



HERTSMERE BOROUGH COUNCIL

ENVIRONMENTAL HEALTH, LICENSING AND RESILIENCE

FOOD LAW ENFORCEMENT 2025 / 2026

**Drawn up in accordance with the Food Standards Agency
Framework Agreement issued September 2000, as amended**

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CONTENTS	PAGE NUMBER
Introduction	3
1. Service Aims and Objectives	4
1.1 Aims and Objectives	4
1.2 Links to Corporate Objectives and Plans	4
2. Background	5
2.1 Profile of the Local Authority	5
2.2 Organisational Structure	6
2.3 Scope of the Food Service Plan	7
2.4 Demands on the Food Service	8
2.5 Access and Equal Opportunities	11
2.6 Enforcement Policy	12
3. Service Delivery	13
3.1 Food Premises Interventions	13
3.2 Food Complaints	14
3.3 Primary Authority Scheme	15
3.4 Advice to Business	16
3.5 Food Inspection and Sampling	17
3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease	18
3.7 Food Safety Incidents	18
3.8 Liaison with Other Organisations	19
3.9 Food Safety Promotion	20
4. Resources	21
4.1 Financial Allocation	21
4.2 Staffing Allocation	21
4.3 Staff Development Plan	21
5. Quality Assessment	23
5.1 Quality Assessment	23
6. Review	24
6.1 Review against the Service Plan	24
6.2 Identification of Variations	24
6.3 Areas of Improvement	24

List of Appendices

Appendix 1	Performance Indicators
Appendix 2	Specialist Services available to Hertsmere Borough Council
Appendix 3	Detailed Profile for Each Category of Food Premises
Appendix 4	Officer Competency Profile
Appendix 5	Performance Review 2024 - 2025

INTRODUCTION

This service plan is dedicated to the food law enforcement functions carried out by Environmental Health personnel under the provisions of the Food Safety and Hygiene (England) Regulations 2013, the Food Safety Act 1990 and EU derived domestic legislation and direct EU legislation in accordance with the European Union (Withdrawal) Act 2018; and reflects the requirements of paragraph six of the Regulators' Code on transparency.

The scope of this service plan covers food safety and hygiene.

The Food Standards Agency requires the Food Service Plan to be submitted for approval to ensure local transparency and accountability. On approval, the 'Plan' will be published in the public arena, including availability via the Council's website. An annual performance review on the service delivery plan is conducted and submitted for appropriate Member approval.

The stated aim of the Food Standards Agency is to make food law enforcement more effective and to be undertaken by the various agencies in a more effective, comprehensive and collaborative manner. This Service Plan sets out to achieve these objectives.

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1. Service Aims and Objectives

1.1 Aims and Objectives

- 1.1.1 The Environmental Health & Licensing Department reports to the Executive Director and carries out the Council's statutory duties which the public appreciates as being of the highest priority. It aims to safeguard their home and their working environment, ensure the wholesomeness of the food they eat, the water they drink and the air that they breathe.
- 1.1.2 The primary objective is *to deliver high quality services responsive to public needs, concentrating on continuous improvement of core services and the proper discharge of the Council's statutory public, environmental and consumer protection responsibilities.*
- 1.1.3 The food service plan seeks to ensure consumer protection by ensuring that the food and drink manufactured, prepared, stored and sold in the borough, including imported food, is safe to eat, free from contamination, is supplied in a hygienic manner from premises that are clean and hygienic.
- 1.1.4 Many of the services are delivered in co-operation with others such as Hertfordshire County Council, the Police, the Health Service, the Health and Safety Executive, the Food Standards Agency, Trading Standards, UKHSA (UK Health Security Agency) and other local authorities.
- 1.1.5 Hertsmere's Environmental Health & Licensing Department is committed to provide a 'balanced service' with regard to food safety and has regard to the enforcement matrix. Our service is driven by the following four criteria and the Regulators' Compliance Code:
- **Demand driven** - requests/complaints, food alerts, food poisoning, etc.
 - **Inspection driven** – programmed food visits, sampling programmes
 - **Education driven** – food hygiene courses, home authority principle, public awareness campaigns, FHRS, Food Standards Agency initiatives and campaigns, etc.
 - **Intelligence driven** – Food Alerts, port health notifications, sampling

1.2 Links to Corporate Objectives and Plans

- 1.2.1 The Food Service Plan is linked to the **Environmental Health Service Plan** by reference in that plan to the range of services provided for food control and food hygiene, infectious disease and food poisoning control, health education and promotion. The Food Service Plan seeks to meet the aims and management plan documented in the Department's Service Plan.
- 1.2.2 The food hygiene service contributes to **Hertsmere Vision 2024-2027** aspirations of a strong identity, sustainable growth, being enterprising, addressing climate action, being inclusive and equitable, and open and collaborative; and **Hertsmere Borough Council's Corporate Plan 2024-2025**, which identifies key areas of work to implement the position statements and commitments that sit underneath these aspirations. The Council aims to carrying out its statutory functions efficiently and effectively.
- 1.2.3 The Council's Financial Strategy determines the allocation of resources to the Department.

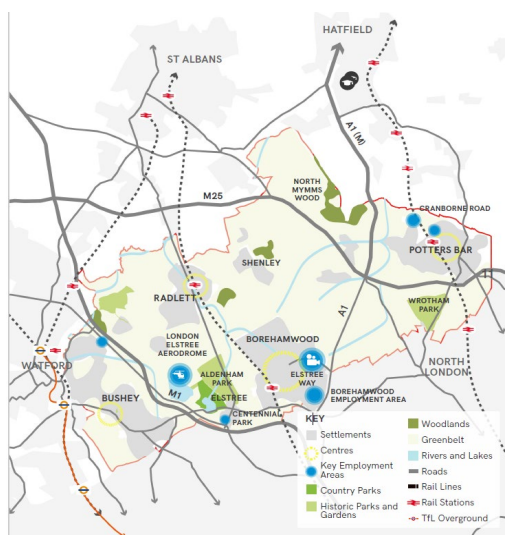
2. Background

2.1 Profile of the Local Authority

The district was formed on 1 April 1974, under the Local Government Act 1972, by a merger of the former area of Bushey Urban District and Potters Bar Urban District with Elstree Rural District and part of Watford Rural District (the parish of Aldenham). The name '*Hertsmere*' was invented for the new district by combining the common abbreviation of 'Hertfordshire' ('Herts') with 'mere', an archaic word for boundary.

