

FOOD SAFETY SERVICE DELIVERY PLAN 2020 - 2022

Approved by:Date..... Gareth Davies, Head of Regulatory Services, Housing and Wellbeing

\FS Service Delivery Plan 2020-22

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Foreword

Lichfield District continues to be a growing centre of culture and heritage. Together with its relatively affluent resident population, the tourism industry has led to the development of a thriving and vibrant day and night time economy which is supported by over 950 food businesses including some of Staffordshire's finest and award winning eateries. A number of events held throughout the year e.g. the Lichfield Food Festival are helping to place Lichfield on the map as the place to go to enjoy food.

Whether it is a lunchtime sandwich, three course meal or food which is produced in the area, we want to ensure that all food available to residents, employees, visitors and the wider public is safe and healthy. Our role is to help ensure food businesses deliver products which are safe and produced from premises which are hygienic and properly controlled, thereby helping the business to grow and thrive. It is also to provide information to the public to help them make informed choices about what and where to eat, through promotion and transparency.

This year we have produced a Plan setting out our Food Service Delivery priorities for the coming two years. This Plan is developed in order to meet the requirements of the 'Food Standard Agency's Framework Agreement on Local Authority Food Law Enforcement' and covers, in detail:

- the aims and key priorities of the services provided
- the organisational structure and the scope of the services provided
- the ways in which the service will be delivered and the targets for its delivery
- the human and financial resources involved in providing the service
- the ways in which the quality of the service will be monitored and improved upon
- the ways in which the service will be reviewed and improved upon

The Food Safety Service Delivery Plan will next be reviewed in spring 2022 or sooner if there are new Food Standards Agency requirements. However, before then the Council would welcome not only feedback on the current Service Plan, but also suggestions from interested parties on what they feel should be included in future plans.

Copies of this Service Plan will be available on our website www.lichfielddc.gov.uk

Comments, observations and any suggestions for improvement should be sent for the attention of Fiona West, Food and Health & Safety Manager, Regulatory Services, Housing & Wellbeing, Council House, Frog Lane, Lichfield, Staffordshire, WS13 6YX, or by e-mailing at <u>food.safety@lichfielddc.gov.uk</u>

Councillor Angela Lax Cabinet Member for Legal and Regulatory Services February 2020

0.1 INTRODUCTION

The Council recognises the important role it plays in securing the safety of food consumed in the District. This plan's key focus is to demonstrate how the Council will fulfil its statutory obligations and duties in relation to food safety.

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

Underpinning our Food Safety Service is the ethos on ensuring we are delivering services to all communities equitably, proportionally and consistently, taking account of the personal beliefs, race, age, disability, gender and sexuality of all our customers.

1 SECTION 1: SERVICE AIMS & KEY PRIORITIES

1.1 SERVICE AIMS

- **1.1.1** The Food and Health & Safety Team aims to provide a food safety service in Lichfield District, to the public and businesses alike, that is equitable, proportional, consistent, helpful, open and takes into account equality issues.
- 1.1.2 It intends to actively contribute to the **Food Standards Agency's (FSA) Strategy for 2015-2020** and its key strategic objective to ensure the interests of consumers in relation to food are protected. Ensuring that:
 - Food is safe
 - Food is what it says it is
 - · Consumers can make informed choices about what to eat
 - · Consumers have access to an affordable healthy diet, now and in the future

The FSAs strategy is currently under review but it has been confirmed that the overarching mission 'food we can trust' will be retained moving forward.

"The main objective of the Agency in carrying out its functions is to protect public health from risks which may arise in connection with the consumption of food (including risks caused by the way in which it is produced or supplied) and otherwise to protect the interests of consumers in relation to food."

1.1.3 To continue to regulate effectively. To achieve this we aim to follow the headline priorities for regulation laid out by the Food Standard Agency:-

- secure effective enforcement and implementation of policies that protect consumers from risks related to food and from fraudulent or misleading practices, targeting the areas where there is highest risk.
- > develop our knowledge of what works in driving up business compliance with regulations.
- safeguard consumers by making it easier for business to comply with regulations, and minimise burdens on business.
- secure more proportionate, risk-based and effective regulation.

1.2 KEY PRIORITIES

- 1.2.1 In order to achieve our stated service aims, we need to set out some key priorities for our Food Safety Service Delivery. These key priorities are:-
 - > To put the consumer first in everything we do.
 - ➢ To ensure that interventions are carried out commensurate with the principles of risk, at food premises within the district, ensuring compliance with the relevant food laws.
 - To ensure as far as reasonably practicable, that imported food used or sold in premises within the District complies with all relevant Food Law.
 - To ensure as far as reasonably practicable, that no illegally produced food is used or sold in premises within the District e.g. meat or meat products from unauthorised premises.
 - > To ensure food complaints are investigated.

- To continue to develop partnerships with small local businesses and larger national companies based in our district, which will help to provide consistent and proportional advice on food safety issues at both local and national levels (acting as a Primary Authority in accordance with guidance from the Regulatory Delivery office within the Department for Business Energy and Industrial Strategy (BEIS)).
- > To undertake a food sampling regime based on local and national priorities.
- To provide informed and helpful advice to businesses and the public alike on matters relating to food safety.
- > To act on food safety alerts promptly and in a manner that is proportionate to the risks involved.
- To play an active role with neighbouring local authorities in the Central England Food Group North (Shropshire and Staffordshire) in order to ensure a consistent approach to food law enforcement.
- To play a key role in developing innovative ways that enable, motivate, educate and inform members of the public of matters relating to food safety.
- To provide help, advice and support to consumers to protect health and promote healthier lifestyles and consumer choice.
- ➢ To review the way we deliver our food service annually that takes into account recognised performance targets and standards.

1.3 LINKS TO CORPORATE OBJECTIVES & PLANS

- 1.3.1 This Food Safety Service Delivery Plan links closely with the strategic themes laid out in **Our Strategic Plan 2020-2024**. These essentially govern how the Council in future will deliver its services based on local aspirations, needs and priorities.
- 1.3.2 At the heart of the **Plan** is the Council's commitment to work collaboratively to enable people, shape place, and develop prosperity across Lichfield District. We will be a good council that innovates and puts our customers at the heart of all we do.
- 1.3.3 Seizing on the Council's core values the Food Safety Service will ensure it delivers:

Put Customers First - We are passionate about our customers and our corporate value is to deliver good customer service.

