



Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

Mid Ulster District Council

Food Service Plan

April 2019 – March 2020

Foreword

This Plan sets out Mid Ulster District Council's Food Service Delivery priorities for the coming twelve months. The plan is developed in order to meet the requirements of the "Food Standards Agency's Framework Agreement on Local Authority Food Law Enforcement" and covers in detail:

- The Food Service Aims and Objectives
- The profile of the Council, including the organisational structure and the scope of the services provided
- The ways in which the service will be delivered and the targets for its delivery
- The human and financial resources involved in providing the service
- The ways in which the quality of the service will be monitored and improved upon
- The ways in which the service will be reviewed and improved upon

The Food Service takes account of the principles of the Government's Better Regulation agenda when planning and delivering these services; these include:

- Targeting
- Proportionality
- Accountability
- Consistency
- Transparency

1.0 Service Aims and Objectives

1.1 Aims and Objectives

The Food Service delivered on behalf of the Council aims to:-

- Reduce the risk to consumers by striving to ensure that all food produced, manufactured, processed, imported or sold within the district is fit for human consumption, is of genuine quality and composition, correctly labelled and free from contamination.

The overarching objectives of the Food Service are:

- To achieve our aim through helping food businesses deliver products which are safe and are produced from premises, which are hygienic and properly controlled.
- To provide information to consumers to help them make informed choices about what and where to eat, through education and promotion.

1.2 Links to the Corporate Objectives and Plans

The objectives of the Food Service are in harmony with the goals and objectives of the Environmental Health Business Plan and our Service Improvement Plan. In the delivery of the Food Service, officers strive to take into account the Council's vision, values and corporate themes.

The Council's vision is:

'Mid Ulster District Council aspires to be at the heart of our community.'

The Council's values are at the core of what is done and these values guide how services are delivered. The Council values are:

- **Professional** – consistently striving to exceed the expectations of our customers by knowing what to do, how to do it, when to do it and why we do it
- **Trustworthy** – working for our communities in a spirit of friendliness and openness by delivering fair, transparent, equitable and ethical services
- **Quality Driven** – delivering the best services we can, making the best use of the resources we have
- **Team focussed** – working together to deliver the best results possible for Mid Ulster District Council
- **Innovative** – New and better ways of doing what we do
- **Customer Focussed** – Designing and delivering our services in response to, and around the needs of our customers.

The Council's Corporate Themes are:

- Delivering for Our People
- Creating Growth
- Building Unity

- Sustaining our Environment

Links are drawn with the Food Standards Agency Strategic Plan 2015-2020, the underpinning definition of which is that:

'Food is safe and what it says it is, and we have access to an affordable healthy diet, and can make informed choices about what we eat, now and in the future'.

This Food Service Plan includes areas which demonstrate how the Food Service actively contributes to and assists in meeting the key aims of the Food Standards Agency's Strategic Plan.

The Food Service will engage, as appropriate, in the Department of Health, Social Services and Public Safety (DHSSPS) Strategic Framework for Public Health 2013-2023, 'Making Life Better', regarding input in respect of health and well-being issues.

2.0 Background

2.1 Profile of the District

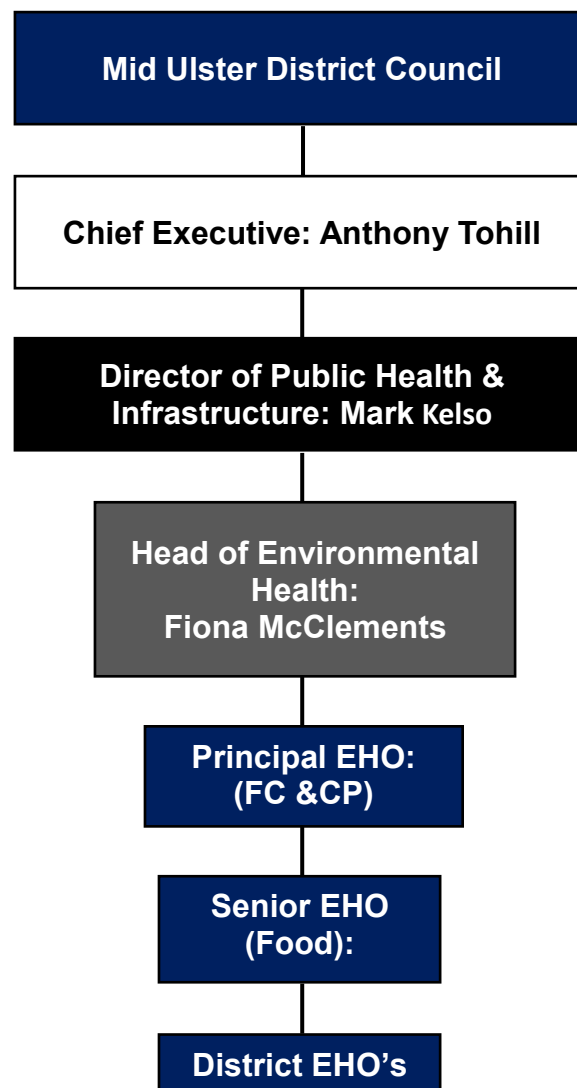
Mid Ulster District Council straddles two counties, running from Swatragh in the north to Fivemiletown in the south and from the Sperrin Mountains in the west to the shores of Lough Neagh in the east. The area is represented by 40 councillors across 7 District Electoral Areas including Carntogher, Clogher Valley, Cookstown, Dungannon, Magherafelt, Moyola and Torrent. Offices are located at Cookstown, Dungannon and Magherafelt.

