



# FOOD SAFETY SERVICE DELIVERY PLAN 2024 - 2025

FS Service Delivery Plan 2024-25

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#### 1 SECTION 1: SERVICE AIMS & KEY PRIORITIES

#### **1.0 INTRODUCTION**

The Food Standards Agency is the Central Competent Authority, overseeing official food controls in local authorities and working in partnership to help them deliver official food controls, Lichfield District Council, as a competent food law enforcement authority, ensures standards of food safety within the District are maintained and improved.

This Food Service Plan has been prepared in accordance with the Food Standards Agency's Framework Agreement. It sets out how Lichfield's official food controls will be provided in 2024 / 2025 in line with the Food Standards Agency Food Law Code of Practice (England) 2023.

This food service plan details the direction, planned activity, and intended achievements of Lichfield District Council's Food and Health & Safety Team for 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025 based on the requirements set out in the code, the Lichfield Plan and best utilising the available resources.

The Food and Health & Safety team has responsibility for food hygiene enforcement, and the provision of advice and support in relation to all food hygiene and safety issues. The Manager with overall responsibility for delivery of official food control within Lichfield District Council is James Johnson, Regulatory & Enforcement Manager assisted by the nominated Lead Officer for Food Hygiene, Lorraine Chapman, Food and Health & Safety Manager.

The Food Safety Service Delivery Plan will next be reviewed in spring 2025 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 <u>www.lichfielddc.gov.uk</u>

Comments, observations and any suggestions for improvement should be sent for the attention of Lorraine Chapman, Food and Health & Safety Manager, Finance Regulation & Enforcement, The Council House, Frog Lane, Lichfield, Staffordshire, WS13 6YX, or by e-mailing at <u>food.safety@lichfielddc.gov.uk</u>

#### 1.1 SERVICE AIMS

1.1.1 The Authority's aim is to make Lichfield a high-quality place to live, work and spend leisure time for all our residents and visitors by supporting a thriving local enterprise economy through effective regulation and ensuring access to safe food by providing a food safety service to the public and businesses alike, that is equitable, proportional, consistent, helpful, open and takes into account equality issues.

Specifically:

- To enforce and ensure compliance with Food Hygiene and Safety legislation.
- To ensure food and drink offered or exposed for sale is fit for human consumption and to expedite the removal of hazardous/risk product from the food chain.
- To work to prevent avoidable illness and reduce the spread of communicable disease

#### 1.2 SERVICE OBJETIVES

- 1.2.1 In order to achieve our stated service aims, we need to set out some key objectives for our Food Safety Service Delivery.
  - > To put the customer 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 Office for Product Safety & Standards(OPSS) Part of the Department for Business and Trade).
  - > 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 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 Regulation & Enforcement Service Delivery Plan 2024-25 and our Lichfield District 2050 strategy. These essentially govern how the Council in future will deliver its services based on local aspirations, needs and priorities.
- 1.3.2 Our Lichfield District 2050 strategy contains several pledges that the activities of the Environmental Health Service, specifically the Food and Health & Safety Team contribute to:

**Confident communities** – regulating business and protecting residents.

*Prosperous communities* – supporting new and existing businesses to comply with legal requirements and ensure prosperous trading conditions.

*Greener Communities* – adapting our ways of working to contribute to a sustainable and carbon efficient manner.

*Active Communities* – ensuring residents have access to wholesome, safe food which will promote healthy living and positive health outcomes.

By supporting and advising over 1000 both new and existing businesses in the District The Food and Health & Safety Team are at the front line of business engagement. Officers executing all aspects of their work will actively support existing and encourage new and prospective businesses. The guidance and advice given will include explaining the most cost-effective ways of complying with legislation, assessing plans and explaining new legislation etc.

By taking enforcement against persistent offenders a competitive level playing field is achieved which will encourage compliant businesses to invest in the District of Lichfield. Tourism which is largely centred on the food industry is also safeguarded and participation in the National Food Hygiene Rating Scheme allows greater consumer confidence.

By preventing and reducing the incidence of food borne illness through both educational and legislative compliance and interventions Lichfield residents and visitors can be supported to lead healthier and less disease prone lives – the Food and Health & Safety service makes a positive contribution to protecting the health and wellbeing of Lichfield residents and visitors.

#### 2 SECTION 2: BACKGROUND

#### 2.1 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 103,965<sup>1</sup>.

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 Resort, 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 2023 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.

