

Growing a place of opportunity and ambition

Date of issue: Friday, 5 July 2019

MEETING CABINET

Councillor Swindlehurst Leader of the Council and

Cabinet Member for

Regeneration & Strategy

Councillor Hussain Deputy Leader of the Council

and Cabinet Member for Governance & Customer

Services

Councillor Anderson Transport & Environmental

Services

Councillor Carter Inclusive Growth & Skills Councillor Mann Planning & Regulation

Councillor Nazir Housing & Community Safety

Councillor Pantelic Health & Wellbeing Councillor Sadiq Children & Schools

DATE AND TIME: MONDAY, 15TH JULY, 2019 AT 6.30 PM

VENUE: VENUS SUITE 2, ST MARTINS PLACE, 51 BATH ROAD,

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DEMOCRATIC SERVICES

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APPENDIX PACK STATUTORY SERVICE PLANS

PART 1

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Food Safety & Food Standards

Service Delivery Plan 2019/20





The Food and Safety Team, sit's within Regulatory Services, which is an outward facing service group made up of:

- Food & Safety
- Primary Authority
- Trading Standards
- Licensing
- Community Safety
- CCTV & Careline
- Community Safety
- Registration Services
- Cemetery and Crematory

Our aim is to deliver a wide range of effective and responsive public protection services for our residents, businesses and visitors.

Here are some facts about Slough Borough Council's Food Safety & Standards Service:

- We are responsible assessing compliance with food safety and food standards legislation at all food businesses within Slough. This role is shared between the Food & Safety Team and the Trading Standards Team. The teams are also responsible for:
 - Health & Safety enforcement
 - Infectious disease control
 - Consumer protection
 - Animal health
 - Imported food and products control
 - Primary Authority Partnerships
 - Smoke Free enforcement



- We provide a responsive service that aims to achieve a balance between enforcement and advice; taking a minimum tolerance approach on issues of serious concern, in line with our enforcement policy, whilst supporting compliant businesses.
- We work closely with businesses and key stakeholders like the Food Standards Agency, Public Health England and other partners within the Council such as Public Health, Neighbourhood Enforcement, Licensing, Building Control & Planning
- We have the equivalent of 3.5 officers dealing with food hygiene and 1 dealing with food standards issues.

The purpose of this plan is to inform you about how we are achieving our aims and of work we are doing, in conjunction with our partners and agencies, to enhance public health and will being. We do this by:

- Completing Risk Based Interventions, focusing on the highest risk businesses and the poorest performers
- Using a range of interventions to support business in Slough whilst protecting customers to increase the % of Broadly Compliant food businesses.
- Promoting well performing businesses through the Food Hygiene Rating Scheme and also identifying those businesses which seek an economic advantage from non-compliance and so put Slough residents and visitors at risk
- Food quality and composition sampling
- Investigating food complaints
- Acting as 'Primary Authority' for large businesses and manufacturers both inside Slough and nationwide, which involves formal liaison with other local authorities, giving advice and support to the business in the Primary Authority partnership. Primary Authority is a cost recovered charged service.
- Investigating food poisoning outbreaks and infectious diseases; taking action to prevent infection and spread
- Inspecting imported food, food products and the verification of imported organic food arriving via Heathrow airport
- Training food handlers to a level 2 qualification in Food Safety in Catering
- Wide range of promotional activities

This plan will be reviewed annually which provides the opportunity to record our achievements and identify those key issues that still need to be addressed. We welcome your views, comments and suggestions on how it could be improved. Please forward your views to:

Levine Whitham – Food and Safety Manager

Tel: 01753 477901 or e-mail: levine.whitham@slough.gov.uk

or

Andrew Clooney, Group Manager – Consumer Protection Tel: 01753 875988 or e-mail: andrew.clooney@slough.gov.uk



Our Vision

The focus of work within the Food and Safety service is to ensure that the Council is able to fulfil its statutory obligations under the relevant legislation, whilst protecting wider public health and wellbeing and supporting local businesses.

We care deeply about the work we do for our town and its residents, visitors and businesses; all the people we are **accountable** to. We are **ambitious** in our plans for the borough, **innovative** in our thinking and actions; all the time listening and **responsive** to those who need us, **empowering** and supporting everyone to reach their goals. All the work we do is geared towards Slough's specific community and business needs, based on local intelligence and our work with partners.

We are one team. We are Slough Borough Council

The Council's 5 Year Plan and the Joint Wellbeing Strategy set out a vision for Slough, for the people, the place, the prosperity and the town, and the things that need to be done to make this a reality. Our work underpins the 5 Year Plan objectives.

The Action Plan at the rear of this service delivery plan shows, in detail, how we are going to achieve this. It demonstrates the golden thread and shows how the Team's work links with the 5 year plan to achieve the council's wider outcomes. The Action Plan should be read in conjunction with our Enforcement Policy.

The Enforcement Policy reaffirms our commitment to carry out our duties in an open, fair and consistent manner, with a graduated approach to enforcement, based on risk. Assessment of risk and the likelihood of reoccurrence are major factors in our enforcement decisions.

We recognise that most people want to comply with the law; therefore, we want to support and enable them to meet their legal obligations without unnecessary expense. Firm action, however will be taken, including prosecution, where appropriate. The service plan sets out the actions we are taking to enhance and improve health, safety and wellbeing in Slough.

Our service plan is ambitious and aspirational. Its important to note the comments made in the resourcing section below, in particular, the level of resource needed to meet the plans objections and that available are not equal. Ultimately we do not have the resources available to complete all aspirations within the plan. This is also mirrored in the Health and Safety Service Plan. It is likely that some of the planned work will be re-prioritised throughout the year, particularly if unforeseen demands on the service arise such as serious investigations.

How we performed last year:

The Food Safety Service can be divided into key activities listed below:

- Primary Authority Scheme and our Commercial offer
- High Risk Food Premises Inspections and Interventions
- Food Alerts and Incidents
- Food Complaints & Enquires
- Imported Food Control
- Food Poisoning and Infectious Disease Investigations
- Training and Promotions
- Sampling
- Food Standards
- Enforcement Action
- Striving for Excellence & resourcing

Primary Authority Scheme



Primary Authority (PA) Partnerships comprises a legally binding contract between the Authority and a business to provide ongoing specialist advice on specific areas of regulation applicable to that business, such as fair trading, product labelling, product safety, food safety and health & safety.

Our Officers are able to provide companies which trade across council boundaries robust and reliable advice, through the creation of these legally recognised partnerships. The scheme also provides a safety net to ensure that local authorities are consistent in the way they regulate businesses.

Since Slough Borough Council introduced Primary Authority partnerships in April 2011 we have already secured more than 40 successful PA partnership agreements. These services are uniquely provided by in house by specialist officers.

Cost recovery is an essential element of the contracts and is applied to Primary Authority partnerships with an hourly charge for any work undertaken; in 2018/19 our income was £89,000 (jointly with the trading standards team). This cost recovery enables the Council to support businesses in Slough and increase the availability of specialist officers who are funded from PA at no extra cost to the Council. Last year the food & safety team had over 487 hours of advice interactions with our PA companies; a high proportion of this was advice and support requests from our partners.

As a Primary Authority we have had communication with many other Council's to ensure that inspection and enforcement action reflects the advice we have already given, and is proportionate. We continue to work with the businesses to produce national inspection plans, and give guidelines to other councils to avoid unnecessary checks and tests.

In July we formally launched our Business Advice and Support Partnership (BAASP). BAASP is a partnership agreement with Kent County Council, Hampshire County Council and East Sussex County Council to increase our capacity to provide and share specialist knowledge and Primary Authority advice in the following areas:

- Trading Standards
- Food & Safety
- Health & Safety
- Fire Safety
- Licensing



Although the partnership is in its infancy, we have been trialling it for some time. This partnership has been recognised by the OPS&S as a strategic Primary Authority provider.

The number of businesses joining and leaving Primary Authority Partnerships with the Council remains changeable; however the demand on PA has remained relatively constant over the past year. As a service we currently maintain 40 partnerships.

More information on Primary Authority Partnerships can be found on the website https://primary-authority.beis.gov.uk/about. Businesses that would like to join the scheme can email primary.authority@slough.gov.uk

Our Commercial offer

In line with last year's service plan we have been looking at ways of supporting businesses at no cost to Council or residents. We introduced a new range of Business Support packages which have been advertised and made available to local food businesses. Businesses are offered bespoke advice packages either on start-up or before a planned intervention. These are charged at cost price and enable businesses to get additional advice on what they specifically need to do to improve their compliance with legal requirements and additionally to improve their Food

Hygiene Rating. Last year we supported 24 local businesses which made an income of £5,115.

High Risk Food Premises Inspections and Interventions

Slough Borough Council is a Competent Authority and is responsible for ensuring that Official Food Controls are undertaken on behalf of the EC. We aim to undertake all of the interventions required by the FSA's Food Law Code of Practice (FLCoP) (which is a Statutory Code of Practice), this includes 100% of all due food hygiene interventions. However, if there is a gap between the resources available to deliver these interventions and the demands on the service then our priority will be to complete interventions to food businesses which present the highest risk. In order to maximise the effective use of resources we will take advantage of Alternative Enforcement Strategies (AES) for low risk category E premises and other flexibilities in the code such as alternating between official interventions and non official controls to medium risk category D premises.

The intervention figures for 2018/19 show that we completed 100% of due inspections to our high and medium risk premises ('A', 'B', 'C' & 'D' rated premises). We inspected all of the non-broadly compliant premises that were due for interventions at the beginning of the year. In total, approximately 89% of <u>all</u> interventions due at the beginning of the year were undertaken (including low risk & those overdue from previous years). As with previous years our focus continued to be on premises which present the highest potential risk to the public.

Changes in staffing has meant that the number of permanent FTEs working in the team has reduced slightly this year- this has placed additional demands on other operational members of the team. During the year we have used the services of a temporary contractor to assist the team. The contractor focussed on medium risk food hygiene inspections; allowing us to achieve 100% of the high and medium risk businesses.

At the beginning of 2018/19 the proportion of premises in the Borough which were broadly compliant with food safety legislation was 79.8% and at the end of 2018/19 this was 82%. This improvement is encouraging but we continue to find that businesses are not making sufficient positive progress between interventions and that has therefore reduced our confidence in their management. This results in a change in the risk assessment, indicating that the business is 'non-broadly compliant'. Additionally any business that is unrated is counted as non-broadly compliant, although we have reduced the proportion of unrated businesses on our database this does have an impact on the overall percentage of compliant businesses. Officers have participated in local and national consistency exercises to ensure that we are applying the scoring in the code accurately. We will continue to use a range of advice and enforcement tools, including social media messaging, to seek improvements in the number of businesses that are broadly compliant.

We assess new businesses on registration and send free start up advice to all businesses. However, we prioritise higher risk businesses for visits.

There are currently 870 registered food premises within the borough, ranging from large manufacturing premises to small corner shops. This number is a 3.8% decrease from last year. We continue to monitor new businesses in Slough, are in regular dialogue with the Town Centre Manager and support the Town Team.

This table shows the number of interventions required and carried out at each category of premises.

	' '	Number of		Total number
Risk Rating	intervention	interventions due at beginning	interventions outstanding at	of interventions**
		•	the end of 2018/19.	carried out in 2018/19
			2010/19.	2018/19
Premise Rating - A	6 months	6	0	21
Premise Rating - B			_	
0	12 months	81	0	152
Premise Rating - C	18 months	113	0	159
Premise Rating -				
D	24 months	137	0	141
Premise Rating - E	Alternative			
Premise Rading - E	Intervention	209	44	145
Premise Rating –	Awaiting initial			
Unrated at Apr 17	inspection.	43	20*	121
TOTAL		589+	64	739

^{*} All but one of the unrated premises that have not been inspected are low risk businesses. They have all been assessed and have been given advice on food safety as part of our initial screening assessment.

^{**}Interventions include inspections, revisits, complaint and sampling visits and self assessment questionnaires completed.

⁺This figure does not include the 117 new businesses that opened during the year.

The table below shows our current premises profile and interventions due for 2019/20 – this includes all interventions that were outstanding at the end of 2018/19.

	Frequency of	Number of food	Number of
Risk Rating	intervention	premises	interventions
			due in 2019/20
Premise Rating – A	C th .	2	
Tremise nating 71	6 months	3	6
Premise Rating – B	12 months	69	69
	12 1110111115	09	09
Premise Rating – C			
Tremise nating 6	18 months	213	141
Premise Rating – D			
	24 months	311	166
Premise Rating – E	Alternative	245	77
Premise nuting - E		243	//
	Intervention		
Premise Rating –	Awaiting initial	19	19
Unrated at Apr 19	inspection.		
Outside programme	N/A	10	0
	74//1	10	
TOTAL		070	470
		<i>870</i>	478

Food Hygiene Rating Scheme

FOOD HYGIENE RATING

We have now been operating the National Food Hygiene Rating Scheme for a number of years. The scheme helps consumers to choose where to eat out or buy their food by giving them information about the hygiene standards in food businesses. The scheme also encourages businesses to improve standards.

There are 6 levels of rating- zero to five. Assessments for a Food Hygiene Rating are carried out during routine food hygiene inspections when inspecting officers look at:

- How hygienically food is handled- including preparation, storage and temperature control.
- The condition of the structure of the building- including cleanliness, layout, facilities and maintenance.
- How the business manages and records what is does to make the food that it sells safe.

At the end of 2018/19 the number of food business with published ratings in Slough was:-

Rating	Number of businesses
0	2
1	68
2	49
3	99
4	128
5	333
Total	679

As indicated earlier our broadly compliant percentage has gone up slightly in the past year- this has a knock on effect on the proportion of our premises that are rated 3-5 (generally satisfactory or better). Working to improve standards in our 0-2 rated premises will contribute to our target of increasing our percentage of broadly compliant businesses in the Borough.

We received 14 requests for Food Hygiene Rating Rescore visits during the year, we charge a fee of £210 for these. We also had one appeal against a Food Hygiene Rating, this was reviewed in line with our internal procedures and the original rating was amended

We have not been regularly tweeting the businesses who have been awarded Ratings of 5 or 0 to promote the scheme and encouraging businesses to improve their standards. All food hygiene inspection results are published at http://ratings.food.gov.uk/authority-search/slough

Town Centre Project

Last year the team undertook a project to support poorly performing food businesses within the Town Centre to improve their FHRS, subsidised by the Council as a Town Centre priority to improve the image of the town and the offer on the high street.

23 business was selected to form part of the project having a FHRS of 0-2. Over the duration of the project, 6 of the 23 businesses closed and re-opened with a different FBO. These businesses then fell out of scope. An additional 3 businesses failed to engage and did not wish to participate in the project. 14 businesses remained in scope and wished to participate. All eligible 14 businesses received support visits approximatively 1 month prior to their due food hygiene inspection. This timing was purposely planned, as it was hoped that advice given by officers would be fresh in the Food Business Operators mind, along with sufficient time to implement their agreed action plan. Food hygiene inspections were then undertaken and assessment of standards made to determine the new FHR score.

In total 9 businesses achieved an improvement in their FHR score. However, 1 business was closed voluntary due to an imminent public health risk. Enforcement action is being taken against this business as a result. Of the 14 premises that were included in the project 64% improved their FHR score, 50% are now 'broadly complaint' FHR 3 or above with. 33% are now rated at a 4 and 11% achieving a FHR 5.

Whilst improvements were achieved in the majority of businesses for the remaining businesses which did not achieve any improvement, barriers such as willingness and desire to improve are most likely. This is also supported by the perceived lack of care regarding the FHR score from some customers. Further work is planned to continue to support food business within the town centre in 2019/20.

However an unexpected positive outcome of the project is that one business was so satisfied with the support he received, that he requested longer term advice and support which has resulted in a formal Primary Authority partnership with us.

Food Alerts and Incidents

All Food alerts and incidents are dealt with in line with the Food Standards Agency's (FSA) Code of Practice and protocols, based upon risk.

During 2018/19 we were notified by the FSA of over 65 Food Alerts for Information and product withdrawals, we check all notifications for potential impacts and carry out further enquiries on local distribution where information suggests it is needed. This year there were no known impacts on food handled by businesses in Slough.

Food Complaints & Enquires

We dealt with **564** complaints and enquiries from or about food businesses in Slough during 2018/19. This is approximately a 7% increase on the number of referrals made to the team in the previous year. A range of enquiries were responded to. In particular:

- 126 reporting concerns about food businesses/poor food handling practices.
- 64 notifications of Imported Food
- 124 requests for new business start up advice
- **30** complaints about food (including contamination with foreign bodies and mould).
- 29 complaints of food poisoning and suspected illness
- 33 requests for information about food hygiene training

We follow a procedure in relation to complaints and aim to keep the customer informed of our progress and outcome. The reasons for investigating food complaints include;

- Providing a service to the public;
- Resolving problems that may pose a risk to public health;
- Providing information to the food business operators help them improve their standards;
- Comply with our statutory requirements
- Prevent similar complaints from happening again.

The continued levels of service requests indicate that demand for the service remains high. Based on data from previous years it is likely that demand will slightly increase through the coming year.

Imported Food Control

We check and either authorise or reject consignments of imported food notified to us as entering the borough from outside the EU. We also check, and either authorise or reject all consignments of organic produce entering the Borough. In addition, we also carryout selected checks on imported food found inland, within food premises, such as corner shops and supermarkets, to ensure it has been imported correctly and does not pose a health risk.