Hertsmere is not an ancient Borough, although the area is certainly rich in history. The great Roman Road, Watling Street, cuts a swathe through the Borough from Elstree, through Radlett and beyond into Hertfordshire, serving to underline the fact that settled communities have existed in the area since early times.

Covering an area of around 39 square miles, Hertsmere's 107,800 residents are concentrated in the Borough's four main towns: Borehamwood, Potters Bar, Bushey and Radlett. In addition to these urban developments, Hertsmere boasts wide tracts (around 80%) of Green Belt countryside dotted with attractive villages; much of the land is still given over to agricultural use.



Hertsmere is the most southerly borough in Hertfordshire and is adjoined by the London Boroughs of Barnet, Enfield and Harrow to the south / southwest and by Hertfordshire's Three Rivers District Council, Watford Borough Council, St. Albans City and District Council, and Welwyn & Hatfield Borough Council to the west and north / northeast.

The Borough's location is within easy access to the A1 (M), M1 and M25 which all run through the Borough. It is this road link that makes up the Hertsmere logo . The rail network links Borehamwood/Elstree and Radlett to Kings Cross St Pancras on Thameslink in 18 – 20 minutes and Potters Bar to Kings Cross St Pancras in 20 minutes. The M25 provides good access to Heathrow, Stansted and Gatwick Airports as well as the Channel Tunnel via the M20, and the M1 provides quick access to Luton Airport.

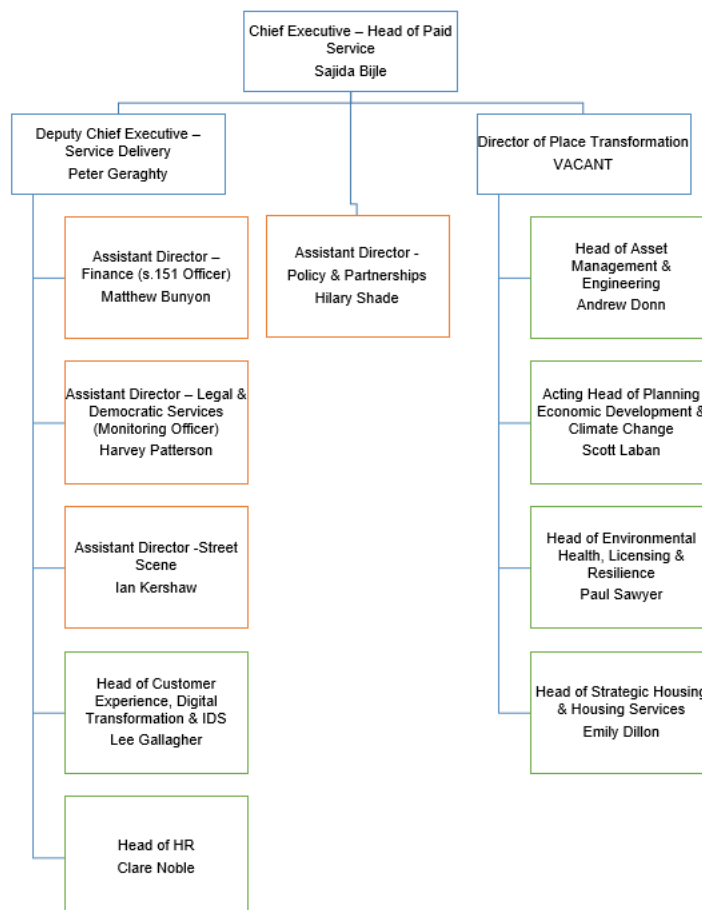
2.2 Organisational Structure

Committee Structure

Cabinet Portfolios	
Consultation, Communications and Asset Management (Leader of the Council)	
Street Scene, Parks, Leisure and Culture	
Communities, Neighbourhoods, Enforcement, Economic Development and Transformation	
Environmental Sustainability and Net Zero and Public Health	
Finance and Budget	
Housing and Housing Development	
Planning Infrastructure and Transport	
Resources, IT and Digital Transformation	

Committees	
Cabinet	Personnel
Council	Personnel Appeals Panel
Audit	Planning
Licensing	Policy Review
Licensing Sub-Committee	Hertsmere Shareholders and Investment Committee
Operations Review	Standards

Management Structure (April 2025)



- 2.2.1 The Commercial Team of the Department is responsible for food safety matters and resides within the Environmental Health Department. It operates under the Head of Service for Environmental Health, Licensing and Resilience who is accountable to the Executive Director. The Organisational Structure is reported in Figure One.
- 2.2.2 The Commercial Team is headed up by an Environmental Health Manager (Commercial) (part time), two Senior Environmental Health Officers (one of whom is part time), a newly qualified Environmental Health Officer, a Senior Technical Officer and a Regulatory Officer. The team is supported by a contractor, working on a part time basis. The commercial manager is also responsible for health and safety, public health and the disabled facilities grants service.
- 2.2.3 In addition to the permanent team of officers within the Department, specialist advice and assistance is provided by the public analyst and the food examiner. Details of these may be found in Appendix Two.

