



WORTHING BOROUGH COUNCIL

Worthing Borough Council

Official Food Controls and Health & Safety Service Delivery Plan

1 April 2024 - 31 March 2025

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1 Service Aims and Objectives

1.1 Service Plan Aims and Objectives

The Service Plan sets out how the council intends to provide an effective food safety service and health and safety at work service to commercial premises under Local Authority enforcement.

Adur & Worthing Councils

The work of the Food and Health & Safety incorporates the principles and missions of Adur & Worthing Councils Our Plan 2023-2026. Our Plan is about our relevance and connection with those we serve. <https://www.adur-worthing.gov.uk/our-plan/>

Our Principles are:

*We are **resilient**, creating a sustainable pace of work and making the most of what we have got.*

*We are **adaptable**, being an organisation that encourages change instead of change being hard, where our systems and processes make us effective, with skills to innovate and try new things.*

*We are **participative**, bringing together everyone's knowledge and experience. To know that we are being heard makes our work more meaningful.*

Our Missions are:

Thriving People: *the public can make their own decisions on where best is safe to buy food and dine out using the FHRS. Protecting public health by Investigation of infectious diseases to control the spread and identify the source with persons in vulnerable groups. Maintaining standards of workplaces by proactive inspections and investigating complaints regarding workplace conditions.*

Thriving Places: *advice to Community groups providing food to the local community, awareness of local initiatives by officers working in districts.*

Thriving Environment: *promoting the prevention of Food Waste, reducing carbon footprint by reducing commuting between visits by working in districts.*

Thriving Economy: *offering businesses support and advice. The support for businesses by the issue of Export Health, Premises Endorsement and Ship Sanitation Certificates. Supporting businesses to remain prosperous, therefore providing employment opportunities to the community.*

Food Standards Agency

The food safety service is designed to meet the requirements of the Food Standards Agency (FSA) Framework Agreement on Local Authority Enforcement. It covers the functions carried out by the Food Safety Team under the provisions of the Food Safety Act 1990, the Food Safety and Hygiene (England) Regulations 2013 and relevant regulations made under the European Communities Act 1992. The plan aims to support the FSA 2022's 5-year strategy and vision for a better food system which focus includes:

- *Food is safe*
- *Food is what it says it is*
- *Food is healthier and more sustainable*

<https://www.food.gov.uk/about-us/our-strategy>

The plan seeks to ensure that all national priorities and standards are delivered locally and provides a balanced approach to local food safety enforcement. This is achieved by not merely directing resources towards a programme of interventions but also by ensuring that adequate provision is made to address food complaints, food poisoning notifications and other reactive work, advice to businesses and also the ability to follow up on intelligence driven areas of work such as sampling and targeted visits.

Health and Safety Executive

The health and safety service is led by national, county and local project work as well the Local Authority's reactive investigations through accident notifications and complaints. The council will aim to support the Health & Safety Executive's (HSE) Strategy 2022-2032- Protecting People and Places:

<https://www.hse.gov.uk/aboutus/the-hse-strategy.htm>

The HSE's 10 year plan includes:

- *Reduce work-related ill health, with a specific focus on mental health and stress*
- *Increase and maintain trust to ensure people feel safe where they live, where they work and, in their environment*
- *Enable industry to innovate safely to prevent major incidents, supporting the move towards net zero*
- *Maintain Great Britain's record as one of the safest countries to work in*
- *Ensure HSE is a great place to work, and we attract and retain exceptional people*

1.2 Service aims and objectives

Our priority is to ensure that food remains safe and that the high standard of food safety and consumer protection enjoyed in the Worthing area is maintained. In addition, our Service aims to ensure that safe working conditions are maintained under the council's enforcement.

This will be achieved through:

- Programmed inspections
- Targeted interventions
- Investigation of complaints
- Investigation and control of infectious diseases
- Sampling initiatives
- Promotional events
- Consultation on planning, licensing and Open Event applications
- Registration and approvals of food establishments

Health & Safety

- Participation in the HSE Priority projects
- Participation in regional projects as part of the Sussex Health & Safety Liaison Group
- Local project initiatives based on local intelligence
- Investigation of notifications under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Investigation of workplace complaints for businesses that are within the council's enforcement area
- Registration of skin piercing applications
- Consultation on planning, licensing and Open Event applications

2 Background Information

2.1 Profile of the Worthing Borough

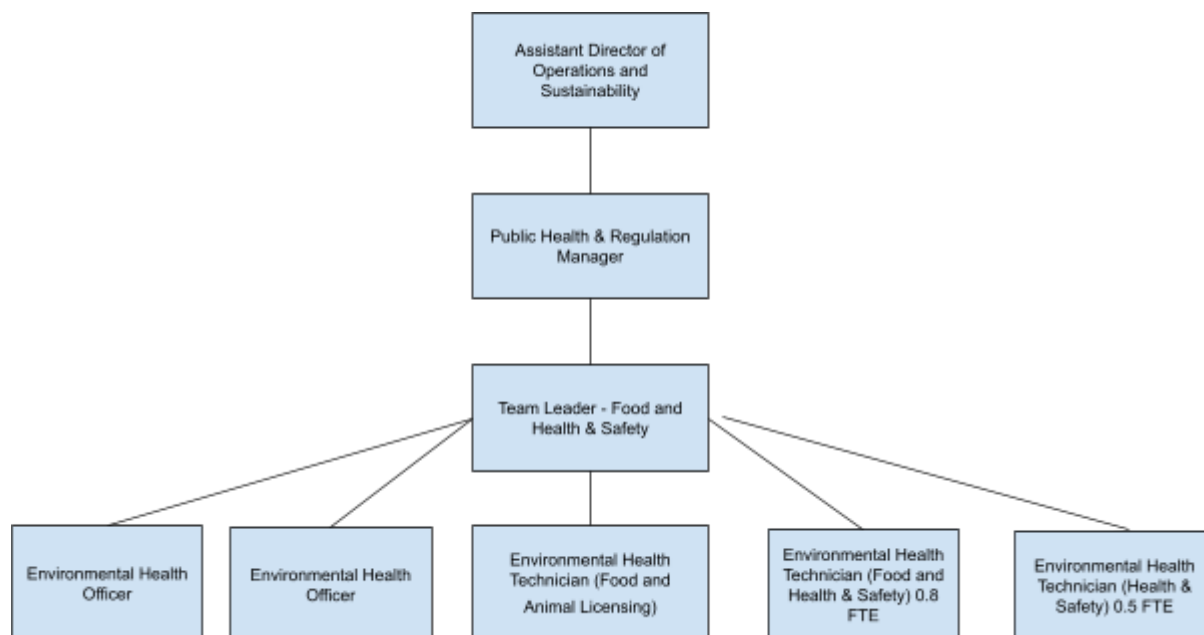
Worthing has a population of approximately 111,400 (source from the 2021 Census) and is a seaside resort town at the foot of the South Downs, occupying a coastal strip of 12.5 square miles between Adur and Arun District Councils.

