To provide support, assistance, training and advice to local businesses, thereby enabling them to market products that comply with legal requirements and best practice.
- To investigate cases of communicable disease notified to the Authority.
- To promote food safety and standards issues to the public through a variety of activities.
- To investigate complaints about the labelling, composition, safety and fitness of food, feeding stuffs and the operation of food premises.
- To act as a home authority and originating authority and deal with enquiries referred by other agencies.

- To approve and register food premises as prescribed by government.
- To enforce the provisions of food and animal feeding stuffs legislation, and take appropriate and proportionate action to secure compliance.
- To take prompt and effective action in response to food hazard warnings and other threats to food safety in York.

1.4 Corporate priorities of the Service

City of York Council has a corporate strategy for the period 2009 – 2012, which incorporates eight priorities. In terms of these priorities, the food team contributes to making York a Thriving City, a Safer City and Healthy City, through improving the health and lifestyles of the people who live in York, in particular among groups whose levels of health are the poorest.

1.5 Links to Community Objectives

York's Local Strategic Partnership, Without Walls, reviewed York's Local Area Agreement (LAA) in 2008 to reflect new government guidance. As part of this review a number of priorities and local improvement targets were decided. The food team formed a partnership with other service providers to submit a bid for LAA funding. The bid focused on tackling the levels of obesity among primary school age children in year 6. The bid was successful and the food team will be delivering a number of workshops over the next two years to raise awareness and understanding about healthy eating.

1.6 Enforcement Policy and Customer Service

The team operates to an enforcement policy that meets the needs of the Statutory Code of Practice for Regulators'. In addition, we have implemented a "Customer Service Standards" policy, which sets out the minimum service standards we aim to achieve when providing our services.