As the seventh largest of the new Council areas, Mid Ulster District Council covers a geographical area of 1714km² and serves a population of over 146,000, accounting for 7.8% of the NI Population. (Source: NISRA Estimated Population 30.6.2017)

One third of the residents live in urban areas, whilst two thirds inhabit rural areas. The main towns are Cookstown, Coalisland, Dungannon, Magherafelt and Maghera.

Employment concentrates on manufacturing, engineering, construction and agri-food industries. A total of 73% of the population aged between 16 to 64 are economically active (Source: NISRA Labour Force Survey 2015). Mid Ulster District Council will seek to avail of every opportunity to positively contribute towards everyone's quality of life.

2.2 Organisational Structure



2.3 Scope of the Food Service

The Food Service covers a range of legislative and advisory functions all of which are undertaken by staff employed directly by Mid Ulster District Council. Food Service activities are either planned or reactive.

Planned	Reactive
<ul style="list-style-type: none">◆ Food Hygiene Interventions◆ Food Standards Interventions◆ Sampling◆ Health Promotion◆ Partnerships◆ Student training◆ Alternative Enforcement Strategy	<ul style="list-style-type: none">◆ Food/Water borne illness◆ Food Complaints◆ Food Alerts◆ Consultations◆ Liaison with other organisations◆ Reactive Health Promotion◆ Reactive revisit requests/appeals under the FHRS

Food Hygiene interventions are generally carried out on their own, but low risk premises may be inspected in conjunction with Food Standards, Health & Safety and targeted promotional initiatives. With the introduction of the smoke free legislation in April 2007, food inspections also encompass checks in relation to premises remaining smoke free. In line with Environmental Health Northern Ireland (EHNI) vision, food officers should embrace health, well-being and sustainability. New premises are registered for Health & Safety as well as food.

2.4 Demands on the Food Service

2.4.1 Establishment Profile

Mid Ulster District Council has food enforcement responsibility for 1685 food premises.

The food premises fall into the following categories: -

Category Breakdown	Number of Premises	Percentage of Total Premises
Primary Producers	2	0.12
Manufacturers/Packers	128	7.6
Importers/Exporters	1	0.06
Distributors/Transporters	49	3
Retailers	296	17.6
Restaurants and Caterers	1209	71.8
Total	1685	100

2.4.2 Approved and Registered Premises

Of the 1685 food premises in the Council area, 1659 are registered with the department as required under Regulation (EC) No 852/2004, whilst the remaining 26 premises are approved, as required under the Regulation (EC) No 853/2004.

2.4.2.1 Approved Premises

The following table provides a breakdown of the number of each Approved product specific establishment. These premises due to the nature of the processes and activities require additional time spend to other premises as outlined in the following table:

	Total	Task time	Total hours
Meat Products	10	25	250
Meat Preparations	2	25	50
Dairy Products	4	25	100
Egg Products	1	25	25
Fishery Products	3	25	75
Edible Co-Products	2	25	50
Cold Stores	4	25	100

Where premises are approved for more than one product; the above figures relate to the largest percentage of output from the premises.

2.4.2.2 Home Authority Premises (excluding EC)

As well as Approved Premises, the Council has a number of manufacturers and packers for which they act as Home Authority, providing additional advice and guidance on legislative requirements.