On a daily basis we check many consignments of imported food that have entered the EU via Heathrow. We undertake detailed documentary checks on consignments of imported food based on risk and intelligence. **This year we stopped 14 consignments of food.** Some consignments contain many different food items; each individual item must be checked for composition and restrictions. Advice is given to the importer or agent on how to correctly import the consignment and of any controls that may exist for a given food type. If the food has been imported illegally this will be subject to detention and destruction/re-exportation depending on the circumstances. This may result in visits to physically check the consignment at the custom bonded warehouse. Some of the food checked includes:

- Illegally imported Gelatine Capsules from India
- Honey from Togo
- Protein drink powder from the USA
- Egg noodles from China
- Food supplements from China
- Honey from China
- Food supplements from the USA
- Peas from Kenya

Of the food checked, 13 consignments of illegal Product of Animal Origin (POAO) were detained and notified to HMRC, and 1 consignment of illegal Non-Products of Animal Origin was detained and destroyed.

Food Poisoning and Infectious Disease Investigations

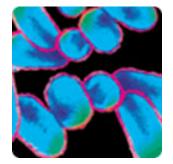
Last year, the Food and Safety Team were notified of 283 infectious diseases and food poisoning related illnesses. This figure shows a **4.7% decrease** in reported infectious diseases from the previous year.



Many of the infectious diseases reported to us require investigation and some require the completion of a food history. We co-ordinate investigations with Thames Valley Public Health England (TVPHE) on the basis of a regionally agreed protocol, and sometimes visit and inspect implicated food premises.

The most common food poisoning reported in Slough is **Campylobacter** which made up 57% of the reported illnesses; this corresponds with national trends, as campylobacter is the most common type of food poisoning in the UK.

Some food poisoning related illnesses affect more than one person; in these cases the possibility of an outbreak is considered and, depending on the circumstances, the team may be required to assist Public Health England with their investigation.



This year we have been involved in the following investigations linked to outbreaks of infectious disease:-

A number of cryptosporidium cases in the same area were noted and this was communicate to TVPHE- officers assisted the control team by visiting some premises to check the controls in place and offering advice to prevent the spread of the illness, speaking to cases and their families and

participating in Outbreak Control Team (OCT) teleconferences.

A local business required investigation after possible links with a large outbreak of illness at an event in Central London. Members of the team visited the premises on a number of occasions, took food samples and participated in the OCT teleconferences

Training and Promotions

We operate an accredited food hygiene training course on a quarterly basis which is open to all members of the public. This is an important service, and ensures all food handlers can attend essential food hygiene training, resulting in better educated and trained personnel, preparing safer food for consumers. In addition, registered tutors from the Team also provide food hygiene training for individual businesses on request, often during school holidays and at weekends.

We continue to use Highfield as the awarding body, who are regulated by Ofqual. The course we provide is a regulated qualification that complies with the Regulated Qualifications Framework (RQF).



Approved HABC Centre

The Level 2 Food Safety in Catering continues to be a valued and sought after qualification for many individuals and businesses, although we have seen fluctuations in demand over the past year. Larger organisations including local schools and children's centres have continued to book our bespoke courses which provide them a dedicated course for several of their own staff, often in their own venues, whereas individual bookings from small food business operators for our public courses has dwindled. The popularity of cheaper (but often inferior) on-line

training courses could be a factor, but many also value the face-to-face traditional teaching approach that our training courses offer.

We will continue to actively promote our open courses over the coming year and respond to demand, with the possibility of laying on additional courses if required.

Fees for food hygiene courses have not increased this year in order to stay competitive with the rest of the market & to make them as affordable and accessible as possible to both individuals and businesses.

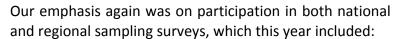
The team has over the last year:

- Run 9 courses (down from 12 the previous year)
- Trained **89** candidates (down from 136 the previous year)
- Had an average pass rate of 96.6% (up from 95.6% the previous year).

This will contribute towards an improvement in the food safety standards within Slough, due to better trained and educated food handlers. This will ultimately contribute to a reduction in food poisoning cases, within Slough and to people passing through the borough using its facilities.

Sampling

The team took 77 microbiological samples last year (consisting of swabs, food samples and water samples), which was a 60% increase on the previous years sampling activity.





- Ready to eat pastry based foods from catering and retail premises;
- Microbiological quality of plastic containers used to store food in takeaway premises;
- Swabbing in catering premises;
- Sushi

The ready to eat pastry based foods survey looked at the microbiological quality of these products, such as pies, pasties and samosas, which are hot held, in chilled cabinets or at kept at ambient temperature after cooking. A range of retailers including convenience stores, smaller supermarkets, takeaways and petrol stations were visited and of the 13 samples taken, just 1 sample was unsatisfactory, with an elevated bacterial count.

The study looking at the microbiological quality of plastic containers used to store food in takeaway premises was a Berkshire wide initiative. A total of 7 samples, comprising of swab tests were taken in 3 premises (all high street takeaways). Our findings revealed a high proportion of unsatisfactory results, primarily due to elevated levels of Enterobacteriaceae, but 2 samples also had detectable levels of Bacillus cereus. The results reflected poor practices such as the continual re-use of plastic containers (that were perhaps only ever designed for single use, such as mayonnaise & ice cream cartons); poor cleaning & disinfection methods; the use of containers that are not intended for food contact (such as general use storage boxes) and the poor quality of some of the containers that were visually damaged. Given these poor results, further sampling of this nature is planned for the coming year.

In the national study on swabbing in catering premises, which was similar in nature to that of the plastic containers, but swabbed a wider range of equipment and surfaces, our results from the 14 samples taken were marginally better. Here we sampled 3 premises, 1 of which returned completely satisfactory results (4 samples). The second premises had just 1 unsatisfactory result (from 5 samples) but the final premises had 3 out of 4 samples providing unsatisfactory results from swabs of a cloth, fridge door handle & hand wash basin tap.



Lastly, we contributed 4 samples to a regional study looking at the microbiological quality of sushi, from 1 premises producing fresh sushi in Slough. All samples returned satisfactory results, in line with the standards set for food of this nature.

Last year we decided to include some local sampling priorities into our sampling programme, to look at the microbiological quality of food and the cleanliness of surfaces in some of our manufacturing premises. In total 13 samples, consisting of 8 food samples and 5 swabs, were taken from 2 premises. All of the food samples returned satisfactory results, however there were 2 unsatisfactory swab samples (from a fridge door handle and tap at the same premises). The failed samples were unsatisfactory for Enterobacteriaceae, possibly demonstrating a lack of effective or regular cleaning to these hand contact surfaces.

In all cases of unsatisfactory samples, letters were sent to each of the implicated businesses on how to improve hygiene and cleaning & these will be followed up during the next visit/interventions.

Our reactive sampling was carried out in response to 2 incidents that arose during the year to help inform the investigations. The first was a case of foodbourne illness, for which we took 14 food samples from a catering premises. All results returned satisfactory results. In the second incident 12 water samples were taken from 1 domestic address and 3 manufacturing sites in response to an investigation concerning cases of Legionnaires disease. There were no positive results from any of the samples taken.

Food standards

Trading standards successfully completed 100 per cent of their high risk routine food standards inspections in 2018/19, in addition to other food standards enforcement visits.

A total of 214 food standards visits were carried out last year. Which resulted in the following Interventions:

- 72 Written Warnings issued
- 92 Compliant on First Visit
- 24 Non-compliant on first visit
- 30 Compliant on Contact
- 6 Non-compliant on contact
- 1 Compliant on Revisit
- 0 Non-compliant on revisit

We also undertook further work on giving advice on food labelling to new food businesses; providing detailed food standards advice to the relevant Primary Authority partners, and taking part in the following food sampling and food related projects:

- Trading Standards South East (TSSE), Traceability. Sampling meat species and coconut water, Total 13 samples
- Trading Standards South East (TSSE), free from Allergens, Total 5 samples
- Slough Trading Standards Traceability Project, Total 37 samples

These projects entailed visits to food business outlets (predominately take-aways and mobile food vans) to determine if the food being advertised was as described. It completed in conjunction with the Food Standards Agency (FSA), TSSE and the Public Analyst.

It was found that many of these outlets were incorrectly labelling the food and the business owners were advised at the time of the visit of the legal requirement.

Over the course of these projects:

- 9 Improvement Notices were served: 7 Improvement Notices were complied with.
- Of these Improvement notices 3 were for failing to supply allergen information
- The remaining 7 improvement notices were for misdescribing the meat species
- 2 Improvement Notices are pending, awaiting the Public Analyst results
- 25 non-compliant (68%) in Traceability, Allergens & Genetically Modified Declarations
- Product Descriptions increased 32% to 89%
- Allergen compliance increased from 54% to 95%
- Genetically Modified Declarations increased 54% to 84%

A separate Trading Standards 2019/20 service plan has been produced which includes Food Standards, which is available via www.slough.gov.uk/business/trading-standards-service.aspx

Enforcement Action

We use a comprehensive set of measures to protect residents of Slough, people who work here and visitors and to promote sensible risk management. We actively work with businesses and other stakeholders to achieve our shared goals. Any enforcement action by us will be graduated, proportionate and in accordance with the council's enforcement policy. A full copy of the policy can be found on our website: www.slough.gov.uk/council/strategies-plans-and-policies/regulatory-and-enforcement-services-enforcement-policy.aspx

The following enforcement action was taken by the Food team in 2018/19

Hygiene Emergency Prohibition Notices	1
Hygiene Improvement notices	45
Written warnings/Letters sent	350
Prosecutions completed	1
Simple Caution	0
Seizure and Destruction of Food (excluding imported food)	0
Detention of Food (excluding imported food)	0
Voluntary Closure	2

Striving for Excellence and Resourcing

Providing excellent customer services is important to us. We will always:

· Be polite, friendly and offer a helpful service



- Take the time to listen and explain things
- Provide accurate information and advice, in a clear and straightforward way
- Deal with enquiries immediately, but if this is not possible, tell you who we have passed your enquiry to and their contact details
- · Keep you informed of progress and the outcome of our investigations
- Treat you fairly and with respect

Customer Pledge

We aim to provide every customer with a quality service and will seek feedback from you to help further improve the quality of the services we provide. A manager will contact you personally if you are unhappy with the service received.

In addition, we have introduced the following standards against which we will monitor the responsiveness of our service, namely:

Service Standard	Target / Response Times
Respond to customer complaints and	Within 5 working days
enquiries	
Provide a full response	Within 10 working days

Customer Feedback and Quality Assurance

We use feedback questionnaires following each intervention. Last year the amount of feedback we received was low, as with previous years. This is a combination of officers failing to hand out the feedback questionnaire, and a poor response from the business. However of what we did receive, 100% agreed or strongly agreed that their business was treated fairly, that they understood the information given to them and that they found it useful.

Only 1 complaint was received regarding the service, which followed the closure of a food business. This complaint was investigated and the outcome was that officers conduction their work in a professional and correct manner. The team is committed to working with local businesses and the local community ensure high levels of satisfaction. We aim to enhance the quality of life of residents within the borough, and will work on improving our feedback going forward. All feedback received is used to inform and improve our service.

We undertake monthly quality assurance (QA) on the whole range of our service delivery. Our QA procedures assess the work of our officers to ensure that it meets the high standard expected by the service.

Members of the Team represent the Authority in a number of regional bodies with the aim of sharing good practice, including the National Food Hygiene Focus Group, Berkshire and Oxfordshire Food and Health & Safety Liaison Group, The Regional Sampling Group, CIEH food experts advisory panel and the Berkshire Infectious Disease group.

Resourcing

The Full Time Equivalent (FTE) staff allocated to food safety & standards work is **5.18 FTE**. This includes the food and safety manager (0.2 FTE) and a Business Support Officer (0.5 FTE). 1 FTE officer is also allocated to Trading Standards work (included in this figure)

The cost of the service during 2018/19 to meet the Food Standards Agency (FSA) Food Law Code of Practice obligations will be approximately £350,000, for both Food Safety and Food Standards. A breakdown of the resources committed to Food Safety and Standards work is contained in Appendix A.

There is an estimated shortfall of 2.5 FTE, based on the FTE required to complete all of the FSA guidance obligations, and that currently allocated to food work.

We will aim to make efficiencies and create income to offset this shortfall. However to complete all of the obligations within this plan is ambitious. Ultimately priority will be based on risk and outcome, and work may be re-prioritised as needs change. Some low risk inspections and aspirational health and safety projects will not be undertaken. Premises deemed as low risk will be managed so their risk is reviewed regularly, and should their risk rating increase, the premises will immediately be subject to interventions. Where possible we will make use of flexibilities within the guidance and other smarter, agile and mobile working initiatives, all of which are detailed in the Action Plan attached as **appendix A**.

The FSA are aware that the expectations on local authorities outweigh what can be delivered, and a national review on the delivery of food safety regulation is under review, namely 'Regulating our Future'. We will continue to undertake quality inspections, not quantity.

Quarterly monitoring of team performance will be undertaken, and any significant shortfalls or non compliance will be raised with Service Lead and Members, along with the associated risks. Where necessary a request for additional resources will be submitted.

Areas for development

We are always striving to move the service forward. In order to achieve this, we set targets to identify areas for development during the coming year;

Continuing to develop and expand income generating streams

- Increasing the number of businesses within Slough achieving a 3, 4 and 5 score in the FHRS (broadly compliant % figure)
- Reviewing and updating the information we have on the CIVICA data base about local food businesses including childminders.
- Updating our general procedures
- Improving our customer feedback

Staff Development

On going development of the work force is paramount to ensure a comprehensive service is provided to the customer, whilst maintaining continuous improvement and providing value for money.

The Food Standards Agency requires that the Council maintains the competency of its officers and also that we have officers with sufficient skills to maintain the breadth of competency needed for Slough specifically. The town's close location to Heathrow airport places additional training requirements upon the team in relation to complex Imported Food legislation.

Variation from service plan

Departures from this service will be exceptional, capable of justification and be fully considered by the Group Manager for Consumer Protection, Andrew Clooney, before varying action is taken. Reasons for any departure will be fully documented. **The action plan for 2019/20, which outlines planned work for the year in Appendix B.**

APPENDIX A

Resource Requirements for Food Service Delivery 2018/19
Calculations

Service Provision	Expected output	FTE required	Resource
Food Hygiene Interventions to	Cat A 6	3.14	S/EHO
, -	Cat B 69	5.14	3/ [10
all premises due, including			
revisits	Cat C 141		
	Cat D 165		
	Cat E 77		
	Unrated 60		
	Total due 518		
Primary Food Standards	High Risk 7	1.0	EHO/TSO
Inspections	Medium Risk 74		
	Low Risk 23		
	Unrated 132		
Imported Food Control	Difficult to estimate	0.1	EHO/TSO
Imported rood Control	demand	0.1	110,130
Complaints & Service Requests	564	0.50	EHO/TSO
Complaints & Service Requests	304	0.50	110/130
Complian	100	0.42	FUO/TCO
Sampling	100	0.12	EHO/TSO
	D.C. 1	4.0 / 15	F110
Primary Authority Food Related	Difficult to estimate	1.0 (self	EHO
Work	demand	funding)	
Enforcement Action –	May vary	0.50	EHO/TSO
emergency procedures, case			
files, simple cautions &			
prosecutions			
Food Hygiene Training	Undertaken in officers	0.0	EHO/TSO
	own time		
QA and updating of procedures		0.2	Manager/
			Team Leader
Day to day management of		0.5	Manager
service delivery			
Administration		0.75	Business
			Support
			Officer
Total (including admin &		7.81	
management of service)		,.01	
management of service)			

EHO = Environmental Health Officer

TSO = Trading Standards officer

FOOD SAFETY & STANDARDS ACTION PLAN 2019/20

Directorate: Adults and Communities		Service Manager: Levine Whitham	
Division:	Regulatory Services	Budget: £350,000 (including Food Standards)	
Team:	Food and Safety Team, and Trading Standards Team	Number of staff employed: 5.18 FTE Dealing with Food Safety and Hygiene, and Standards (including Food & Safety Manager 0.2 and Business Support Officer 0.75)	

Service Objectives:

We have strong links to the Councils 5 Year Plan, which is indicated against each service activity below. The work of the Food Safety & Standards teams is essential in securing safe foundations from which the council can deliver its plan. Without the basics, such as safe places to eat and protection against disease and food related illness, it would be impossible to build a safe, healthy and vibrant place to live, work or visit. We are the prerequisite for a fit and resilient Borough.

Protecting public health via Food Safety; Income generation via the Primary Authority Scheme and Commercialisation; and Supporting local businesses in Slough.

Provide a value for money food safety service within the Food & Safety and Trading Standards Teams with excellent customer focus and well motivated competent staff to deliver our statutory obligations and the specific needs and priorities of Slough.

The timely delivery of specific work plans, evidence based initiatives and joint working with partners both within and beyond the Council to improving the quality of life in Slough and protect customers whilst supporting business growth and developments within the Town Centre.