2.2 Organisational Structure

The Food and Health & Safety Team, sits within the Public Health & Regulation Section, which falls under the Assistant Director of Sustainability and Resources. Public Health & Regulation is a joint shared service for Adur District and Worthing

Borough Councils.

<https://www.adur-worthing.gov.uk/about-the-councils/senior-management-structure/>



Executive Member for Communities and Wellbeing: Rosey Whorlow

2.3 Demands of the Service

Worthing Borough Council's Food and Health & Safety Service is delivered from: Worthing Town Hall, Chapel Road, Worthing, West Sussex, BN11 1HA.

Telephone number: 01903 221064

Email: publichealth.regulation@adur-worthing.gov.uk

Opening hours: Monday to Friday 9am - 5pm.

Out of Hours: 07713 889128

Launch of online portal for service requests and applications

This has been a project that commenced last year for the introduction of an online portal service for service requests, registration and licensing applications and Public Registers. Skin piercing applications are now available to apply on the online portal. Further developments are required for service requests for this Service and the Public Register with the aim for its introduction later this year. It is hoped with the increase in digital advances that the Technical Support team will be able to reduce some of the administrative tasks undertaken by officers.

2.4 Scope of Food Service

The service covers amongst others, food hygiene inspections of premises, inspections of food, foodstuff and food premises complaint investigations, food

poisoning investigations (sporadic cases and outbreaks), inland imported foods controls, sampling, issuing certificates (export Health, premises endorsement and support attestations), food safety promotional activities, and provision of advice and guidance on legal requirements and good practice to new and existing businesses. Inspections are unannounced and if they are announced it is in line with the Food Law Code of Practice. Food Officers consult on Planning, Licensing and Open Event applications as well, as attending Safety Advisory Group meetings (SAGs).

The majority of interventions will be the official controls listed below.

Official control methods and techniques	Non-official food controls	Other official activities
<ul style="list-style-type: none"> • Inspection • Audit • Sampling for analysis • Monitoring • Surveillance • Verification 	<ul style="list-style-type: none"> • Education • Advice • Coaching • Information and intelligence gathering 	<ul style="list-style-type: none"> • Enforcement measures and/or remedial actions following non-compliance • Management of lists of registered/approved FBOs • The act of issuing official certificates or official attestations


Cases of genuine emergency, such as food poisoning outbreaks reported outside normal hours are referred via the Council's emergency contact arrangements to the Team Leader (Specialist Food & Health & Safety).

As of April 2024 a total of **1052** food premises are subject to programmed interventions as per the following table.

Type of Premises	Number
Distributors/Transporters	14
Farmers/growers (Primary producers/fishing vessels)	2
Hospitals/nurseries/caring Premises	139
Hotel/bed & breakfast/guest house	10
Importers/Exporters	1
Manufacturers & Packers	21
Mobile caterer	55
Other catering premises	153
Pub/bar/nightclub	98
Restaurant/Cafe/Canteen	231

Retailers	151
Retailers - supermarkets/hypermarkets	33
School/college/university	33
Takeaway/sandwich shop	111
Total	1052
Registered	1051
Approved Establishments	1
Festivals/Events	1

Registered food premises must meet the requirements of assimilated Regulation (EU) No. 852/2004, as applied by the Food Hygiene (England) Regulations 2013. However, there are businesses which process animal products, such as meat products, fishery products or dairy products and trading is not with the final consumer, are required to apply for product specific establishment approval. These businesses must also meet assimilated Regulation (EU) No. 853/2004. There is 1 business in Worthing that meet the approval criteria and are required to display a unique code which those in the Worthing area begin with SX.

	<p>Worthing's approved establishments code is SX.</p> <p>1 x Meat Products establishment</p>
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2.5 Scope of Health & Safety Service

The Service has one designated officer specialising in health and safety. Officers providing the food service also carry out focused health and safety interventions in a range of food premises when matters of evident concern are identified in the course of conducting food hygiene interventions. The Officers take part in the HSE's Priority Projects as well as accident investigations, complaints and skin piercing registration applications.

2.6 Export Health Certificates, Support Attestations and Certificate of Premises Endorsement

On 31 December 2020 the Brexit Transitional Period ended and on 1 January 2021 the requirement to process and certify Export Health Certificates for consignments of fish/fishery products and Egg Products commenced into the EU.

We aim to support our businesses involved in this process to enable guaranteed movement of these products into the EU. This is a non-statutory function and can provide only a limited service should businesses require an Export Health Certificate. We can provide Support Attestations and Certificate of Premises Endorsement.

2.7 Enforcement Policy

This Department is very aware of the effect of the cost of living crisis and the financial impact of COVID on food businesses. This has been coupled with difficulties in staff recruitment in hospitality, food chain pressure and rise in fuel prices. The Food Team will support businesses to a broadly compliant Food Hygiene Rating with those businesses requesting assistance but ensuring public safety.

The council has a documented Public Health & Regulation Enforcement Policy <https://www.adur-worthing.gov.uk/media/Media.97402.smx.pdf> which details the enforcement approach for the whole service, including food safety, based on good practice guidance from Local Government Regulation and the Regulators' Code from the Better Regulation Delivery Office.

2.8 Enforcement Management Model

In addition to the Department's Enforcement Policy, the decision making process for health and safety enforcement after the investigation of accidents and complaints, and the observation of defects observed during inspections, the Health & Safety Executive's Enforcement Management Model must be followed. <https://www.hse.gov.uk/enforce/enforcement-management-model.htm>

It is a toolkit to assist enforcement officers to ensure that the most appropriate and consistent course of action is taken.

Section 3 Food Service Delivery Plan for 1 April 2024 to 31 March 2025

3.1 Programmed Food Hygiene Inspections

The FSA's COVID-19 Recovery Plan had concluded on 31 March 2023, Local Authorities were then tasked with realigning their food hygiene programmes back with the Food Law Code of Practice. This is the second year of the realignment which is a reflection on the frequency of inspections and contractor assistance during the COVID-19 Recovery period. The programme will be in line with using the full range of flexibilities in the Code. A risk-based and intelligence led approach will be taken to the prioritisation of interventions.