Have respect for everyone - We believe in mutual respect, whether that's between our staff and customers, or our staff and members. By working together in a respectful way, we believe we can achieve more.

Improve and Innovate - We are always striving for continuous improvement, whether that's in what we all achieve on a daily basis, or in the services we deliver to our customers.

- 1.3.4 To help deliver this plan the Council has identified the following external facing key 'priorities'
 - Enabling People to help themselves and others, to collaborate and engage with us and to live healthy and active lives.
 - Shaping Places To keep it clean, green and safe. To preserve the characteristics and to ensure sustainability and infrastructure needs are balanced.

- Developing Prosperity To encourage economic growth. To enhance the district for all (visitors/residents/employers) and to invest in the future.
- A Good Council that is financially sound, transparent, accountable and is responsive and customer focused.
- 1.3.5 Our Food Safety Service Delivery Plan will contribute to the priority of 'Enabling People' by:-
 - > ensuring we are delivering services to all communities equitably, proportionally and consistently.
 - carrying out interventions prioritised by risk and regulate to help ensure that all food businesses are providing safe food to consumers.
 - providing help, advice and support to consumers to protect health and promote healthier lifestyles and consumer choice e.g. National Food Hygiene Rating Scheme.
 - providing transparent, robust and consistent approaches to investigating and resolving consumer complaints about food and food businesses.
 - taking part in national food sampling programmes and taking action to remove unsafe food from the market.
 - working towards increasing overall food hygiene ratings for food businesses, thereby protecting food consumers within the District.
 - > Investigate all substantiated food poisoning allegations and notified food poisoning outbreaks.
 - To pilot a commercialised service to provide tailored support to poor performing businesses to enable them to improve food safety compliance. The aim of the pilot will be to enable the development of a package of services that work best for businesses alongside the other demands of the service.
- 1.3.6 Our Food Safety Service Delivery Plan will contribute to the priority of 'Shaping Places' by:-
 - Carrying out waste enforcement and education during visits at food businesses, ensuring that adequate provisions have been put in place to deal with waste generated by businesses.
 - Working towards increasing overall food hygiene ratings for food businesses within the District, thereby improving their reputation and appeal to consumers.
 - Supporting events, where food plays a major role, with a suitable balance of advice and regulation to help protect the District's growing reputation for providing popular food events.
- 1.3.7 Our Food Safety Service Delivery Plan will contribute to the **priority** of **'Developing Prosperity'** by:
 - identifying the need to ensure a consistent, proportionate and fair approach to enforcement is carried out across the District;
 - continue to provide support to start-up food businesses in the form of advisory visits designed to assist them to achieve a high food hygiene standard.
 - delivering support, signposting and networking opportunities to existing businesses to help them thrive.
 - targeting interventions at lower food hygiene rated businesses to encourage improvement as higher ratings have been shown to increase customer base.

- supporting businesses in the district through Primary Authority arrangements to ensure they get assured and consistent advice on regulatory compliance.
- > actively participating in initiatives that arise on regulatory reform as part of the Greater Birmingham and Solihull Local Enterprise Partnership.
- > Incentivise event organisers and traders on high standards e.g. through the street trading policy .
- 1.3.8 Our Food Safety Service Delivery Plan will be built on the **foundation** underpinning the priority of being **'A Good Council'**. It will outline how we will monitor and measure our performance by:-
 - > identifying what we are currently delivering in our Food Safety Service;
 - setting out what we want to do between 2020-2022 in a work programme based on government and local agendas; and
 - highlighting an Action plan (Section 6.3) to make our Food Safety Service better, within given timescales which we can be measured against.
- 1.3.9 By helping us to listen to local people and businesses' aspirations, this will help shape some of our key priorities for our Food Safety Service in the future if possible.
- 1.3.10 Performance of our service is measured against national and local targets. The indicators provide an objective measure on how our premises are improving. An outline is provided in Section 3.11.

2 SECTION 2: BACKGROUND

1.4 District Profile

2.1.1 Lichfield District is one of 9 Staffordshire District Councils. Within commuting distance of both the Black Country Boroughs and Birmingham. Central London is accessible via train in approximately 1 hour 15mins. The District has a population of circa 103,965¹.

The District was formed in 1974, and comprises urban populations in the town of Burntwood and the city of Lichfield, and a substantial rural population in surrounding villages, some of which have significant populations.

- 2.1.2 Lichfield has nationally and internationally renowned visitor attractions, including Drayton Manor Park, The National Memorial Arboretum and the historic environment of Lichfield City along with its cathedral which provides a strong base for tourism.
- 2.1.3 Lichfield has seen a dramatic increase in the number of mobile street traders attending festivals and events, many of whom originate from other areas in the UK. Our Food Safety Service needs to ensure that these and all our premises provide food safely.
- 2.1.4 A proportion of our residents originate from other countries throughout the world and this is shown in more detail in the Equality Statement 2020 published on the Council's website.
- 2.1.5 The challenge for our Food Safety Service is to ensure that we are delivering services to all communities equitably, proportionally and fairly, taking into account the personal beliefs, race, age, disability, gender and sexuality of all our customers. The service will ensure it encourages fairness and equal opportunities to all communities. This could require services to be delivered in different ways for different people to ensure it:
 - provides support to those who find it difficult to access or understand our services e.g. directing to translation services and food safety materials available in different languages such as the Safer Food Better Business pack.

gives support with advice and guidance to help maintain existing businesses and help in the establishment of new food businesses;

> makes it easy to comply with requirements and minimise burdens where possible.

1.5 Organisational Structure

- 2.2.1 The Regulatory Services, Housing and Wellbeing Service has a wide range of duties covering the spectrum of public health, environmental and housing functions, community safety, homelessness and licensing. The Council's Food Safety Service is delivered by the Food and Health & Safety (H&S) Team which sits within Regulatory Services. Housing and Wellbeing. The structure of the team is detailed in **Appendix 1**
- 2.2.2 The Head of Service for Regulatory Services, Housing & Wellbeing and the Food and Health & Safety Manager have delegated powers in relation to food safety to act on behalf of the Council.
- 2.2.3 In response to the 'modernising agenda' the Council has adopted the 'cabinet and leader' approach to local governance. The committee structure and where our food safety service fits into this is detailed in **Appendix 2**

¹ Equality Statement 2020, Lichfield District Council published 31st January 2020.