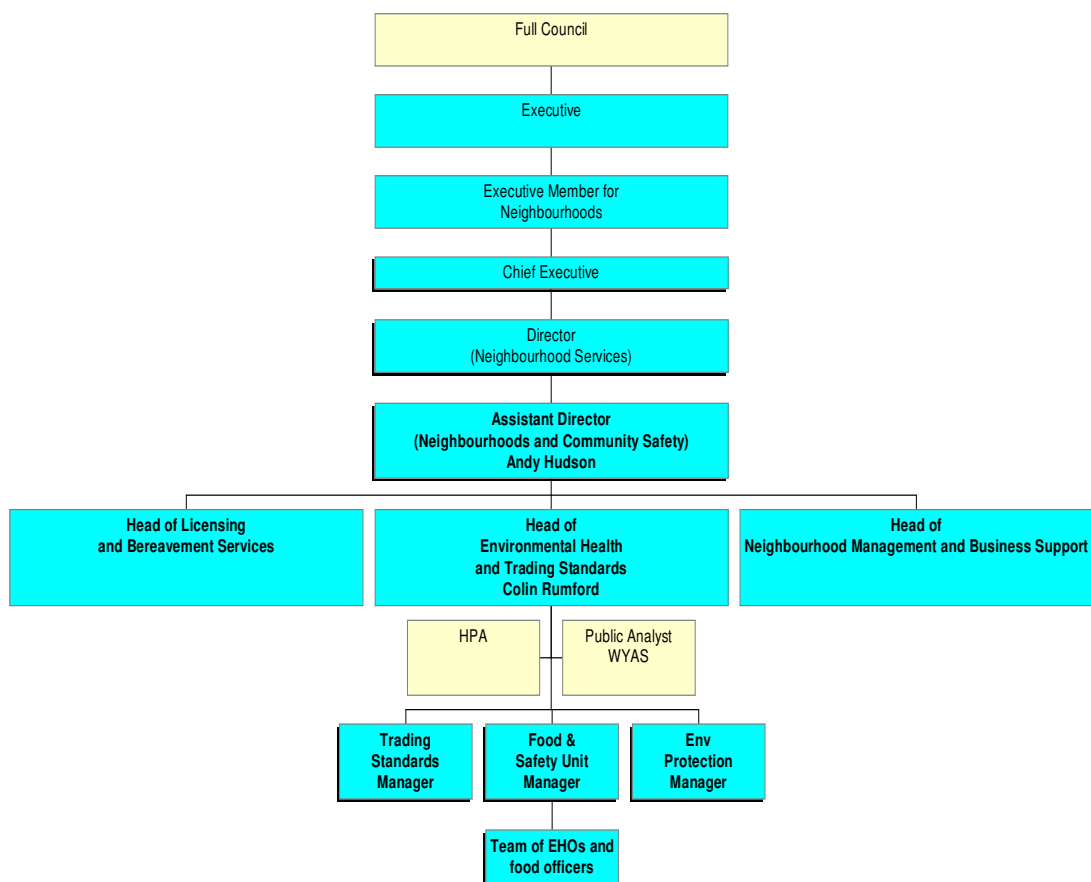
2. BACKGROUND

2.1 Profile of the Local Authority

City of York Council is a unitary authority, with a population of approximately 193,000 and an area of 105 square miles (27,250 hectares). The majority of the electorate (60%) are located in the urban city area, with the remainder resident in the outlying towns and villages.

The area is predominantly urban, covering the historic city with the associated tourism, hospitality and catering activities.

2.2 Organisational Structure



2.3 Provision of Specialist services

- Public Analyst Services covering food and animal feeding stuffs are provided under contract by West Yorkshire Analytical Services, Morley, Leeds.
- Microbiological food examination is carried out under service level agreement with the Health Protection Agency (HPA) laboratory service, based in Leeds.
- The proper officer for communicable disease purposes is the Consultant in Communicable Disease Control at the HPA.

2.4 Scope of the Food Team

As a unitary authority, City of York Council is responsible for the full range of food law enforcement activities.

The food team has responsibility for the full range of food safety, food standards, animal feeding stuffs and primary production activities. The team is part of Environmental Health and Trading Standards, which sits within Neighbourhoods & Community Safety.

The team comprises of both environmental health and trading standards professionals, in addition to technical support staff. Some officers have dual qualifications and the team also carries out health and safety checks in food premises.

The service consists of:

- A programme of food/feeding stuffs interventions.
- Investigation of consumer complaints.
- Investigations of food poisonings/infectious disease notifications.
- Promotion and education/advice for businesses and the public.
- Health improvement promotion (e.g. healthy eating awareness).
- Sampling of food and animal feeding stuffs according to annual targeted programmes.

2.5 Demands on the Food Team

The authority's area contains a mix of manufacturing, retail and catering premises; hospitality and catering are the dominant sectors. There is a large international confectionery manufacturer, a district hospital, various large academic institutions and a racecourse.

The profile of food premises in York is heavily biased towards restaurants and caterers, which is a reflection of the city's status as a major tourist destination. There can be a rapid turnover of business ownership in this sector, which can place a strain on the team in terms of premises inspection, advice provision and maintaining an accurate premises database.

Under the product specific or "vertical" EU Directives, there are two premises that are approved by the food team.

Additionally, the team acts as "home authority" for the businesses that have a base in the City, but trade regionally or nationally. This means that we provide a link between other food authorities and the companies, resolving issues where appropriate.

Local customer consultations carried out in 2004, via the "Talk About" residents' panel, indicate that food remains a concern for residents. Indeed, out of all the functions performed by environmental health and trading standards services, respondents thought that investigating dirty conditions in restaurants should be given the second highest priority.

This view echoes the findings of the FSA's 2005 consumer attitudes survey that found that 60% of respondents were concerned about hygiene in catering outlets. The FSA survey showed that the top 4 consumer concerns about food were the amount of salt in food, the amount of fat in food, food poisoning, and the amount of sugar in food respectively.

Consumers were found to be increasingly concerned about the accuracy of food labels, which appears to be part of an increasing awareness and concern about healthier eating.