Programmed Food Hygiene Interventions are carried out in accordance with the arrangements set out in the Food Law Code of Practice. The inspections are logged on Tascomi Environmental Health software and standard reports enable progress, and future demand, to be constantly monitored.

The programmed food hygiene inspections due in the period 1 April to 31 March and a breakdown of intervention types are shown in the following table.

Risk Category/ Frequency of Intervention/ Inspection Type	Intervention Type	Number of Planned Interventions Due In	
		2024-2025	2025-2026
A / every 6 months, within 28 days of due date	Official Control Intervention, full programmed inspection,	3	No data
B / every 12 months, within 28 days of due date	Official Control Intervention, full programmed inspection	35	19 (will increase)
C / every 18 months, within 28 days of due date	Official Control Intervention, full programmed inspection	110	103 (will increase)
D / every 24 months, aim is within 28 days of due date if not within the year	Official Control Intervention (full programmed inspections for non-broadly compliant); partial programmed inspection or Alternative Enforcement Strategy for broadly compliant	221	159 (may increase)
E / every 36 months, aim is within 28 days of due date if not within the year	Official Control Intervention (full programmed inspections for non-broadly compliant); partial inspection or Alternative Enforcement Strategy for broadly compliant	126	173
Unrated, within 28 days of date of commensurate of trading	Official Control Intervention (full inspection)	33 + 130 (estimate from 2023)	160 (estimate from 2023)
Enforcement Revisits	Official Control Intervention	90 (estimate from 2023)	90 (estimate from 2023)
Complaint; monitoring, verification & surveillance; and sampling for analysis visits	Official Control Intervention	110 (estimate from 2023)	110 (estimate from 2023)

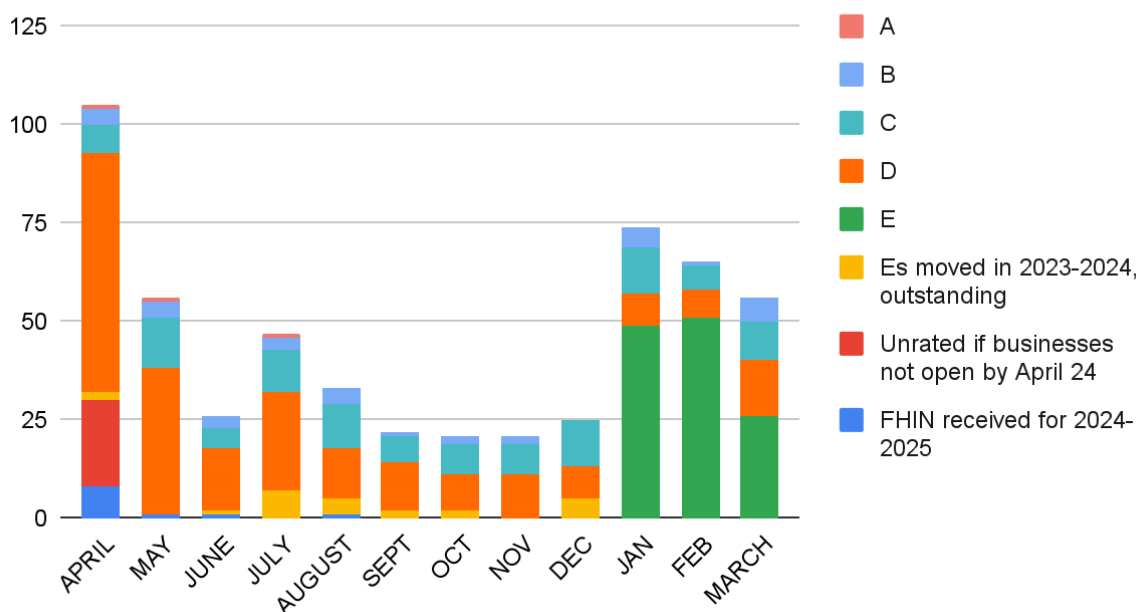
Information & intelligence gathering; advice & education; and routine sampling	Non-Official Food Controls	5 (estimate) & 30 sampling	5 (estimate) & 30 sampling
Requested Revisits for Food Hygiene Rating	Non-Official Food Controls	55 (estimate from 2023)	55 (estimate from 2023)
Total		858	904 (will increase)

Risk Category D and E inspections may receive official control interventions and Alternative Intervention Strategies can be applied. Partial inspections will focus on the areas critical to the operation of the business. During the course of the inspection, if it is evident that the business will not be issued with a Food Hygiene Rating of 5, a full inspection will be undertaken.

Alternative Intervention Strategies will involve analysis of detailed questionnaires sent to businesses which provide information of the activities within their business. The business chosen will be based on low risk activities, in receipt of third party audits and previous history of compliance. Businesses in receipt of a questionnaire will not receive an updated Food Hygiene Rating Score. If there has been a significant change in the business, a food hygiene inspection visit will follow. Any non-compliant business will receive a full food hygiene inspection.

The chart below illustrates the programmed inspections due in 2024-2025.

Worthing 2024-2025 Food Inspection Programme



For 2024-2025, the Category D inspections will not be completed within the Food Law Code of Practice requirements due to the majority of due for inspection within the first quarter of the year. The mass of inspections in the first quarter was the result of contractors used to catch up with outstanding inspections as result of COVID-19 lockdowns. A portion of Risk Category D premises will receive Alternative Enforcement Strategy due to a reduction in staff in the Service.

Some of the Category D inspections due in 2024-2025 have been completed in the last quarter of 2023-2024, as a result of complaints received.

The Risk Category E inspections have been brought forward during the year to even the distribution of inspections.

3.2 Ongoing Proactive Surveillance

Proactive surveillance is essential to establish an accurate picture of the local business landscape and to identify open/closed/ recently reopened/ new businesses; as well as businesses where there has been a change of operation, activities or Food Business Owner.

New and prospective businesses are identified from informal contacts, Officers working in districts, applications for planning consent, licensing and building regulation approval and food premises registration.

Surveillance has continued with links to local Food Facebook groups as well as monitoring local news websites and social media platforms. There has been a growth of unregistered food businesses operating on social media and dark kitchens.

The fishing vessel community will be contacted every three years to establish if there is a change in those that are trading. Those that have increased in their operation, may receive an inspection.

Other council departments have been requested to notify the Food Service for new businesses that have not registered as a food premises with the council.