- 2.2.4 The Regulatory & Licensing Committee have responsibility for policy, review and development in respect of a wide range of environmental health issues including food safety. Performance against this Plan will be reported to this Committee at the end of every financial year.
- 2.2.5 Officers who deliver our Food Safety Service are multi-skilled and work across all the team's work areas at a level depending upon their competence and qualification. The officers with key responsibility for the service are:
 - The Food and Health & Safety Manager service development; overall management of the service, day to day management of the service; service development; official returns; food safety database management; product specific premises inspection; high risk premises inspection; service requests; food sampling; Infectious diseases and street trading.
 - Environmental Health Officer(s) service development; high risk premises inspection; food alerts; service requests; food safety data base support; food sampling; food complaints; product specific premises inspection; infectious diseases and street trading.
 - Technical Officers service development; high risk premises inspection; food alerts; service requests; food safety data base support; food sampling; food complaints, product specific premises inspection; infectious diseases and street trading.
 - Technical Support Officer administrative support; infectious disease notifications; database support; alternative strategy inspections.
- 2.2.6 The Council uses the Public Health England Food, Water & Environmental Services based in Colindale. A framework agreement is in place with Eurofins Laboratory for analytical services. Laboratory Services can be found in **Appendix 3 Useful Contacts**.
- 2.2.7 In relation to Food Standards Law Enforcement, colleagues from Staffordshire County Council's Trading Standards Section based at Burton-upon-Trent cover issues relating to food composition, labelling, animal feeding-stuffs, and weights and measures (see Appendix 3 Useful Contacts)

1.6 Scope of the Food Service

- 2.3.1 The Food and Health & Safety Team is responsible for delivering all the Authority's Food Safety Service as relevant to a District Council. This includes:-
 - > programmed and intelligence led food hygiene interventions and revisits
 - > the investigation of complaints regarding food sold or prepared in the District
 - > the investigation of complaints regarding hygiene standards or practices
 - ➢ infectious disease control including food poisoning and food borne disease
 - > responding to food alerts issued by the Food Standards Agency
 - > the provision of advice and information on food safety issues
 - > the monitoring of existing approved premises as well as granting new approval applications.
 - > consideration of the environmental aspects of planning and licensing applications in food premises
 - routine/ planned sampling programmes organised in liaison with the Central England Food Coordinators Group and national studies organised by the FSA/Public Health England and local need.
 - imported food control

- 2.3.2 All the officers who deliver services within our Food and Health and Safety Team also undertake certain duties in relation to the delivery of our Occupational Health & Safety Service, certain licensing functions and take part in the Council's Emergency Planning roles.
- 2.3.3 Whilst undertaking food safety interventions, officers are expected to carry out the following additional functions:
 - hazard spotting in relation to health & safety issues
 - > priority based health and safety inspections (currently focussed on gas safety)
 - smoking compliance checks
 - duty of care checks in relation to waste
 - licensing checks (gambling machine referrals)
 - supporting trading standards surveys
- 2.3.4 All food services are delivered by in house staff, except where food analytical services are used. Casual staff or contractors are occasionally used to support our work and help us manage variances in demand.

2.4 Demands on the Food Service

2.4.1 Food Hygiene Interventions

In Lichfield District, the Food Safety Team are responsible for approximately 945 premises, ranging from large manufacturers to one-person operations. A breakdown of the premises, as defined by type in the Food Standards Agency's Local Authority Enforcement Monitoring System Report (as of March 2019) is as follows:

Type of premises	Number	
Primary Producers	5	
Manufacturer / Packer	31	
Importer / Exporter	0	
Distributors / Transporters	10	
Retailer	166	
Restaurant / Caterers	733	
Total Number of Premises	945	

Of these premises, approximately 500 are due for inspection each year. In addition we also get around 80 new businesses per annum to inspect. 2019-20 saw an increase in the number of new business applications (over 90).

In addition the team receives approximately 30 requests for a food hygiene re-rating requests per annum (Food businesses are able to request a re-rating after they have made improvements). There is a charge of £175 (reviewed annualy) for this service as it requires an additional inspection to be carried out. Section 3 below.

The full range of food safety interventions also includes advisory visits, revisits to check compliance and food sampling visits.

This averages more then 60 interventions per month for the team.

2.4.2 Approved Premises

The Food Safety Team is responsible for 6 premises under Approved Premises Regulations. Details of these premises are given below:-

Establishment Name	Type of Approval	Approval Number
Highfields Dairy	Dairy Products	LF 001
Brownsfield Farm	Egg Packing	LF 006
John Owen	Fishery Products	LF 007
ELC UK Ltd	Cold Storage	FL008
Sustainable Farming Ltd	Egg Packing	LF012
Alfa Doner Kebab Manufacturing Ltd.	Meat Product Manufacturing	LF010

These premises are inspected in accordance with our risk rating programme.

2.4.3 Regionally & Nationally Significant Companies

In the District, there are several large manufacturers / processors including **Florette UK and Ireland Ltd** (Salad Products - Fradley), **Manor Vinegar** (Preservative Products - Burntwood) and **Roxane UK Ltd** (bottled drinking water).

Also within the District we have 2 recognised (in accordance with European and National legislation) Natural Mineral Water Sources at Maple Hayes, Burntwood and Elmhurst Spring, Elmhurst.

Lichfield itself is home to the headquarters of **The Central England Co-operative Society** and **Busy Bees Nursery's Ltd**, both are regionally and nationally significant companies. We have **Primary Authority** relationships with both of these companies for food hygiene matters.

Referrals from other local authorities into the activities of these companies form a large part of the work generated by such premises.