Service Activity	Priority & 5 YP	Targets	Key Actions	Anticipated Outcomes	Responsible	Time Scale &
Service / tearvity	Outcome &	rangeto	ney renons	7 minorpared Garcomes	Officer	Measures
	Statutory					
	Requirement					
Primary Authority	3. Slough will be	Maintain income	Designated officers to work closely with PA businesses to:	Generate income	Food &	March 2020
(PA) & Compliance	an attractive	targets			Safety	
Support	place where		Develop partnerships with PA clients	Improved standards,	Manager	
	people choose to			efficiencies and		Monthly
	live, work and	Develop existing PA's	Provide specific advice in relation to management systems	compliance within PA's,	Trading	Reports on
	stay	and explore new PA	& procedures and controls adopted by the company	with less enforcement	Standards	hours and
	,	opportunities, creating income in	nationally	action taken by Enforcement Authorities	Manager	income
	5. Slough will	line with projected	Issue 'formal PA advice' where procedures and controls are	(EA).	All Food	generation
	attract, retain	target.	deemed suitable and compliant	(LA).	Safety &	Quarterly
	and grow	targeti	accined suitable and compilant	Reduced, efficient and	Trading	Reviews
	businesses and	Support the Business	Handle referrals from other local authorities and central	effective regulation by	Standards	
	investment to	Advice and Support	government bodies on behalf of that business	other EA nation wide, via	Officers	Yearly overview
	provide	Partnership (BAASP)		the provision of PA		of individual
	opportunities for	and its strategic	Develop and publicise Inspection Plans	support which has a		company
Page 24	our residents	objectives.		national impact.		Action Plans
ge			Issue of advice and guidance to other Enforcement			
Ŋ			Authorities on the companies activities	Reduced regulatory		Number of PA's
+	Income		Maintain an accurate record of any advise and avidence	burden on PA		in Portfolio
	generation		Maintain an accurate record of any advice and guidance	businesses.		Virtual PA
			Hold meetings with partner businesses on a regular			management
			timetable of mutual agreement, along with annual action			team
			plans where mutually agreeable.			
			, ,			
			Respond to request within in line with Customer Charter			
			and Pledge, or as agreed with the PA.			
Income	3. Slough will be	Maintain income	Provide free signposting to comprehensive self help support	Generate income	Food &	March 2020
Generation and Commercialisation	an attractive	target	and guidance to new business start ups and existing SME's	Improved standards	Safety	
Commercialisation	place where		in Slough.	Improved standards,	Manager	

Food Service Delivery Plan 2019/20

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	people choose to live, work and stay 5. Slough will attract, retain and grow	Develop commercialisation opportunities to generate income, in line with projected income target.	Grow and promote our offer of chargeable business support options for all types of businesses, both inside and outside Slough, including, but no limited to: • Primary Authority • Tailored business advice	efficiencies and compliance within businesses. Reduced the amount of regulation required by the council via business	Trading Standards Manager All Food Safety &	Monthly Reports on hours and income generation
CZ ang	businesses and investment to provide opportunities for our residents Income generation &	Support the Business Advice and Support Partnership (BAASP) and its strategic objectives.	 Assessment of labelling/brochures/website Pre-start up advice Pre-Inspection support visits Regulatory Health Check Training & Talks Training needs assessment Analysis of statutory defence Review of policy & procedures Audit of systems Support in achieving 5 FHRS Supply of SFBB material Buy with Confidence Assured Trader Schemes Funded projects from regional or national groups (TSSE/NTS) 	paying for support and improving standards before statutory inspections are undertaken. Developed skilled workforce, with a range of business support abilities.	Trading Standards Officers	Number of businesses given chargeable business support. Number of businesses achieving 5 FHRS. Time spent on regulation, and number of planning
			Generate income from charging for Food Hygiene Rating Scheme re-score visits and SFBB packs. Sent quarterly emails to all businesses due for inspection within the forthcoming quarter reminding them of their due food hygiene inspection date, and current FHRS, whilst offering a chargeable pre-inspection visit. Provide easy to access payment services, including telephone and online payments. Promote and advertise services, including working with			inspections achieved. Number of hits on our website. Number of press released and publicity campaigns

			other council departments, leaflets, press releases, and information on website. Benchmark where possible with other local authorities who have embarked on commercial enterprises to highlight best practice.			
Interventions with	3. Slough will be	100% of due food	Allocation of interventions based on risk priority.	Safer food businesses in	Food &	Ongoing until
food premises in	an attractive	interventions,		Slough & increase in % of	Safety	March 2020
Slough	place where	including approved	Make full use of Alternative Enforcement Strategies (AES)	broadly compliant	Manager	
	people choose to	premises in line with	to applicable businesses in line with FSA CoP, including	premises	_	Monthly and
	live, work and	FSA CoP	newsletter, SAQ's, targeted advice and other relevant		Food Safety	Quarterly
	stay		advice.	Reduced incidence of	Team Leader	review
	,	All approvals to be	Characteristics O AEC to suggest the same in	food poisoning	AU 5	
	5. Slough will	issued within time	Stagger interventions & AES to support the service in	lo avacas in our possible of	All Food	
	attract, retain	limits as defines in FSA CoP	achieving statutory requirements in FSA CoP.	Increase in proportion of premises achieving 3, 4	Safety Officers	
_	and grow	rsa cur	Share intel and concerns regarding allergens with trading	& 5 in the Food Hygiene	Officers	
ag G	businesses and	Assess compliance	standards, and take action to ensure compliance and	Rating Scheme (FHRS)	TS/NET/	
Page 26	investment to	with allergen	consumer safety where necessary.	nating seneme (i i ins)	Licensing	
<u>ත</u>	provide	information to	,	Consumers have greater	acting as	
	opportunities for	consumers and safe	Secure improvements where there are evident concerns,	information on local	'eyes and	
	our residents	handling of allergens	taking enforcement action where compliance is poor; in line	business hygiene	ears'	
	our residents	during food	with the council's Enforcement Policy and business growth	standards, so they can		
	Statutory	interventions	agenda.	make informed choices	Support	
	•			on where to eat and	material	
	Requirement	Deal with complaints	Recover costs for service of Hygiene Emergency prohibition	purchase food	from the FSA	
	Income	and service requests	Notices.			
		in line with Customer		Number of concerns		
	generation &	Service Charter and	Provide free signposting to comprehensive self help support	raised and intel shared		
	effective use of	Pledge	and guidance to new business start ups and existing SME's	Number of businesses		
	resources	Explore focused	in Slough.	Number of businesses taking up chargeable		
		interventions and	Offer chargeable business support options as detailed	business support		
		sector specific	above.	business support		

			projects on high risk premises or where local intelligence suggests necessary Ensure all new food business registrations are risk assessed & inspected in line with risk and FSA CoP	Publicise enforcement action taken against non compliant premises as a deterrent to other businesses and incentivise improvements. Publicise non compliant businesses who put public health at risk by tweeting 0 FHRS Publicise and award those businesses that do well, but tweeting 5 FHRS	Number of joint food hygiene & standards visits undertaken		
Page 27			Offer business support options as detailed above. Where possible undertake joint food hygiene and standards visits to make efficiencies and reduce burden on business.	 Added Value: Use professional curiosity when visiting premises to identify concerns and share intelligence with relevant bodies Raise aware of CSE and safeguarding when visiting premises, by handing out leaflets and information Assessing compliance with Smoke Free requirements Identify H&S matters of concern and take appropriate action where necessary Assess pest activity and waste issues external to food premises and share intel with NET team 			
	Reactive Investigations, response to intelligence from other areas of work, Food Complaints & response to	3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will	Respond to 100% of service request within 5 days and in line with customer charter. 100% of investigations	Investigate service requests and where issues are identified use a full range of enforcement options to ensure compliance and safety. Take a minimum tolerance approach to serious incidents, whilst managing customer expectations in line with Customer Charter.	Safer food businesses in Slough. Reduced incidence of food poisoning Consumers feel able to eat out and purchase	All officers	Ongoing until March 2020 Assess during 1:1 meetings and Case Reviews

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service requests	attract, retain and grow businesses and investment to provide opportunities for our residents Statutory Requirement	proceeding to formal action to be reviewed by Team Leader/Manager at monthly 121's	Promptly close service requests which are not serious or present health risks, managing customer expectation from the beginning. Where appropriate signpost customers to self help resources. Work in line with Enforcement policy, prosecution template and internal procedures. Outcome from QA - in line with procedures Full range of enforcement options used, as appropriate in line with the enforcement policy Explore alternative enforcement opportunities on a case by case basis. Added value: - Work to support % increase in BC businesses	food safely in businesses within Slough All complaints and service requests dealt with in line with Customer Service Charter and Pledge		Number of businesses and customers provided with regulatory support
Food Hygiene Rating Scheme	3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents	Continue to implement FHRS in Slough food businesses in line with FSA Brand Standard Increase in premises achieving 2, 3, 4 and 5 score in the FHRS Improved customer awareness of the Scheme, and better informed choices when eating out	Risk based interventions focusing on 0 & 1 FHRS scoring premises, to increase scores and hygiene standards, and their business potential Publicise the scheme monthly via tweeting 0 & 5 FHRS businesses, to increase peer pressure on low performing businesses to achieve higher scores. Publicity campaigns around key dates, such as Valentines and Christmas to raise awareness of FHRS. Provide free guidance to businesses on the scheme and how to achieve 5 FHRS. Added value: - Work to support % increase in BC businesses - Support compliance businesses and target those	Measurable improvement on risk ratings Consumers have greater information on local business hygiene standards, so they can make informed choices on where to eat and purchase food.	Food Safety Team Leader All Officers to support	March 2020 Monthly review Number of publicity actions to raise customer awareness.

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Supporting the Town Centre	3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents	Attend Town Team meetings and walk arounds Project lead on getting a regular market into on the High Street Support businesses within the town in achieve good food hygiene and safety standards.	seeking financial gain from non-compliance - Peer pressure to improve ratings and threat of adverse publicity Project to improve the number of food businesses in the town centre with a good or very good food hygiene rating: Identify poor preforming food businesses, including restaurants, take away's and retailers, within the town centre area and offer subsidised support to improve their FHRS (aiming for a 5 FHRS), and in turn attractiveness to customers. Offer a suit of chargeable business support options, along with free signposting aforementioned, to allow business growth.	Improvement in FHRS scores within businesses in the town centre Number of businesses participating in the project	Food Safety Team Leader All Officers to support	March 2020
Level 2 Food Hygiene Training Programme	5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents	Offer food hygiene courses, minimum of 4 courses a year, to members of the public both inside and outside Slough. Offer courses to other service uses, such as the Councils Training &	Develop a publicity campaign to advertise course, and where appropriate discounts to attract bookings. Undertake annual internal audit of course procedures to ensure in line with Highfield requirements. Evaluate course feedback and where necessary take appropriate action to ensure course delivery to high standard. Added Value:	Improve food safety knowledge amongst food handlers, in turn improving food safety standards within businesses & increase in % of broadly compliant premises Supports businesses in regulatory compliance,	Sandi Johal Support from all food officers Support material from training provider	March 2020 Quarterly review Feedback from candidates Number of candidates taught and pass
	generation &	Development Team,	- self funding training reducing delivery costs to SBC	including those with	-	rates

	effective use of resources	and other private businesses. Maintain procedures required for an accredited training centre Maintain the high standard of course delivery currently achieved. Provide quick and easy payment	- Positive impact on BC %	enforcement notices served.		
Imported Food Controls	3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents Statutory	methods. Intelligence and risk lead checks on 100% of imported food notifications. Continue to support and facilitate Onward Transmission (OT) arrangements with clearing agents in Slough, regarding high risk food imported and subject to BIP testing.	Duty officer to monitor and respond to all notifications of imported food on a risk based approach, taking appropriate enforcement action where necessary. Maintain close working arrangements with both MHMRC, Hillingdon, Stanstead and Felixstowe BIP, regarding the sharing of intel, OT's and location of ETSF's. Undertake verification of organic imported food and issue certificates to imported organic food were requested Control of onward Transmission referrals and notifications of Personal Imports Investigations into illegally imported Products of Animal Origin (POAO) and other restricted foods (NPOAO), both at ETSF's and inland.	Safe and complaint food imported into the EU via Slough. Food businesses in Slough, offering safe and complaint imported food.	Food & safety Manager All officers to support	March 2020 Quarterly Review Number of imported food consignments checked and notices serviced. Number of inland food investigations undertaken & notices serviced.

	Requirement Income generation & effective use of resources		Work with clearing agents and importers regarding the safe and legal import of non EU foods, including signposting to information and advice on our website and elsewhere. Issue of export certificates to businesses inside and outside Slough, regarding the export of foods outside the EU. Annual review of internal procedures, including keeping abreast of know and emerging issues and rapid changes in import controls. Added value: - Slough community, the rest of the UK and other EU countries are protected against illegal and hazardous imports from third countries			
Sampling Page 3	3. Slough will be an attractive place where people choose to live, work and stay Statutory Requirement	Participating in National and Regional sampling programmes to investigate emerging food concerns, and to ensure food is safe Undertake sampling as part of a suite of interventions to improve food hygiene and food standards and focus on high risk and local needs	Regional sampling to be agreed at Berkshire Food Liaison group. Explore funding avenues from external organisations e.g. Food Standards Agency Undertake appropriate APT (adenosine triphosphate) testing in local businesses on cleaning practices, giving immediate results during interventions and projects to increase awareness of effective cleaning. Timely follow up on 100% of sampling results, including investigation into unsatisfactory results where necessary. Explore joint sampling initiatives with Food Standards Officers where appropriate Undertake imported food sampling where intelligence suggests necessary	Contribute to local and national sampling intelligence, which will support improved both hygiene and food standards levels in Slough and nation wide. Safer food locally and nation wide.	Julie Snelling All officers to support	March 2020 Quarterly review Number of samples taken

Infectious Disease Notifications & Control, and Public Health	3. Slough will be an attractive place where people choose to live, work and stay Statutory Requirement	Investigation of Infectious Notifications including suspected food poisoning outbreaks in line with Public Health England (PHE) protocols Support Public Health Initiatives	100% of notified infectious disease cases investigated in line with PHE Protocols. Appropriate action taken where food handlers, or high risk groups are involved, including exclusion from work until clear of infection. Where source can be identified, take appropriate action to prevent reoccurrence, including enforcement. Link in with the Public Health team to support initiates where possible, including obesity.	Reduced incidents of infectious disease. Increased intelligence on sources of infectious disease, locally and nation wide	Food Safety Team Leader All Officers to support	March 2020 Quarterly reviews
Food Standards Inspections and work.	3. Slough will be an attractive place where people choose to live, work and visit 5. Slough will attract, retain and grow businesses and investment to provide jobs and opportunities for our residents	100% of due food standard inspections. Carry out Intel led - Sampling on Takeaway meals for:traceability, colours, GM oil, meat & fish speciation, and allergens at catering premises. Project to establish which food operators are gathering the appropriate documentation to verify the authenticity of their	Allocation of interventions based on risk priority. Make full use of Alternative Enforcement Strategies (AES) to applicable businesses in line with FSA CoP, including newsletter, SAQ's, targeted advice sessions and other relevant advice. Inspections based on risk; - 100% inspection of A, B, C and all other non complaint food businesses - Identified poor performing businesses targeted with appropriate interventions and re-rating the risk To tackle Food Fraud Secure improvements where there are evident concerns, taking enforcement action where compliance is poor; in line with the council's business growth agenda, providing	Safer food businesses in Slough & increase in % of broadly compliant premises Increased awareness among traders of their legal responsibilities in respect of Food Standards. Working alongside our colleagues in Food Safety the aim will be to provide consumers with greater information on food standards and local business hygiene	Trading Standards Manager/ Food Standards Lead Officer Food Safety Team Leader All TS Food Officers FS/NET/ Licensing acting as 'eyes and ears'	Ongoing until March 2020 Monthly and Quarterly review

	Statutory	food products.	'incubation periods' where suitable.	standards in order that		
	Requirement			they can make informed	Support	
		Calculate amount of	Provide free regulatory advice for new businesses starting	choices on where to eat	material	
		traders brought into	up.	and purchase food.	from the FSA	
		compliance.				
		Participation in	Alternative interventions to low risk premises, including			
		national/regional	newsletter, SAQ's, targeted advice sessions and other			
		sampling	relevant advice.	Working in partnership		
		programmes as		on local, regional and		
		directed by TSSE or	Publicise enforcement action taken against non compliant	national basis.		
		the Public Analyst.	premises as a deterrent to other businesses and incentivise			
		Including Internet	improvements.	Better understanding of		
		sellers within the		compliance levels in take		
		Borough.	Enhance advice for businesses on SBC web site	away sector in relation		
				to food standards.		
		To work	Involvement in targeted sampling projects for compliance			
\downarrow		collaboratively with	with a wide range of food legislation (e.g. compositional			
മ്		TSSE to undertake	standards, compliant labelling, health nutritional			
Page 33		the Food Standards	information, additives, allergens, colourings, GM Oil and			
ယ္		that have been	traceability etc.), with further follow up enforcement as			
		identified as a	required.			
		regional national				
		problem	Undertake sampling as part of a suite of interventions to			
			improve food standards and food hygiene focus on high			
		Ensure all new food	risk and local needs and intel lead information.			
		business registrations				
		are risk assessed &	Participating in National and Regional sampling			
		inspected in line with	programmes to investigate emerging food concerns, and to			
		risk and FSA CoP	ensure food is safe			
		Offer business	Offer chargeable business support options as detailed			
		support options as	above.			
		detailed above.				
			Publicise enforcement action taken against non compliant			
			premises as a deterrent to other businesses and incentivise			

			improvements			
			improvements.			
			Enhance advice and signposting for businesses on SBC web site.			
			Focused interventions and sector specific projects on high risk premises or where local intelligence suggests necessary			
			Added Value: - Assessing compliance with all consumer protection legislation - Identify matters which may be relevant to other services			
Becoming an enabling authority — providing self — help and links to coguidance and support	3. Slough will be an attractive place where people choose to live, work and stay	Increasing the number of users accessing the council website for information and self help	Publicise and direct users to councils website and dedicated email on all correspondence to businesses. Review and update information on council website on an annual basis, and when new information becomes available, ensuring its user friendly and information easily accessible.	Reduced demand on service from enquires which can be resolved via self help Improved consumer access and awareness of	Food & safety Manager All officers to support	March 2020 Quarterly review of information on website
Promotion of Food Hygiene issues and involvement in	5. Slough will attract, retain	Increase enquires to the team via foodandsafety@slou	Work with the Town centre manager to support local shops	food hygiene and standards		Number of website hits
joint projects with	and grow businesses and	gh.gov.uk	Undertake monthly tweets of businesses with 0 & 5 FHRS.	Quicker response times to enquires made to the		Feedback from website users
other partners Community	investment to provide	Provide free signposting to	Participate in the FSA national food safety week campaign.	service via foodandsafety@slough.g		website users
engagement	opportunities for our residents	comprehensive self help support and guidance to new	Publicise enforcement action taken against non compliant premises as a deterrent to other businesses and incentivise improvements.	<u>ov.uk</u>		
		business start ups and existing SME's in Slough.	Issue releases where necessary, such as product recalls, local enforcement against poor performing premises, local			