3.3 Food Complaints/ Premises Complaints

The Food Team will continue to investigate all complaints received regarding the safety of food. Any investigation will incorporate consideration of the risk to public health, compliance with statutory requirements, measures required to prevent recurrence and customer expectations. The documented food complaint procedure is in accordance with Local Government Regulation Guidance (Guidance for local authorities dealing with food complaints). Action taken on conclusion of the

investigation will be in accordance with the Public Health & Regulation's Enforcement Policy. It is estimated that 110 complaints will be received. Complaints ranged from allegations of food poisoning to a caterpillar found in a cake.

The Food Team will not investigate complaints where there is no breach of legislative requirement or that Worthing Borough Council is not the Competent Authority, such as food labelling complaints which will be referred to West Sussex Trading Standards.

3.4 Primary and Home Authority Principle

The Home Authority Principle was developed by Food and Trading Standards authorities to aid consistent enforcement. The scheme provides businesses with a home authority source of guidance and advice and provides a system for the resolution of disputes. Alternatively, businesses can form a 'Primary Authority' statutory partnership with a local authority to assist with consistent enforcement. The guidance and advice the local authority provides must be taken into consideration by officers carrying out inspections and dealing with instances of non-compliance. The council endorses the home authority principle and currently has yet not received any requests for support in this area.

3.5 Advice to businesses

The Food Team has a strong commitment to providing an advisory role on legislative requirements and good practice for both new and existing businesses. New businesses and existing businesses can access information relating to food matters on the council's website. During programmed inspections officers also advise businesses accordingly in all aspects of food control. Such approaches are considered an investment to reduce the likely need for enforcement activities at a later stage. However, pre-inspection visits are no longer carried out prior to the opening of businesses. Therefore, it is difficult to estimate the number of advisory inspections that we will deliver but it will depend on the nature and size of the business. However the Service received approximately 165 requests for information last year.

3.6 Food Sampling

An annual food sampling programme is in place and outlines the Local Authority's sampling strategy and approach to specific local and national demands. UK Health Security Agency (UKHSA) implements a national programme of coordinated food studies in partnership with local authorities and Local Authority Food Liaison Groups. Microbiological examinations are undertaken by the UKHSA's Food, Water and Environmental Laboratory at Porton Down. Worthing receives an allocated budget

from the UKHSA solely for microbiological sampling. It is estimated that 10 sampling visits will be carried out. This is dependent if there are businesses that meet the criteria of the co-ordinated studies. There were 2 unsatisfactory environmental samples taken from the same business in Worthing last year from Sampling Study 78 - Hygiene in Catering Premises. There were unsatisfactory levels of *Bacillus cereus* on a chopping board and unsatisfactory levels of Enterobacteriaceae from a freezer handle.

Sampling Programmes for 2024-2025	
National UKHSA Sampling	Study 80: Pasteurised and unpasteurised milk cheese From retail and catering premises (<i>Listeria spp</i>)
National UKHSA Sampling	Study 81: Hygiene in Tattooing and Cosmetic Piercing Premises Testing for <i>Pseudomonas aeruginosa</i> in water samples, swabs and samples of any 'green' soap or disinfectants
National UKHSA Sampling Reactive Study	Study 82: Raw Eggs Shells Imported eggs/non lion brand from retail and catering Premises (<i>Salmonella spp</i>)
Local Sampling Programme	Approved Premises/Manufacturer A selection of food and environmental samples to be taken from premises in Worthing that are approved establishments or are manufacturers
Local Sampling	District Intervention: Reactive Sampling Further intervention from a food hygiene inspection or complaint.

Food samples for analysis are sent to the Public Analyst at Hampshire Scientific Services, Southsea, Hampshire. The analysis includes testing for food composition and contamination.

Our Food Sampling Policy can be found in Appendix 1.

3.7 Food Safety Incidents

The Food Team will continue to respond to food safety incidents in accordance with the provisions of The Food Law Code of Practice, and all food alerts issued by the FSA will continue to be dealt with in accordance with this Code. It is estimated that 10 Food Alerts For Action (FAFA) will be received.

We will work with manufacturers and suppliers in liaison with the Food Standards Agency should a product recall be required to be instigated.

3.8 Liaison with other Organisations

The Food and Health & Safety team work closely with other organisations in order to achieve the same goal, public safety. We are a part of the Sussex Food Liaison Group which is attended by the FSA and UK Health Security Agency (UKHSA). There are other Sussex Local Authorities groups that the team attends, Food Study Group, Health and Safety Liaison Group and Infectious Disease Group. It is estimated that attendance equates to 3 days a year taken from Worthing resources.

Close partnerships have been developed with FSA, UKHSA, HSE, West Sussex Trading Standards, Sussex Police, Southern Water, West Sussex Public Health, Sussex Inshore Fisheries and Conservation Authority, MMO, Cefas, Natural England, South Downs National Park, Defra and APHA. Internally within the council, the Service has a designated Solicitor. Our Service works closely with Wellbeing, Planning, Building Control, Events, Concessions and Cleansing.

3.9 Projects/ Schemes/Food Safety Promotion

3.9.1 Food Hygiene Rating Scheme (FHRS)

The food hygiene rating or inspection result given to a business reflects the standards of food hygiene found on the date of inspection or visit by the local authority. The food hygiene rating is not a guide to food quality. Not all food businesses meet the criteria to be part of the Food Hygiene Rating Scheme (those that do not have direct contact with the public, those businesses that the public do not associate as a food business).

The FSA holds information provided on businesses on behalf of local authorities participating in the national Food Hygiene Rating Scheme in England. The council shall continue to participate in the national Food Hygiene Rating Scheme, however, on 1 July 2018 it was agreed to utilise a cost recovery function in regard to requested re-inspections/ re-visits under the terms of the FHRS.

It is the ambition of the team and of the council that we have a thriving hospitality sector in our places, whilst supporting the health and wellbeing of our communities and visitors. In the support of food businesses, those with a Food Hygiene Rating Score of 5 are listed on the [council website](#). At the same time, limited resources need to be directed to where they are most needed and this will be one way of supporting those resources.

For businesses that wish to apply for a requested revisit for a Food Hygiene Rating, we offer two fees. The urgent requested revisit which will be carried out within 35 days of payment which supports businesses that are required to obtain a broadly

compliant Food Hygiene Rating Score to continue their partnerships with food delivery platforms. There is the standard requested revisit for a Food Hygiene Rating which will be carried out within 3 months of receiving payment.