2.4.4 Other Factors likely to have an impact on Food Safety Service Delivery in 2020-22

In addition to some of the demands identified above, other factors are likely to influence the way we work in 2020-22, including:-

- the possible change in government direction in relation to how official food controls are delivered following the UKs departure from the European Union.
- Changes in the way in which Food Safety is delivered after the Food Standards Agency delivers its Regulating Our Future Programme.
- > a review of our working procedures
- > the ongoing implementation of a new back office computer system and mobile working solution.
- > demands around health & safety enforcement
- demands from other areas of our work including licensing

2.4.5 Access to our Service.

Our Food Safety Service is delivered from The Council House, Frog Lane, Lichfield, Staffordshire. Service users may contact Officers on site or by leaving a message, in the following ways:-

in person:by telephone:	between 8.45am and 5.15pm Monday to Friday. on 01543 308000 between 8.45am and 5.15pm Monday to Friday. Out of hours:- 01527 871565
by e-mail:	food.safety@lichfielddc.gov.uk
❖ by website:	https://www.lichfielddc.gov.uk/food-safety-advice

For other useful contact addresses and numbers please refer to Appendix 3

2.5 Enforcement Policy and its application in Food Safety Service Delivery

- 2.5.1 The Council has signed up to follow the principles laid out in the Government's **Enforcement Concordat** and the principles contained in the **Regulators Guide to Compliance**. A service specific Enforcement Policy has been developed, this was updated and approved by Committee in February 2015 and updated in 2017.
- 2.5.2 Underpinning our Enforcement Policy are certain key elements, which are applied to how we deliver our food safety service. The Policy recognises the Regulators Code which states:-
 - Regulators should carry out their activities in a way that supports those they regulate to comply and grow.
 - Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views.
 - Regulators should base their regulatory activities on risk.
 - Regulators should share information about compliance and risk.
 - Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply.
 - Regulators should ensure that their approach to their regulatory activities is transparent.

3 SECTION 3: SERVICE DELIVERY

3.1 Food Premises Interventions

- 3.1.1 One of this Service Plan's key priorities is to ensure that all our businesses receive an intervention within the minimum frequency set down in Food Law Code of Practice (England) 2017
- 3.1.2 The category of the premises, i.e. A E, is defined by scoring premises around potential hazard associated with the business and food safety compliance, this then relates to the interval between inspections. For example: category A premises are inspected every 6 months and category D every 2 years.
- 3.1.3 Interventions are key to improving compliance with food law by food business operators. The range of possible interventions allows authorised officers to use their professional judgement to apply a proportionate level of regulatory and enforcement activity to each business.
- 3.1.4 Interventions fall into either official control of non-official control as follows:

 Official Control interventions include:- monitoring surveillance verification audit inspection sampling and analysis 	 Interventions which are not Official Controls:- ≻ targeted education & advice ≻ information & intelligence gathering
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- 3.1.5 In 2020-22 we intend to continue to use these techniques to help businesses to comply, particularly where the business is already 'broadly compliant' with the law (category C premises only).
- 3.1.6 The techniques and interventions we can use by category of risk are outlined in the Food Law Code of Practice (England) 2017
- 3.1.7 In 2020-22 we intend to continue concentrating our resources on non-compliant and higher risk premises identified in an intelligence led review of our premises profile. We intend to continue with a project based approach which seeks to improve standards, by using a range of measures from providing advice to conducting enforcement action.
- 3.1.8 The following is a breakdown of categories of risk; frequency of intervention and number of premises within the District due in 2020-22.

Rating	Frequency of Inspection (At least once every)	Number of premises as of the 21 st January 2020				
А	6 months	1				
В	12 months	53				
С	18 months	186				
D	2 years	285				
E	3 years	375				
Unrated	-	45				
Total		945				

A variety of means will be used to ensure that individuals and organisations meet with their legal responsibilities relating to food safety during an inspection including education, negotiation, advice, guidance, warning letters, formal notices, simple cautions and prosecution.

- 3.1.9 In addition to visits undertaken as part of the risk assessment programme, interventions are also undertaken in respect of:
 - complaints regarding food business operations;
 - enquires and request for advice from a food business;
 - investigation following a poor sampling result;

- transient stalls and mobiles
- new business operation or new proprietor
- 3.1.10 New businesses registering with the authority will be inspected within **28** days of the business opening for trading or sooner if requested.

3.2 Food and Premises Complaints

- 3.2.1 Food complaints received and investigated by the service fall into one of two broad categories food contamination or complaints about food businesses (hygiene and practices).
- 3.2.2 Investigations of food complaints are carried out in accordance with guidelines issued by the Food Standards Agency.

3.3 **Primary Authority Scheme**

- 3.3.1 The Council continues to fully support the National Primary Authority Scheme for businesses. We currently have Primary Authority arrangements for food Hygiene with the **Central England Co-operative Society** and **Busy Bees Nurseries Ltd**. This supports the key strategic **priority** of **Developing Prosperity**.
- 3.3.2 We will continue to develop our **Primary Authority** arrangements. Officers are currently working with the Co-op on a significant ongoing piece of work to review all of their food safety procedures. Similar works are planned to take place with Busy Bees from spring 2020.
- 3.3.3 A charging process is in place to recover costs related to this work.
- 3.3.4 The Council has previously taken part in a Food Standards Agency Pilot scheme with Busy Bees Nurseries Ltd., testing the potential of National Inspection Strategies. This means that as a primary authority, we can build a picture of compliance across the whole of the business' operations. After considering all the information available, the primary authority could take the view that it has sufficient evidence that the business is being well managed, and consider that a lower number of checks are needed to ensure compliance and protection for the public. This is implemented via a national inspection strategy and is forming part of the FSA Regulating Our Future Programme.

3.4 Advice to Business

- 3.4.1 The food team will take a proactive role in providing advice to businesses to help them comply with the law and encourage the use of best practice. Such an approach helps standards of food hygiene to improve and positive relationships to be built with proprietors. This is achieved through:-
 - advice given during inspections and other visits
 - the provision of advice leaflets
 - responding to enquiries
 - Safer Food Better Business (SFBB) coaching
 - Development of commercialised services to support food businesses
- 3.4.2 We will also provide advice and assistance to new and proposed businesses at the planning and preplanning stages and will assist existing businesses that propose to make changes to their operations. This will improve skills to manage businesses more effectively which is likely to impact on the businesses ability to maintain food safety standards and remain viable.
- 3.4.3 In an attempt to increase the standards in the poorest performing businesses we will continue the implementation of project based work where such businesses will be offered advice on how to improve their hygiene standards and thereby their food hygiene rating.