Page 35		Increase awareness of food hygiene issues via local press and the Council's website Promote channel shift via all communications with stakeholders, to the trading standards dedicated council website, whilst being sensitive to the needs of 'at risk' persons and isolated stakeholders. All press releases and forms to direct readers to website. Aim is to reduce avoidable contact whilst promoting existing digital options.	food hygiene award winners. Other initiatives undertaken, including sector specific initiatives, joint projects and visits with licensing and TS Explore social media to profile work of the service and to reach food businesses, such as Facebook & use Whatsapp to ease burden on businesses when sharing information Explore opportunities to engage with the community, such as campaigns at focused groups, schools, and libraries; Monitor website hits and advice requests received, for decide in requests, and increase in website hits. Added Value: - Improve awareness and compliance of food safety and standards issues - Supports Income generation			
Safeguarding & intelligence sharing	 Slough Children will grow up to be happy, healthy and successful Slough will be 	All officers to use their professional curiosity when making face to face contact with service users, and refer concerns in a timely	Use the 'Concern Card', and assess effectiveness of this avenue to rapid reporting All staff to undertaken SBC online training for safeguarding adults and children on a annual basis Safeguarding to be on the agenda and discussed at team	Improve the safety of children and vulnerable people in Slough. Improved life's of people in Slough	Food & Safety Manager All officers to support	March 2020 Monthly review and feedback to Head of Service in CP&BC monthly

	an attractive	manner, 100% of the	meetings, 121's, and appraisals.			meetings
	place where	time.				
	people choose to live, work and stay	Ensure all staff are trained in safeguarding and following the SBC safeguarding principles. Continue to share	All officers to be vigilant and aware of safeguarding issues when making any face to face service user contact, and follow the corporate safeguarding principles if any concerns are raised. Holistic approach to all operations which involve potential victims with safeguarding issues.			
		intel and concerns with other partners such as TVH, HMRC, Immigration & RBFRS				
EU Exit	3. Slough will be an	Ensure all	To maintain presence on her majesty's government Local	Ensures a holistic	Consumer	Ongoing
Preparedness	attractive place to live, work and stay	contingency has been put in place to ensure all trading	Authorities Border Delivery Steering group to prepare for EU Exit.	approach to EU Exit issues and bring with it resilience and capacity	Protection Group Manager	
		standards staff can perform their duties effectively on Day 1	Maintain active participation of all council contingency plans in relation to Brexit preparedness.	and expertise to deal with scenarios which involve Trading	Trading Standards	
		leave.	To ensure trading standards relevant news in relation to residents and business is profiled through council	Standards and our liaison with business and	Manager/Fo od Safety	
		Ensure all authorisations and	communications.	consumers alike.	Manager	
		delegations are in place to entitle	Ensure we liaise with all necessary partner agencies and regulators to ensure we can support and help business and	A positive effect on business function and		
		trading standards staff to ensure they	residents in lead up to, and in the aftermath of EU exit.	competitiveness, especially for SME's in		
		are authorised, in	Be mindful of opportunities EU Exit will bring in terms of	the lead up to EU Exit		
		accordance with the	profile for the council and the trading standards service and	where many may be		
		councils, constitution	be an exemplar of change and support by maintaining a	confused with the		
		to carry out all	high profile locally, regionally and nationally.	wealth and mosaic of		

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	legislative duties.		information available. Use available resources to communicate any trading standards messages effectively and to target audience.		
Looking Ahead	Horizon scanning; providing a forward thinking service and fulfilling statutory obligations	Keep abreast of developments from the Food Standards Agency on the future of the Delivery of Official Food Controls and align our service provision accordingly. Identification and registration (where appropriate) of primary producers of food (as identified in FSA National Enforcement Priorities). Continue to participate in the Food Standards Agency's Regulation Our Future work. Keep abreast of the future of the Delivery of Official Controls in light if the ROF and Brexit agendas and align our services accordingly. Implement new Acrylamide Regulations, following national guidance. Provide information to businesses via council website. Building links with other teams within the Council to ensure that changes in business ownership and nature and identified and acted upon in a timely fashion.		Food & Safety Manager, Food team Leader and Enforcement Team Leader	Ongoing

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Service Delivery Plan 2019/20



Health, Safety and Wellbeing in Slough



The Food and Safety Team, sit's within Regulatory Services, which is an outward facing service group made up of:

- Food & Safety
- Primary Authority
- Trading Standards
- Licensing
- Community Safety
- CCTV & Careline
- Registration Services
- Cemetery and Crematory

Our aim is to deliver a wide range of effective and responsive public protection services for our residents, businesses and visitors.

Health & Safety Service

Slough Borough Council is responsible for health and safety regulation under the Health and Safety at Work etc. Act 1974, and associated regulations. We provide advice and enforce health & safety within approximately 1,600 commercial premises in the borough, including warehouses, residential care homes, leisure centres, shops, pubs and restaurants. Health and safety enforcement is divided between the Health & Safety Executive (HSE) & LA depending on the main activity in the workplace. We play a major role in protecting the health, safety and welfare of employees and members of the public in Slough.

Our approach to health and safety regulation is largely reactive and follows formal guidance issued by the HSE, namely the National Local Authority Enforcement Code. The aim of this code is to ensure a consistent and sensible approach to health and safety regulation. Since its introduction in 2013 the direction of health and safety enforcement nationally has changed considerably. The Code targets resources on risks and aims to reduce the regulatory burden on compliant businesses. As a result our intervention strategy is targeted at local and national priorities, where evidence suggests risks are not being controlled. Proactive inspections are reserved only for premises that do not manage their own risks or premises on the HSE's list of high risk sectors. This means few proactive inspections are undertaken, which releases capacity for more effective outcome-focused interventions and thorough reactive work. Where we do undertake H&S interventions they are project based, and focus on sectors which are high risk, where we have little information about levels of compliance or where local intelligence suggests an intervention may be necessary.

Greater emphasis is placed on dealing with complaints, accidents and incidents, targeting those businesses which are poor performers and failing to meet their duties under health and safety legislation.

In line with our enforcement policy we provide a graduated enforcement approach based on risk to public health. We show our commitment to carrying out our work in an open, transparent and fair manner, protecting employees and the wider public from risk whilst supporting business and economic growth. We recognise that most businesses want to comply with the law, therefore we will support those businesses in meeting their legal duties and be safe.

We have adopted a 'sensible risk management approach' in line with the Enforcement Code. This also links to the council's Primary Authority Scheme, where our work on improving safety standards extends to the national scale. Further information on Primary Authority is provided below.



The Health & Safety Service is delivered via the Food & Safety Team. A relatively small amount of officer time is dedicated to health and safety work, due to the direction of the Enforcement Code. However, allocation of officer time is fluid and reactive to service need, so officers will spend a significant amount of time investigating serious workplace accidents when necessary. However, this does have a knock on effect on other work which may have to be re-prioritised.

We also support and work with businesses by providing advice when issues are noted during other interventions, such as food visits. This helps businesses to comply with requirements and good practice.

We work in partnership with the Licensing Team, police, immigration enforcement and other partners to help promote awareness of child sexual exploitation and safeguard workers and others who may be exploited.

The purpose of this plan is to let you know how we are going to achieve the various measures that we will be taking in conjunction with our partners and other agencies, to enhance public health, safety and wellbeing.

We will do this by:

- signposting businesses and residents to information and free advice
- visiting businesses on the basis of risk, so reducing the burden on compliant businesses whilst targeting those that seek to gain an advantage from noncompliance
- investigating complaints and listening and responding to concerns
- investigating accidents, giving priority to those involving major injury or death in the workplace
- developing safety and health promotion initiatives
- consulting our customers on the quality of our service
- working in partnership with others to improve our outcomes for Slough. For example - The Health & Safety Executive, Thames Valley H&S Group, UK Border Agency, Thames Valley Police, the Royal Berkshire Fire and Rescue Service and other council teams.

We are committed to helping change the health and safety culture in Britain and retain common sense in the approach we take to ensuring the protection of employees and the public.

Helping Great Britain Work Well

This plan is reviewed annually and we welcome your views, comments and suggestions on how it can be improved.

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To find out more about our service and initiatives visit our website at: http://www.slough.gov.uk/business/health-and-safety/



Our vision

The focus of work within the Health & Safety Service is to ensure that the council is able to fulfil its statutory obligations under the relevant legislation and that this is geared towards Slough's specific community and business needs, based on local intelligence and our work with partners.

We care deeply about the work we do for our town and its residents, visitors and businesses; all the people we are **accountable** to. We are **ambitious** in our plans for the borough, **innovative** in our thinking and actions; all the time listening and **responsive** to those who need us, **empowering** and supporting everyone to reach their goals.

We are one team. We are Slough Borough Council

The council's Five Year Plan and the Joint Wellbeing Strategy set out a vision for Slough, for the people, the place, the prosperity and the town, and the things that need to be done to make this a reality. Businesses and other partners within Slough are already working together to improve life in the borough.

One of our key aims is to protect and enhance public health and wellbeing whilst supporting local businesses. The action plan at the rear of this service delivery plan shows how we are going to achieve this. It demonstrates how we directly link with the Five Year Plan to achieve the council's wider outcomes. The action plan should be read in conjunction with our Enforcement Policy.

The Enforcement Policy reaffirms our commitment to carry out our duties in an open, fair and consistent manner with a graduated approach to enforcement, based on risk. Assessment of risk and the likelihood of reoccurrence are major factors in our enforcement decisions. We recognise that most people want to comply with the law; therefore, we want to support and enable them to meet their legal obligations without unnecessary expense. Firm action, however will be taken, including

prosecution, where appropriate. The service plan sets out the actions we are taking to enhance and improve health, safety and wellbeing in Slough.

Our plan for 2019/20 and looking ahead

The Health & Safety action plan for 2019/20, which outlines our planned work for the year is detailed in appendix A. As with previous years, we plan to undertake our statutory obligations by investigating accidents, complaints, and undertaking proactive interventions based on risk. This year, we also aim to undertake several projects based on the HSE list of sectors and activities suitable for an intervention, which forms part of the Enforcement Code.

We are planning focused projects in:

- under reporting of incidents and accidents generally
- reporting under RIDDOR in higher risk sporting activities
- Gas safety in catering premises
- Welfare conditions in Nail bars
- Preventing access to large commercial waste bins
- Asbestos management in catering and hospitality premises built before 2000

Such projects will also allow is to update our knowledge/database of premises in Slough.

Some of these priorities will be looked at during whilst undertaking food hygiene visits. This is to reduce the burden on businesses by undertaking separate visits, whilst linking in with the HSE's priorities.

It's important to note that this year we <u>aim</u> to undertake more proactive interventions than we have in previous years. This is due raised local intel that risks are not managed, and due to a change in the HSE's list of sectors and activities suitable for an intervention, more of which are applicable to premises in Slough.

Our health and safety plan is ambitious and aspirational. Its important to note the comments made in the resourcing section below, in particular, the level of resource needed to meet the plans objections and that available are not equal. Ultimately we do not have the resources available to complete all aspirations within the plan. This is also mirrored in the Food Safety and Standards Service Plan. It is likely that some of the planned work will be re-prioritised throughout the year, particularly if unforeseen demands on the service arise such as serious workplace accident investigations.

Our service plan will be reviewed on an annual basis and provides the opportunity to record our achievements and identify those key issues that still need to be addressed.

How did we perform during 2018/19?

The Health and Safety Service can be divided into key activities and projects, listed below.

- Primary Authority Scheme and our Commercial Offer
- Accident investigations.
- Complaints about Health & Safety in Slough
- Health and safety interventions and projects
- Enforcement Actions
- Striving for Excellent and resourcing

Primary Authority Scheme and our Commercial Offer



Primary Authority (PA) Partnerships comprises a legally binding contract between the Authority and a business to provide ongoing specialist advice on specific areas of regulation applicable to that business, such as fair trading, product labelling, product safety, food safety and health & safety.

Our Officers are able to provide companies which trade across council boundaries robust and reliable advice, through the creation of these legally recognised partnerships. The scheme also provides a safety net to ensure that local authorities are consistent in the way they regulate businesses.

Since Slough Borough Council introduced Primary Authority partnerships in April 2011 we have already secured more than 40 successful PA partnership agreements. These services are uniquely provided by in house by specialist officers.

Cost recovery is an essential element of the contracts and is applied to Primary Authority partnerships with an hourly charge for any work undertaken; in 2018/19 our income was £89,000 (jointly with the trading standards team). This cost recovery enables the Council to support businesses in Slough and increase the availability of specialist officers who are funded from PA at no extra cost to the Council. Last year the food & safety team had over 487 hours of advice interactions with our PA companies; a high proportion of this was advice and support requests from our partners.

As a Primary Authority we have had communication with many other Council's to ensure that inspection and enforcement action reflects the advice we have already given, and is proportionate. We continue to work with the businesses to produce national inspection plans, and give guidelines to other councils to avoid unnecessary checks and tests.

The number of businesses joining and leaving Primary Authority Partnerships with the Council remains changeable; however the demand on PA has remained relatively constant over the past year. As a service we currently maintain 40 partnerships.

In July we formally launched our Business Advice and Support Partnership (BAASP). BAASP is a partnership agreement with Kent County Council, Hampshire County Council and East Sussex County Council to increase our capacity to provide and share specialist knowledge and Primary Authority advice in the following areas:

- Trading Standards
- Food & Safety
- Health & Safety
- Fire Safety
- Licensing



Although the partnership is in its infancy, we have been trialling it for some time. This partnership has been recognised by the OPS&S as a strategic Primary Authority provider.

More information on Primary Authority Partnerships can be found on the website https://primary-authority.beis.gov.uk/about. Businesses that would like to join the scheme can email primary.authority@slough.gov.uk

Our Commercial offer

In line with last year's service plan we have been looking at ways of supporting businesses at no cost to Council. We introduced a new range of Business Support packages which have been advertised and made available to local food businesses. Businesses are offered bespoke advice packages either on start-up or before a planned intervention. These are charges at cost price and enable businesses to get additional advice on what they specifically need to do to improve their compliance with legal requirements. Last year we supported 24 local businesses which made an income of £5,115.

Accident investigations

The team received 41 accident notifications, a 31% decrease from the previous year, which was a 25% decrease on the year before. The reduction of accident notifications year on year is a concern, as there is no specific reason to explain this decrease. Therefore this year we plan to undertake an initiative to raise the awareness of accident reporting. It is likely that many accidents are not reported at all by employers, which allows dangerous practices and unsafe working conditions to continue. The majority of notifications are from large multi site employers who are known to have systems in place to promote the health and safety of employees. There have been almost no notifications from medium and small businesses.

Of the 41 accidents reported 26 employees needed to stay off normal work duties for more than 7 days, 3 employees sustained a specified major injury and 12 members of the public needed to go to hospital.

On receipt of each notification we make a decision as to whether the accident warrants an investigation based on current HSE accident investigation guidance. The nature of the accidents reported last year varied, although figures regarding the type of injuries remain the same, with slips, trips and falls continuing to account for the highest proportion of accidents notified (46%) followed by being struck by a moving object/machinery or vehicle (22%). This is in line with national statistics. The results of accidents were relatively minor with 9 fractures, 10 cuts/abrasions and 8 bruising.





Complaints about Health and Safety in Slough

Employees and members of the public made 38 complaints and enquiries about health and safety last year. This is a roughly the same as last year, and still remains low in comparison to other complaints and enquiries we receive. It is unclear why this is and we are exploring other ways in which people can contact us easily. The types of queries received are wide ranging, including complaints about unsafe workplaces, asbestos, legionella, poor welfare conditions, unsafe use of a bandsaw, dangerous fork lift truck driving, and concerns about the safety of lifting equipment.

Health and safety interventions & projects

In accordance with the HSE National Code, we target our resources on outcome focused interventions and reactive work, rather than proactive inspections. Proactive inspections are a good tool used in the right circumstances; however, they are the most resource intensive for both the council and the business, and therefore not always appropriate for low risk businesses.

As a result we undertook 14 health and safety visits to premises in Slough, a reduction of 40% on last year. Of which 13 were reactive following complaints or accident

notification and the other was an inspection due to poor standards. We also undertook 12 revisits to ensure standards had improved.

In addition, we undertook 3 focused initiatives in line with HSE priorities on:

- Raising awareness to prevent members of the public accessing large commercial bins, resulting from recent cases where people have gained access to bins for shelter and then been injured or killed when the bins are crushed. We sent a leaflet to 644 food business in January 2019. We plan to repeat this message again next winter and during routine food hygiene inspections.
- Raising awareness of violence at work, and controls to reduce risks to employees. A letter with information and advice was sent to 36 premises selected as higher risk sectors.
- Raising awareness of warehouse safety, including manual handling and working at height. A targeted letter with information and advice was sent to 84 premises.

Gas Safety in Catering

Business operators have a legal obligation to ensure that gas appliances that are used in connection with food business are maintained in a safe condition. Historically, in Slough there have been areas of non compliance within food businesses.

The food and safety team routinely assess compliance with gas safety requirements and assess levels of awareness at local catering businesses, when undertaking routine food hygiene visits. Advice is provided on matters that require attention and timescales are agreed for meeting legal requirements. Where necessary follow up work is undertaken to ensure the improvement of standards where premises are found to be non compliant. Last year the team secured improvements at 6 premises, including, interlocking of ventilation system to the gas supply were secured at 3 premises, a new gas equipment was provided at one premises following the service of an Improvement Notice served.

Cooling tower registration

Registration of wet cooling towers and evaporative condensers, with the local authority, is a legal requirement.