2.3 Scope of the Food Service

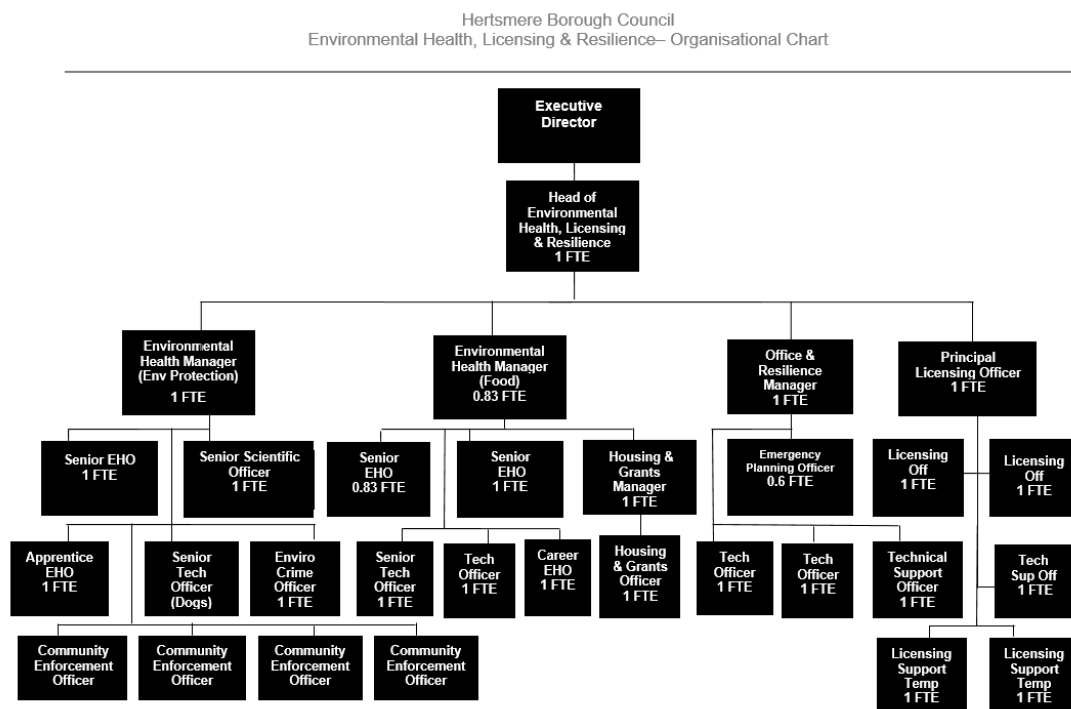
- 2.3.1 The Commercial Team is responsible for the following:
- ✓ Registration and approval of food businesses
 - ✓ Food interventions, business advice, hygiene and other trainings
 - ✓ Enforcement including emergency prohibition, detention and seizure of food, prosecutions and so on
 - ✓ Food complaint investigations and incidents, food crime/fraud
 - ✓ Infectious disease and outbreak investigations
 - ✓ Food Hygiene Rating Scheme
 - ✓ Imported Food Control
 - ✓ Review and update of food safety policies and procedures
 - ✓ Statutory returns
 - ✓ Maintenance of database and register of food businesses
 - ✓ Planning consultations
 - ✓ Safety advisory / event management consultation
 - ✓ Attendance at various Liaison Group/Committees
 - ✓ Health Promotion Activities e.g. Food Standards Agency led campaigns
 - ✓ Budget review and monitoring
 - ✓ Primary Authority, Home Authority and Originating Authority liaison
 - ✓ Private water supply sampling
 - ✓ Participation in statutory food sampling programmes, investigative food sampling and environmental sampling
 - ✓ Provision of training for professional staff and attendance at external training courses for continuing professional development
 - ✓ Quality monitoring, maintaining staff competencies
 - ✓ Keeping abreast of changes in legislation and Food Standards Agency guidance
 - ✓ Annual review and revision of the food service plan and performance review
- 2.3.2 It is the policy of the Council to engage the services of outside contractors to assist in the delivery of the food service where the following applies:
- There being a backlog of inspections which cannot be completed by the existing permanent staff

- Contractors meeting the requirements of Regulation (EC) No 882/2004 and the Food Law Code of Practice (England) Chapter 3 Authorisation, qualifications and competency and compliance with the Council's internal professional policies and procedures
- Sufficient budgetary resources.

2.3.3 In addition to the above, officers within the Commercial Team are also responsible for:

- health and safety, public health duties and complaints
- delivery of Level 2 and Level 3 food safety training and Safer food better business seminars
- smoke free legislation
- some officers participate in the out of hours service providing '24/7' cover
- the on-call out of hours officer is also designated 'site liaison officer' / silver commander for the purpose of the Council's Emergency Plan.

Figure One - Department Organisational Structure



Footnote: this structure reflects the position as of May 2025

2.4 Demands on the Food Service

Premises Profile

2.4.1 At 1 June 2025 there were 1046 food businesses registered with the Council that are subject to programmed food hygiene inspections. The range of premises include manufacturers to supermarkets, restaurants, take-aways, pubs, home, mobile and event caterers, schools, nurseries, care homes, hospitals, and others.

2.4.2 The current premises profile is indicated in the table that follows.

Description of premises	Number of premises
Primary producers	2
Manufacturers / Packers	15
Importers / Exporters	11
Distributors / Transporters	19
Retailers	192
Restaurants and other Caterers	807

A detailed profile for each category of food premises is shown in Appendix Three.

Approved and Licensed Premises

2.4.3 We have one fully approved (product specific) premises in the Borough:

- Hass Foods, cheese manufacturer

Imported Food Control

2.4.4 All local authorities have responsibility for imported food controls. Through port health authorities at sea and airports and international rail links and Border Inspection Posts, the UK has effective imported food controls at point of entry. However, in spite of effective border controls, illegal imports will still arrive at point of sale due to international smuggling of illegal goods or failure to declare items due to lack of knowledge on behalf of the importer. It is, therefore, important that inland controls are also in place. The identification of food not of animal origin and products of animal origin that have not been physically checked at point of entry or have been illegally imported, and any subsequent enforcement will normally be made during routine food hygiene inspections.

2.4.5 We have no border controls or transit sheds, etc. and so inspections are made during routine visits to businesses.

Primary Authority

2.4.6 The Home Authority for **Pizza Hut (UK) Ltd** based in Borehamwood which has 136 restaurant units nationwide was replaced with a Primary Authority arrangement in January 2012. Refer to paragraph 3.3.3.

The national Food Hygiene Rating Scheme

2.4.7 We implement the Food Standards Agency's national Food Hygiene Rating Scheme (FHRS), which applies to establishments supplying food directly to consumers. Exemptions apply.