3.5 Food Sampling

- 3.5.1 The microbiological and physical examination and analysis of food is undertaken on the basis of:
 businesses identified for sampling as part of nationwide, regional or local schemes;
 - businesses subject to consumer complaints or outbreak investigations;
 - during a programmed inspection where an inspector deems a sample is necessary.
- 3.5.2 The Council supports all relevant nationally co-ordinated food sampling programmes organised by the Food Standard Agency and Public Health England's Laboratory Services as well as any relevant cross regional surveys coordinated by the Food and Water Laboratory.
- 3.5.3 The general principle of this strategy is to make announced surveillance visits with businesses being informed of both the sample collection and results, co-ordinated by each authority in turn. Unannounced sampling is occasionally used to verify complaint allegations and suspicions of contraventions arising from inspection visits.
- 3.5.4 Samples requiring microbiological examination are sent to the PHE Food, Water & Environmental Services based at Colindale or otherwise are sent to a public analyst.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Diseases(Food Poisoning)

- 3.6.1 Investigation of outbreaks will be in accordance with the Public Health England (PHE) Communicable Disease Outbreak Management Plan co-ordinated by the PHE based out of Stafford. The number of notifications received almost always relates to single cases rather than outbreaks.
- 3.6.2 The Central England Food Coordinators Group, in consultation with Public Health England, has produced guidance on the investigation of infectious diseases and this is followed when dealing with notifications.
- 3.6.3 All infectious disease notifications are followed-up by a standard letter and questionnaire wherever practicable to identify possible sources of infection and recommend practices to prevent its spread.
- 3.6.4 In October 2017, a Salmonella food poisoning outbreak was reported by guests attending a wedding organised by a Galloping Gourmet (Coulsdon) Ltd which at the time were based at Packington Moore Farm. Over 50 guests reported symptoms. The extensive investigation carried out by the food service team led to a successful prosecution for food safety offences with fines of £200,000 and costs of £49,000 awarded.

3.7 Food Safety Incidents

- 3.7.1 The Council complies with Food Safety Act Code of Practice in relation to handling food alerts. All the officers within the Food and Health & Safety Team are alerted to food alerts via Food Standards Agency E-mail alerts.
- 3.7.2 We respond to all food alerts that **require action** within 1 working day.

3.8 Liaison with Other Organisations

- 3.8.1 Members of the Food Safety and Health & Safety Team play an active role in the Central England North Food Coordinators Group, which is governed by a Core Constitution. The group's primary aim is to encourage greater consistency in enforcement across the whole of the 9 Staffordshire Authorities represented as well as Shropshire..
- 3.8.2 Members of the Food Safety and Health & Safety Team also attend the Shropshire & Staffordshire Health Protection Liaison Group Health Protection Agency Community Control of Infection Committee and its Water Sub Committee which was set up to:
 - develop guidelines on infection control
 - > act as advisory groups, on all aspects of communicable diseases
 - > formulate exercises and where necessary, implement outbreak control plans.

3.9 Food Safety Promotional Work and Education

- 3.9.1 The Food Safety Service can contribute to improving the health of the community by helping to ensure that individuals have access to credible and trustworthy information to enable them to make informed choices that impact on their health. The service will look to develop its food safety education role and seek to identify new opportunities to deliver information on food safety and food allergen awareness.
- 3.9.2 There will be an enhanced approach to allergen awareness by the food safety service alongside the implementation of the Staffordshire Allergen Incident MoU which outlines how District/Borough councils will work with Staffordshire County Council Trading Standards Service, to enforce the Food Information Regulations 2014 and ensure food businesses are able to provide information on the allergens that are present in the food that they prepare. This will involve representatives from the food safety team attending relevant technical groups, supporting the development of County MoU, disseminating information to the rest of the service and implementing an approach at during food safety interventions and in relation to incidents/service requests.
- 3.9.3 Allergen awareness interventions will be included within routine food safety inspections. The result will be increased awareness within food businesses, enhanced public protection, better coordination and communication with T/Standards in relation to reactive/enforcement cases, greater awareness and understanding within the team.

3.10 Regulating Our Future Programme

- 3.10.1 The Food Standards Agency has concluded that it's time to improve the way the UK delivers regulatory controls in food. Their Regulating Our Future (ROF) Programme paper explains the direction they intend to take to create a modern, risk-based, proportionate, robust and resilient system.
- 3.10.2 The ROF Programme has introduced the trial of a new enhanced registration process for food businesses. The Council is now considering being part of that trial which will allow for the information we receive on new food business in the District to be part of a centralised national database of food businesses.
- 3.10.3 The Council has taking part in the development of the ROF programme, in particular, around testing the feasibility of a National Inspection Scheme, which may see Primary Authorities and their partnered businesses providing advice and guidance on business compliance. Using access to business compliance data the Primary Authority could influence whether other authorities carry out visits and to what degree.
- 3.10.4 More information can be found relating to the ROF programme here: <u>https://www.food.gov.uk/sites/default/files/rof-paper-july2017_0.pdf</u>

3.11 Improved Performance Indicators.

- 3.11.1 A suite of new performance indicators is in place which directly reflect those reported in the FSA Annual report on Local Authority Food Law Enforcement which benchmarks against all local authorities. This will help to give a better overview of the team's performance in comparison to national averages.
- 3.11.2 This has changed the way we measure the proportion of premises that are broadly compliant (have a FHR 3 or above) as it now takes into consideration the unrated/new business that are still awaiting an inspection. As a result this has lowered the % of broadly compliant premises overall in comparison with previous year performance monitoring. Previously we monitored the % of broadly compliant premises based only on those that had received an intervention. This resulted in a in a higher % (based on those that have an intervention there are currently 94% that are broadly compliant but when you take into consideration the unrated businesses this is now 86.7%). The reason for the change is to be more consistent in line with our central competent authority and to be more efficient in terms of recording and monitoring.

Table 3.11 New Performance Indicators for 2020/2022

Status	Performance Indicator	Actual 2018/19	Target	National Average 2018/19 ²	Notes
New	The % of food establishments in the District achieving broad compliance (FHR of 3 or above).	86.7%	91%	90.7%	Reported annually
New	The % of food business within the District rated as having an unsatisfactory level of compliance (FHRS of 2 or less).	5.5%	4.5%	4.5%	Reported annually
New	The % of remaining premises yet to be risk rated (new businesses not yet subject to an intervention).	7.7%	5%	4.8%	Reported annually New businesses allocated to officers monthly. Progress monitored during monthly 1:1 meetings and regular reporting.
New	The % of due food safety inspections achieved (based on the number of programmed inspections at the start of the year).	98.9%	100%	86.3%	Reported annually. Progress monitored during monthly 1:1 meetings and regular reporting.
New	The % of programmed food inspections completed within 28 days of the due date, in line with the Food Law Code of Practice.	Not reported	90%	n/a	Reported annually. Progress monitored during monthly 1:1 meetings and regular reporting. Aim is to reduce the number of overdue inspections in order to better manage workloads and prioritise interventions.
Current	Number of food safety Written Warnings sent to food establishments.	341	n/a	n/a	Reported annually. No target (previous ref LEH7(o) (i))