The level of comprehension of food labels by consumers has not improved and remains quite low.

The team will continue to respond in 2009/10 to the issue of obesity/healthy eating by working to deliver against the Local Area Agreement improvement targets for levels of obesity in year six children.

2.6 PREMISES PROFILE

The high proportion of restaurants and takeaways in York means that officers are required to work out-of-hours in order to gain access to these premises. They must also be sensitive to the needs of ethnic minorities. In the past the team has been the subject of an equalities impact assessment, leading to a number of service improvements, including the provision of food hygiene training tailored and made accessible to Turkish, Chinese and Indian restaurants operators/employees.

Table 1 - Breakdown of food premises by FSA category as at 1 April 2009.

FSA CATEGORY	Number
Primary Producer	7
Manufacturer & Packer	46
Importer/Exporter	2
Distributor/Transporter	22
Retailers Other	77
Restaurants/Cafe/Canteen	329
Supermarket/Hypermarket	41
Small Retailer	235
Hotel/Guesthouse	188
Pub/Club	236
Takeaway	163
Caring Establishment	139
School/College	91
Mobile Food Unit	47
Restaurant/Caterers – Other	166

2.7 SERVICE DELIVERY POINT

The service is delivered from a single office based in De Grey House, Exhibition Square, York. The hours of operation are 08:30 -17:00 Monday to Friday, although officers work out of hours where necessary.

2.8 REVIEW OF INTERVENTIONS CARRIED OUT FROM THE 2008/09 PROGRAMME

2.8.1 FOOD HYGIENE INTERVENTIONS

Premises rating	A	B	C	D	E
No. of planned interventions at 1/4/2008	13	122	457	45	0
No. of interventions achieved	13	121	452	45	0
No. of interventions <u>not</u> achieved	0	1	5	0	0

In addition to the above figures, 44 unrated premises were subject to interventions during the year. These are newly registered food premises that are required to receive an inspection and be risk-assessed.

Interventions were carried out at 100 % of our category A premises and 99% of our category B and C premises (the Local Performance Indicator is 100%). These figures are very similar to our performance last year and we aim to maintain our intervention performance at this level.

The lowest risk premises in category E do not receive physical visits, unless we receive intelligence, such as a complaint, that there may be problems at the premises. These premises are assessed by alternative approaches, such as issuing a questionnaire.

2.8.2 FOOD STANDARDS INTERVENTIONS

Premises Rating	High	Medium	Low
No. of planned interventions at 1/4/2008	9	554	0
No. of interventions achieved	8	163	39
No. of interventions <u>not</u> achieved	1	391	0

All but one of our high-risk premises received an intervention (88%). Due to having a limited number of staff, we were only able to carry out interventions at 29% of our medium premises. We focused our limited resources on our high risk and unrated premises.

As with food safety interventions, the lowest risk premises are not programmed to receive physical visit.

2.8.3 Feeding Stuffs/Primary Production Interventions

During 2008/09, we outsourced this area of work to a neighbouring authority. The authority visited 22 of our registered animal feed premises that were due for an intervention that year (100 % intervention rate). The authority also carried out primary production interventions at 36 premises. These primary production visits were combined with animal feed visits where possible.

2.8.4 Alternative Enforcement Strategies (AEA)

As mentioned, we do not have a programme of physical visits for our lowest risk premises.

A risk assessment framework determines the frequency at which food premises are visited. In order to direct our resources away from low risk premises, we do not include them in our annual programme of interventions. Instead, these businesses receive a questionnaire, which seeks to check that the businesses remains low risk, whilst providing information relevant to food law. There are a number of advantages to this arrangement, not least the fact that officers can concentrate on those premises which pose a greater risk or where the service can have a greater impact.

In 2008/09, the team issued 188 food safety AEAs. No food standards AEAs were issued as the teams resources are being used to focus on higher risk premises.

