

# **DIRECTORATE OF NEIGHBOURHOOD SERVICES**

**FOOD LAW ENFORCEMENT SERVICE PLAN 2008/2009** 

#### **FOREWORD**

Under the Food Standards Act 1999, the Food Standards Agency (FSA) requires City of York Council to produce an annual service plan for food safety and food standards law enforcement. The plan sets out the aims and objectives of the council's food team for 2008/2009. The food team, which is part of the food and safety unit, is responsible for food law enforcement and this plan sets out what demands are placed on the team and what resources are available to meet those demands.

Resources 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.

Variance between the 2007/2008 planned and actual performance is highlighted. Where necessary, corrective action is recommended and incorporated into the 2008/2009 plan.

## 1. SERVICE AND TEAM OBJECTIVES WITH LINKS TO CORPORATE OBJECTIVES

# 1.1 The vision of the Environmental Health and Trading Standards Service 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 Corporate priorities of the Service

City of York Council has a corporate strategy for the period 2007 – 2011, which incorporates 10 priorities. In terms of these priorities, the food team contributes to improving the health and lifestyles of the people who live in York, in particular among groups whose levels of health are the poorest.

#### 1.3 The aims of the Food Team are:

- To reduce the risk of food poisoning in York.
- To make a positive difference to the quality of life of residents and visitors to York.
- To raise standards of safe and fair-trading.
- To promote healthy living.
- To continuously improve our service through communication with our customers.

# 1.4 The objectives of the Food Team are:

 To operate a comprehensive regime of inspection, 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.

## 1.5 Enforcement Policy and Customer Service

The team operates to a new enforcement policy that has been implemented in response to the Statutory Code of Practice for Regulators'. In addition, we have implemented a "Customer Service Standards" policy, which sets out service standards for environmental health and trading standards services.

## 1.6 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. Contained within the LAA are a number of priorities that form part of a delivery plan for the lifespan of the LAA. The food team expect to contribute to the priority covering levels of obesity among primary school age children in year 6.

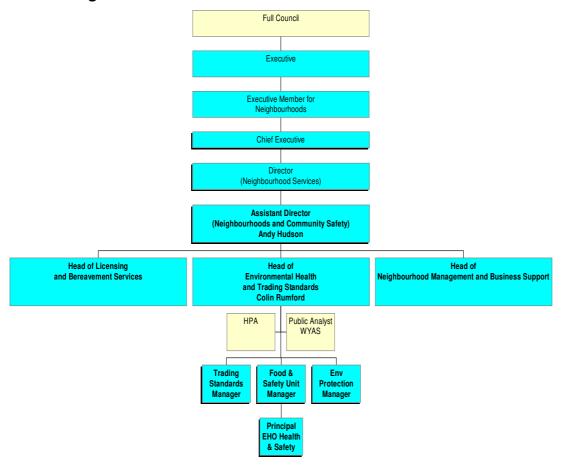
## 2. BACKGROUND

# 2.1 Profile of the Local Authority

City of York Council is a unitary authority, with a population of approximately 184,000 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

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

# 2.4 Scope of the Food Team

As a unitary authority, the council is responsible for the full range of duties under the Food Safety Act. It is also responsible for the provisions of the Agriculture Act 1970 in relation to animal feeding stuffs.

The food team carries out all of the food safety, standards and animal feeding stuffs activities on behalf of the council. The team is based within environmental health and trading standards services in the Neighbourhoods & Community Safety department.

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

The service consists of:

- Programmed food/feeding stuffs premises inspections.
- Investigation of consumer complaints.
- Investigations of food poisonings/infectious disease notifications.
- Safe food promotion and education/advice.
- 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 within this mix. 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 2008/2009 to the issue of obesity/healthy eating. Samples of primary school meals will be analysed for nutritional values and healthy eating promotional activity will form part of the team's work programme.

## 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. 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.

Breakdown of food premises in York by FSA category as at 1 April 2008.