Current	% of written warnings sent within 10 days	94%	98%	n/a	Monitored during 1:1 meetings and through reporting system.
Current	Number of food hygiene legal notices served.	4	n/a	n/a	No target required for this activity
Current	Number of Simple Cautions issued for food safety offences.	1	n/a	n/a	No target required for this activity (Previous ref LEH7(o))
Current	Number of Legal proceedings for food safety offences.	1	n/a	n/a	No target required for this activity (Previous ref LEH7(p))
New	Number of food establishments in the District	945	n/a	n/a	Reported annually. Used for year by year comparison and to programme work levels and resource.
New	Number of non- compliant businesses in the District	52	n/a	n/a	Reported annually. Reflects the number of business that are performing badly to identify shifts in compliance. The aim is to reduce the overall number of non-complaint businesses each year.
New	Number of new businesses.	126	n/a	n/a	Reported annually. Used for year by year comparison and to programme work levels and resource. To demonstrate the increasing demand for non- programmed/ additional food safety interventions.
Current	LEH7(e) Total number of food safety intervention visits made (which includes, revisits, re-rating visits and food sampling visits)	804	67 month/ 804 a year	n/a	Reported monthly and annually. No national average. Reviewed and monthly one2ones and through reporting systems.

²Annual report on UK local authority food law enforcement, 2018-19, FSA

4 SECTION 4: RESOURCES 4.1 Financial Allocation

- 4.1.1 A breakdown of expenditure for the Food and Health & Safety Team by activity for 2020-2022 is included in **Appendix 5**.
- 4.1.2 The Council recognises the importance of being able to deal with legal actions and other one off occurrences by maintaining adequate corporate reserves and provisions. The service makes use of a shared legal service with South Staffordshire District Council and Tamworth Borough Council.
- 4.1.3 If legal action is to be taken by the service, costs are met from within a central budget for legal fees. Where possible costs are recovered.

4.2 Staffing Allocation

- 4.2.1 Pressures on staffing resources for food safety service delivery are likely to increase. To ensure the viability of our service we have implemented ways to deliver our service in a number of different ways such as:-
 - the introduction of a new database system
 - changing the way we carry out interventions to release resources in 'pressure areas' such as enforcement
 - raising income through the delivery of services and further 'Primary Authority' arrangements
 - Continued streamlining the inspection report process to reduce administrative burdens.
- 4.2.2 The staff resources available to undertake food law enforcement during 2020-22 are equivalent to 3.3 full time officers. We believe that we can deliver the service with this resource, using the techniques highlighted above in this time. Resource to task allocation is highlighted in the work/improvement table that follows. A breakdown of this figure based on full time equivalent posts (FTE) is as follows:-

Post	Full Time Equivalent (FTE)
Food and health & Safety Manager	0.6
Environmental Health Officer (Pt time/4days)	0.5
Environmental Health Officer (Pt time/ 3days)	0.4
Environmental Health Officer (Pt time/2.5days)	0.3
Technical Officer	0.7
Technical Officer	0.7
Technical Support Officer (Pt time/ 4days)	0.1
Total (FTE)	3.3

- 4.2.3 All Technical Officers are qualified to undertake food safety work. Both officers have the Higher Certificate in Food Premises. The Food and Health & Safety Manager and EHOs are qualified to undertake the whole range of food safety work. When needs arise, the Head of Service is trained to cover food safety enforcement.
- 4.2.4 Support for our service comes from our Technical Support Officer who supports the team with their full range of admin functions not just food safety enforcement.

4.3 Staff Development

- 4.3.1 The Council recognises that there is a need to invest in the continuing development of staff. Each member of staff takes part in a performance and development review at the beginning of the financial year in order to establish work and performance targets and identify training and development needs.
- 4.3.2 Within the Food and Health & Safety Team, such development is needed in order to meet the continuing professional development requirements of the Chartered Institute of Environmental Health and more specifically requirements contained in the Food Standards Agency's Code of Practice.
- 4.3.3 All Officers are required to prove competence via the competency framework introduced by the Food Standards Agency. Each officer must attend 20 hours CPD training each year.
- 4.3.4 All necessary training will be undertaken through in house training, formal courses and vocational visits as appropriate. Sufficient resources will be allocated towards such training and the extent of training will be assessed as part of the development review process.
- 4.3.5 The Food and Health and Safety Manager will also implement a reviewed 'Monitoring of Officer Competency' procedure to monitor the quality of interventions carried out by officers in line with the requirements of the Food Standards Agency Food Law Code of Practice.

5 SECTION 5: QUALITY ASSESSMENT

5.1 Quality Assessment

- 5.1.1 The work of the team is subject to scrutiny by Members, internal auditors and the Food Standards Agency.
- 5.1.2 The following monitoring arrangements are currently in place to assist in the quality assessment of the work carried out by the food team :-
 - > sample inspection audits
 - customer satisfaction questionnaires
 - sample audits of food files and associated paperwork
 - sample audits during visits
 - > sample audits post enforcement action being taken
 - performance and development reviews
 - > performance monitoring of target response times
 - > performance monitoring against targets set down by National Indicators
 - > 1:1 meetings with team members
 - ➢ team meetings
- 5.1.3 We aim to continue to build on the qualitative aspects of our work and recognise that through the implementation of the new IDOX database, the reporting and monitoring of key aspects of our service will improve.
- 5.1.4 In our work programme we will continue to review and improve our documented food procedures required within the Food Standards Agency's Framework Agreement.

6 SECTION 6: REVIEW

6.1 Review against this Service Plan

- 6.1.1 The process of review will be commenced in March/April each year based on:-
 - > performance and resources available over the previous 12 months
 - > responses to feedback from local businesses and the community
 - observations from Members and the food safety team
 - advice and guidance issued by the Food Standards Agency, the Local Authority Co-ordinating Body on Regulatory Services and examples of best practice.
- 6.1.2 A briefing paper on the previous year's performance against the Food Safety Service Delivery Plan will be submitted to the Regulatory & Licensing Committee in each year.