3. PLANNED ENFORCEMENT ACTIVITY 2009/10

3.1 FOOD SAFETY INTERVENTIONS

Premises rating	A	B	C	D	E	Unrated
No. of premises due an interventions	9	122	472	72	265	59*
No. of programmed interventions	18	122	472	72	265	59

* - This is the number of unrated premises at the start of the year. There will be more premises during the year as new businesses open etc.

3.2 Food Standards Interventions

Premises rating	A	B	C
No. of premises due an intervention	19	751	428
No. of programmed interventions	19	0	0

3.3 Feeding Stuffs/Primary Production Interventions

A total of 31 programmed animal feed interventions are due to be carried out this year. As with last year, we are outsourcing this work. Where appropriate, we will incorporate primary production hygiene interventions to reduce the burden on farms in line with Hampton principles.

3.4 Food and Feeding Stuffs Sampling

The team will sample foods and feeding stuffs in accordance with its documented policy. We will also participate in national LACORS/HPA sampling programmes and fulfil any requirements to sample those premises approved under the product specific regulations.

Both the food standards and feeding stuffs sampling programmes have been produced in consultation with the Authority's public analyst/agricultural analyst. The food standards team co-operates with other regional authorities to coordinate sampling initiatives, so as to avoid duplication and to optimise the statistical soundness of results data. Sampling results are submitted to national sampling initiatives where appropriate (eg: LACORS/FSA).

3.4.1 Food and feeding stuffs sampling programme

	2008/09 Samples Programmed	2008/09 Samples Taken	2009/10 Samples Programmed
Food standards samples	105	100	120
Feeding stuffs samples	5	6	5
Food safety samples	207	247	228

3.4.2 Comments on sampling performance

Sampling is an important tool for both the food standards and food safety teams.

The food safety team is primarily concerned with the microbiological safety of food, but also samples food to establish the nature and likely harm arising from foreign bodies and the like.

The sampling programme tends to focus on areas of past non-compliance, premises that are failing to meet minimum standards and emerging priorities such as butchers and food at large outdoor events.

Each year the Health Protection Agency undertakes microbiological analysis of the samples we provide, most of which are done without charge under a credits system. Of the 247 samples taken last year, 21 (9%) were found to be unsatisfactory. The samples covered a range of products and premises. Some samples were from a takeaway premises where we had concerns about cleanliness (this premises has now been sold). An imported cheese being sold by a local delicatessen also came back as unsatisfactory, so further samples were taken and we liaised with the Food Standards Agency and the business proprietor to resolve the issue.

Our food standards samples are normally looking at the description, composition and labelling of food, to ensure that legal requirements are being met. Samples are normally targeted at areas where problems are regularly found, or where intelligence suggests there could be issues.

Of the 100 food standards samples taken in 2008/09, 32 (32%) were unsatisfactory. Enforcement action instituted as a consequence of these samples have included cases concerning the substitution of spirits. However, in most cases our findings have been passed to the Home Authority for the companies concerned.

3.5 Education and Information Programme

3.5.1 Advice to Businesses/Customers

The team will provide all reasonable support and assistance to businesses operating or intending to operate in the City of York area.

It is estimated that the team will receive over 300 requests for advice this year, some of which will require discussion on site at the business premises. This advice is often in relation to prospective businesses seeking advice before they commence trading. The recession does not seem to have affected York's food sector, as we are seeing many new premises opening and new business proposals being considered.

3.5.2 Food Team Promotional and Project Work

The team will continue to raise consumer and business awareness of food matters by means of a programme of talks, press releases and other promotional activity.

Over the next couple of years we are working in partnership with other service providers to tackle the level of obesity in Year 6 students. We have secured funding from the Local Area Agreement to help us deliver a programme of healthy eating workshops.

Earlier this year we took part in Food Safety Week, which focused on the sharp rise in cases of listeria, particularly in people over 60. To target this group, we circulated promotional material to sheltered housing schemes and luncheon clubs. Free thermometers were also provided, as food stored at the wrong temperature can allow listeria, if present, to grow.