Businesses that are requiring their Food Hygiene Rating Score to be uploaded urgently can apply for this paid service which is scheduled to be available later this year.

3.9.2 Food Safety Campaigns

The team will support food safety campaign initiatives promoted by the FSA. This had included campaigns on Student Kitchen campaign and Perfect Picnic. This function is taken from Adur resources.

The Departmental website is maintained annually to provide current guidance to businesses on food and health & safety. Approximately 5 days a year are required to maintain the website and which are taken from Worthing's resources.

3.10 Control of Outbreaks and Infectious Disease

The Food Team will investigate food-related infectious disease notifications in accordance with procedures agreed with the Consultant in Communicable Disease Control (CCDC). Investigation of outbreaks will be in accordance with the Outbreak Control Plan agreed with the UKHSA. Officers within the team will be first responders in line with the Emergency Plan, in the event of a serious outbreak.

<https://www.gov.uk/government/publications/communicable-disease-outbreak-management-operational-guidance/communicable-disease-outbreak-management-operational-guidance>

170 notifications of sporadic cases are expected and at least one outbreak of food poisoning or viral illness requiring investigation. Notifiable infectious diseases that require investigation within set time periods set by the UKHSA. We are required to work closely with UKHSA to support each Service in protecting public health.

Section 4 Health and Safety Service Delivery Plan for 1 April 2024 to 31 March 2025

4.1 Health and Safety Inspections

The Health & Safety Delivery Plan is the Service's enforcement and liaison with businesses on health and safety, under the Health & Safety at Work Etc Act. 1974.

Section 18(4) of the Health and Safety at Work Act etc. 1974 places a duty on Local Authorities to make 'adequate arrangements for the enforcement' of health and safety and the Code sets out what is meant by 'adequate arrangements for enforcement'.

Health and safety enforcement of businesses is shared with the HSE. Local Authorities enforcement are mostly with businesses where the public has accessed. <https://www.hse.gov.uk/foi/internalops/og/og-00073-appendix1.htm>

Since 2009 there is no requirement for the registration of businesses under the Offices, Shops and Railways Premises Act 1963. Local authorities do not keep an updated database on businesses unless the industry has been targeted for intervention by the HSE or RIDDOR notifications or complaints have been received.

There was further deregulation in 2013 and Local Authorities were no longer required to undertake programmed routine health and safety inspections of all Local Authority enforced businesses: <https://www.gov.uk/government/news/new-code-curbs-unnecessary-council-safety-checks>

Local authorities now plan health and safety inspections based on the HSE's Local Authority Circular (LAC) Setting Local Authority Priorities and Targeting Interventions <https://www.hse.gov.uk/lau/lacs/67-2.htm> which is renewed annually.

This LAC provides details of national priorities identified by HSE and should be used to compliment (and support) any priorities identified from local intelligence. Using the guidance and tools for priority planning and targeting of interventions ensures a proportionate and consistent risk-based approach, which meets the requirements of the National Local Authority Enforcement Code. The Code provides flexibility for LAs to address local priorities alongside the national priorities set by HSE. <https://www.hse.gov.uk/lau/la-enforcement-code.htm>

There is no longer a separate health and safety team within Public Health and Regulation. The priority projects chosen for this year's plan are based on previous interventions, businesses undertaking high-risk work activities and the availability of sectors in Worthing. One FTE 0.5 Environmental Health Technician leads on these projects with the assistance of Food Officers in food premises.

Below is the Health & Safety Service Plan for Worthing.

Setting Priorities	National HSE projects from LAC 65/2 rev 13	Worthing's 2024-2025 Health & Safety Priority Projects
Annex A Health Topics "Protecting People and Places"	Duty to manage asbestos	Undertake as part of proactive inspections
	Legionella	Spa pools and hot tubs in the tourism sector and retail
Not included in Plan	Respirable Silica Dust, Cooling Towers, Work Related Stress, Visitor attractions prevention/control of ill health arising from animal topics	
Annex A Safety Topics	Planned Preventative Maintenance	part of warehouse inspections
	Gas Safety in Commercial Catering Premises	Gas safety certificates requested by Food Officers on food hygiene visits. LPG project at markets/open events/concessions.
	Electrical safety in hospitality settings	Public houses with gardens
Not included in Plan	Inflatable amusement devices, trampoline parks, provision of licensable adventure activities without AALA licence, raising awareness of the need to prevent injury to members of the public from accessing large commercial waste and recycling bins topics, Safety in Motorsports.	
Annex B (businesses that a targeted inspection can be carried out.	Warehouse (manual handling, workplace transport and falls from heights).	Annual on-going project.
	LPG in catering	Gas safety certificates requested during new business and routine inspections by food officers and during Open Events consultation.
	CO poisoning from solid fuels	Kebab takeaways and restaurants to send guidance from HSE on CO monitoring.
	Crowd management at large scale public events. Fireworks displays.	Participate in SAGs. Corporate Safety lead.
	Leaking LPG from caravan/camping parks	Delegated authority is with the Private Sector Housing team
	Violence at work at retail	On receipt of RIDDOR notification or complaint only
	Musculoskeletal disorders in residential care homes	On receipt of RIDDOR notification or complaint only
Not included in Plan	Lead poisoning at indoor firing range, open farm E.coli/cryptosporidium infection. Occupational diseases	
Annex C LA intervention Plans	Local A&W	Possible projects from incidents in A&W. and national non-HSE initiatives
	Work Plan with Liaison Gp	Possible projects from Liaison Group
	Investigation of incidents and complaints	LA to apply HSE's risk based selection criteria.

It is estimated that there will be approximately 50 service requests. Any service requests for health and safety that are not within council's enforcement will be referred to the appropriate agency. This includes work activities at domestic premises, construction, hospitals and nursing homes, schools, whilst in transport, ports and peripatetic workers. This Service does not investigate complaints relating

to public safety where there is no work activity and that the work activity takes place on a domestic premises.

It is estimated that this Service will receive 35 notifications under RIDDOR. RIDDORs will not be investigated for HSE enforced premises, service users linked to residential care homes which are referred to the Care Quality Commission.

This Service will follow the HSE's Incident Selection Criteria Guidance providing a proportionate, transparent and targeted procedure for the selection and investigation of accidents and incidents.