	Total	Task time	Total hours
Home Authority Premises	51	10	510

2.4.2.3 Local Specialist / Complex Processes

A number of large scale manufacturing premises are located within the District, exporting product worldwide. One premises holds Protected Geographical Indication status for its product.

Where necessary, queries on specialist or complex processes are directed to the Northern Ireland Food Managers Group (NIFMG) or the Northern Ireland Approvals Forum for opinion to ensure competent and consistent enforcement of legislation. Advice may also be sought from other external agencies as necessary.

2.4.2.4 Imported Foods

The Mid Ulster District Council area does not have a port of entry. However, the Department would have enforcement responsibility as an inland authority for imported foods where;

- Imported food not of animal origin (FNAO) does not comply with food law or fails to meet food safety requirements.
- Products of Animal Origin (POAO) have been brought into NI other than through a Border Inspection Post (BIP)
- POAO have been removed from border inspection post without a common veterinary entry document (CVED) or the authority of the official veterinary surgeon.
- POAO have been transported from the border inspection post to a destination other than that specified on the common veterinary entry document.

2.4.3 Service Delivery Points

The service is available from Monday to Friday inclusive from 0900hrs to 1700hrs at the three offices of Mid Ulster District Council. The addresses of these offices are:

Cookstown Office - Burn Road, Cookstown, BT80 8DT

Dungannon Office - Circular Road, Dungannon, BT71 6DT

Magherafelt Office - Ballyronan Rd, Magherafelt, BT45 6EN

During the hours outlined above, officers can be accessed by telephoning **03000 132 132** or by direct access e-mail. The Environmental Health email address is environmentalhealth@midulstercouncil.org.

Planned out of hours work is carried out as agreed by the Head of the Environmental Health. The Department currently does not operate an out of hours service.

2.4.4 Specialist Services

Mid Ulster District Council avails of the following external services:

- Public Health laboratory Services (PHLS)
- Department of Agriculture, Environment and Rural Affairs (DAERA)
- Public Analyst Scientific Services Ltd. (PASS), Wolverhampton.
- Public Health Agency (PHA)
- Food Standards Agency (FSA)
- Northern Ireland Water (NIW)
- Safe food
- Education Authority
- NIFMG and associated subgroups
- NIEA – Drinking Water Inspectorate

2.4.5 Factors likely to impact on Food Service Delivery

Current issues that may impact on the demands of the service in the forthcoming year are:

- Continued work on allergen management within businesses following outcome of the evaluation of the regional Allergen Management Strategy undertaken in 2017/18 and 2018/19.

- Working jointly with the FSA to consider Nutrition and Dietary Health priorities in line with the FSA strategic Plan 2015-2020. This will include the continued promotion and implementation of the Calorie Wise Scheme.
- Implementation of the recommendations of the report, which resulted from the review of the EC approved premises and approval procedures as part of a NI wide project.
- The FSA's ongoing review of the delivery of the food service, 'Regulating our Future'.
- Continuation of consistency exercises across the three offices to ensure ongoing consistency in the application of the statutory FHRS.
- Preparation of businesses for the online aspect of the Statutory Food Hygiene Rating Scheme, the Regulations for which are currently in draft form.
- Continued adherence and review of the competency frameworks for staff as required by the Food Law Code of Practice for Northern Ireland.

2.5 Enforcement Policy

The Council has adopted a Generic Regulatory and Enforcement Policy, which has an appendix specific to Food Law enforcement issues. Food businesses and the general public will have the opportunity to access the Enforcement Policy on the Environmental Health section of the Council's website at www.midulstercouncil.org.

3.0 Service Delivery

3.1 Programmed Interventions

The Council intends to carry out food hygiene and food standards interventions at a minimum frequency as outlined in the Food Law Code of Practice (Northern Ireland). It will also register, and where necessary approve, new premises that open within the District throughout the year. All food interventions will be conducted according to the following policies:

- Mid Ulster District Council Regulatory and Enforcement Policy
- Enforcement Concordat
- Home Authority Principle / Primary Authority
- The Statutory Food Hygiene Rating Scheme Guidance for District Councils

The Food Law Code of Practice (COP) allows local authorities greater flexibility in how to secure compliance with food safety legislation, particularly in relation to lower risk premises.

Interventions are defined as activities that are designed to monitor, support and increase food law compliance within a food establishment. Interventions can be divided into 2 categories, official controls and other interventions.