4. REACTIVE ENFORCEMENT ACTIVITY

4.1 Formal Action Taken

The following tables summarise the level and types of formal enforcement action taken in 2008/09. We believe that to be effective, the full range of enforcement options should be used, from informal letters offering advice, through to prosecutions.

Food Safety

TYPE OF ACTION	NUMBERS TAKEN/ISSUED 2007/2008	NUMBERS TAKEN/ISSUED 2008/09
Prosecution	2	6
Simple Caution	5	4
Prohibition Notice	0	0
Hygiene Improvement Notice	45	84
Formal written warning *	5	5

* – These are written warnings issued by CYC to businesses where prosecution is not the most appropriate course of action. They are not written warnings as defined by the FSA.

Food Standards and Feeding Stuffs

TYPE OF ACTION	NUMBERS TAKEN/ISSUED 2007/2008	NUMBERS TAKEN/ISSUED 2008/09
Prosecution	1	0
Simple Caution	5	7
Formal Written Warnings	31	19

Last year we prosecuted a number of premises for food hygiene offences. These included a care home, public house and takeaway premises. These premises had failed to improve to a satisfactory standard, despite the efforts of officers to help them improve. Standards in the care home have improved, the public house is under new ownership and we are monitoring standards at the takeaway.

We have developed an intervention strategy to secure improved standards in those premises that are not broadly compliant with food hygiene law. As part of this strategy, we are issuing improvement notices where advice and education fail to secure improvements. This explains the increased number of notices that were served in 2008/09. Most of these notices related to the lack of a documented food safety management system.

An area where our food standards officers continue to find problems, is alcohol drinks that are either under strength or falsely described. Under strength drinks are often connected with the use of open top pourers on spirits, which allows the evaporation of alcohol.

Food being sold past its use-by date also accounts for some of the cautions and formal written warnings.

4.2 Food Premises, Food and Feeding Stuffs Complaints

Investigation into food and feeding stuffs complaints is carried out in accordance with quality management system procedures.

In 2008/09, 859 complaints and requests for service were received. This high figure is consistent year-on-year, reflecting how busy the food sector is in York and the high awareness of food issues amongst our customers.

4.3 Home Authority & Primary Authority

City of York Council subscribes fully to the LACORS home authority principle, and currently has agreements with Nestle (for food standards in relation to confectionary) and National Express East Coast for food safety on their trains.

The team will liaise with other local authorities about our national and regional companies. We will support, in particular, small/medium and new companies through advice on matters such as changes in the law. In 2008/09 the team received 26 referrals from other local authorities and a similar number can be expected in 2009/10.

We are also committed to the new Primary Authority Scheme being administered by the Local Better Regulation Office.

4.4 Control and Investigation of Outbreaks of Food Related Infectious Disease

The team will investigate all food poisoning notifications and outbreaks of food borne disease in accordance with procedures agreed with North Yorkshire District Control of Infection Committee and our local quality procedures.

In 2008/09, the team received 380 formal notifications of infectious disease, although some of these related to mumps, rather than food poisoning.

4.5 Food/Feeding Stuffs Safety Incidents

It is the policy of the authority to handle all food alerts from the FSA in accordance with the FSA Code of Practice and our local quality procedure. Notifications are received from the FSA by e-mail and mobile phone, and an appropriate course of action is taken in each case.

The reactive nature of this task makes it difficult to estimate the likely level of activity. During 2008/09, 72 food alerts were received. Although alerts can be issued by the FSA for information only, some require a formal response, be it the issue of a local press release or contacting food businesses directly, which has resource implications.

The FSA have also started issuing food allergy alerts, and 63 of these were received last year.

It is expected that a similar or greater number of food alerts will be received in 2009/10.