<https://www.hse.gov.uk/lau/lacs/22-13.htm>

When deciding which incidents to investigate and the level of resource to be allocated to the investigation, account should be taken of the:

- severity and scale of potential or actual harm;
- seriousness of any potential breach of the law;
- duty holder's known past health and safety performance;
- enforcement priorities;
- practicality of achieving results; and
- wider relevance of the event, including serious public concern
- [national guidance on targeting interventions \(LAC 67/2\)](#)

The Incident Selection Criteria Guidance will be referred to if any mandatory incident is not investigated and explanation recorded. In addition, this guidance will be used for selection of discretionary investigations for incidents reported to LAs that do not require investigation.

All major incidents require a mandatory investigation. These include fatalities, specific injuries as defined under RIDDOR, reportable occupational disease, incidents where there is a serious breach of health and safety law and relevant precursor events as identified within the HSE business plan. Any incidents that are not defined as mandatory are discretionary for investigation. This is dependent on previous history, if the incident links to the HSE's priority projects, the incident may arise to complaints and has potential for high media profile.

Section 5 Resources

The Food and Health & Safety Service is currently not on the Corporate Risk Register list.

<https://www.adur-worthing.gov.uk/about-the-councils/corporate-strategies-and-policies/strategic-performance-risk-management-framework/>

In the autumn, Public Health and Regulation will be undergoing a service redesign in line with the council's Organisational Design.

- The council as a whole requires renewal of work practices to reflect the changes in the community and the economic context we are operating in.
- To work towards becoming more adaptive, resilient and participative.
- Therefore, the council becomes better at working with our communities and with other partners to address the big challenges and opportunities coming towards us.

The approval of the redesign will be implemented in April 2025.

5.1 Financial Allocation

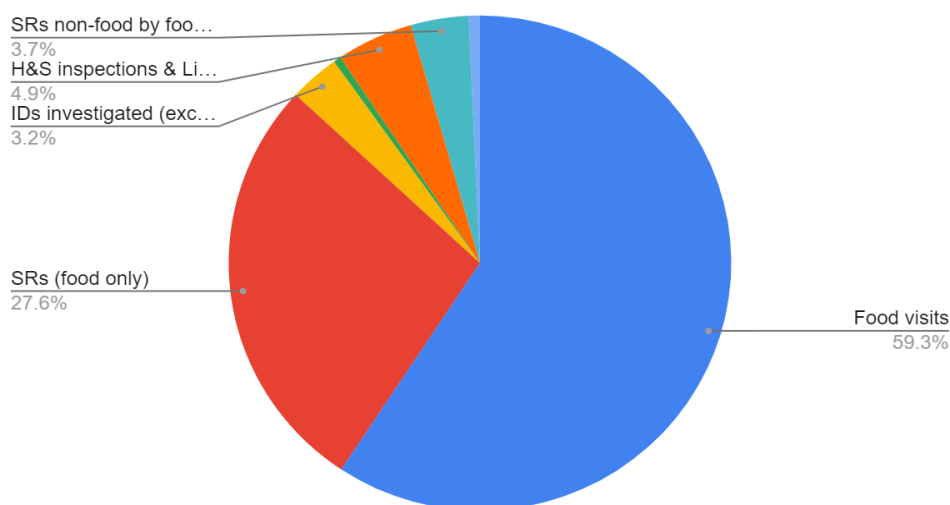
EXPENDITURE HEAD for Food Safety	2023-2024 Actual	2024-2025 Forecast
Central Support and Employee Costs	£247,777	£252,860
Supplies and Services	£11,324	£3,300
Gross expenditure	£259,101	£256,160
Total income	£8,155	£7,500
Net expenditure	£250,945	£248,660

EXPENDITURE HEAD for Health & Safety	2023-2024 Actual	2024-2025 Forecast
Central Support and Employee Costs	£36,049	£36,260
Supplies and Services	£1,968	£3,780
Gross expenditure	£38,017	£40,040
Total income	£2,441	£550
Net expenditure	£35,575	£39,540

5.2 Staffing Allocation

The following pie chart illustrates the range of Environmental Health tasks that the Food Officers undertook in Worthing in 2023-2024.

Worthing PHR work by Food Officers 2023-2024



Officers work in districts (except for the Environmental Health Technician specialising in health and safety). Officers gain community knowledge, build partnerships with businesses, reducing carbon footprint by working in designated areas. All officers work in the Worthing area. There is one EHO and one EHT (who is also an Animal Licensing Officer) that are designated to the Adur area, as well as sharing the East Worthing area and Worthing town centre. All officers undertake health and safety enforcement and some licensing functions. The following table illustrates the allocation of staff resources.

Position	Full Time Equivalent for Food Law Enforcement	Food Law Competency (authorisation is base on post)	Full Time Equivalent for Health & Safety Law Enforcement	Health and Safety Competency (authorisation is base on post)	Administration, training, meetings, non-food and non-health & safety work
Team Leader (FTE 1.0)	0.7 (of which 0.4 district)	Lead Food Officer Authorised Officer	0.1	Authorised Officer	0.2
Environmental Health Officer (FTE 1.0)	0.8	Authorised Officer	0.1	Authorised Officer	0.1
Environmental Health Officer (FTE 1.0)	0.8	Authorised Officer	0.1	Authorised Officer	0.1
Environmental Health Technician (FTE 0.8)	0.65	Authorised Officer, not to determine food fitness or seize & detain food.	0.05	Authorised Officer	0.1
Environmental Health Technician (FTE 1.0)	0.65	Authorised Officer, not to determine food fitness or seize & detain food.	0.05	Authorised Officer	0.3 (role includes Animal Licensing)
Vacant (post freeze) Environmental Health Technician	0	Authorised Officer, not to determine food fitness or seize &	0	Authorised Officer	0

(FTE 0.4)		detain food			
Environmental Health Technician (FTE 0.5)	0	N/A	0.45	Authorised Officer	0.05
Total in Post 5.3	3.6		0.85		0.85

The Food Standards Agency does not produce any official figures on the number of officers required for Food Delivery but the national guidance is as follows:

250 premises per FTE is a well-resourced LA
350 or more premises per FTE is a stretched LA
450 or more premises per FTE is an LA which is likely to founder and not deliver all the statutory functions.

These ratios are based on premises per FTE and assume the FTEs can undertake the full range of interventions and controls. It assumes a proportionate split across types of premises and categories and that officers will only be doing statutory functions and no other activities such as advisory services. A well-resourced authority ensures that there are sufficient resources to respond to a serious incident (food alert for action, food poisoning outbreak, fatality, prosecutions) and meet the Food Law Code of Practice requirements.