6.2 Identification of any Variation from the Service Plan

6.2.1 Performance figures are produced for our National & Local Indicators at half year and end of year points through the council's performance monitoring software 'Pentana'. Any variances against the Food Safety Service Plan, including resource implication, will be addressed during this process as well as directly through regular 1:1 and team meetings with service staff.

6.3 Action Plan

6.3.1 An **Action plan** has been developed as part of this Service Plan, details of which can be found in the tables below (Section 6.3.2).

6.3.2 Action Plan 2020-2022

Work Activity	Ongoing Work / Improvement Action	1. Ena 2. Sha 3. Dev 4. A G	abling Per aping Place veloping I accod Cou	rities: ople ces Prosperit ncil	у	Performance Measures –	Timescales (based on end of reporting years for 2020 to 2022)	Responsibility
Interventions	To undertake routine inspections at food premises in accordance with our annual programmes for 2020-21 & 2021-22 Target worst performing premises to improve standards To produce LAEMS return To reduce the number of overdue inspections (carried out more than 28days after the due date) in order to better manage workloads and prioritise interventions. Demonstrate better compliance with the Food Law CoP.	<u>1</u> ✓	2	3	<u>4</u> ✓	 Complete 100% of Annual Programme of routine inspections by year end. To carry out 90% of programmed inspections within 28 days of the due date in line with FCoP. To increase % of 'Broadly Compliant' Premises (those with a FHR of 3 or above) to 91%. 97% performance in the 10 day target for turnaround of paperwork LAEMS Return submitted by FSA set deadline (May 2021 and May 2022). 	March 2021 March 2022	Food and H&S Team / FHSM
	Allergen awareness interventions included within routine inspections alongside implementation of the Staffordshire Allergen Incident MoU. Increased awareness within food businesses, enhanced public protection, better coordination and communication with T/Standards in relation to reactive/enforcement cases, greater awareness and understanding within the team.	✓ 	V	V	V	Allergen information and advice provided to approx. 500 food businesses in line with programme of routine inspections. Implementation of the Staffordshire Allergen MoU	Ongoing	Food and H&S Team / FHSM
	To implement the internal monitoring procedure to monitor consistency of intervention and enforcement.				V	To check against procedures on monitoring of intervention and enforcement. Requires 10% of interventions to be checked. 95% compliance / training needs acted upon if identified	Monthly/ March 2021 March 2022	FHSM

Work Activity	Ongoing Work / Improvement Action	1. Ena 2. Sha	inks to prior bling Peo ping Plac reloping F ood Court	ities: ople ces		Performance Measures –	Timescales (based on end of reporting years for 2020 to 2022)	Responsibility
	To target worst performing business – providing new advisory interventions to improve FHRS ratings and standards. To pilot a commercialised service to provide tailored support to poor performing businesses to enable them to improve food safety compliance. This will be reflected in improved food hygiene ratings. This service will be charged for on an hourly rate on a cost recovery basis. The pilot will focus on a small number of business and will enable the development of a package of services that work best for businesses alongside the other demands of the service.	· · · · · · · · · · · · · · · · · · ·		 ✓ 	· · · · · · · · · · · · · · · · · · ·	Increase in higher FHRS ratings for current programmed visits and assessment of sustainability for those taking part in previous years. Review level of uptake and effectiveness of cost recovery/commercialised activity to enable a determination to be made for the direction of this service.	Ongoing March 2022	Food and H&S Team / FHSM
Food & Premises Complaints	To investigate all food and premises complaints	~	~	~	~	To respond to 97% of all food and premises complaints within 5 working days	March 2021 March 2022	Food and H&S Team / FHSM
Primary Authority	To continue to develop our working arrangements and partnership where we act as a primary authority. Increased areas of work through review and development of management systems for food safety and H&S with both Co-op and Busy Bees. This will take up a significantly more resource then it has previously years in order to enable the completion of this work. This work will be outlined in an agreed actions plan.	×	×	×	V	Time spent on this area of work is charged for on a cost recovery basis. Completion of the agreed work plan with Primary Authority partner. Outcomes – properly reviewed and implemented policies and where relevant new assured advice issued in line with Primary Authority guidance.	March 2021 March 2022	Food and H&S Team / FHSM

Work Activity	Ongoing Work / Improvement Action	1. Ena 2. Sha	Links to Strategic priorities: 1. Enabling People 2. Shaping Places 3. Developing Prosperity 4. A Good Council 1 2 3 4			Performance Measures –	Timescales (based on end of reporting years for 2020 to 2022)	Responsibility
Provision of Advice to Business & other Service Users	To respond to all requests for advice from businesses and service users	 ✓	✓ ✓	 ✓	<u>4</u> √	To respond to 97% of all requests for advice within 5 working days	March 2021 March 2022	Food and H&S Team / FHSM
Food Sampling	To undertake a food sampling programme based on relevant national and cross regional sampling programmes. Where these are not suitable or specific the focus for sampling will instead be on local priorities e.g. end product sampling at high risk food manufacturers or hygiene surveys at non-compliant businesses. With the emphasis being based less on the number/quantity of samples achieved over the period but more on their relevance or the risk priorities.	~	~			To take a minimum of 30 samples in in 2020-21 To take a minimum of 30 food samples in 2021-22	March 2021 March 2022	Food and H&S Team / FHSM
Food Poisoning & Outbreak Investigations	To undertake investigations of all food poisoning or outbreak notifications received	~	~			To respond to 97% of all food poisoning or outbreak notifications within 1 working days	March 2021 March 2022	Food and H&S Team / FHSM
Food Safety Incidents	To respond to food alerts issued by the Food Standards Agency	~	~		~	To respond to all food alerts received in accordance with guidance issued by the FSA	March 2021 March 2022	Food and H&S Team / FHSM
Liaison with Other Organisations	To actively participate on the Central England North Food Coordinators Group	~	~	~	~	Attendance by a member of the Food Team at 4 meetings	March 2021 March 2022	Food and H&S Team / FHSM
Food Safety Promotion & Education	To review documented procedures for food safety enforcement and train officers in their implementation				~	Completion of procedures review and implement updates	March 2021	FHSM