5. OTHER AGENCIES - REFERRALS AND LIAISON

5.1 Liaison with Other Organisations

The team will take steps to ensure that it is operating in a manner that is consistent with both neighbouring and national local authorities and other agencies. Various methods will be used to facilitate this, including benchmarking, peer review and liaison with: -

North Yorkshire Food Liaison Group

This is a LACORS food liaison group working under the wing of the North Yorkshire Chief Environmental Health Officers Group. All eight North Yorkshire local authorities are represented on both of these groups. Of particular relevance is the food safety quality management system (QMS), which is accredited to the quality standard ISO 9001.

This is discussed later in Section 8 – Quality Assessment.

Yorkshire and The Humber Trading Standards Quality Standards Technical Group

Following a review of regional priorities, the Quality Standards Technical Group is now a virtual group and a new Food Fraud group has been established.

The group meets on a quarterly basis and seeks to promote best practice and consistency in food enforcement in the region. The group also considers emerging intelligence and looks at joint projects to detect food fraud across the region.

West Yorkshire Analytical Services

This is the public and agricultural analyst for the City of York Council. After recently going out to tender, we recently renewed our contract with them to provide these services over the next three years.

Health Protection Agency

Bi-annual review meetings are held with the HPA food laboratory, based in Leeds, to promote co-ordination and good sampling practice.

North Yorkshire District Control of Infection Committee

This is a multi-disciplinary group of public health consultants, consultant microbiologists, environmental health officers, infection control nurses, general practitioners and associated professions. It meets on a quarterly basis to discuss infection control issues and set policies in relation to their investigation and control.

Planning/Licensing Sections

The list of all planning applications is seen by the team and plans requested where necessary, so that recommendations/conditions can be supplied.

The team liaises with licensing to ensure that an integrated approach to enforcement is followed.

5.2 Referrals to Other Organisations

Where the team receives a food related service request that does not fall within its enforcement remit or geographical enforcement area, it refers the person concerned to the correct body or forward the item of work to the relevant authority without delay.

6. CONSULTATION

We have reviewed the way in which we survey our customers. This has come about because of the new National Indicator 182 - *Business satisfaction with local authority regulatory services*. A programme is in place to send questionnaires to businesses, dependant on the outcome of the intervention. In accordance with the National Indicator, we must send questionnaires to a proportion of businesses that were found to be compliant and not compliant with food law.

We also survey our customers on a regular basis to ensure that we are providing a high quality, customer focused service.

7. RESOURCES

7.1 Financial Allocation

The overall level of financial allocation to food safety and standards enforcement activity for the year 2008/09 and 2009/10 is as follows:

	2008/09 Actual £k	2009/10 Estimate £k
Staffing costs	274.2	280.9
Support costs	123.5	126.6
Supplies & services (inc transport)	42.3	45.2
Analytical & sampling costs	11.5	15.6
Income	-43.5	-27.3
Overall Expenditure	408.0	441.0

7.2 Allocation of staff for 2009/10

Food Safety

- 3.5 Senior EHOs – fully competent to enforce food hygiene law
- 1 Food Officer – holds environmental health degree, working towards EHORB registration
- 1 Contractor is being employed to complete over 400 interventions at low risk and broadly compliant premises

Food Standards

- 0.8 Senior Food Officer – fully competent to enforce food standards law
- 1 Food Officer – fully competent to enforce food standards law

Animal feed inspections and hygiene at primary production level will be outsourced to a neighbouring authority

The team is managed by the food and safety unit manager, lead officer for food safety and standards.

7.3 Staff Development Plan

Staff development needs are identified on an ongoing basis, through the team's quality management system. We also hold annual Performance Development Reviews with individual officers, where the training needs are considered. Any training needs that are identified will be met by: -

- Training to achieve specific qualifications
- Attendance of technical seminars/courses
- In-house training on specific issues
- Cascade training by staff that have attended relevant courses.

Training records show that officers consistently achieve the required levels of CPD training as required by the Food Law Code of Practice.