Number of registered food premises	Premises per FTE ratio	Makeup of FTE	Additional FTE required for a well-resourced LA
1052	438	2.4 (66% of team's food work in worthing)	1.8

The reduction in resources has been reflected in the Service plan to incorporate a greater number of remote interventions to meet the Food Law Code of Practice.

5.3 Staff Development/ Competency

The Team Leader shall monitor staff development and identify any additional training needs. Training requirements are also identified via the council's staff appraisal process. The team undertakes the Food Standard Agency's and Sussex Food Group's Consistency Exercises. There will be planned group team training this year linked to internal procedures.

The Code of Practice requires those who carry out official controls on food to have undertaken a minimum of 20 hours Continuing Professional Development (CPD) per

year and at least 10 hours of CPD must be spent on 'core' food areas. The remaining 10 hours will include a proportion of health and safety training (the Environmental Health Technician specialising in health and safety will undertake at least 10 hours of training in health and safety areas).

Any Authorised Food Officers that have not completed previous Food Standards Agency's Competency Matrix will be required to complete the new matrix introduced in March 2022.

The council will be introducing a new Corporate Competency Matrix in which will encompass the principles of Our Plan and other council policies such as equalities and communication.

In addition the team has weekly meetings to discuss local trends, legislative interpretation, internal procedures, and feedback from Sussex EH liaison and study groups.

Section 6 Quality Assessment and Internal Monitoring

The council recognises the need for competent officers to undertake uniform and quality Food Hygiene Inspections in accordance with The Food Standards Agency code of practice and practice guidance and food laws.

The Internal Monitoring Procedure for Food Enforcement sets out measures to ensure compliance with the Food Standards Agency code of practice guidance and food laws and any relevant associated legislation/guidance. This procedure shall also apply to any contractors employed to undertake food safety inspections. It shall be the responsibility of the Team Leader - Specialist Food & Health & Safety to ensure that measures in this procedure are implemented.

The Food Team Leader provides monthly data for the department's PH&R Indicators. This includes progress on the food hygiene programme, number of RIDDORS received, infection control investigations undertaken within the target timeframe. This data is shared with other council departments and the Service Portfolio Holder. Every quarter, the Team Leader monitors areas that are related to the Food and LAE1 returns.

Officers receive a 1:1 with the Team Leader every 6 weeks to discuss officer workload and training requirements.

Annually the Team Leader will accompany officers in the team to assess their competency in terms of appropriate application of legislation, enforcement action

taken and to ensure consistency in the team. The audit will conclude with an assessment of inspection database records and associated reports.

The Department continues to cooperate in Inter Authority Auditing to ensure consistency of approach in Sussex for both the food and health & safety service.

Section 7 Service Plan Review

7.1 Service Plan Review of 2023-2024

Quarterly reviews were undertaken to monitor progress of the inspections programmes, accuracy and if any changes were required to the Service Plan.

99% of the inspection programme was completed in 2023-2024 and the new business still awaiting inspections were those that had registered but had not commenced trading.

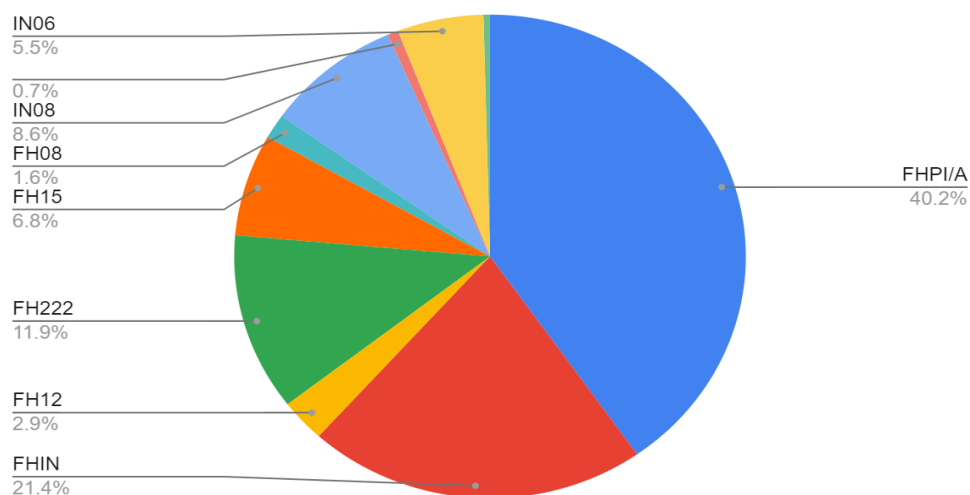
2023-2024 Food Safety Interventions - Mixture of routine inspections and Alternative Enforcement (AES)

A	B	C	D	E	Unrated	Total
4	36	105	112	62	157	476
Planned FHPI completed		315	Outstanding FHPI		4	99% completed

Number of Inspection types for 2023-2024	FHPI/A Inspections completed 2023-24	295
	New Businesses inspected (FHIN)	157
	Monitoring, verification, surveillance (IN08)/ Complaint visits (IN06)/Food complaint visit (IN15)	106
	Enforcement Revisits (FH222)	87
	Number of actual food official control interventions in 2023-2024	645
	FHRS RV (FH15)	49
	Sampling (FH08)/Advice & education (FH220)/Info/Intelligence Gathering (FH211)	12
	Questionnaires (FH12) (AES)	21
	Number of actual food non-official food control interventions in 2023-2024	82
	Joint visits (approved premises, enforcement, food crime)	45
	Total Number of actual food control interventions in 2023-2024	727

The chart below illustrates the proportion of time Food Officers spent on different food inspection interventions.

Worthing 2023-2024 Food Inspections by Category



Number of Requests for service 2023-2024	Hygiene of premises	68
	Food Complaints	39
	Food Hygiene Requested Revisits	48
	Request for Information/advice	165
	EHC/Premises Endorsement Certificate	1
	Other Food Related Enquiries	18
	Total	339

Enforcement Action undertaken in 2023-2024	Improvement Notices	0	Seizure, Detention, Voluntary Surrender of food	9
	Hygiene Emergency Prohibition Notices	0	Simple Cautions	0
	Hygiene Emergency Prohibition Orders	0	Prosecutions	0
	Voluntary Closure	6	Written Warnings	395

Food registration forms received in 2023-2024	187
An approximate number of businesses ceased trading in 2023-2024	176

Food Hygiene Rating Score (FHRS) in 2023-2024 (data may not include businesses that later ceased trading)	0	1	2	3	4	5
Number of FHRS per category issued excluding re-scores	0	34	18	39	77	302
Number of FHRS per category issued as re-scores	1	0	1	3	4	41
Broadly Compliant (BC)	93%		Sussex BC average*		91%	
Non-broadly compliant (NBC)	7%		National BC average *		85%	

* calculations from the Food Standards Agency's ratings website in April 2024.