Work Activity	Ongoing Work / Improvement Action	Links to Strategic priorities: 1. Enabling People 2. Shaping Places 3. Developing Prosperity 4. A Good Council			Performance Measures –	Timescales (based on end of reporting years for 2020 to 2022)	Responsibility	
	All officers undertaking food safety work to have received at least 20 hours training in relevant subject areas	 ✓	2 ✓	3 ✓	<u>4</u> √	Completion of 20 hours of training	March 2021 March 2022	Food and H&S Team / FHSM
Food Business Database and back of office line of business system	To continue with the full implementation and configuration of the new IDOX system. To ensure that inspections and interventions are updated/recorded on Uniform in a timely manner to prevent loss of data and ensure regular progress reporting can be carried out. To use available online letters and forms for providing information to customers (where ever possible emailing reports as opposed to using postage), linking electronic records through DMS to reduce the reliance on paper files, to support the reduction in paper and printing costs. Review the ongoing plan to implement mobile working devices.					Back office line of business system fully implemented. Completed review of all admin and recording procedures to enable better efficiency and reduce the administrative burden on officer. Reduction in printing and postage costs.	March 2021 March 2022	FHSM

- 1 Framework Agreement on Local Authority Food Law Enforcement 2010
- 2 Food Standards Agency Strategy Plan for 2015 2020
- 3 Lichfield District Council Strategic Plan 2016-2020
- 4 Food Standards Agency Food Safety Act 1990 Code of Practice & Practice Guidance Notes (2017)
- 5 Lichfield District Council's Regulatory Services, Housing & Wellbeing Enforcement Policy 2015, updated 2017
- 6 PHE WM Centre Outbreak Control Plan 2017
- 7 Annual report on UK local authority food law enforcement, 1 April 2018 to 31 March 2019, FSA
- 8 Equality Statement 2019, Lichfield District Council published 31st January 2019

Appendix 1 - Team Structure

Food and Health & Safety Team



(total FTE)

FTE resource designated to food safety enforcement

Appendix 2 - Committee Structure & Food Safety Reporting



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Appendix 3 - Useful Contacts

Lichfield District Council Regulatory Services, Housing & Wellbeing Food Safety Team Council House Frog Lane Lichfield WS13 6ZE	Tel:- 01543 308000 Out of Hours Tel:- 01527 871565 E-mail:- <u>food.safety@lichfielddc.gov.uk</u> Web address:- <u>www.lichfielddc.gov.uk</u>
Lichfield District Council Council House Frog Lane Lichfield WS13 6ZE	Tel:- 01543 308000 E-mail:- <u>enquiries@lichfielddc.gov.uk</u> Web address:- <u>www.lichfielddc.gov.uk</u>
Food, Water and Environmental Microbiology Laboratory London Public Health England 61 Colindale Avenue London NW9 5EQ	Tel:- 0208 327 6550 https://www.gov.uk/guidance/london-food-water-and- environmental-laboratory-services-takes E-mail address:- fwem@phe.gov.uk
Eurofins Food Testing UK Ltd i54 Business Park, Valiant Way Coven Wolverhampton WV9 5GB	Tel: - 01902 627200 E-mail address: - <u>info@eurofins.co.uk</u>
PHE West Midlands 6th Floor 5 St Philip's Place Birmingham B3 2PW	Tel:- 0344 225 3560 E-mail address:- <u>phebirmingham@heartofengland.nhs.uk</u> Web address:- <u>https://www.gov.uk/government/organisations/public- health-england</u>
Staffordshire County Council Trading Standards Staffordshire Place Stafford ST16 2DH	Business Support Tel:- 0300 111 8002 E-mail address:- <u>businessadvice@staffordshire.gov.uk</u> <u>www.staffordshire.gov.uk/Business/Tradingstandards/Contact-Us.aspx</u>
Food Standards Agency Headquarters Floors 6 and 7, Clive House 70 Petty France London SW1H 9EX	Tel:- 0330 332 7149 E-mail address:- helpline@food.gov.uk Web address:- <u>www.food.gov.uk</u>

Appendix 4 – Previous performance by Food and Health & Safety Team

	2015-16		2016-17		2017-18		2018-19	
	Target	Actual	Target	Actual	Target	Actual	Target	Actual
LEH7(a) No. of food establishments inspected in the last month that were broadly compliant		420		457		387		392
LEH7(b) No. of food establishments inspected that were not compliant		40		49		74		54
LEH7(c) Total number of food safety inspection visits made		527		527		563		579
LEH7(d) % all food establishments within the District which are broadly compliant - moving figure (monthly).	97%	95.43%	97%	94.89%	97%	94.55%		94.12%
% of reports sent within 10 working days of intervention	Not recorded						97%	96.72%
LEH7(e) Total number of new food premises that have started up since the last month		80		105		90		125
LEH7(f) No of new food premises start ups in the last month which have been provided with regulatory advice that achieve 4* or above	75%	74.12% 30		83.06% 27		74.46% 39		71.94% 37
LEH7(o) Food Safety Simple Cautions		0		0		1		1
LEH7(o)(i) Food Safety Written Warnings		284		343		321		337
LEH7(p) Food Safety Legal Proceedings		0		0		0		0
LEH18(a) Shift in Compliance - Number of premises improving from 0, 1 & 2 to 3 or above rating	Overall improvement 60%	39		27		28		36
LEH18(b) Shift in Compliance - Number of premises falling into the lower 0, 1 & 2 rating		21		35		46		26
Satisfaction of business with local authority regulation services (NI 182)	99%	100%	99%	Unavailable	99%	Unavailable		Unavailable
% of premises inspected of those due	100%	99.62%	100%	99.38%	100%	Unavailable	100%	98.98%

Appendix 5 - A Breakdown of Net Expenditure for Food and Health & Safety Team from 2018/19 to 2022/23

			Forecast			
	Actuals	Projected	Budget	Budget	Budget	
	2018/19	2019/20	2020/21	2021/22	2022/23	
	£	£	£	£	£	
Expenditure						
Employees	241,303	216,027	243,620	249,300	254,450	
Transport	6,760	6,560	7,570	7,570	7,570	
Supplies and Services	63,038	14,848	5,680	4,680	4,680	
Overheads	169,190	138,320	138,320	138,320	138,320	
Capital Charges	0	2,000	2,000	2,000	2,000	
Total Expenditure	480,291	377,755	397,190	401,870	407,020	
Income						
External Sources	32,996	21,103	12,000	12,000	12,000	
Internal Recharges	84,990	84,990	84,990	84,990	84,990	
Total Income	117,986	106,093	96,990	96,990	96,990	
Net Expenditure	362,305	271,662	300,200	304,880	310,030	