Official Controls	Other Interventions
Inspections (Full or partial)	Education
Audits	Advice
Sampling visits	Coaching
Monitoring visits	Information and intelligence gathering
Surveillance visits	
Verification visits	

The majority of due inspections/interventions for the year 2019-2020 will be carried out as inspections as these are businesses which would be included within the scope of the statutory FHRS. However, due to the flexibility provided in the COP, lower risk establishments may receive an intervention other than inspection. These visits may be any of the official controls listed in the above table, and may take the form of an alternative enforcement strategy e.g. information gathering via questionnaires. This approach would be taken with lower risk establishments which are not included in the statutory FHRS e.g. childminders, pharmacies etc.

The following interventions are planned for the 2019-20 year.

3.1.1 Food Hygiene

Risk Category	Planned Interventions	Task Time (hrs)	Total Hours
A	1	7	7
B	31	6	186
C	190*	5	950
D	263*	4	1052
E	161*	2	322
Unrated	22	4	88

* Includes carryover from 17-18

3.1.2 Food Standards

Risk Category	Planned Interventions	Task Time (hrs)	Total Hours
A	9	7	63
B	116	5	580
C	324	2	648
Unrated	19	2	38
Outside Programme	11	1	11

The number of 'unrated' establishments will vary throughout the year as new businesses open or businesses change ownership. These businesses will be inspected within 28 days of starting or from when the Council becomes aware that the establishment is in operation.

Businesses within the 'outside the programme' category relate to those where the risk is considered to be so low that there is effectively no inspectable risk, or where a mobile food unit is registered in the District but trades in other Council area(s) and where the Council is responsible for managing the Food Hygiene Rating for the Business. Businesses such as primary producers which are outside the programme for food hygiene but included for food standards are also included in this category.

3.1.3 Revisits

Revisits may be required for a number of reasons:

- Compliance monitoring following a programmed intervention
- Revisit following submission of a Request for Revisit form under Food Hygiene Rating Scheme
- Other revisit not related to the above

The number of planned revisits under each category for food hygiene and food standards (based on figures from 2018/19) are outlined in the tables below:

3.1.3.1 Food Hygiene Revisits

	Planned Interventions	Task Time	Total Hours
FHRV	58	2	116
FHO	49	2	98
FHRSRV	8	2	16

3.1.3.2 Food Standards Revisits

	Planned Interventions	Task Time	Total Hours
FSRV	53	2	106
FSO	8	2	16

3.1.3.3 Food Standards Focused Inspections

Based on 2018/19 figures, the following number of additional inspections were carried out focusing on food allergens as part of the allergen management strategy. This work will continue into 2019/20.

	Planned Interventions	Task Time	Total Hours
FSFI	208	2	416

3.1.4 Sampling

The Council undertakes routine sampling in accordance with the Food Law Code of Practice (Northern Ireland) and the Council's Chemical and Microbiological Sampling Programmes. Follow up action in response to unsatisfactory sample results are contained within the sampling programmes.

The Public Health Laboratory at Belfast City Hospital will complete microbiological examination of food samples. The Public Analyst appointed by the Council to carry out chemical analysis of food samples is Public Analyst Scientific Services Ltd. (PASS), Wolverhampton.

The Council also undertakes water sampling on behalf of the Drinking Water Inspectorate for food businesses using private water supplies.

The estimated number of samples is outlined in the following table:

	Planned Interventions	Task Time (hrs)	Total Hours
Microbiological Sampling	384	1.0	384
DWI	61	1.0	61
DWI Risk Assessments	24	3.0	72
Chemical Sampling	203	2.5	507.5

It may also be necessary to submit samples or swabs as part of complaint investigations or in the investigation of foodborne illness.

3.2 Reactive Work

3.2.1 New Premises / Advisory Visits

Throughout the year a number of businesses change ownership and new businesses open. This requires a new premises inspection to be completed within 28 days of opening. A number of advisory visits are also completed for both new and existing businesses as outlined in the table below. (Figures based on those for 2018/19)

	New and Advisory Visits	Task Time (hrs)	Total Hours
New Premises Inspections	155	3	465
Advisory Visits	28	2	56

3.2.2 Food Complaint

Food complaints will be investigated according to the food complaints procedure. The estimated number of complaints for the 2019/20 year is outlined below (based on figures for 18/19). On occasion, requests will be received from another Council area for a Home Authority report to assist with a food complaint investigation. This is considered under Section 2.4.2.2 on the Home Authority Premises.