Food safety

FSA CATEGORY OF ESTABLISHMENT	Number
Manufacturer and packers	49
Importers/exporters	2
Distributors/transporters	22
Retailers	372
Restaurant & caterers	1315
Total:	1760

## Food standards

FSA CATEGORY OF	Number
ESTABLISHMENT	
Manufacturer and packers	50
Importers/exporters	1
Distributors/transporters	22
Retailers	374
Restaurant & caterers	1311
Total:	1758

# 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 when necessary.

# 2.8 Review of inspections carried out from the 2007/2008 Programme

# 2.8.1 Food Safety Inspections

Premise Rating	Α	В	С	D	Е
No of planned inspections at 1/4/2007	44	108	484	116	0
No. premises capable of inspection <sup>1</sup>	21	48	350	81	0
No. of inspections achieved <sup>2</sup>	21	48	348	78	0

#### Notes

- 1. The number of premises capable of inspection includes the in-year adjustments, which have to be made to the start of year inspections plan. These are usually the result of businesses closing.
- 2. This figure is the number of actual inspections. It reflects the fact that some A rated premises either closed during the year, or were downgraded to a lower risk rating and therefore did not require inspecting twice in the year.

In addition to the above figures, 32 unrated premises were inspected during the year. These are newly registered food premises that are required to be inspected and risk-assessed. The lowest risk premises are category E and these are assessed by alternative approaches to physical inspection.

# Summary

We inspected 100 % of our category A-B premises and 99% of our category C premises (the Local Performance Indicator is 100%). These figures are very similar to our performance last year and we aim to maintain our inspection performance at this level.

The lowest risk premises are not programmed to receive physical inspections.

# 2.8.2 Food Standards Inspections

Premises Rating	High	Medium	Low
No. of planned	26	498	0
inspections at			
1/4/2007			
No. of premises	12	432	0
capable of			
inspection			
No. of inspections	12	91	0
achieved			

## Summary

We inspected 100 % of our high-risk premises (the Local Performance Indicator is 100%). However, due to staff shortages we were only able to inspect 21% of our medium premises. We are reviewing our approach this year and intend to move towards more targeted inspections that take into account local intelligence.

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

## 2.8.3 Feeding Stuffs Inspections

During 2007/2008, we outsourced this area of work to a neighbouring authority. They inspected 31 of our registered animal feed operators that were due for inspection that year (ie 100 % inspection rate).

# 2.8.4 Alternative Enforcement Strategies (AEA)

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

A risk assessment framework determines the frequency at which food premises are inspected. In order to direct our resources away from low risk premises, we do not include them in our annual programme of inspections. Instead, these businesses are approached by means of questionnaires, which seek both to check that the businesses remain 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 where the service can have a greater impact.

In 2007/2008, the team dealt with 96 food standards AEAs and 188 food safety AEAs. To reduce duplication, we integrate food safety and food standards AEAs where appropriate.

## 3. PLANNED ENFORCEMENT ACTIVITY 2008/2009

# 3.1 Food Safety Inspections

Premises rating	Α	В	С	D	Е	Unrated
No. of premises due an inspection	6	94	419	40	164	44
No. of programmed inspections	12	94	419	40	0 (AEAs)	44

# 3.2 Food Standards Inspections

Premises rating	High risk	Medium risk	Low risk
No. of premises	20	370	55
due an inspection			
No. of programmed	20	370	0 ( AEAs)
inspections			

# 3.3 Feeding Stuffs Inspections

A total of 21 programmed animal feed inspections are to be carried out this year. As with last year, we are outsourcing this work. Where appropriate, we will incorporate primary production hygiene inspections 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

	2007/2008	2007/2008	2008/2009
	Samples	Samples	Samples
	Programmed	Taken	Programmed
Food standards samples	160	211	105
Feeding stuffs samples	10	4	5
Food safety samples	200	272	207

# 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 contamination of food, but also samples food to establish the nature and likely harm arising from foreign bodies and the like.

The sampling programme focuses on areas of past non-compliance, and emerging priorities such as imported foods and school meals.

Of the 211 food standards samples taken, 48 (23%) were unsatisfactory. Legal proceedings 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.

Each year the Health Protection Agency undertakes microbiological analysis of samples we provide, most of which are done without charge under a credits system. Of the 272 samples taken last year, none were reported to be unsatisfactory.

# 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.

# 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.

Through its links with the Selby and York Healthy Lifestyles and Obesity Strategy Group, and its sampling of primary school meals, the team will maintain its role in the promotion of healthy eating. We are also seeking to engage with York's Local Area Agreement, in particular the performance indicator that relates to the level of obesity in Year 6 students.

Earlier this year we took part in Food Safety Week, which involved running a food safety poster competition for children of school age and also organising displays at a number of retail outlets in the York area.

A new area of work for us in the last year was becoming involved with the Enterprise in Food initiative run by Business Link. The purpose of the initiative was to offer training for new businesses. We ran sessions on food safety and food standards so

that the businesses would better understand our role and the requirements of food law.