- 2.4.8 Businesses receive a sticker awarding them a score of between 0 and 5, the display of which remains voluntary. Safeguards exist to enable businesses to request a revisit to re-score, to appeal the score and/or publish a 'right to reply'.
- 2.4.9 Ratings are published on the Agency's website with links from Hertsmere's website. This enables members of the public to make informed choices about where they eat food. Businesses that fail to achieve even the basic standard are encouraged to make improvements through educational means, revisits or if necessary through enforcement action.
- 2.4.10 The Food Standard's Agency guidance on the Food hygiene rating scheme, the 'Brand Standard' allows for the charging of requested revisits, permitted under the Localism Act 2011. Hertsmere introduced charging in July 2023 and the current charge for a requested re-rating visit is £285.00.
- 2.4.11 Participation in the Food Standards Agency's consistency exercises on FHRS.

Safer Food Better Business

- 2.4.12 *Safer Food Better Business* (SFBB) designed to assist the small caterer in meeting the requirement of having a documented food safety management system. Officers actively encourage food business operators to adopt SFBB in the absence of any other food safety management system.
- 2.4.13 SFBB seminars are offered by Hertsmere for a nominal charge. Since its inception by the Food Standards Agency, packs have been designed for caterers, retailers, Indian and Chinese cuisines, Cantonese language, childminders, residential care homes, teaching resources for colleges. These are available at [Safer food, better business \(SFBB\) | Food Standards Agency](#).
- 2.4.14 Childminders and nurseries are not required to register with Environmental Health Departments. The Office for Standards in Education (OFSTED) provides details of registered care providers to Environmental Health, via Hertfordshire County Council.

Food Hygiene Intervention Rating of Premises

- 2.4.15 The Code of Practice (England) Chapter 4 Delivery of interventions, Annex 1 has identified five risk categories of food premises (A – E), with each class of risk group having a specific minimum frequency of intervention. The following table indicates the number of premises in each risk category at June 2025:

Risk rating	Number	Minimum frequency of intervention
A	3	At least every 6 months
B	25	At least every 12 months
C	154	At least every 18 months
D	413	At least every 24 months
E	263	A programme of alternative enforcement or interventions every 3 years
Unrated	188	Within 28 days of registration or start of trading

- 2.4.16 Premises scoring 0 – 30 points overall (low risk businesses) are subject to an alternative enforcement strategy at least once in any three year period, and hence not subject to a primary inspection.

- 2.4.17 As individual food businesses are scored at every planned intervention, premises can move up or down the risk rating system. We have a specific policy requiring the Environmental Health Manager (Commercial), to approve the lowering of risk ratings of high-risk premises (those downgraded from categories A or B).

External Factors Impacting on Service

- 2.4.18 The difficulty in recruitment and retention of competent staff is an ongoing challenge, reliance being placed upon the availability of suitable contractors.
- 2.4.19 The number of food business registrations received year on year continue to exceed expectation and place additional burden on staff. Often the businesses are difficult to contact, they provide starting dates several months ahead of registering, some operators seek to enter high risk production without any experience or knowledge of food safety and legal requirements, and many home based businesses are undertaking high risk activities. This requires officer persistence to make contact with food business operators, some of whom eventually decide not to proceed. We received 145 registrations between 1.4.2024 – 31.3.2025 compared with 205 registrations received between 1.4.2023 – 31.3.2024. Staff resource issues impact the ability to consistently meet the requirement of the Food Standards Agency Practice Guidance that all new registrations of food businesses undertaking high risk activities are inspected within 28 days. However, as per Practice Guidance, inspections of low risk businesses can be deferred.
- 2.4.20 Businesses that are a cause for concern include those that trade online and also those that trade in supplements / alternative products. Often, they are 'hidden' by virtue of the fact that they advertise on social media; and/or do not physically take possession / handle products. Whilst we monitor social media, resources are limited; businesses are 'springing up' faster than we can 'track them down' and regulate.
- 2.4.21 Events across the borough and an annual international religious festival held over two to three days attended between 45,000 to 80,000 people. These and other events are supported by the safety advisory group, of which commercial team members are integral members.
- 2.4.22 A number of food businesses are owned by people from different communities such as Indian, Chinese, Turkish, Afghani, whose first language is not English.
- 2.4.23 A senior officer from the team has been assisting with a fatality investigation since 2024, requiring 0.3 of a FTE post.

2.5 Access and Equal Opportunities

2.5.1 Accessing Services

Service Delivery Points

The Department is located in the Civic Offices in Borehamwood. Requests for service may be received in-person, by telephone / email / correspondence.

Office hours are 9.00am to 5.15pm Monday to Thursday and 9.00am to 5.00pm on Friday. We now operate a hybrid working pattern of a minimum of three working days in the office per week for full time staff, pro rata for part time staff.

Staff visit commercial and residential premises to carry out their normal duties.

Out of office hours there is a local rate telephone number for emergencies. It is available 24 hours, 365 days a year and a suitably experienced officer is available on standby.

Visits are made to premises outside of normal office hours where necessary. The Civic Offices are accessible to people with disabilities.

The Council website (www.hertsmere.gov.uk) provides access to the following:

- Service Plan For Food Law Enforcement
- Corporate Enforcement Policy
- Telephone and email contact details
- 'Register A Food Business' (online food establishment registration)
- Food Hygiene Rating Scheme
- Guidance from different agencies

We have access to 'Language Line' to provide translation and interpreting facilities to people whose first language is not English. Officers regularly use 'Google Translate'.

2.6 Enforcement Policy

2.6.1 We have a corporate enforcement policy approved by the Council. It considers the requirements of the Regulators' Compliance Code and has regard to the Crown Prosecution guidelines.

2.6.2 The Enforcement Policy and the Service Plan are available for public viewing.

3. Service Delivery

3.1 Food Premises Interventions

The Department operates a risk-based Intervention Strategy. There are a range of possible interventions (or activities) designed to monitor, support and increase food law compliance. These are: inspections, monitoring, surveillance, verification, audit, sampling, advice and education, information and intelligence gathering.

- 3.1.1 The number of interventions achieved and outstanding is shown in the table that follows, as reported in the returns made to the Food Standards Agency. The number of programmed inspections is taken directly from IDOX, our environmental health management system.