	Complaints	Task Time	Total Hours
Food hygiene & Food standards	96	8	768

3.2.3 Food Alerts / Incidents

The Council will respond to alerts in accordance with the Food Law Code of Practice (Northern Ireland) and the Food Alerts Procedure. The estimated number of alerts for the 2019/20 year is outlined below (based on figures for 2018/19). Other alerts for information and Allergy Alerts will be considered by the Principal Food Officer and actioned where necessary.

	Number	Task Time	Total Hours
Food Alerts for Action	3	5	15
Localised Food Incidents	12	5	60

3.2.4 Food Related Illness and Infectious Disease

The Council completes investigations, alleged and confirmed, on behalf of the Public Health Agency for Infectious Disease Notifications through the completion of questionnaires and follow up action with implicated food businesses as necessary. The estimated number of food related illness for the 2019/20 year is outlined below (based on figures for 2018/19).

	Planned Interventions	Task Time (hrs)	Total Hours
Sporadic Investigations including ID notifications from Public Health Agency	96	4	384

3.3 Enforcement Action

Follow up enforcement action may be required as a result of either programmed or reactive work which involves additional officer time. Whilst it is not possible to predict how often each enforcement action will be required for 2019/20, the estimated time spend for each type of enforcement action is outlined in the following table:

	Follow Up Action	Task Time Hrs/premises	Total Hours
Hygiene Improvement Notice	1	2	5
Hygiene Emergency Prohibition Notice	1	14	14
Caution	1	10	10
Voluntary Closure (Based on 2018/19)	2	4	8
Voluntary Surrender (Based on 2018/19)	4	6	24
Detention Notice	1	4	4
Remedial Action Notice	1	2	2
Prosecution	1	40	40

3.4 Food Safety and Standards Promotion

Throughout the year the Council participates in promotional campaigns in partnership with the Food Standards Agency, other Council departments and external partners to deliver promotional messages through various projects, including:

Promotional Activity	Total Hours
Food Safety Week	10
Christmas Food Safety Campaign	10
Presentations to Schools / Community Groups	25
Participation in Health Fairs	10
Promotion of calorie wise	40
Business seminars (e.g.) assisting with Allergen compliance	30

3.5 Additional Resource Requirements

In addition to delivery of the inspection programme a number of administrative and management duties must be completed for the delivery of the service. These are outlined in the following table (not an exhaustive list).

Additional Resource Requirements	Total Hours
Food Hygiene Rating Scheme including database/portal management, consistency training, weeks of action etc.	180
Food Hygiene Rating Scheme Appeals / Right to Reply	20
LAEMS Return	100
KPI performance statistics	20
Food Service Plan	100
Preparation of papers for the Environment Committee	100
Sample Plans	30
Advising/preparing for PACE interviews, preparation of legal files	200
Freedom of Information Requests	150
Food Officers CPD Personal Development/Competency Framework/Internal Monitoring	400
MUDC updating of policies/procedures/forms etc.	100
Representation at NIFMG, NI Approvals Forum, Food Standards and Food Fraud Subgroup, FHRS Implementation Group and similar steering groups	140
Food Management – staff review and recruitment	100
Participation in the continuation of NI Allergen Strategy	400
EU Exit contingency preparation	400

EU Exit

DAERA is the competent authority for export health certification of live animals, product of animal origin and animal by-product including fishery products. However, SOLACE has indicated that whilst export certification is not a Council statutory duty, District Council's would be prepared to provide the certification service, subject to funding. Therefore, as part of contingency preparations for EU exit and the consequent increase in demand for EHCs when the UK leaves the EU (particularly if there is a no-deal Brexit), the 11 District Councils have been working with DAERA to identify local businesses that supply products of animal origin (POAO) to other EU member states (mainly the Republic of Ireland).

As part of this preparatory work, calculations have been carried out and it has been estimated that Mid Ulster District Council will require an additional resource of **1.2** officers to undertake the certification service on behalf of DAERA for fishery and egg products.