We also participate in the York Food and Drink Festival, by giving advice and raising awareness on food safety and food standards issues (eg: food labelling for school children and highlighting the salt, sugar and fat contents of various foods).

## 4. REACTIVE ENFORCEMENT ACTIVITY

#### 4.1 Formal Action Taken

The following tables summarise the level and types of formal enforcement action taken in 2007/2008. We believe that to be effective, the full range of enforcement powers should be used, from informal letters offering advice through to prosecutions.

# 4.1.1 Food Safety

TYPE OF ACTION	NUMBERS TAKEN/ISSUED 2006/2007	NUMBERS TAKEN/ISSUED 2007/2008
Prosecution	5	2
Simple Caution	0	5
Prohibition Notice	0	0
Hygiene Improvement Notice	63	45
Formal written warning <sup>1</sup>	4	5

<sup>1 –</sup> 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.

# 4.1.2 Food Standards and Feeding Stuffs

TYPE OF ACTION	NUMBERS TAKEN/ISSUED 2006/2007	NUMBERS TAKEN/ISSUED 2007/2008
Prosecution	3	1
Simple Caution	4	5
Formal Written Warnings	21	31

## Comments on statistics

The percentage of businesses which were compliant with food law and other trading standards legislation on first inspection, or were brought into compliance within the year (2007/8), was 99%. However, there remain instances where formal action has to be taken in line with the service's enforcement policy and in order to bring about compliance.

We served less hygiene improvement notices during 2007/8 when compared to the previous year. We had expected to see a rise in numbers, due to the predicted need

to serve notices on those premises that had still not implemented an adequate food safety management system.

Formal actions recorded against the food standards team are for premises that were falsely describing alcoholic drinks.

# 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 2007/8 770 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 increasing awareness of food issues amongst our customers.

# 4.3 Home Authority Principle

City of York Council subscribes fully to the LACORS home authority principle.

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 2007/2008 the team received 25 referrals from other local authorities and a similar number can be expected in 2008/2009.

# 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 2007/2008 the team received 328 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 2007/8, 54 food alerts were received. Although alerts can be issued by the FSA for information only, some require a response, be it the issue of a local press release or contacting food businesses directly, which is more time consuming. It is expected that a similar or greater number of food alerts will be received in 2008/9.

We are now also receiving allergen alerts from the FSA, which we process and respond to as required.

#### 5. OTHER AGENCIES - REFERRALS TO 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 9002.

This is discussed later in Section 8 – Quality Assessment.

# Yorkshire and The Humber Trading Standards Group Quality Standards Technical Group

This is the LACORS food standards and feeding stuffs liaison group for the region. It meets on a quarterly basis and seeks to promote best practice and consistency in food enforcement in the region.

# West Yorkshire Analytical Services

This is the public and agricultural analyst for the City of York Council.

# 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 has been developed to send questionnaires to businesses, dependant on the outcome of the inspections. In accordance with the National Indicator, we must send questionnaires to businesses that were found to be compliant and not compliant with food law.

# 7. RESOURCES, THEIR USE AND DEVELOPMENT

# 7.1 Financial Allocation

The overall level of financial allocation to food safety and standards enforcement activity for the year 2007/2008 and 2008/9 is as follows:

	2007/08 Actual £k	2008/09 Estimate £k
Staffing costs	258.1	264.5
Support costs	116.0	118.9
Supplies & services (inc transport)	35.7	44.1
Analytical & sampling costs	19.6	15.6
Income	-36.5	-26.7
Overall Expenditure	392.9	416.4

#### 7.2 Allocation of staff 2008/9

## Food Safety

- 3.5 Senior EHOs fully competent to enforce food law
- 1 Technician holds environmental health degree, working towards registration 346 food safety inspections will be undertaken by contractors

## Food Standards

- 0.8 Senior Officer fully competent
- 1 Technician fully competent

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 where the training needs of individual officers are identified. 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 safety enforcement element of the team operates within the North Yorkshire Food Liaison Group's quality management system (QMS)

The QMS, which is independently accredited to ISO 9002 standards, includes a rigorous system of controlled documents that state the minimum standards for our food safety 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 2002, 2004 and again in 2006. The auditor reported zero non-compliances following the latest audit.

The Environmental Health and Trading Standards service at City of York Council also holds the Charter Mark, which has been renewed this year. We intend to apply for the new standard, Customer Service Excellence, in due course.