We have registered 14 premises with a total of 113 cooling towers or evaporative condensers.



However, there has been an increase in the number of non-notifiable devices being installed which are more efficient and less costly to operate and maintain. This shift is due to the nature of new large I.T data centres setting up on the trading estate which rely on efficient air treatment plant to cool their data servers, to ensure continuity of service during periods of hot weather.

An important part of the monitoring of cooling tower safety is the assessment of controls to prevent multiplication and possible infection with Legionella, together with scrutiny of the businesses' own sampling procedures and results.

In February 2018, we audited each of the 5 local authority enforced premises where 95 notifiable devices are installed. At each LA enforced premises: water test results; cleaning and disinfection procedures and controls were satisfactory. Competent individuals are in place, or available, to implement and oversee safe water management controls. We continually review the register of devices and liaise with both Public Health England (PHE) and HSE concerning case investigations or allegations of unsafe practice.

In January 2019, PHE notified our team of a cluster, where 4 Legionella cases were recorded. Working with HSE and PHE our Officers carried out a thorough investigation, including water sampling at both domestic and commercial premises. We are pleased to confirm that no positive legionella results were detected. We found no evidence that the cooling towers in Slough were associated with the 4 cases notified.

Private water supplies

We have two private water supplies located in Slough that we monitor for compliance with the relevant legislation. In June 2018 the Horlicks site was closed and the monitoring of this this private water supply ceased. The results of the monitoring for the private water supplies are submitted to the Drinking Water Inspectorate on an annual basis in January for the preceding year. The return for 2018 was completed and submitted on time.

Working with partners & SAG (Safety Advisory Group)

We recognise that working with partners can increase our capacity to deliver health and safety solutions for businesses in Slough.

We are members of the Slough Borough Council SAG. SAG's role is to advise the council on the suitability of applications to hold events, safely, in the borough's parks, open spaces and premises and on the borough's roads. Our role is to consider health and safety issues in planning, organising, setting up and holding events and to recommend approval or rejection of applications. We also advise SAG and applicants on the law and technical standards in relation to health and safety at events. Last year

we gave advice on Vaisakhi, a football tournament, football matches at a local stadium, Langley Carnival, Slough Festival, the national Playday, The Canal festival, the annual bonfire, the Christmas lights turn on and half marathon. Advice given also relates to food safety.

We also attend the Thames Valley Health and Safety Group. The Mayor of Slough is the group's Honorary President. The group was originally set up jointly by Slough Borough Council and the business health and safety community. The group is part of Safety Groups UK, is affiliated to ROSPA and provides a forum and a focus for safety professionals in the Thames Valley. Many major businesses in Slough are active members of the group as are those that are in the smaller and medium categories. The group meets monthly at different company venues in the Thames Valley region. We aim to attend meeting on a regular basis, however due to resource implications, this is not always achieved.

Enforcement action

We have a range of measures to protect residents of Slough, people who work here as well as visitors and to promote sensible risk management. We actively work with businesses and other stakeholders to achieve our shared goals.



Any enforcement action by us will be graduated, proportionate and in accordance with the council's enforcement policy.

The team take relatively low enforcement actions, which is reflective to the small amount of health and safety work undertaken by the team, in comparison to food safety work. As a result in 2018/19 we served 6 Improvement Notices (compared to 3 last year) and 4 prohibition notices (compared to 1 last year). We have

6 warranted health and safety officers who are able to take enforcement action.

Finding these dangerous situations reinforces the necessity for safeguards to be in place to prevent dangerous occurrences and reduce risk of injury. They also reinforce the importance of verification checks by both employers and enforcing authorities. By maintaining a competent trained inspectorate Slough Borough Council fulfils its obligations under the Health and Safety at Work, etc., Act 1974

Prosecutions

We have not taken any prosecutions, or have any pending cases at present.

The time and resource taken to investigate serious cases often outweighs the fines and penalties awarded,



however such enforcement action is necessary to morally seek justice against those who put others at risk, and ensures duty holders and managers who fail to meet their responsibilities are held accountable for their actions. It also acts as a strong deterrent to other businesses, demonstrating that Slough Borough Council will not tolerate poor performing businesses who take an unfair advantage and put peoples lives at risk.

Striving for Excellence and Resourcing

Providing excellent customer services is one of our key priorities. In order to achieve this we will always:

- Service Guarantee
- be polite, friendly and offer a helpful service
- take the time to listen and explain things
- provide accurate information and advice, in a clear and straightforward way
- deal with enquiries immediately, but if this is not possible, tell you who we have passed your enquiry to and their contact details
- keep you informed of progress and the outcome of our investigations
- treat you fairly and with respect

Customer Pledge

We aim to provide every customer with a quality service and will seek feedback from you to help further improve the quality of the services we provide. A manager will contact you personally if you are unhappy with the service received.

In addition, we have the following standards against which we will monitor the responsiveness of our service, namely:

Service standard	Target / response times
Respond to customer complaints and	Within 5 working days
enquiries	
Provide a full response	Within 10 working days

Customer Feedback and Quality Assurance

We use feedback questionnaires following each intervention. Last year the amount of feedback we received was low, as with previous years. This is a combination of officers failing to hand out the feedback questionnaire, and a poor response from the business. However of what we did receive, 100% agreed or strongly agreed that their business was treated fairly, that they understood the information given to them and that they found it useful.

Only 1 complaint was received regarding the service, which followed the closure of a food business. This complaint was investigated and the outcome was that officers

conduction their work in a professional and correct manner. The team is committed to working with local businesses and the local community ensure high levels of satisfaction. We aim to enhance the quality of life of residents within the borough, and will work on improving our feedback going forward. All feedback received is used to inform and improve our service.

We undertake monthly quality assurance (QA) on the whole range of our service delivery. Our QA procedures assess the work of our officers to ensure that it meets the high standard expected by the service.

We regularly attend the Berkshire and Oxfordshire Food and Health & Safety Liaison Group with the aim of sharing good practice.

Resourcing & Staff development

The food and safety team comprise of 6 FTE officers (full time equivalent). This includes the Food and Safety Manager and a Business Support Officer. However of this, only 0.75 FTE is allocated to health and safety work. This is because the team focus most of their time on food safety work as this has greater statutory demand and obligations. The cost of the service during 2019/20 to meet statutory obligations and aspirations in the action will be approximately £30,000.

To complete all of the obligations within this plan is ambitious. Ultimately priority will be based on risk, and work will be re-prioritised as needs change. It is likely that projects and other non statutory work will not be undertaken, or projects will be downsized and exclude advisory visits. We also aim to make efficiencies and create income to offset this shortfall.

Quarterly monitoring of team performance will be undertaken, and any significant shortfalls or non compliance will be raised with Head of Service and members, along with the associated risks. Where necessary a request for additional resources will be submitted.

On going personal development of the work force is paramount to ensure a comprehensive service is provided to the customer, whilst ensuring continuous improvement and providing value for money. The HSE requires that the council maintains the competency of its officers and that we have officers with sufficient skills to maintain the breadth of competency needed for Slough specifically.

Variation from service plan

Departures from this service will be exceptional, capable of justification and be fully considered by the Group Manager for Consumer Protection, Andrew Clooney, before varying action is taken. Reasons for any departure will be fully documented. **The action plan for 2019/20, which outlines planned work for the year in Appendix B.**

Appendix A - Health & Safety Action Plan 2019/20

Directorate: Adults and Communities	Service Manager: Levine Whitham, Food & Safety Manager
Division: Regulatory Services	Budget: £30,000
Team: Food and Safety Team	Number of staff employed: 1 FTE (0.75 FTE, plus 0.25 Business Support Officer)

Service objectives:

We have strong links to the council's Five Year Plan, which is indicated against each service activity below. The work of the Food & Safety Team is essential in securing safe foundations from which the council can deliver its plan. Without the basics, such as safe places to work and visit, it would be impossible to build a safe, healthy and vibrant Slough. We are the prerequisite for a fit and resilient borough.

The timely delivery of this work plan, which focuses on sensible health and safety regulation, based on risk. Implementation of evidence based initiatives focused upon national and local priorities; joint working with partners both within and beyond the council to improving the quality of life for Slough residents, visitors and those that work in Slough.

Service activity	Priority & 5 YP outcome & statutory requirement	Targets	Key actions	Anticipated outcomes	Responsible officer	Timescale and measures
Primary Authority (PA) & Compliance Support Page 54	3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents Income generation	Maintain income targets Develop existing PA's and explore new PA opportunities, creating income in line with projected target. Support the Business Advice and Support Partnership (BAASP) and its strategic objectives.	Designated officers to work closely with PA businesses to: Develop partnerships with PA clients Provide specific advice in relation to management systems & procedures and controls adopted by the company nationally Issue 'formal PA advice' where procedures and controls are deemed suitable and compliant Handle referrals from other local authorities and central government bodies on behalf of that business Develop and publicise Inspection Plans Issue of advice and guidance to other Enforcement Authorities on the companies activities Maintain an accurate record of any advice and guidance Hold meetings with partner businesses on a regular	Improved standards, efficiencies and compliance within PA's, with less enforcement action taken by Enforcement Authorities (EA). Reduced, efficient and effective regulation by other EA nation wide, via the provision of PA support which has a national impact. Reduced regulatory burden on PA businesses.	Food & Safety Manager Trading Standards Manager All Food Safety & Trading Standards Officers	March 2020 Monthly Reports on hours and income generation Quarterly Reviews Yearly overview of individual company Action Plans Number of PA's in Portfolio Virtual PA management
			timetable of mutual agreement, along with annual action plans where mutually agreeable.			team

			Respond to request within in line with Customer Charter and Pledge, or as agreed with the PA.			
Risk based interventions within business in Slough	3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents Statutory requirement Effective use of resources	Undertake targeted risk based interventions to businesses in line with HSE LAC 67/2 rev 7 – Guidance to Local Authorities on Targeting Interventions Compliance with National Code for Local Authority Enforcement.	Undertake proactive interventions to premises where local intelligence suggests controls are not being managed or where an investigation is warranted following complaint or report of accident Assess the need for interventions and projects based on: - HSE high risk list of activities suitable for inspections - HSE national priority list and sector strategies - Local priorities and needs of slough - Berkshire wide priorities - Businesses that have poor food safety management standards, as H&S standards are likely to be similar Possible projects/raising awareness in the following areas: - Under reporting of incidents and accidents generally, with specific focus on reporting	Safer businesses in Slough Reduced accident rates Improved safety and wellbeing for people who work within and visit Slough Greater health and safety awareness amongst slough employers and employees	All officers	March 2019, Monthly monitoring
			 under RIDDOR in higher risk sporting activities Welfare conditions in Nail bars, using professional curiosity to link into to modern 			

Page 56			slavery - Asbestos management in catering and hospitality premises built before 2000 - Gas safety in catering premises, with focus on maintenance of systems, combining this with routine food hygiene inspections to ensure efficient spend of resources - Preventing access to large commercial waste bins/recycling bins – prevent accidental crushing to those taking shelter Officers to be vigilant when visiting businesses for other reasons in order to identify and deal with Matters of Evident Concern (MEC) or Matters of Potential Major Concern (MPMC) Monitor MEC & MPMC to identify trends and local issues			
Investigations and prosecutions	 3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide 	Undertake investigations into work related accidents, MEC, MPMC, or concerns raised about a business, to determine if serious and public safety at risk	Support and advice given to businesses appropriate to the risk presented, in order to allow businesses to manage their own risks safely Officers to used HSE Enforcement Management Model (EMM) and work in line with department enforcement policy when considering enforcement action Where enforcement is deemed appropriate, adhere to timescales for prosecutions file submission	Safer businesses in Slough Reduced accident rates Improved safety and wellbeing for people who work within and visit Slough	All officers	March 2020

	opportunities for our residents Statutory requirement Effective use of resources	Where necessary take action to secure sensible heath and safety regulation, proportionate to risk	Full range of enforcement options used, as appropriate in line with the enforcement policy Explore alternative enforcement opportunities on a case by case basis	Justice taken against those business who fail to meet their health safety obligations and put peoples health at risk		
Reactive investigations in response to intelligence or coreported incidents	3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents Statutory requirement	Assess and respond to accident notifications, complaints and service requests relating to workplace health and safety, wellbeing, including referrals via the HSE	Respond to all notifications in line with customer charter and pledge including timescales Determine if investigation is appropriate using the HSE incident selection criteria, and recording decision Promptly close service requests which are not serious or present health risks, managing customer expectation from the beginning. Where appropriate signpost customers to self help resources. Work in line with enforcement policy, prosecution template and internal procedures.	Safer businesses in Slough Reduced accident rates Improved safety and wellbeing for people who work within and visit Slough	All officers	March 2020 Quarterly monitoring
Legionella controls and registration of cooling towers	Statutory requirement	Maintain cooling tower register and ensure legionella controls are in place	Maintain and update registration of all cooling towers in Slough and monitor risk of legionella infection in conjunction with HSE Assess cooling tower controls and risk assessments for	Ensure the risk of legionella infection from cooling towers in Slough is controlled	Thomas Kilduff	March 2020

			all new cooling towers.			
			Assessment undertaken by desk top review. Biannually assessment of control of existing cooling towers by sending out self assessment tools, and review of response (due 2019/20)			
			Where necessary inspect cooling towers, specifically where change in management, change of process, alteration, replacement or water treatment or where controls deem unsatisfactory			
Becoming an	3. Slough will be	Increasing the	Publicise and direct users to council's website and	Reduced demand on	Food &	March 2020
enabling	an attractive place	number of users	dedicated email on all correspondence to businesses	service from enquires	Safety	
pauthority –	where people	accessing the		which can be resolved	Manager	Quarterly
providing self	choose to live,	council website for	Review and update information on council website on	via self help		review of
help and links	work and stay	information and	an annual basis, and when new information becomes		All officers to	information
to guidance		self help	available, ensuring its user friendly and information	Improved consumer	support	on website
and support	5. Slough will		easily accessible. Council website to have clear links	access and awareness		
	attract, retain and	Increase enquires	to HSE website	of heath and safety.		Number of
Promotion of	grow businesses	to the team via				website hits
health and	and investment to	foodandsafety@slo	Provide business start up support and signposting to	Quicker response		
safety issues	provide	ugh.gov.uk	free guidance and information	times to enquires		
and	opportunities for			made to the service		
involvement in	our residents	Provide free	Publicise enforcement action taken against non	via		
joint projects		signposting to	compliant premises as a deterrent to other businesses	foodandsafety@sloug		
with other	Statutory	comprehensive self	and incentivise improvements	<u>h.gov.uk</u>		
partners	requirement	help support and				
		guidance to new	Issue press releases where necessary, such as			
Community	Effective use of our	business start ups	supporting national campaigns or local enforcement			

Smoke free enforcement and advice	3. Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents Statutory	and existing SME's in Slough Increase awareness of health and safety issues via local press and the council's website Ensure all premises offering smoking facilities, including Shisha's are complaint with smoke free requirements	against poor performing premises Other initiatives undertaken, including sector specific initiatives, joint projects and visits with other council departments where possible. Support key messages from public health which impact on health & wellbeing of employees Provide start up advice to new shisha's or premises offering smoking facilities on smoke free compliance Assess premises offering smoking facilities to ensure compliant with smoke free requirements, give advice and take necessary enforcement where appropriate in line with council's enforcement policy and wider growth agenda Link with other stakeholders, such as public health planning, BRFRS, NET, police and licensing at soonest opportunity to ensure joint up simple enforcement Undertake surveillance to facilities allowing smoking to ensure compliance	Reduce risk to health to employees of shisha's and premises offering a smoking facility, from second hand smoke	All officers	March 2020 Quarterly review
Asbestos – Duty to Manage	3. Slough will be an attractive place where people	Assessment of all ASB5 notifications, and notifications of	Assess all ASB5 notifications, and notifications of notifiable non licences work to determine if controls suitable, and where necessary visit site to ensure	Reduced risk of health from exposure to asbestos fibres	Sandeep Johal	March 2020
	choose to live,	notifiable non	controls in place to minimise risk from exposure to		All officers	

	work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents Statutory requirement	licences work via HSE website Respond to enquires regarding asbestos	asbestos fibres Give accuracy advice on control of asbestos, including duty to manage Signpost to HSE website for information and guidance	Increased awareness of asbestos		
Private water supplies and private water distribution systems	3. Slough will be an attractive place where people choose to live, work and visit 5. Slough will attract, retain and grow businesses and investment to provide jobs and opportunities for our residents Statutory requirement	Complete risk assessments for private water suppliers and implement action plans to ensure safe water supplies Review PWS sampling programmes in line with statutory guidance Complete annual DWI return	Complete risk assessments and implement action plans for private water suppliers Assessment of private water supplies information and collation for return to the Drinking Water Inspectorate Confirm locations of private distribution systems, verify, risk assess, implement action plans and set up sampling programme	Safe water from private water supplies and distribution centres in Slough, with reduced risk of illness	Sarah Hill	March 2020 Quarterly review

Pago Solough specific:		Identify private distribution systems and verify with Thames Water Authority Risk assess private distribution systems and set up water sampling programme in line with statutory guidance				March 2020
Slough specific:	3. Slough will be an attractive place	Attend meetings, give advice on	Supports partnership working with local businesses and stakeholders	Ensure consistent and proportionate health	All officers	March 2020
Safety Advisory	where people	enforcement		and safety regulation		Ongoing
Group (SAG)	choose to live,	issues, changes in	Give advice to SAG to ensure events are operated			monthly and
	work and stay	standards and	safely			quarterly
County liaison		guidance, support				meeting
group and	5. Slough will	and take necessary	Benchmark, share intel and information, and support			attendance
Regional	attract, retain and	follow up actions	to and from other Berkshire authorities			
strategy group	grow businesses and investment to		Participate in discussions on health and safety issues			
TVHSG	provide		regionally, cascading to county groups and the team			
IVH3G	opportunities for		regionally, cascading to county groups and the team			
	our residents					

Safeguarding	1. Slough children	All officers to use	Use the 'Concern Card', and assess effectiveness of	Improve the safety of	Food &	March 2020
and intelligence	will grow up to be	their professional	this avenue to rapid reporting	children and	Safety	
sharing	happy, healthy and	curiosity when		vulnerable people in	Manager	Monthly
	successful	making face to face	All staff to undertaken SBC online training for	Slough		review and
		contact with	safeguarding adults and children on a annual basis		All officers to	feedback to
	3. Slough will be	service users, and		Improved life's of	support	Head of
	an attractive place	refer concerns in a	Safeguarding to be on the agenda and discussed at	people in Slough		Service in
	where people	timely manner,	team meetings, 121's, and appraisals			department
	choose to live,	100% of the time				monthly
	work and stay		All officers to be vigilant and aware of safeguarding			meetings
		Ensure all staff are	issues when making any face to face service user			
		trained in	contact, and follow the corporate safeguarding			
0		safeguarding and	principles if any concerns are raised			
age		following the SBC				
e (safeguarding	Holistic approach to all operations which involve			
62		principles	potential victims with safeguarding issues			
		Continue to share				
		intel and concerns				
		with other partners				
		such as TVH,				
		HMRC, Immigration				
		& RBFRS				

Slough Trading Standards



Service Delivery Plan 2019/2020

The Trading Standards service sits within Regulatory Services, which is an outward facing service group made up from:



Our aim is to deliver a wide range of effective and responsive public protection services for our residents, businesses and visitors.