4.0 Financial Allocation

A Generic Costs Framework for Food Safety is utilized to derive direct and support costs for delivery of the Food Function, in accordance with standard accounting practice. The estimated level of expenditure provided by the Council towards delivery of the food service for the financial year 2018/19 is as outlined in the table below:

	Total
Staffing	£300,232 (EH)
Travel and Subsistence	£7,599
Equipment	£500
Sampling Budget	£27,000
Total	£335,331

4.1 Staffing Allocation

Officer	Total
PEHO	0.5
SEHO	1.0
DEHO	5.2 (includes 1.1 FTE vacant)
Support Staff	N/A
Clerical Staff	1.0
Total	6.7 EHO; 1.0 administration

The total number of estimated Environmental Health Officer hours required to deliver the food service for 2019/20 as outlined in this plan is **11,288.5** hours. This equates to **7.02** full time equivalent environmental health officers (based on 1606 hours per FTE). This does not account for the additional requirement of **1.2** officers required to carry out the export certification in the event of Brexit, nor does it reflect that while the allocation of EHO resource above is **6.7** FTE, the food team has been operating with vacant posts equivalent to **1.1** FTE officers since October 2018. To deliver the food service for 2019/20 as outlined above, there is a current shortfall of **1.72** FTE officers. In the event of EU Exit and EHOs undertaking the export certification duties as detailed under 3.5 above, the shortfall will be **2.92** FTE officers.

4.2 Staff Development Plan

All staff within the Food Section are encouraged to identify training needs via the competency framework and in conjunction with the Principal and Senior EHOs (Food and Consumer Protection) on an annual basis at the PDP meetings. These needs are recorded and prioritised.

All lead and authorised officers are required to undertake at least 20 hours of Continuing Professional Development each year. Food Officers are required to complete at least 10 core hours in food training.

In addition training needs may arise outside the annual review due to changing workloads, staff movement and legislation. Such additional training needs may be accommodated in house.

The programmes for training courses are assessed for relevance by the PEHO for Food to ensure the training objectives have been met and implemented. These are then signed off as necessary by the Director of Public Health and Infrastructure.

5.0 Quality Assessment

The PEHO/SEHO (Food) will carry out management checks on planned vs actual inspections, examine workload distribution and file management and review performance at food team meetings. Accompanied inspections will be carried out as and when necessary to include E.C. premises, and/or Home Authority premises.

Additionally, the Principal Officer/Senior Officer will carry out periodic documentation checks of files, letters etc. Consistency exercises will be undertaken with all staff to ensure uniformity in enforcement and scoring of premises.

6.0 Review

6.1 Review against the Service Plan

The following reviews will be undertaken against the work carried out to ensure consistent implementation of the component parts of the Food Service Plan:

- Review KPI's within the Business Plan and Service Improvement Plan
- Annual Report to Council against Plan

6.2 Identification of any variation from the Service Plan

A review will be carried out at the end of the year to identify variation from the plan.

The review of the 2018/19 Service plan is summarised in the table below.

Food Hygiene		2018/19
New premise inspections		155
FH programmed inspections		448
Other Food Hygiene visits		344
Infectious Disease investigations		77
Food Standards		2018/19
New premise inspections		153
FS programmed inspections		207
Other Food Standards visits		344
Food hygiene & food standards service requests		2018/19
Service request including FOIs		320
Food complaints		95

6.3 Areas of Improvement

The work carried out by the food team was impacted throughout the year by a number of factors.

During the year, additional food work was carried out in the areas of nutrition and allergen management. The Department participated in the Calorie Wise scheme, a scheme developed by the Food Standards Agency NI in partnership with District Councils which encourages food businesses to display calorie information on their menus. Advisory and assessment visits were made to several food businesses, and an information seminar was delivered to promote the scheme. This resulted in a Mid Ulster business becoming one of the first businesses in Northern Ireland to receive the Calorie Wise award.

The Department also participated in the NI wide strategy to improve compliance with allergen management. This strategy was devised by the Northern Ireland Food Managers group and aims to improve compliance with the FIR allergen requirements across Northern Ireland and to provide a consistent approach to addressing issues relating to known allergens added to foods as allergenic ingredients and also those introduced by cross contamination. Several additional visits have been made to businesses in order to assess management controls and actions have been taken where non-compliance has been found. A series of seminars were delivered to local businesses regarding allergen management, which were well attended and showed business engagement. These seminars served to further educate businesses on the requirements and on the consequences of non-compliance.

Areas of improvements are raised and discussed at quarterly food team meetings. The improvements may at the suggestion of district officers undertaking food duties or at the suggestion of the PEHO/SEHOs. Areas of improvement the food section are currently working on include streamlining procedures to improve efficiencies (e.g.) sending letters out within timeframes, electronic signatures shared across the administration team so letters can be issued from any of the three locations, allocation of workloads per ward and proportionate to the full time equivalent time allocated to undertaking food duties.

Other areas for improvement will be identified throughout the year via quality assessment procedures (as outlined in section 5.0), at team meetings and PDPs. Plans to action such improvements will be developed and implemented to address these as they arise.