#### 9. REVIEW OF PERFORMANCE AGAINST LAST YEARS SERVICE PLAN

The team performed well in respect of its inspection targets for high and medium risk food safety premises and improved on its performance in 2007/2008. At the same time, a well-balanced work programme, combining advice and promotional work with special projects and formal action, was maintained. Over and above the narrower issues contained in the plan, customer consultation results indicate high customer satisfaction with the work of the team.

## 10. FUTURE DEVELOPMENTS

The Food Law Code of Practice (CoP) was reviewed by the Food Standards Agency in 2008. It was revised to reflect the principles of better regulation and to reduce the administrative burdens on business and on local authorities, while maintaining standards of public health and consumer protection. Local authorities must have regard to the CoP.

#### 10.1 Interventions

One of the most important changes that the new CoP introduces is the flexibility for local authorities to choose how they assess levels of compliance with food law. Traditionally this has been done by undertaking inspections. Under the new CoP local authorities will have some discretion about how they regulate food premises, and will be able to use one of the following 'interventions':

- Inspection
- Monitoring
- Surveillance
- Verification
- Audit
- Sampling

These interventions are considered 'official controls' at European Community level and may be used to verify compliance with food law. The interventions were introduced for two reasons;

- (i) To give local authorities more flexibility in how they regulate food business in their area, allowing them to target resources at problematic businesses; and
- (ii) By using the full range of the above interventions, local authorities will be able to reduce the burden on those businesses that are 'broadly complaint' with food law (a requirement of the Hampton Report).

The intervention used will depend on the type of business, the history of the business and whether the business is 'broadly complaint' with food law. For example, a business with a history of complying with the law may only need a surveillance visit which will be less time consuming than a full inspection. Officer time is then freed up to deal with those premises that are failing to meet a 'broadly complaint' standard. These premises invariably need more time and effort from officers to improve standards.

## 10.2 Monitoring local authorities work

Another change being introduced by the FSA is the way the work of local authority food teams is monitored. In the past local authorities have had to compile statistical reports on an annual basis that are then submitted to the FSA. Under the new system, called the Local Authority Enforcement Monitoring System (LAEMS), local authorities will be able to upload data generated from their database onto a webbased system. This will give the FSA a better ability to monitor and assess how local authorities are performing. We have already started configuring our database in preparation for this change.

# 10.3 Assessing local authority performance

In connection with this change, the FSA is changing the way it assesses a local authorities performance. In the past it has only looked at statistical data, such as how many food inspections have been completed. Whilst the number of food inspections completed is one measurement of performance, it says little about the quality of those inspections or what those inspections have actually achieved in terms of improving compliance with food law.

In a move towards an 'outcome' based monitoring system, the FSA will now also be assessing how many food businesses are 'broadly compliant' with food safety law. The term 'broadly compliant' is based on the risk assessment score a premises is given following an inspection and covers the following parameters:

- Level of current compliance hygiene and safety procedures
- Level of compliance structure of the premises
- Confidence in management and control procedures

All of the above can be influenced by the work of officers (eg. by providing education and advice to improve standards).

The FSA will be judging our overall performance by considering both of the following:

- How many premises are 'broadly compliant' with food law, and how many premises we improve to a 'broadly complaint' standard over time; and
- How many of our planned interventions, or inspections, we achieve each year

It is understood that the FSA will be using a matrix when considering these two indicators and will split them in the ratio of 70% and 30% respectively.

We have already identified our premises that are not 'broadly compliant' and have started an intervention programme. As part of this intervention programme we have developed a strategy for dealing with these premises to ensure a consistent approach. For example, in the first instance we will offer our small and medium businesses advice and education to improve. But where sufficient improvements are not made, or improvements are not maintained, we will consider using formal enforcement action to ensure compliance with food law.

## 10.4 New National Indicator

The importance of increasing the number of food businesses in our area to a 'broadly compliant' standard is reinforced in the new National Indicator 184 – *Food establishments broadly compliant with food hygiene law.* There is a clear need for us to target sufficient resources so that we can positively influence this National Indicator.

In previous years our inspections have been done by our officers and agency contractors. Due to the potential for enforcement action, a decision has been made that our officers will tackle our premises that are not 'broadly compliant' with food law. Our other inspections will be allocated to agency contractors. We are also keeping our high-risk businesses in house, such as care homes and hospitals.