Planned Interventions 1/4/24 – 31/3/25		Interventions Achieved 1/4/24 – 31/3/25		Interventions Outstanding 1/4/24 – 31/3/25		Planned Interventions 1/4/25 – 31/3/26 (figures as of 14/6/25)	
Risk Rating	Number	Risk Rating	Number	Risk Rating	Number	Risk Rating	Number
A	1	A	1	A	0	A	2
B	22	B	19	B	3	B	23
C	121	C	117	C	4	C	102
D	126	D	101	D	25	D	214
E	16	E	13	E	3	E	25

For the period 1/4/2024 – 31/3/2025, 67 planned interventions of prioritised unrated high risk new businesses were achieved.

- 3.1.2 Interventions are aimed to be carried out within 28 days of their relevant dates. Premises in risk groups A and B are classified as high risk and resources are targeted at achieving the minimum number of inspections during the year. Appropriately qualified staff have carried out these inspections, the majority of which have been carried out by Contractors.
- 3.1.3 The authority's inspection proforma ensures a more consistent approach to imported food control during routine inspections.
- 3.1.4 Implementation of the Food Standards Agency's document *E. coli 0157 Control of Cross Contamination* continues to result in officers dedicating more time to all food businesses that handle raw meat / vegetables / unwashed salads and ready to eat foods to explain the requirements and how they can comply.
- 3.1.5 The Agency has revised the *Safer food better business* pack to reflect these requirements. However, the Department also uses its own inserts on prevention of cross contamination by E. coli 0157 for the SFBB pack. These are now handed out to relevant businesses during visits.

Service Plan 2025-26

Inspections

- 3.1.6 We will continue to inspect / audit food businesses with an intervention rating of A or B, and non-compliant Cs to a plan developed in accordance with the 'Framework Agreement on Local Authority Food Law Enforcement', the Code of Practice.
- 3.1.7 It should be noted that with the C rating banding scored between 52 – 71 (previously 42 – 71), the number of C rated premises due for inspection in any one year has decreased as they are now scored as Ds, so requiring inspection every 2 years rather than every 18 months.
- 3.1.8 E rated (low risk) establishments are subject to an alternative enforcement strategy at least once every three years, as documented in FSQM 28 of the Food Safety Quality Manual.
- 3.1.9 We aim to achieve 90% of interventions (inspections, monitoring, surveillance, verification, audit, sampling, advice and education, information and intelligence gathering).
- 3.1.10 In the post inspection report, the officer will either stipulate timescale for compliance or request the food business operator to propose a reasonable timescale to be submitted.
- 3.1.11 Following inspections, businesses subject to the Food Hygiene Rating Scheme, will be notified of their ratings by letter and issued with a sticker. All ratings are publicised on the Food Standards Agency's website.
- 3.1.12 Following inspections where businesses achieve either a 0 or 1 rating on the Food Hygiene Rating Scheme, officers will discuss with the lead food officer the most appropriate formal enforcement action.
- 3.1.13 Revisits will be targeted to non-compliant A, B, C and D rated premises.
- 3.1.14 We have made arrangements for access to adequate expertise to enable competent inspection of specialised processes, for example access to specialised consultancies shown in Appendix Two. Priorities relating to nationally or locally driven outcomes, for example compliance with new legislation and guidance, include the Code of Practice and Practice Guidance, imported food control and work on *Safer Food Better Business*.

3.2 Food Complaints

- 3.2.1 We have a documented policy on food complaints.
- 3.2.2 The purpose of investigating food complaints is to:
 - provide a service to the public;
 - resolve problems which have public health implications/risks;
 - provide information to the food industry in order to raise and maintain standards;

- fulfil the duty of enforcement; and
- prevent future complaints.

3.2.3 We receive complaints within the following broad categories:

- Foodstuffs (contamination)
- Complaints about food businesses (hygiene, pests, refuse, drainage, etc.)
- Food alerts

During the period 1/4/24 – 31/3/25, 50 complaints were received.

Service Standards

- Respond to **100%** of serious food complaints **within 1 working day**
- Respond to **100%** of other food complaints and requests for advice **within 3 working days**.
- Complaints with no or low food safety risk are not dealt with.
- Anonymous complaints will not normally be dealt with unless the lead food officer deems there could be a serious risk to public health based on the initial complaint.

3.2.4 We anticipate that we shall continue to receive food complaints during 2025-26. We have estimated the number likely to be received, but numbers may vary significantly due to local or national issues.

	Activity	Quantity/ Outcome
FC 1	Investigate and resolve complaints	40

3.3 Primary Authority Scheme

3.3.1 Companies have the right to form a statutory partnership with a single local authority, which then provides robust and reliable advice for other councils to take into account when carrying out inspections or dealing with non-compliance. It is the gateway to simpler, more successful local regulation.

3.3.2 This is a regulatory partnership between individual local authorities and businesses that are multi-site operations. It drives and supports progress towards businesses receiving advice from local authorities that is applicable across the UK providing a secure basis for investment and operational decisions. Primary Authority is a formal arrangement providing regulatory advice across a range of areas including food safety, health and safety, trading standards, etc. Officer time is re-charged to the business to cover the cost of the partnership.

3.3.3 The operation of the Primary Authority scheme is a statutory responsibility of the Better Regulation Delivery Office, BRDO, whose role is to register partnerships, issue guidance and resolve disputes.

3.3.4 We have been the Primary Authority for **Pizza Hut (UK) Ltd** (restaurants) since 2012. However, in January 2025, it was confirmed that the business had been acquired and the Primary Authority Partnership was subsequently dissolved.

Discussions are underway to re-establish the Partnership with the new food business operator.

- 3.3.5 At this time, responding to requests for information from other local authorities and the provision of advice is suspended.