Trading Standards

Slough Borough Council's Trading Standards Service has responsibility for the vast majority of consumer protection issues that arise in Slough.

Trading Standards play a major role in residents' health, safety and economic wellbeing.

This service delivery plan is provided to keep you informed of our achievements and future plans and how we intend to deliver them with the continued cooperation of our internal and external partners and stakeholders.

Prompt response to complaints and intelligence (triggering detailed investigations into consumer protection offences) Targeted project work Participation in national and regional liaison group 3 Risk based inspection programme Training and advice, provided to both consumers and business 5Working with other organisations with similar priories **Proportionate Enforcement** -with prosecution of offenders as a last resort (in line with our Corporate Enforcement Policy)

The work we have completed and continue to carry out is achieved through:

This plan is reviewed annually and we welcome your views, comments and suggestions on how it could be improved.

Please forward your views to:

Ginny de Haan, Service Lead for Regulatory Services

Tel: 01753 475111 or e-mail: TS.DUTY@slough.gov.uk

Or

Andrew Clooney, Group Manager - Consumer Protection (Trading Standards, Licensing, Food Safety and Health & Safety)

Tel: 01753 475111 or email: TS.DUTY@slough.gov.uk

Address:

Slough Trading Standards, St Martin's Place, 51 Bath Road, Slough, SL1 3UF

Or visit our website at: http://www.slough.gov.uk/tradingstandards

The following pages provide more information on our performance last year and our plans for the year ahead.

Slough Growing a place of opportunity and ambition

Our vision



The Joint Wellbeing Strategy and the council's Five Year Plan set out a vision for Slough, for the people, the place, the prosperity and the town, and the things that need to be done to make this a reality. Businesses and other partners within Slough are already working together to improve life in the borough.

The focus of work within the Trading Standards Service is to ensure that the council is able to fulfil its **statutory obligations** under the relevant legislation and that this is geared towards Slough's specific community and business needs, based on local intelligence and the Five Year Plan outcomes. More detail on the five year plan can be found at:

http://www.slough.gov.uk/council/strategies-plans-and-

policies/regulatory-and-enforcement-services-enforcement-policy.aspx

Our work underpins these objectives and also supports the two cross-cutting themes of the Joint Wellbeing Strategy and Joint Strategic Needs Assessment - civic responsibility and promoting the image of the town.

One aim is to protect and enhance public health and wellbeing while supporting local businesses.

We will achieve this through the attached action plan, (appendix B). This should be read in conjunction with our enforcement policy which aims to ensure a graduated approach to enforcement based on risk. The action plan shows how we are going to achieve this and demonstrates a direct link with the five year plan to achieve the council's wider outcomes. The action plan should be read in conjunction with our enforcement policy.

The enforcement policy reaffirms our commitment to carry out our duties in an open, fair and consistent manner. We recognise most people want to comply with the law, therefore, we want to support and enable them to meet their legal obligations without unnecessary expense. Assessment of risk and the likelihood of reoccurrence are major factors in our enforcement decisions. However, firm action will be taken, including prosecution, where appropriate. The full enforcement policy can be accessed at:

http://www.slough.gov.uk/council/strategies-plans-and-policies/regulatory-and-enforcement-services-enforcement-policy.aspx

The service plan sets out the actions we are taking to enhance and improve health, safety and wellbeing in Slough, while ensuring a fair, safe and equitable trading environment.

How did we perform during 2018/2019?

Our service plan will be reviewed on an annual basis and provides the opportunity to record our achievements and identify those key issues that still need to be addressed.



It is very well recognised that there is a lack of consistent data to paint a picture of what local trading standards services are delivering for people and communities.

As such, Slough trading Standards has agreed to take part in the pilot of the ACTSO (Association of Chief Trading Standards Officers) Impacts and Outcomes Framework. The Impacts and Outcomes Framework is intended to raise the profile of the service locally, whilst offering the ability to demonstrate how services are collectively supporting consumers and businesses nationally.

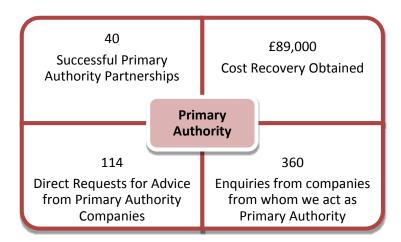
A comprehensive review of our Impacts and Outcomes for the year 2018-2019 is available through the following link: http://www.slough.gov.uk/business/trading-standards/the-trading-standards-service.aspx

The following report adds some narrative to our performance and achievements over the past year. At the end of the report is the service delivery plan for the forthcoming year.

Primary Authority Partnerships and Income Generation

Primary Authority partnerships comprise a legally binding contract between the authority and a business to provide ongoing specialist assured advice on specific areas of regulation applicable to that business, such as fair trading, product labelling, product safety, food safety and health and safety.

Our officers are able to provide companies robust and reliable advice, through the creation of these legal partnerships. Assured advice is provided to businesses with the establishment of Primary Authority partnerships or through co-ordinated partnerships. This has brought many advantages to businesses in Slough.



Since Slough Borough Council introduced Primary Authority partnerships in April 2011, we have secured more than 40 successful Primary Authority partnership agreements. These services are uniquely provided by in-house specialist officers. This year, four new companies signed up to become Primary Authority Partners.

Advice is provided at a cost recovery rate with an hourly charge for any work undertaken. In 2018/19, along with our colleagues in Food Safety, we obtained cost recovery of circa £89,000. This cost recovery enables the council to support businesses in Slough and increase the availability of specialist officers who are funded by the Primary Authority at no extra cost to the council. Last year we received 114 direct requests for advice from our Primary Authority portfolio of companies. A large number of other interactions with our Primary Authority companies were successfully completed and a high proportion of these involved mediating in consumer complaints. We also liaised daily with other local authorities and act as a single point of contact for any enquiries concerned with our portfolio of Primary Authority companies, reducing burdens on business and preventing any unnecessary duplication. In the past year we received a total of 360 enquiries from companies for whom we act as Primary Authority. The number of businesses joining Primary Authority partnerships with the council continues to grow and this will have a profound impact upon how we deliver the service, requiring a flexible approach to our management of resources.

Maintaining and promoting the Primary Authority scheme within Slough contributes to the council's overall aim of Slough being the premier location in the South East for businesses of all sizes to locate, start, grow, and stay.

More information on Primary Authority partnerships can be found on the Primary Authority website https://primary-authority.beis.gov.uk/ and https://www.slough.gov.uk/ primary-authority.

In July we launched our Business Advice and Support Partnership (BAASP). BAASP is a partnership agreement with Kent County Council, Hampshire County Council and East Sussex County Council to increase our capacity to provide and share specialist knowledge in the following areas:

- Trading Standards
- Food & Safety
- Health & Safety
- Fire Safety
- Licensing



Although the partnership is in its infancy, this has enabled us to be selected as a key partner, knows as a 'strategic partner' with the Office of Product Safety and Standards OPS&S (the Government Dept. who manage the Primary Authority Scheme) for delivery of Primary Authority Partnerships.

We aim to become more commercial in focus. As such we also offer a range of other business advice and paid for services, all of which amounted to Trading Standards achieving a combined income in excess of £113,000

Age restricted sales

Trading standards are tasked with ensuring retailers do not sell age restricted products to children. We manage this responsibility in a variety of ways

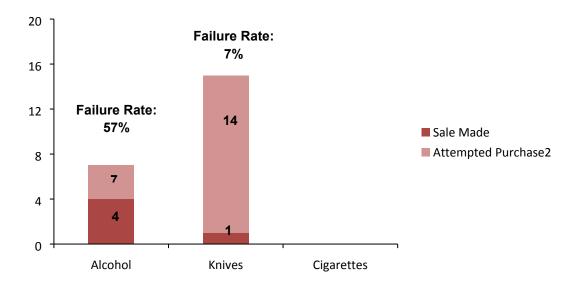


- ➤ Trader information packs were distributed to local businesses, providing information on the law on age restricted products, along with advice on due diligence and further information/documents to assist staff training on underage sales matters. Many of these were distributed on Crime Reduction and Enforcement Days (CRED), which Trading Standards participated in throughout the year.
- > Licensing reviews have been used for all traders failing a test purchase. This can result in conditions on the trader's licence or

even a complete revocation. Three traders are currently in the process of having their premises licence reviewed following sales of age restricted goods or other Trading Standards intervention. Trading Standards supports licensing by preparing evidence packs to support the licensing review. Last year we supported one such license review.

➤ **Test purchasing** is essential and establishes whether local businesses are complying with the law and not selling restricted goods to children.

Underage sales operations - Figures for 2018/2019



Total sales = 5 out of 21 attempted purchases.

In certain circumstances where there has been a sale we offer alternative resolution options. This alternative resolution comprises a training pack pre read and an exam. Completion of the course avoids a potential criminal prosecution.

Last year, as a direct consequence of the rise in knife crime, Trading Standards in conjunction with Thames Valley Police continued with an increased programme of carrying out test purchasing of knives. The aim being to ensure that retailers do more to prevent knife crime by ensuring that they do not sell knives without undertaking age verification. One sale took place in s national retailer.

Tobacco control work



Slough Trading Standards are represented at National Tobacco Focus Group meetings and share regional best practice with colleagues from around the UK.

Trading Standards work closely with other agencies such as Thames Valley Police, HMRC, neighbouring local authorities, Slough licensing team, Slough neighbourhood enforcement team and public health teams, both locally and regionally to tackle this issue.



Detection Dogs & illicit Tobacco Inspections

During 2018/2019 trading standards carried out twelve inspections of premises, with the assistance of tobacco detection dogs. Below is an outline of the illicit products discovered:

- **1528** x packs of 20 cigarettes (30,558 sticks in total)
- 1099 x pouches of chewing tobacco (14441g / 14.44kg in total)
- 60 x 50g pouches of hand rolling tobacco (3000g / 3kg in total)

Products were seized that either bore non-English health warnings, no pictorial health warnings, non-statutory warnings, or no warnings at all.

Shisha Bars

A number of shisha bar premises were visited with Thames Valley Police and Environmental Health to ensure all legal requirements were being met. Each business was provided with assistance to bring their business in compliance with the respective legislation.

Where shisha pipes were being provided to customers without statutory health warnings about tobacco, the pipes themselves can be (and have been) seized as evidence.

Food standards

Advice to those who prepare and sell food

From 13 December 2014 new food laws come into force and these require you to declare the allergens in the food you prepare and sell. These are the allergens that must be declared:

	Allergen	Examples	Ways to declare allergen
	Celery		information
300	Crustaceans	Prawns, crab, lobster, crayfish	On the menu next to the food item
ALC:	Eggs		On a warning notice telling people where
	Fish		to find it e.g. on a separate leaflet or chart
4	Gluten	Wheat, rye, barley, oats, spelt, kamut	A notice similar to below advising the
ogette.	Lupin	Pizza bases	information can be given verbally.
	Milk (Lactose)	Whey powder	
老色	Molluscs	Clams, mussels, whelks, oysters, snails, squid	Make sure your
	Mustard	Including mustard seed	staff are trained and are aware
	Sesame	Burger buns, prawn toast	of all your products which
100	Soya beans	Tofu	have allergens.
	Sulphur Dioxide (Sulphites)	Preservative found in dried fruits and wine	To comply, the
B	Peanuts		minimum you are
A.	Nuts	Almonds, pecans, brazil, pistachio, cashew, macadamia, hazelnut, walnuts	required to do is put a notice up.

Trading standards successfully completed 100 per cent of their high risk, medium risk and low risk routine food standards inspections in 2018/2019 in addition to other food standards enforcement visits.

A total of 192 food standards visits were carried out last year.

Interventions on these visits: 49 Written Warnings Issued

Compliant

118	Compliant on First Visit
22	Compliant on Contact
1	Compliant on Revisit

Non Compliant

37	Non Compliant on First Visit
0	Non Compliant on Revisit
4	Non Compliant on Contact

Further work included:

- giving labelling advice to new food businesses including allergen information.
- providing detailed food standards advice to the relevant Primary Authority partners
- taking part in the following food sampling and food related projects:

Project	Total	Unsatisfactory	
Trading Standards South East (TSSE)	6	5	
Internet Sampling –Compliance with Labelling	0	9	
Trading Standards South East (TSSE)	1	2	
Supplements Project –Compliance with Labelling	4	3	
Trading Standards South East (TSSE)		3	
Takeaway Project -Compliance with Meat Species,	10	unsatisfactory regarding	
Colours, Allergens & GM Oil		meat species	



These projects entailed shopping on the internet, visits to food business outlets (predominately restaurants and take-aways) to determine if the food being advertised was as described. It was completed in conjunction with the), TSSE and the Public Analyst.

It was found that many of these Food Business Operators (FBO) were incorrectly labelling the food and the business owners were advised of the legal requirement when selling or offering for sale food in the UK. Test purchases made on the internet from Food businesses outside of the Borough were written to and their local Trading Standards informed.

Over the course of the project:

- 9 Letters were written to other trading standards services
- ❖ 5 Letters were written to traders for non compliance
- 13 Visits made to premises in the Borough
- ❖ 3 Traders now displaying the true name of the food 1 x Ongoing traceability and investigation on meat DNA content.
- Allergen compliance increased
- Genetically Modified Declarations increased

A separate food standards plan has been produced for Trading Standards for 2019-20/. Targets included in appendix B are:

- complete 100 per cent high risk food inspections
- complete 100 per cent medium risk food inspections

- complete 100 per cent of low risk food inspections
- 100 per cent of 'programmed' unrated premises to be inspected and rated within the year
- complete SBC / Regional food sampling programmes as required.

Product safety



The trading standards team enforces a wide variety of legislation from the EU and UK. These laws affect all consumer non-food products. As well as general safety laws, there are also sector specific areas of product safety which include toys, plugs and sockets, electrical appliances and furniture.

Trading Standards is responsible for checks on non-food items at the border points. In Slough we have **37** custom bonded warehouses which are subject to product safety controls, and also the national Royal Mail distribution hub at Langley. This work is part of a National Trading Standards and TSSE ports project.

Highlights from 2018/2019 are below:

- Advising multinational companies on their labelling of cosmetic and healthcare products.
- > Advising importers of cosmetics on roles and responsibilities.
- Conducting product recalls.
- ➤ Checks carried out at the border points, resulting in **124** consignments being stopped from entering the UK and EU, involving more than **33,000** goods with an estimated retail value of £1,013,880.00.
- ➤ The service dealt with **117** enquiries relating to product safety.
- > Active participation on the national and regional groups of which Slough is a member and chair.
- Visit to primary authority partner with the Office for Product Safety and Standards (OPS&S).
- ➤ Hosted several visits from OPSS to explain the role of local trading standards.
- > Advised OPSS on their new (yet to be launched) product safety database in preparation for the EU Exit.
- Attendance at Launch event of the new Product Safety standards (PAS 7100:2018) for product recalls and corrective actions.
- > Joint working with HMRC to set up a new inspection site for controls on imported goods.

Rogue traders and doorstep crime



The Trading Standards doorstep sales response team is constantly on hand to assist residents with any issues they have with rogue traders who carry out shoddy work and then charge extortionate amounts for their services.

> Residents can be quoted one price and then the cost increases as the job progresses.

- > Rogue traders tend to target elderly or vulnerable people, who may be easier to manipulate or intimidate.
- > Some cases have reported victims being driven to banks/building societies to draw out large sums of cash to pay these traders.

A "Rogue Trader Day" was carried out in October 2018. A joint operation by Slough Borough Council and Thames Valley Police, saw **64** homes visited across the borough as part of a national crackdown on roque trading.

A 20-strong team targeted homes where building work was going on in a bid to weed out any rogue traders operating in the area. Rogue traders are criminals who take advantage of householders by using high pressure sales techniques. The work is often sub-standard or not required at all.

No rogue traders were found operating in Slough during the operation. However, as a result of the day of action, **24 building firms were warned about not issuing statutory 14-day cancellation notices**, which are required by law to enable customers a cooling off period before committing to building work.

Effectively dealing with rogue traders and preventing and detecting doorstep crime remains a high priority for 2019/2020 as ultimately the victims are predominantly vulnerable residents.