The council's KPIs has a target of 90% of all food businesses achieving a Food Hygiene Rating Score of 3 and above. Worthing's businesses meet the standard and are above average in Sussex and nationally. However, the Service will continue to focus on the non-broadly compliant businesses to ensure there is a high level of food safety compliance in Worthing. 87 food hygiene enforcement revisits and 48 requests for a Food Hygiene Rating Score revisit were undertaken last year.

Non-food official controls carried out by Food Officers

Notifiable Infectious Diseases 2023-2024			
Campylobacter	131	Cryptosporidium	15
E.coli STEC	3	Giardia	5
Entamoeba histolytica	0	Hepatitis A	1
Hepatitis E	1	Legionella	1
Listeria	0	Salmonella spp	11
Shigella spp	3	Typhoid/paratyphoid	0
Investigated	39	Non-investigated (not required by UKHSA)	132
Single cases	171	Outbreaks	0
Investigation within time target	100%	Total	171

Planning application consultation *	No data
Licensing application consultation *	No data
Open Events Consultation *	No data
Freedom of Information Request	47
Animal licensing applications (issued by EHT)	3
Animal licensing inspections by EHT	6

* new codes set up to start in 2024.

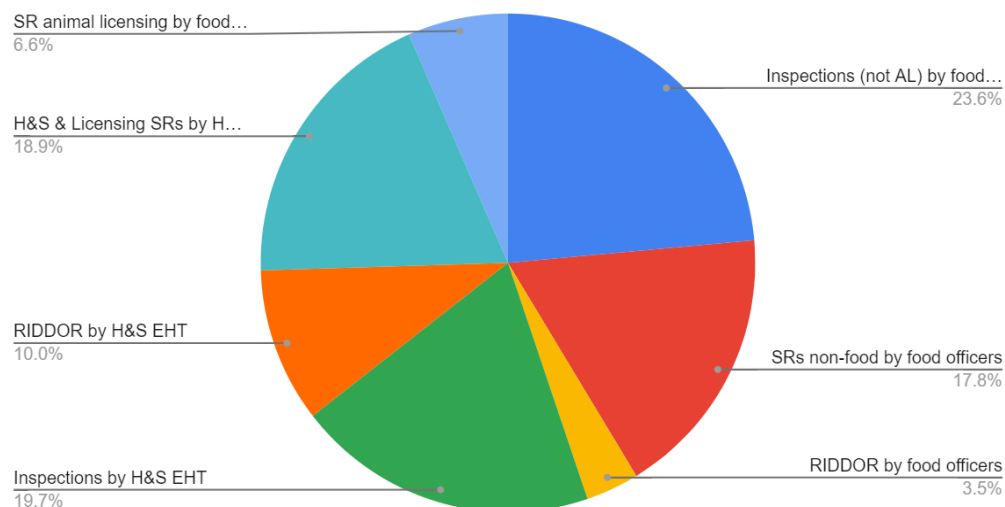
Health & Safety official controls carried out by all Officers

Total Health and Safety Inspections in Worthing 2023-2024 by all Officers	113
Proactive Inspections (HS01, HS03)	13
Non-proactive visits/face to face contacts (HSON, HSOL)	56
Non-inspection interventions or contacts (HSNN, HSDN, HSNL, HSDL)	29
Visits to investigate complaints (HSRA, HSRC)	9
Visits to give advice (HSRS)	2
Follow up visits/revisits (HSRV)	4
Accident notifications	24
Skin piercing applications	27

Health and Safety Enforcement Action undertaken in 2023-2024	Improvement Notices	0	Simple Cautions	0
	Deferred Prohibition Notices	0	Prosecution cases resulting in at least one conviction	0
	Immediate Prohibition Notices	1	Prosecution cases resulting in no conviction	0

Food Officers do not solely carry out food safety enforcement. The chart below illustrates the proportion of Health and Safety and Licensing work carried out in Worthing by Food Officers and the 0.5FTE Environmental Health Technician specialising in health and safety.

Worthing H&S & Licensing work by Food and H&S team 2023-2024



6.2 Identification of any Variation from the Service Plan

Additional funding was available to increase the EHT 0.8 post to almost 1.0 (0.8 for food work).

Food

The 50% of the Category D inspection due in April 2024 was not all brought forward as planned in order to reduce the inspection numbers in 2024-2025. The action was in preference to ensuring businesses that were due an inspection in 2023-2024 was carried out.

One of the Food Officers contributes time as part of the council's Meno buddies. This resource is derived from the Worthing district which matches the resources. This equates to approximately 4 days a year.

Health and Safety

An adjustment in the proactive national intelligence inspections on warehouses was undertaken to incorporate more inspections for the electrical safety in catering premises priority project. A local project supporting the Coffee Safe initiative on pressure vessels of coffee machines was undertaken alongside these inspections. In preparation for the Health Act 2022 new licensing regime to include botox, maintenance on our skin piercing registrations database was undertaken.

Administration

Public Health & Regulation has introduced an online portal to replace emails received via the website for queries and complaints. In addition, the online portal will receive applications for registration and licensing. The aim is to reduce administrative tasks and to enable applicants to provide the correct document for their applications. Skin piercing applications are the first to be available for registration via the online portal, considerable time was required for preparation and testing the portal.

Any variation from the Service Plan was approved by the Public Health and Regulation Manager.

7.3 Areas of Improvement

Resources

Although, it is estimated at 1.8FTE is required to provide a well resourced food service, the Service will be reviewed for redesign. It is important to consider that there are sufficient resources to enable our team to continue to meet Food Standards Agency and council targets, supporting local businesses and

safeguarding public safety. The Food Standards Agency contacted all Local Authority Chief Executives in January 2024. The letter detailed the responsibility of delivering food official controls and the importance of ensuring that teams are appropriately resourced to deliver these statutory functions on food.

Areas of work for 2024-2025:

- Continuous updating of procedures
- Maintaining the food business database and to include fishing vessels AES
- Continuous support of the missions of the FSA, HSE and Council's Our Plan.
- Introducing a sampling programme for 2024-2025 after resource re-directed as a result of COVID-19
- Increase use of flexibility in the Food Law Code of Practice
- Introduction of online portal for service request and applications.