	Activity	Quantity/ Outcome
FPA 1	Provide advice and respond to requests for information / advice	Currently on hold

3.4 Advice to Business

- 3.4.1 We will always seek to secure compliance from food business operators by education, advice and actively encouraging new and existing business to contact us. Additionally, we offer pre-planned and charged for Level 2 (and level 3 on request) food safety training courses and have provided seminars aimed at businesses when new legislative requirements applicable to them have been introduced, for example Safer food better business seminars.
- 3.4.2 Advice to businesses is provided during inspections and other visits and through:
- advisory literature (provided free of charge);
 - follow up contact with all new food business operators;
 - in response to enquiries;
 - training courses;
 - the issue of press releases for food alerts;
 - upon request by the Food Standards Agency; and
 - hosting of *Safer Food Better Business* seminars.
- 3.4.3 We have not previously recorded the number of requests for advice received and cannot show the trends from previous years.
- 3.4.4 During 2025-26 we shall continue to offer training aimed at food handlers. We shall also consider establishing further forums for food businesses to improve customer feedback and provide better channels of communication and consultation.
- 3.4.5 Trainings aimed at food handlers / caterers, professional staff and food safety consultants will include:
- Imported Foods
 - Approved Premises
 - Sampling / Interpretation of Results
 - Enforcement Sanctions
 - Returning to Food Safety
 - Introduction to Food Microbiology
 - Shelf Life and Durability
 - Seizure and Detention
 - Allergens

Service Standards

- Respond to **100%** of requests for food safety advice **within 2 weeks**
- We aim to provide Level 2 training for a minimum of 50 delegates

3.5 Food Inspection and Sampling

3.5.1 Our sampling policy targets food sampling for microbiological examination and analysis on the following criteria:

- participation in sampling activities to facilitate national and locally co-ordinated programmes
- sampling in relation to food poisoning outbreaks
- sampling in relation to food complaints, complaints about individual food premises and food alerts
- manufacturers and other businesses engaged in the handling and/or preparation of high risk foods/routine inspections
- sampling at large outdoor events within the district.

3.5.2 All sampling undertaken will be in accordance with relevant legislation. Formal samples will also be taken in accordance with the Code of Practice (England) and Practice Guidance.

3.5.3 The sampling programme aims to enable us to participate in relevant sampling initiatives devised and co-ordinated by the Food Standards Agency, UKHSA, Herts. and Beds. Heads of Service / Chief Officers Food Study Group, the EU, and East of England Trading Standard Authorities (EETSA).

3.5.4 We aim to take at least the minimum number of samples required in national, regional and local co-ordinated programmes. This is in addition to samples submitted in relation to food complaints.

3.5.5 During the period 1 April 2024 to 31 March 2025, 11 microbiological samples were taken.

3.5.6 We anticipate that we shall continue to take food samples during 2025-26. The number taken could vary due to local or national issues.

	Activity	Quantity/ Outcome
FIS 1	Reactive food sampling	20
FIS 2	Surveillance sampling	20
FIS 3	Food Standards Agency / UKHSA surveys	20

3.5.7 The sampling budgets for the year 2025–26 are shown in the table:

Type of Sampling	Allocation for 2025 – 26
Microbiological (food only) NB There is no direct cost for these samples as the Environmental Health & Licensing Department receives an 'allocation' from PHE to be used solely on microbiological sampling	Figure not yet provided by UKHSA, but likely to be 3832 units allocated. The laboratory service is funded by Central Government and allocates credits to each local authority based on one per thousand resident population 1999 – 2000.

Analysis and microbiological	If UKHSA are unable to perform the required analysis, etc., the sample can be submitted to the Public Analyst, for example. There is no specific allocated budget for this, but the costs are met from a central departmental budget
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- 3.5.8 Samples will be analysed and/or examined by the laboratories authorised by the Council, details of which are set in Appendix Two, namely UKHSA and the Public Analyst.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

- 3.6.1 We are responsible for the investigation and prevention of the spread of notifiable diseases in accordance with the requirements of the Public Health (Control of Disease) Act 1984. This is done in accordance with procedures agreed with the Consultant in Communicable Disease Control (CCDC).
- 3.6.2 We investigate all outbreaks in accordance with the East of England Joint Communicable Disease Incident / Outbreak Management Plan.
- 3.6.3 The number of traditional infectious disease notifications has decreased. However, allegations of food poisoning still continue to be received.

Service Standards

- Commence **100%** of infectious disease investigations **within one working day**.
 - Advise CCDC of **100%** of infectious disease outbreaks **immediately** upon confirmation.
- 3.6.4 We anticipate that we shall continue to receive notifications of infectious disease during 2025-26. The number may vary significantly due to local or national circumstances.

	Activity	Quantity/ Outcome
FID 1	Investigate notifications of infectious disease	100%

- 3.6.5 In the event of an outbreak, the FTE will be significantly higher due to the intensive staffing demands required in such eventualities.

3.7 Food Safety Incidents

- 3.7.1 We respond to food alerts (including allergy alerts, product recalls and notifications of food crime) issued by the Food Standards Agency in accordance with the requirements of the Code of Practice (England) Chapter 5. Emergency cover is provided by an on-call officer, out of hours, 365 days a year, with access to qualified Commercial Environmental Health Officers out of hours.
- 3.7.2 Food alerts are transmitted electronically via FSA Link. On receipt of an Alert, the responsible officer will ensure that all food officers of the Commercial Team receive copies of the Alert, either electronically or as a hard copy, and that

appropriate action is taken in accordance with the category of the Alert received.

Service Standards

- Take appropriate action in response to **100%** of food safety incidents according to the category of food alert received

3.7.3 We anticipate that we shall continue to receive food safety incident notifications during 2025-26. The number may vary significantly due to national and international circumstances.

	Activity	Quantity/ Outcome
FSI 1	Respond to notifications of food safety incidents	100%

3.8 Liaison with Other Organisations

3.8.1 We are committed to ensuring that our approach to service delivery and enforcement is consistent with other local authorities and that we develop consistent approaches where appropriate. Regular dialogue on general environmental health and food safety takes place through the following:

- Hertfordshire, Bedfordshire & Milton Keynes Food Liaison Group
- Food Standards Agency
- CIEH
- Knowledge Hub
- UKHSA
- BRDO / OPSS
- DEFRA
- Hertfordshire County Council Trading Standards
- East of England Trading Standards Authorities (EETSA)
- East of England Control of Infection Committee
- Sampling Working Group
- Thames Water and Affinity Water
- LGA
- Royal Society for Public Health
- Business Guidance Group / Better Business for All

3.8.2 Where there is a shared or complementary enforcement role with other agencies, provision is made to liaise with those agencies. For example:

- Trading Standards Department of Hertfordshire County Council
- Office for Standards in Education (OFSTED)
- Food Standards Agency
- Office of Fair Trading (OFT)
- Hertfordshire Constabulary
- Care Quality Commission

3.8.3 Formal liaison exists between the Council and the Hertfordshire Public Health Board.

Ref	Activity	Quantity/ Outcome
FSL 1	Attend meetings of Herts, Beds & Milton Keynes Food Liaison Group	6
FSL 2	Attend Bedfordshire, Luton, Milton Keynes & Hertfordshire Health Protection Advisory Group meeting	4
FSL 3	Attend meetings of Environmental Health and Trading Standards Food Coordinating Group	Demand driven
FSL 4	Attend meetings with OFSTED	Demand driven
FSL 5	Attend meetings with UKHSA; East Anglian Veterinary Environmental Medical Liaison Group	Demand driven
FSL 6	Attend business guidance group	Weekly
FSL 7	Attend NI-GB Food Supply Chain Forum (DEFRA)	Weekly

3.9 Food Safety Promotion

3.9.1 Food safety promotion aims to improve the health of the community through prevention and promotion initiatives. Such initiatives aim to prevent ill health, promote well-being and reduce health inequalities by increasing awareness and by putting various measures into practice that can help individual needs.

3.9.2 The amount of education and promotion will be dependent upon demand and resources available.

Service Standards

No planned activity.

3.9.3 We aim to participate in Food Standards Agency driven campaigns during 2025-26.

4. Resources

4.1 Financial Allocation

Expenditure and Income	Budget 2025 – 26 (£)
EXPENDITURE	
Direct Costs	
Staffing (excl. contractors)	271,811
Contractors	3,000
Income	
Short courses	- 7,000
Cost of Service	267,811

4.2 Staffing Allocation

- 4.2.1 The estimated staffing profile for all officers working on food law enforcement role and related matters is set out below:

Staff	Time Allocation - FTE
Environmental Health Manager (Commercial) (part time 0.8 FTE)	60%
Senior Environmental Health Officer (part time 0.8 FTE, of which 0.3 diverted to H&S investigation)	50%
Senior Environmental Health Officer	90%
Environmental Health Officer	90%
Technical Officer / Regulatory Support Officer	100%
Contractor (part time)	20%

- 4.2.2 The projected resource required to deliver the service is 3.5 FTE. It is currently being delivered by a FTE of 3.10 (excludes technical / regulatory support officer). The shortfall can be met by engaging contractors within the existing budget. These figures exclude other duties, health and safety and admin which increase the overall FTE count.
- 4.2.3 The competency matrix of the authorised food law enforcement officers is given in Appendix Four. The figures for competency are given in terms of numbers of officers so authorised and not as FTEs.
- 4.2.4 The Code of Practice (England) Chapter 3 and Competency Framework detail competency and authorisation requirements for Lead Food Officers, Authorised Officers and Regulatory Support Officers.

4.3 Staff Development Plan

- 4.3.1 The Department will ensure that all food officers are appropriately qualified and receive regular training to maintain and improve their level of competency. During 2025-26, all officers will have access to the equivalent of at least 20 hours update training, which promotes professional development.

4.3.2 The training structure comprises:

- The employment of enforcement officers capable/competent on food law enforcement
- Evidence of formal and relevant qualifications (sight of original certificates prior to commencement of employment and copies kept on file thereafter)
- In house competency based training (including use of IT and inspection techniques)
- Identification of training needs during performance appraisal and development interviews
- Identification of training needs by staff throughout the year

4.3.3 External courses that will continue to receive priority during the year 2025–26:

- Food Standards Agency online training courses
- Approved establishments
- Sampling Techniques
- Microbiology
- Webinars e.g. Specialist Cheesemakers Association
- New database provider training
- HACCP Assessment training
- Enforcement Sanctions training
- PACE training
- Food law update
- New and relevant trainings
- Herts, Beds & Milton Keynes Food Liaison Group organised CPD training days

It should be noted that in response to budgetary pressures, the Food Standards Agency has moved away from traditional classroom based courses and seeking to improve access to online training modules. Additional training can be introduced, if required, to address specific developmental needs or new areas of official controls.

4.3.4 Internal courses and cascade training will continue to be provided.

5. Quality Assessment

5.1 Quality Assessment

- 5.1.1 A documented internal monitoring procedure is in place.
- 5.1.2 A documented review of performance against the service plan is currently underway – an executive summary is provided in Appendix 5.
- 5.1.3 The Herts, Beds & Milton Keynes Food Liaison Group will consider more topics for training and Inter Authority Auditing, based on Food Standards Agency protocols.
- 5.1.4 Participation in the Food Standards Agency's national consistency exercises (risk rating and food hygiene rating).
- 5.1.5 We have the following monitoring arrangements in place to assist in the quality assessment of the work carried out:
- Review of post inspection paperwork (including contractor paperwork) by the Environmental Health Manager (Commercial), including FHR scores
 - Joint visits with inspectors
 - Team meetings
 - Performance appraisals and probationary reviews
 - Validation inspections following complaints
 - Quantitative monitoring
- 5.1.5 We will continue to implement the arrangements to assess the quality of our service.

Ref	Activity	Quantity/ Outcome
GQ 1	Review the results of post inspection paperwork from inspections carried out by staff progressively through each month (includes <i>FHRS</i>)	ongoing
GQ 2	Complete individual officer inspection performance audits (joint visits)	6
GQ 3	Hold team meetings	12
GQ 4	Performance appraisal	One to ones and quarterly

- 5.1.6 We intend to further improve/update and document procedures required within the Food Standards Agency Framework Agreement and also as part of the Food Safety Quality Manual during 2025-26.

6. Review

6.1 Review against the Service Plan

- 6.1.1 We have developed a number of indicators to assess our food safety performance. The performance indicators are shown in Appendix One.
- 6.1.2 The service plan will be submitted to the relevant portfolio holder for approval. The performance review for the current year will be submitted in the following year.
- 6.1.3 We will review the service plan annually.