Mass Marketing Scams

Mass marketing scams are the scourge of our communities. They are operated by criminals with the sole purpose of identifying & exploiting often vulnerable, elderly and mentally impaired people. Scams can be a major factor in the decline of the health of older people and elderly victims are 2.4 times more likely to die or go into a care home than those who are not scammed. The average scam victim loses about £1000 to scams but some have lost their homes, their life savings and many thousands of pounds. Many other public services are required to help pick up the pieces and all this has a cost.



The National Trading Standards Scams Team (NTSST). Mail scams, although not the most common channel for scammers, is one commonly used to target the elderly. This can be anything from lottery scams to the sale of grossly overpriced goods such as supplements. The NTSST obtains details of victims through the seizure of 'sucker's lists' or through work with partner organisations. The team then disseminates this information to local Trading Standards officers who are able to visit the victims and offer advice and support.

Last year a total of **52** visits were made by Slough Trading Standards to scam victims locally.

In addition to these visits, the Service also worked with partner organisations to raise awareness of scams. Talks to raise awareness of scams were delivered at the 50 Plus Forum & Cippenham Residents & Tenants Association. The service also regularly leaflet drops residential areas with advice leaflets and face to face advice.

Trading Standards participated in the NTS Wellbeing project this year where the wellbeing of scam victims was assessed before and after intervention by Trading Standards.

During scams awareness month in June, visits were carried out to distribute posters, leaflets & doorstep stickers to churches, health centres, libraries and community centres to raise awareness of scams.

Anyone can be a Friend Against Scams and make a difference in their own way. To find out more please see the following link http://www.friendsagainstscams.org.uk

Slough Trading Standards also promote the mail marshal scheme. A mail marshal is a former victim of scams, but assists law enforcement by collecting their scam mail for intelligence purposes. We signed up 1 mail marshal locally last year.

Illegal Money Lending

Loan sharks and illegal money lending can devastate communities and the lives of individuals.

Slough Trading Standards, has worked with the national England Illegal Money Lending Team (IMLT) – for many years. Part of this work is to engage with partner agencies and make them aware of illegal money lenders.

The IMLT team offer training to Police Officers, Carers, Social Services anyone who has a role in visiting people that are vulnerable and likely to engage with Loan Sharks.

As part of CRED week awareness, Slough Trading Standards spoke to many - residents in the Chalvey area of Slough to raise awareness of loan sharks and how to avoid falling prey to one. There was also a leaflet drop in the area. This was in partnership with the National Money Lending Team SBC colleagues and Thames Valley Police.

The Banking Protocol

A new scheme, known as the Banking Protocol, is aimed at ensuring banks and police are more active in protecting customers, particularly the vulnerable.

It is being run locally as a joint venture between Thames Valley Police, Financial Fraud Action - which represents banks - and Slough trading standards supported by National Trading Standards.

All customer-facing bank staff will be told to look out for specific signs that a client may be the victim of ongoing fraud. If they have suspicions, they are encouraged to call the police and/or trading standards and we will look into the matter as a matter of urgency. If they have

suspicions and do not report it, the bank is at risk of being investigated for money laundering offences!

Nationally the banking protocol has achieved the following successes between January and March 2019:

- £11,668,510 in prevented fraud
- 66 arrests
- 1,780 emergency calls

Animal health



Trading Standards carries out inspections for animal health, animal welfare and animal by-products.

Animal diseases are always a threat. The Slough Notifiable Animal Disease Contingency Plan was updated last year, and was available for reference, in the event of animal disease outbreaks around the country, and is compiled with regular liaison with our emergency planning team.

We will also continue to liaise with local poultry keepers, to ensure that they are aware of the restrictions imposed by DEFRA, in order to control potential Avian Flu outbreaks; which can also affect the descriptions of eggs (i.e. free range eggs).

We currently have a Memorandum of Understanding with West Berkshire Trading Standards to ensure that we can respond effectively and efficiently to animal health, animal welfare and feedstuff complaints.

Counterfeit goods



"There is hardly anything in the world that some man cannot make a little worse and sell a little cheaper, and the people who consider price only are this man's lawful prey." John Ruskin.

The effects of counterfeit goods are well known. Not only does the consumer suffer but so does the honest seller. Taxes and business rates are avoided and innovation and investment is stifled. This will also have a knock on effect on employment.

In an effort to deter counterfeiters Trading Standards use the Trade Marks Act 1994, the maximum penalty for which can be up to 10 years imprisonment and an unlimited fine. Where it can be shown that the defendant benefitted monetarily from the criminal lifestyle, action can also be taken under the Proceeds of Crime Act (POCA). In addition, the seized goods can be ordered for forfeiture and destruction.

One particular operation that started in the previous year came before the courts and the defendant was found guilty and has been remitted to the Crown Court for sentence and confiscation proceedings under POCA.

We have proactively been working with a Primary Authority partner to disrupt the online sales of accessories. This work has enabled us to get through the supply chain and has seen a drop in the numbers of counterfeit and potentially unsafe electrical accessories entering the supply chain and ultimately consumer's homes.

Fireworks



Trading Standards has a responsibility to licence the storage and retail of fireworks. During 2018/19 we licenced **18** businesses within the borough - two of which are licenced to sell fireworks all year round.

Weights and measures



- ➤ Last year, qualified officers examined **386** pieces of equipment with a **46** per cent compliance rate.
- Inspectors of weights and measures provide advice to local businesses that pack by weight or volume, to make sure their systems are robust and durable; ensuring consumers can have confidence in the purchases that they make.
- ➤ The department also provides weights and measures advice and assistance to our Primary Authority companies in the borough, many of whom are packers so need to ensure their tolerances are correct on all their weight. Advice given included compost, food products and household cleaning products.

Additional targeted project work

Lettings agent project

The letting agents industry has featured highly on research into scales of consumer detriment and new legislation in this sector is welcome. Trading Standards a keen to support Outcome four of our 5 Year Plan: *Our residents will live in good quality homes.* As a result we continued monitoring this sector last year and will continue this year too. Last year

- All agents on our records were advised of the new legislation and their responsibilities to be a member of a property ombudsman scheme and to list all their prices in store and on their websites.
- Following the advice, letting agents were visited and monitored and the vast majority were found to be compliant.

Trading Standards is committed in improving the standard of service to landlords and tenants provided by the borough's letting agents. To ensure this, action will be taken against a letting agent who fails to comply with the legislation.

Last year, a fixed penalty notice for a fine of £5,000 was issued by the council against a letting agent who was found to be breaching the legislation.

Complaints and enquiries



Throughout 2018/19 we continued to work with our partners for the Citizen's Advice Consumer Service (CitA). Citizen's Advice Consumer Service is funded by government to offer civil advice nationally through their contact centres and website. Any enquires they receive which concern either Slough residents or traders are then referred to Slough Trading Standards and where we can identify a criminal breach, are investigated accordingly on a risk assessment basis.

Based on the figures we are able to obtain from CitA, our total unique enquiries received is calculated to be **1739**. However, when we count the total amount of enquiries received about any issue the service has dealt with **2581** enquiries.

In essence the number of enquiries we have received has stabilised.

Thank you...

Last year the service received 5 separate letters of thanks from consumers and other stakeholders who wanted to express their appreciation for the work and service they had received.

Chief Constables Award

Slough trading Standards were awarded a Chief Constables Award which reflected their invaluable contributions to the success of a major partnership investigation known as Operation Component; which comprised a highly complex fraud involving an organised crime group operating across the whole country. The company, First Choice Engines, was based in and operated from Slough and Slough Trading Standards were part of the joint team also comprising Thames Valley Police and the Insolvency Service. Slough Trading Standards also took part in the planning and execution of an entry warrant in Slough. All defendants were later convicted and sentenced to imprisonment in excess of 4 years.



Education and encouraging channel shift

Education is vital for consumers, in order for them to make informed choices when purchasing and to prevent them being ripped off.

Increasingly, we will be encouraging both traders and consumers to use the self-help guidance sheets listed on our website: https://www.slough.gov.uk/tradingstandards

The promotion of our website as a first point of call is an important action as it will hopefully relieve the pressure on front line officers who would usually have to respond to enquiries that can be dealt with by simple signposting to our website.

Enforcement action and policy



Trading Standards has a comprehensive set of measures in place to protect consumers and promote business in the area.

> Any enforcement action taken will be graduated and proportionate; in line with Slough Borough Council's enforcement policy.

A full copy of the policy can be found on our website:-

http://www.slough.gov.uk/council/strategies-plans-and-policies/regulatory-and-enforcement-services-enforcement-policy.aspx

Striving for excellence

Service Standards

Providing excellent customer service is one of our key priorities. In order to achieve this we will always:

- be polite, friendly and offer a helpful service
- take time to listen and explain things
- provide accurate information and advice in a clear straightforward way
- deal with enquiries immediately, but if this is not possible, explain why
- provide you with any other contact details that you may need
- keep you informed of the progress and outcome of any investigations
- treat you fairly and with respect.

Customer Pledge

- > We aim to provide every customer with a high quality service and will seek feedback from you to help further improve the quality of the services we provide.
- > The Trading Standards Manager will contact you personally if you are unhappy with the service received.

Freedom of Information

Last year the service dealt with 15 requests for information under the Freedom of Information Act 2000 which gives a right of access to a wide range of information held by public authorities.

Professional development

The on-going development of the work force is paramount to ensure a comprehensive and competent service is provided to the customer, while maintaining continuous improvement and providing value for money.

The Regulators Code requires that the council's regulatory services maintains the competency of its officers and also that we have officers with sufficient skills to maintain the breadth of competency needed for Slough specifically. Food standards officers and trading standards practitioners are also required to carry out 20 hours of CPPD activity per year.

Looking to the future and the challenges ahead

This coming year there will also be major changes with the onset of new regulations which will affect consumers, businesses and enforcers alike. These regulations include:

- General Data Protection Regulations and Law Enforcement Bill
- > EU Exit

We will monitor the impact these new pieces of legislation have on the work we do.

The Trading Standards Service plan for 2019/2020, which outlines our planned work for the forthcoming year, is detailed in **Appendix A**.

Resourcing

Slough Trading Standards employs eight staff, two of whom are part time (effectively seven full time employees). There are six FTE enforcement officer posts within the team.

This serves a estimated population of 149,400. This serves a business population of approximately 7000 enterprises.

We aim to increase the income generation and commercialisation aspects of the service, to maximise our cost recovery activities and further offset the cost of service delivery, while maintaining resilience and our ability to delivery our core statutory work.

Variation from the service plan

Departures from this service plan will be exceptional, capable of justification and be fully considered by the Trading Standards Manager and Group Manager for Consumer Protection before varying action is taken. Reasons for any departure will be fully documented in the action plan and reflected upon in the next service plan

Appendix A

TRADING STANDARDS ACTION PLAN 2018/19

Directorate: Adults and Communities	Service Manager: Andrew Clooney
Division:	Budget: £348500
Regulatory Services	Population: 145,700
	Business's in Slough: 7000
Team: TRADING STANDARDS	Number of staff employed:
	7 FTE dealing with Trading Standards, Food Standards and Animal Health
	issues. Figure includes one full time Senior Business Support Officer
	- ''

Service objectives:

To promote a safe, fair and equitable trading environment and to support and help legitimate business prosper and grow within Slough.

Provide a value for money service within the Regulatory Services division, with excellent customer focus and well-motivated competent staff. To deliver our statutory obligations and the specific needs and priorities of Slough. Where at all possible, all outcomes will fit directly into a five year plan outcome area.

The service will provide timely delivery of specific work plans, evidence and intelligence based initiatives and joint working with partners both within and beyond the council to improve the quality of life in Slough and protect consumers, whilst supporting business growth and enterprise.

The outcomes from all our work have strong links to the council's Five Year Plan, which is indicated against each service activity below. The work of the Trading Standards Team is essential in securing safe building blocks from which the council can deliver its plan. Trading Standards promote and support legitimate business, whilst taking strong action against traders who flout the law. In doing so we help build a safe, healthy and vibrant place to live, work or visit. If legitimate business is to prosper and new inward investment is to thrive, then Trading Standards is an essential service to support such aims.

Authority (PA) & Compliance Support	Trading	March 2020 Monthly
## Solough will attract, retain and grow businesses and investment to provide opportunities for our residents ### Support the Councils Open for Business Strategy and the Corporate Business Growth plan ### Target: Meet and/or exceed aggregate income target of £113,500 of which £77,800 is primary authority. ### Target: Meet and/or exceed aggregate income target of £113,500 of which £77,800 is primary authority. ### Business Growth plan ### Target: Meet and/or exceed aggregate income target of £113,500 of which £77,800 is primary authority. ### Authorities and controls and peted by the company nationally systems & procedures and controls adopted by the company nationally systems & procedures and controls adopted by the company nationally seystems & procedures and controls adopted by the company nationally systems & procedures and controls adopted by the company nationally systems & procedures and controls adopted by the company nationally systems & procedures and controls adopted by the company nationally seven by Enforce Authorities (EA). ### Reduced, efficient effective regulation of the provision support which has national impact. ### Reduced efficient effective regulation of the provision and powers and controls are deemed suitable and compliant than dentry to support which has national impact. ### Reduced efficient effective regulation of the provision and powers and controls are deemed suitable and compliant than dentry to support which has national impact. ### Reduced efficient effective regulation of the provision of the company's activities on the company'	All Food Safety & Trading Standards Officers	reports on hours and income generation Quarterly reviews Yearly overview of individual company Action Plans Number of PA's in portfolio Virtual PA management team Increase in income Increase in capacity

Income	3. Slough will be	Target: Meet	support business in more holistic way, supporting the Slough Open for Business model. Provide free signposting to comprehensive self-help	Generate income	Trading	March 2020
Generation and Commercialisa tion	an attractive place where people choose to live, work and stay. 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents	and/or exceed aggregate income target of £113,500 of which £77,800 is primary authority. Target: Support and resource the Business Advice and Support Partnership (BAASP) and its strategic objectives.	support and guidance to new business start-ups and existing SME's in Slough. Grow and promote our offer of chargeable business support options for all types of businesses, both inside and outside Slough, including, but no limited to: Primary Authority Tailored business advice Assessment of labelling/brochures/website Pre-start up advice Pre-Inspection support visits Regulatory Health Check Training & Talks Training needs assessment Analysis of statutory defence Review of policy & procedures Audit of systems Support in achieving 5 FHRS Supply of SFBB material Assured Trader Schemes Funded projects from regional or national groups (TSSE/NTS/FSA) Send quarterly emails to all businesses due for inspection within the forthcoming quarter reminding them of their due food hygiene inspection date, and current FHRS, whilst offering a chargeable pre-inspection visit. Provide easy to access payment services, including; Telephone and online payments	Improved standards, efficiencies and compliance within businesses. Reduced the amount of regulation required by the council via business paying for support and improving standards before statutory inspections are undertaken. Developed skilled workforce, with a range of business support abilities.	Standards Manager Food & Safety Manager All Food Safety & Trading Standards Officers	Monthly Reports on hours and income generation Number of businesses given chargeable business support. Number of businesses achieving 5 FHRS. Time spent on regulation, and number of planning inspections achieved. Number of hits on our website. Number of press released and publicity
			Tribinote and advertise services, including working with		1	

			other council departments, producing brochures, press			campaigns
			releases, information on website and case studies.			
			Benchmark where possible with other local authorities who have embarked on commercial enterprises to highlight best practice.			
			Explore whole package offers, including licensing and planning teams.			
			Promote, support and resource the Business Advice and Support Partnership which will bring capacity, resilience and expertise to our business advice model.			
Food Standards Juspections Sand work	3. Slough will be an attractive place where people choose to live, work and stay. 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents. Statutory requirement	Target: 100% of high risk businesses 100% of Medium Risk Premises to be inspected. To be monitored monthly Target: 100% of low risk businesses to be inspected Target: 100% of unrated premises to be inspected and rated.	Allocation of interventions based on risk priority. Make full use of Alternative Enforcement Strategies (AES) to applicable businesses in line with FSA CoP, including newsletter, SAQ's, targeted advice sessions and other relevant advice. Inspections based on risk; - 100% inspection of A, B, C and all other non rated premises	Safer food businesses in Slough & increase in % of broadly compliant premises Increased awareness among traders of their legal responsibilities in respect of Food Standards. Working alongside our colleagues in Food Safety the aim will be to provide consumers with greater	Trading Standards Manager/ Food Standards Lead Officer Food Safety Team Leader All TS Food Officers	Ongoing until March 2020 Monthly and Quarterly review
	requirement	Target: Carry out Intel led - Sampling on Takeaway meals for:-	 complaint food businesses Identified poor performing businesses targeted with appropriate interventions and re-rating the risk 	information on food standards and local business hygiene standards in order that they can make		
		traceability, colours, GM oil, meat & fish speciation, and]	To tackle Food Fraud	informed choices on where to eat and purchase food.		