8. QUALITY ASSESSMENT

The food team operates within the North Yorkshire Food Liaison Group's quality management system (QMS)

The QMS, which is independently accredited to ISO 9001 standards, includes a rigorous system of controlled documents that state the minimum standards for our food enforcement activities. It includes internal monitoring within the authority and is further enforced by inter-authority auditing. The system is also subject to external monitoring by ISOQAR, an accredited certification body.

The system ensures the delivery of high quality enforcement activity across the City of York, which is consistent with the other North Yorkshire authorities and is in accordance

with good practice. York's QMS was subject to external audits in 2004, 2006 and again in 2009. The auditor reported zero non-compliances following the latest audit.

The Environmental Health and Trading Standards service is also proud to have been presented with the Customer Service Excellence award, which demonstrates our commitment to putting the customer at the heart of everything we do.

9. REVIEW OF PERFORMANCE AGAINST LAST YEARS SERVICE PLAN

9.1 Enforcement work

The team performed well in respect of its inspection targets for high and medium risk food hygiene premises. As highlighted earlier, we are targeting our resources at those premises which are either high risk (eg butchers) or are not broadly compliant with food law.

For 2008/09, National Indicator 184 was introduced – “Food establishments broadly compliant with food hygiene law”. At the end of 2008/09 our figure for this indicator was 88%, which is lower than we had anticipated. This dip in performance came about because premises that were unrated at the end of the year (eg new premises due an inspection), were counted as not being broadly compliant with food hygiene law.

We expect to see this NI figure improve over the next couple of years as our efforts to improve the poorer premises start to show . We have also put in place measures to ensure all our unrated premises are inspected before the end of 2010.

There is a new performance indicator from the FSA for 2008/09, which considers how many of our premises were inspected on time, and how many of our premises are broadly compliant with food hygiene law (the overall figure is split 30%/70% respectively). We achieved a figure of 90% in this area and when figures for other authorities become available, we will be able to compare our performance.

Our food standards officers focused on high risk and unrated premises during 2008/09. We continue to have a back log of overdue inspections in this area due to limited resources.

9.2 Future developments from 2008/09

Along with the North Yorkshire Food Liaison Group, we have been considering how to use the range of interventions introduced by the revised Food Law Code of Practice. Due to our current structure, we plan to inspect our low risk and broadly compliant premises by using a contractors. The other high risk premises, which are being kept in-house, will receive full inspections as this is felt to be the most appropriate intervention to achieve improvements.

This is the first year where the FSA have collected performance data using the Local Authority Enforcement Monitoring System (LAEMS). The system involves uploading data to the LAEMS web site. We prepared for LAEMS in early 2008 by making changes to the way we record our activities on our database. The data upload has been successful and the return formally signed off.

9.3 Conclusion

Overall, we delivered a well-balanced work programme, combining advice and promotional work, along with special projects and formal action. Business and customer consultation results indicate high levels of satisfaction with the work of the team.

10. FUTURE DEVELOPMENTS

10.1 Scores on the doors

A significant development, not mentioned in last year's Service Plan, is scores on the doors. This scheme uses the internet to publicise how well a premises is performing in terms of food hygiene, by using a star rating scheme.

As an authority, we committed to scores on the doors back in 2007. We had been waiting for the FSA to launch a national scheme, but earlier this year it became apparent that this launch was some time off. A decision was made to press ahead with a scheme, as there were real benefits for consumers and businesses.

We launched the scheme during Food Safety Week 2009. On the first day alone, the web site received over 18,000 searches. Businesses have been responding well to the scheme and are keen to improve so they get a better star rating. We anticipate that scores on the doors will be an effective tool for improving standards in our premises that are not broadly compliant with food hygiene law.

10.2 Retail enforcement pilot

As identified in this service plan, we do not have the resources to visit all our premises that are due a food standards intervention. We have been piloting our own version of the Retail Enforcement Pilot, and we are hopeful that this will provide us with the means to gather intelligence on premises where it is not feasible to carry out individual inspections. Data gathered in this way will be analysed and acted upon where emerging issues are apparent.