6.2 Identification of Variations

- 6.2.1 Where the review against the service plan identifies any variance, we will identify the reasons and the Head of Service will propose an action plan to remedy the situation as appropriate. Any additional work in other areas of the enforcement mix will be reviewed to identify whether or not it has contributed/addressed any apparent deficiencies.

6.3 Areas of Improvement

- 6.3.1 We will seek to identify opportunities to improve the service and where appropriate, prepare an appropriate action plan to address those service issues.

APPENDIX 1

PERFORMANCE INDICATORS

Performance against Local Service Standards

- Respond to **85% of correspondence** by letter **within 10 working days**
- Respond to **100% of correspondence** by letter **within 15 working days**
- Respond to **emails** received at the customer enquiry email address **within one working day**; and **within 5 working days** if received by individual officers
- Respond to service **requests out of normal office hours within 2 hours**
- Respond to **100%** of serious food complaints **within 1 working day**
- Respond to **100%** of other food complaints and requests for advice **within 3 working days**.
- Respond to **100%** of requests for food safety advice **within 2 weeks**.
- Commence **100%** of infectious disease investigations **within one working day**.
- Advise CCDC of **100%** of infectious disease outbreaks **immediately**
- Take appropriate action in response to **100%** of food safety incidents and in accordance with the category of food alert received.

APPENDIX 2
SPECIALIST SERVICES AVAILABLE TO HERTSMERE BOROUGH COUNCIL

1. Public Analyst appointed

Kent Scientific Services

[Kent Scientific Services - Kent County Council](#)

T: 03000 415100

E: kss@kent.gov.uk

Physical and chemical analysis, and foreign object examination.

2. Food Examiner

UKHSA – London

Food, Water & Environmental Microbiology Laboratory

61 Colindale Avenue London NW9 5EQ

T: 020 8327 6550

E: FWEM@ukhsa.gov.uk

3. Consultancy

ADAS

T: 03330142950

E: enquiries@adas.co.uk

Technical advice/consultancy

[Leading the way in environmental research | ADAS](#)

Consultancy

Campden BRI

T: 01386 842 000

E: support@campdenbri.co.uk

Technical advice/laboratory

[Campden BRI - Science and technology for the food and drink industry](#)

APPENDIX 3

DETAILED PROFILE FOR EACH CATEGORY OF FOOD PREMISES

Primary Producers: premises producing unprocessed food intended for human consumption, for example, fruit and vegetables, cereal, eggs, and honey.

Manufacturer/Processor: includes manufacturers packing all the food produced as a manufacturer.

Packer: premises where the main activity is packing food but not processing. Includes producer co-operatives.

Importers/Exporters: Quays or berths used for the handling of food.

Distributor/Transporter: include pre-retail distribution activities including importation, transportation, wholesaling and cash and carry premises which sell to retailers as well as caterers and final consumers.

Retailers: include supermarkets, off licences, newsagents, market stalls, mail order activities.

Restaurants and other Caterers: includes kitchens in institutional premises eg hotels, village halls, holiday camps, colleges and factories. Include public houses, hospitals, take-aways and bed and breakfast accommodation.

Manufacturers selling mainly by retail: premises such as local butchers and bakers who manufacture and sell most of their goods from their own outlets locally and local farms producing for their farm shop.

APPENDIX 4

OFFICER COMPETENCY PROFILE

COMMERCIAL TEAM

Based on the Code of Practice (England) Chapter 3 Qualifications and Competencies

Number of officers correct as at 1 April 2025

FOOD HYGIENE AND SAFETY

Authorisation Matrix

Activity	Officers' Initials							
Food hygiene and official controls in A, B and non-compliant C and D premises	SK	JM	DR					
Food hygiene and official controls in compliant C and D premises	SK	JM	DR	JR				
Approval of establishments subject to Regulation 853/2004	SK	JM	DR					
Inspection of approved establishments	SK	JM	DR					
HACCP based systems	SK	JM	DR					
Complex / specialist manufacturing processes	SK	JM	DR					
Inspection of premises rated compliant C to E	SK	JM	DR	JR				
Inspection, detention and seizure of foodstuffs	SK	JM	DR					
Service of hygiene improvement notices	SK	JM	DR					
Service of remedial action notices / detention notices (approved establishments)	SK	JM	DR					
Service of Emergency Hygiene Prohibition Notices / Prohibition Notices	SK	JM	DR					
Food sampling for analysis and examination	SK	JM	DR	JR				

Imported food inspection	SK	JM	DR					
Familiarisation with FSQM Procedures	SK	JM	DR	JR				
Advice and Education	SK	JM	DR	JR	SH			
Information / Intelligence Gathering	SK	JM	DR	JR	SH			
Alternative Enforcement	SK	JM	DR	JR	SH			

Guidance: the LFO must initial and date the relevant boxes on the matrix to indicate the level of authorisation for all staff involved in the delivery of the food service areas above, based on satisfactorily meeting the criteria stated in the 'Authorisation Chart ...' Appendix 5.1 Food Safety Quality Manual – Authorised Officers.

APPENDIX 5

PERFORMANCE REVIEW 2024 - 2025

Review in progress

INTRODUCTION

The Service Plan for Food Law Enforcement 2025 / 26 was drawn up in accordance with the Food Standards Agency Framework Agreement issued September 2000, as amended.

An annual performance review of the service delivery plan is required to be carried out, documented and submitted for appropriate Member approval.

This report seeks to comply with this requirement and does so by detailing performance against activities identified in the Food Service Plan.

The number of businesses registered with Hertsmere Borough Council at June 2025 was 1046 compared with 1092 at April 2024.

EXECUTIVE SUMMARY

Service Achievements

- 88% of planned interventions achieved
- Demand for training in the Level 2 Award in Food Safety in Catering, as attended by 28 candidates
- Implementation of the national Food Hygiene Rating Scheme
- Participation in the Food Standard Agency's (FSA) 2024 national consistency exercise. Following discussion within the team and completion of the exercise, Commercial team members achieved consistency amongst each other and in line with the FSA's expected outcome.
- Continued enforcement activity:
 - The service of four hygiene improvement notices
 - The service of one hygiene emergency prohibition notice and thus formal closure of the business and service of a hygiene emergency prohibition order
 - The voluntary closure of two businesses