			compliant premises as a deterrent to other businesses and incentivise improvements. Enhance advice and signposting for businesses on SBC web site. Focused interventions and sector specific projects on high risk premises or where local intelligence suggests			
			necessary Added Value: - Assessing compliance with all consumer protection legislation - Identify matters which may be relevant to other services			
Product safety & counterfeit cogoods	3.Slough will be an attractive place where people choose to live, work and stay 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents	Target: All detections at Ports authorities for unsafe/illicit goods to be followed up according to national Trading Standards Ports Project Protocol Target: Participate in National / Regional projects which reflect a local priority Target: Continue to develop competencies of all enforcement staff to ensure they are	Inspections at designated ports and ERTS Safety testing Product profiling Feeding into intelligence database Maintain detection rates within scope of National ports /ERTS Project Ongoing visits to ERTS distribution centres in Slough Monitor a specific product and ensure its safety following Intel to suggest there may be a problem – sunglasses Support PA companies and other legitimate trade within the borough and protect their intellectual property where appropriate and where duty to do so	Ongoing participation in the national "Ports project" and taking samples of suspicious products Measurable improvement in consumer and business confidence Enhanced public confidence that goods available for purchase can be relied upon to meet approved standards of safety Reduction in harmful accidents to consumers through	Trading Standards Manager Lead Product Safety Officer - RDC All officers to support	March 2020 Monthly review

		competent to carry	Appropriate enforcement action taken if necessary	less availability of		
		out ports project work	To share intelligence and best practice with external agencies and other partners	unsafe and dangerous products		
			Collaborative working with TSSE regional focus groups	Promotes a fair, safe and equitable local,		
			and other partners and sharing data to build regional and national statistics	regional and national trading environment		
			Record all intervention at ports and locally so that the volume and value of items can be calculated for future record retrieval and dissemination purposes			
Under age sales	1: Slough children will grow up to be	Target: Trading Standards will	Enable children and young people have physically and emotionally healthy lives	Improved health and wellbeing for young	Trading Standards	March 2020
	happy, healthy and successful.	investigate and act upon 100% of all	Ensure children and young people are supported to be	people through reduced access to	Manager	Quarterly review
Pa	and succession.	age restricted sales	safe secure and successful	potentially harmful	Lead	TEVIEW
Page 88		complaints and		products	Underage	Feedback from
8		enquiries they	Evaluate alternative resolutions package course	•	Sales	candidates
ω		receive.	feedback, and where necessary, take appropriate	Supports businesses	Officer -LJ	
		Tananata Atlanat A	action to ensure course delivery to high standard	in regulatory	FO/NET/	Number of
		Target: At least 4	Portnership working with all portners, but in particular	compliance and reduce risk of	FS/NET/	candidates
		under age sales test purchase	Partnership working with all partners, but in particular SBC licensing and Thames Valley police in order to	reduce risk of reputational harm	Licensing/T hames	taught and pass rates
		operations will take	support a consensus approach to enforcement and	following negative	Valley	pass rates
		place throughout	follow up actions	media profile of	police	
		the year. They will		underage sales	acting as	
		be Intel lead or	All information on under age sales to be shared with	_	'eyes and	
		provoked by	SBC licensing	Reduction in incidence	ears' and	
		national or regional	Our and with any data of said-our and a said-our	of under-age young	intel	
		remit into specific	Support, with provision of evidence packs, any request	people purchasing	sources.	
		areas along with partners.	from SBC licensing to instigate a licensing review following an underage test purchase operation which	alcohol, tobacco, fireworks and other		
		partificis.	resulted in a sale and therefore identified a traders	dangerous and health-		
		Target: Promote	inability to comply with the licensing objective:	damaging items		
		under age sales	protection of children from harm	3 3 3		
		'alternative		Increase in retailers'		

resolutions'	Added value:	compliance rates	
package', which	- Self funding training reducing delivery costs to SBC	regarding the display	
gives sellers option	- Positive impact on business compliance and	of warning notices	
to attend and	awareness of legal responsibilities	about tobacco and	
complete BTEC		alcohol sales	
training and in			
doing so no legal		Alleviation of	
proceedings will be		pressures on hospital	
taken		A&E departments	
		through reduction in	
		excess alcohol cases	
		among under 18 year	
		olds	
		Improved health and	
		wellbeing for young	
		people through	
Page 89		reduced access to	
<u>g</u>		potentially harmful	
∞		products	
9		Reduced pressure on	
		health services from	
		long-term effects of	
		smoking and alcohol	
		consumption	
		Enhanced confidence	
		among parents and	
		others in positions of	
		responsibility (e.g.	
		teachers), that those	
		from who they are	
		responsible cannot	
		easily obtain health-	
		damaging products.	
		A 'level playing field'	
		for legitimate	
		businesses selling	

				age-restricted items		
Page 9				Ensure children and young people are emotionally and physically healthy Better health and improved life expectancy in respect of reduced access to illicit product Fairer competition for all businesses Enhanced parental confidence and those in positions of confidence		
Becoming an enabling authority – providing self-help and links to guidance and support Community engagement	3. Slough will be an attractive place where people choose to live, work and stay. 5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents.	Target: Promote channel shift and increase in users of the Trading's standards website for information and self help Target: Where applicable, promote via press releases and social media any trading standards activity or issues relevant to residents and business.	Promote channel shift via all communications with stakeholders, to the Trading Standards dedicated council website, whilst being sensitive to the needs of 'at risk' persons and isolated stakeholders. All press releases and forms to direct readers to website. Aim is to reduce avoidable contact whilst promoting existing digital options Publicise and direct users to council's website and dedicated email on all correspondence to businesses Review and update information on council website on an annual basis, and when new information becomes available, ensuring its user friendly and information easily accessible Work with the Town Centre Manager to support local shops and the Town Team	Reduced demand on service from enquires which can be resolved via self help Improved consumer access and awareness of trading standards and food standards (monitored via customer surveys) Quicker response times to enquires made to the service via CitA	Food & Safety Manager Trading Standards Manager All officers to support	March 2020 Quarterly review of information on website Number of website hits Feedback from website users

			Participate in the FSA national food safety week campaign Publicise enforcement action taken against non-compliant premises as a deterrent to other businesses and incentivise improvements Issue releases where necessary, such as product recalls, local enforcement against poor performing			
Page 91			premises Other initiatives undertaken, including sector specific initiatives, joint projects and visits with licensing and Food Safety/Health and Safety Explore novel ways of using social media to profile work of the service			
e 91			Ensure Trading Standards use Twitter to profile their work and emerging issues Explore opportunities to engage with the community, such as campaigns at focused groups, schools, and libraries			
			Monitor website hits and advice requests received, for decide in requests, and increase in website hits Added value: - Improve awareness and compliance of food safety and standards issues - Supports Income generation			
Tobacco Control / Tobacco Alliance work/legal	2: Our people will be healthier and manage their own care needs.	Target: To carry out two illicit tobacco enforcement days along with sniffer	Joint intelligence led interventions to promote tobacco awareness and close working with the Smoking Cessation provider and other partners Build upon links with Licensing and Food & Safety	Licensing reviews considered for any business being found to not be operating in compliance with	Trading Standards Manager Lead	March 2020 Take enforcement measures that

highs Page 92	3. Slough will be an attractive place where people choose to live, work and stay.	dogs and or other partner agencies including Police, HMRC, Licensing, NET Team, Border Agency, Public health etc, if available to support Target: Ensure we bid for any funds which may come available in order to effectively enforce the range of legislation which deals with illicit tobacco in all its forms. Target: To carry out at least 1 operation targeting Slough self storage units for the detection and identification of individuals/busines s using such units for storage of illicit tobacco.	Teams to deliver join initiatives on Shisha and illicit tobacco sales and explore the proportionality of reviewing licenses where appropriate Involve partners such as HMRC and Thames Valley Police on shisha operations. Liaise with those partners and other partners such as Solutions for Health in order to build upon intelligence picture Continue to contribute to the National drug and alcohol strategy at a local level to prevent individuals engaging in illicit and harmful drug use, particularly legal highs, and support individuals to become drug and alcohol free via signposting To share intelligence and best practice with external agencies and other partners Explore collaborative working with Solutions4Health on aspects of tobacco control To work in collaboration with our Environmental health colleagues on enforcement of legislation around Shisha Cafes Support public health in the development of preventative approaches to enable our residents to become more able to support themselves	Positive impact on personal health and the economy through less sickness and time off work with respect to smoking related illness Better health and improved life expectancy in respect of reduced access to illicit product Fairer competition for all businesses	Tobacco Control Officer - DC All Officers to support	are appropriate and in line with enforcement policy Maintain TSSE tobacco focus group attendance
Safeguarding, scams and intelligence sharing	1: Slough children will grow up to be happy, healthy and successful. 2: Our people will	Target: Trading Standards will intervene in 100% of all scam victim notifications they receive, from all	Staff use the 'Concern Card', and assess effectiveness of this avenue to rapid reporting All staff to undertaken SBC online training for safeguarding adults and children on a annual basis	Improve the safety of children and vulnerable people in Slough	TS Manager Compliance Team Leader	March 2020 Monthly review and feedback to Head of Service in

Lead

CP&BC

monthly

people in Slough

	care needs.	signposting &	3,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Where appropriate	Scams	meetings
		holistic support to	All officers to be vigilant and aware of safeguarding	more referrals to	Officers -JS	
	3. Slough will be	all vulnerable	issues when making any face to face service user	safeguarding		
	an attractive place	victims.	contact, and follow the corporate safeguarding		All officers	
	where people		principles if any concerns are raised	Increase officer's	to support	
	choose to live,	Target: To		awareness of		
	work and stay	participate in	Holistic approach to all operations which involve	safeguarding issues		
		national Rogue	potential victims with safeguarding issues			
	5. Slough will	Trader Day.		Increase officer's		
	attract, retain and		Ensure people are at the heart of the adult	interaction with		
	grow businesses	Target: Ensure all	safeguarding process and are supported to manage	Safeguarding services		
	and investment to	staff are trained in	any risks	within Slough and		
	provide	safeguarding and		beyond		
	opportunities for	follow the SBC	Safeguarding to be on the agenda and discussed at	Increased profile for		
ס	our residents.	safeguarding	team meetings, 121's, and appraisals	Increased profile for		
ag		principles.	All officers to be vigilant and aware and everges their	the service amongst all stakeholders		
Page 93		Target: Participate	All officers to be vigilant and aware and express their 'professional curiosity' of safeguarding issues when	stakenoiders		
93		in scams	making any face to face service user contact, and	All officers to use their		
		awareness month	follow the corporate safeguarding principles if any	professional curiosity		
		with range of	concerns are raised	when making face to		
		activity.	concerns are raised	face contact with		
		douvity.	Partners such as Adult Social Care, Thames Valley	service users, and		
		Target: All scams	Police, HM Revenue and Customs (Hidden Economy	refer concerns in a		
		victims to be	unit), Home Office Immigration and Community	timely manner, 100%		
		assessed and	Wardens to be further engaged and encouraged to	of the time		
		where necessary a	support Trading Standards activity where safeguarding			
		safeguarding	issues are prevalent, in particular Scams visits and	Increased community		
		referral to be made.	Rogue Trader Day	engagement		
		Target: All scams	Holistic approach to all operations which involve	Service delivery and		
		victims to be asked	potential victims with safeguarding issues	resources will be		
		if they should		better targeted		
		require a call	Continue to participate in national Rogue Trader Day	towards 'at risk'		
		blocker and where	and engage with partners to ensure that the activity is	persons people		
		funding availability	both intelligence led and safeguards the most 'at risk'			

Safeguarding to be on the agenda and discussed at team meetings, 121's, and appraisals

be healthier and

manage their own

stakeholders

providing

				Sustainment of independent living for elderly and other 'at risk' persons people for longer durations (with consequent saving on adult social care budget) Raised awareness of illegal money lending and associated scams		
Service Dimprovement, Presilience and Capacity. Staff Training, competence and experience.	5. Slough will attract, retain and grow businesses and investment to provide opportunities for our residents.	Target: Each TS officer will be provided with and maintain a competency level to meet the requirements of the role and service need. Target: Each TS officer will carry out at least 1 formal enforcement action within the financial year. Target: A system of quality assurance and performance evaluation will be	Compliance with Regulators Code. Compliance with Better Business for All. Ensures effective delivery of enforcement policy. Ensures cost effectiveness as service don't waste money or time on training the 'wrong' areas (i.e. areas in which employees are already capable). Efficiency: The transfer gap between the training environment and working on the job is reduced substantially in a competency-based approach. Increased productivity Officers are competent in meeting their work objectives, know what the performance expectations are, receive recognition for their abilities, and have insight into the overall strategy of the team, department, and organization, they are usually more motivated and experience higher job satisfaction.		TS Manager. All officers to support	

Partnership days and	3. Slough will be an attractive place	implemented. This may span several years. Target: The service will adopt the ACTSO impacts and outcomes model and report back annually on national performance figures. Target: At least 2 enforcement days /	Reduced risk: providing the organization with greater ability to scale and flex as needed, thereby reducing the risk it faces. Increased customer satisfaction Employees who have been trained and assessed are, by definition, able to perform the required tasks associated with a job. The knock-on effect is that, they are able to provide high service levels, thereby increasing customer satisfaction. Liaise with community groups and partners on Trading Standards issues and ensure that we can provide them		Trading Standards	March 2020
 regional profile	to live, work and stay	partnership days working alongside mosaic of partners where appropriate and where Trading Standards presence will add value Target: To maintain active presence within TSSE and where their work also reflects a local priority, to engage in that work and provide necessary resources in which to do so, or access those resources as made available	with appropriate guidance and signpost them to the best areas for advice and guidance, particularly where we are dealing with vulnerable residents/consumers. Maintain profile and presence on local regional and national groups where necessary to ensure the voice of Slough borough council and its residents are represented in respect of trading standards issues.	Ensures a holistic approach to issues and bring with it resilience and capacity and expertise to deal with issues which involve issues beyond Trading Standards. A positive effect on competitiveness, especially for small businesses, as fraudulent trading is dealt with in a holistic and regional manner	Manager Compliance Team Manager All officers to support	Monthly review and feedback to Head of Service during CPBC managers meeting
		through TSSE				

		Target: Carry out talks to community groups on trading standards issues				
Lettings and Property Management Redress scheme	4. Our residents will have access to good quality homes. (Health Economy and skills)	Target: Set up surveillance protocol to monitor all estate and letting agents in the borough and ensure compliance within the sector. Ongoing. Target: Expand previous project scope into letting and estate agent compliance to include new provisions of the Tenant Fees Act 2019 and The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019 Target: Explore better partnership arrangements and	Liaise and meet with SBC housing on best approach Take enforcement action where necessary Continue to benchmark with other authorities who have carried out similar work, (Reading, LB Islington, Milton Keynes etc.) Ensure cabinet approval for issuing fines is sought. Impose where appropriate, a fixed penalty fine £5,000 an agent or property manager who should have joined a scheme has not done so, should have displayed tenant fees and should have provided client money protection and had not done so.	Tenants and landlords with agents in the private rented sector and leaseholders and freeholders dealing with property managers in the residential sector will be able to complain to an independent person about the service they have received Enforcement action includes the ultimate sanction of a £5000 fixed penalty notice	Trading Standards Manager Lead Lettings Officer (LJ/PAD) All officers to support	March 2020 Monthly review and feedback to Head of Service during CPBC managers meeting

Animal health - contingency plans and inspect horse/livestoc k dealers to bring into compliance	3. Slough will be an attractive place to live, work and stay. (Health)	intel sharing protocols with SBC Housing. Target: Manage and maintain all Animal Disease Contingency plans as directed by DEFRA, in partnership with all recognised partners Target: Ensure MOU with Public Protection Partnership (PPP) in respect of animal health and feed provision, is monitored to ensure cost effectiveness of service provision	To carry out a monitoring programme at the Langley Horse Fair, to ensure compliance Inspection of local animal keepers and quarterly monitoring to ensure that all AMLS and AMES data inputting are completed within set targets To share intelligence and best practice with external agencies and other partners Collaborative working with TSSE regional focus groups and other partners and sharing data to build regional and national statistics To ensure that all relevant Contingency plans & procedures are up to date	Enhanced public confidence in standards of animal health and welfare and in the provenance and quality of meat products A healthier and better cared for livestock Better animal health Disease prevention A healthier and betters cared for livestock Prevention of and reduction of livestock disease	Trading Standards Manager West Berkshire Trading Standards Service Lead Animal Health Officer - DC	March 2020 Ongoing Half year review
EU Exit Preparedness	3. Slough will be an attractive place to live, work and stay	.Target: Ensure all contingency has been put in place to ensure all trading standards staff can perform their duties effectively on Day 1 leave. Target: Ensure all authorisations and	To maintain presence on her majesty's government Local Authorities Border Delivery Steering group to prepare for EU Exit. Maintain active participation of all council contingency plans in relation to Brexit preparedness. To ensure trading standards relevant news in relation to residents and business is profiled through council communications.	Ensures a holistic approach to EU Exit issues and bring with it resilience and capacity and expertise to deal with scenarios which involve Trading Standards and our liaison with business and consumers alike.	Consumer Protection Group Manager Trading Standards Manager/F ood Safety Manager	Ongoing

ପ୍ର Chooking Ahead	delegations are in place to entitle trading standards staff to ensure they are authorised, in accordance with the councils, constitution to carry out all legislative duties.	Ensure we liaise with all necessary partner agencies and regulators to ensure we can support and help business and residents in lead up to, and in the aftermath of EU exit. Be mindful of opportunities EU Exit will bring in terms of profile for the council and the trading standards service and be an exemplar of change and support by maintaining a high profile locally, regionally and nationally.	A positive effect on business function and competitiveness, especially for SME's in the lead up to EU Exit where many may be confused with the wealth and mosaic of information available. Use available resources to communicate any trading standards messages effectively and to target audience.		
ြင်း Looking Ahead	Horizon scanning; providing a forward thinking service and fulfilling statutory obligations	Keep abreast of developments from the Food Standards Agency on the future of the Delivery of Official Food Controls and align our service provision accordingly. Identification and registration (where appropriate) of primary producers of food (as identified in FSA National Enforcement Priorities). Continue to participate in the Food Standards Agency's Regulation Our Future work. Keep abreast of the future of the Delivery of Official Controls in light if the ROF and Brexit agendas and align our services accordingly. Implement new Acrylamide Regulations, following national guidance. Provide information to businesses via council website. Building links with other teams within the Council to		Group Manager – Consumer Protection; Trading Standards Manager; Food & Safety Manager, Food Team Leader	Ongoing

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	ensure that changes in business ownership and nature and identified and acted upon in a timely fashion.		