#### 2.2 Organisational Structure

- 2.2.1 The Finance, Regulation & Enforcement Services has a wide range of duties covering the spectrum of public health, environmental and housing functions and licensing. The Council's Food Safety Service is delivered by the Food and Health & Safety Team which sits within Regulation & Enforcement Services. The structure of the team is detailed in **Appendix 1**
- 2.2.2 The Regulation & Enforcement Manager 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 Cabinet structure and where our food safety service fits into this is detailed in Appendix 2

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<sup>&</sup>lt;sup>1</sup> Equality Statement 2023, Lichfield District Council

- 2.2.4 The Regulatory & Licensing Committee can make recommendations to the relevant cabinet member 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.
  - 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.
  - Food Safety Officer 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.
  - Food Safety Support Officer administrative support; infectious disease notifications; database support; alternative strategy inspections.
- 2.2.6 The Council uses the UKHSA Food, Water and Environmental Microbiology Services Laboratory based in London Porton and York for the microbiological analysis of food and water samples. A service level agreement is in place for these 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)

#### 2.3 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/UK Health Security Agency (UKHSA) and local need.
  - imported food control

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- > Duty of care waste checks in food premises
- 2.3.2 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
  - supporting trading standards surveys
- 2.3.3 In addition to the areas of work listed above the officers whose duties include food safety also enforce a wider range of environmental health and public health law within the district for example infectious disease control and certain licensing functions. Suitably qualified officers within the team also enforce the Health and Safety at Work etc. Act 1974 in premises where the local authority is the relevant enforcement authority.
- 2.3.4 Officers are also responsible for enforcing legislation in respect of Private Water Supplies ensuring that premises which have a private supply in Lichfield are complying with the legislative parameters and are providing potable (safe) water.
- 2.3.5 All food services are delivered by in house staff, except where food and water 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 Environmental Health Commercial Team are responsible for approximately 900/1000 premises, ranging from large manufacturers to one-person operations. Categorisation of food premises according to Food Standards Agency (FSA) type is as follows:

Type of premises	Number	
Primary Producers	8	
Manufacturer / Packer	34	
Importer / Exporter	0	
Distributors / Transporters	12	
Retailer	176	
Restaurant / Caterers	698	
Total Number of Premises	928	

Each food premises is rated in accordance with the FSA Code of Practice risk assessment. The detail of establishment risk profile i.e. the number of premises in each category for food hygiene/safety as of 1st April 2024 is as follows:

Risk Profile	Number of premises as of March 2024
A	2
В	34
С	179
D	291
E	362
Unrated	58
Outside the programme	2
Total	928

#### 2.4.2 Approved Premises

The Environmental Health Commercial Team is responsible for 3 premises under Approved Premises Regulations. Details of these premises are given below:-

Establishment Name	Type of Approval	Approval Number
John Owen, Britannia Enterprise Park, Lichfield	Fishery Products	LF 007
ELC UK Ltd, Lynn Lane, Shenstone	Cold Storage	FL008
Snackaway, 7a-7b Plant Lane, Business Park, Plant Lane, Burntwood, Staffordshire	Cold Storage, Re-wrapping Establishment and Meat Products	LF015

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

Approved premises, other than stand-alone cold stores, are resource intensive, requiring an extensive approval process, more frequent and detailed inspections and resources to deal with home authority referrals where products are distributed regionally and nationally. Additionally, there is a need for ongoing specialist training for officers who inspect approved premises.

#### 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 spring water & Natural Mineral Water Sources recognized in accordance with European and National legislation).

Lichfield is home to the headquarters of **Busy Bees Nursery's Ltd**, a regionally and nationally significant company. We have a **Primary Authority** relationship with Busy Bees Nursery's Ltd for food hygiene and Health & Safety matters.

Referrals from other local authorities into the activities of this company 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 2024-25

In addition to some of the demands identified above, other factors are likely to influence the way we work in 2024-25, including:-

- Recovering from a backlog of interventions due to the loss of two district posts in March 2022 and August 2022. The recruitment of a full-time Environmental Health Officer from May 2024 gives us significant extra capacity into the team for 2024-2025. Including the retention of a Food Safety Consultant (0.3 FTE).
- > The ongoing implementation of a new back office computer system and mobile/hybrid working solution.
- There is an upward trend in the numbers of 'new' food businesses. We have received approx. 158 new business registrations in the last 12 months, which is approx. 13 per month. This is an increase from approx. 10 per month over the previous few years. Although some may never have started trading and others will have ceased trading, the risks associated with them remain largely unknown. These all require a full food hygiene inspection to be carried out, to risk rate the business and bring it into the programme.
- The new food standards delivery model is currently being implemented and the food hygiene intervention rating scheme will be reviewed and revised for implementation, currently scheduled for 2025/26. This means that there will be a significant amount of work for LAs and the FSA to undertake in preparation and during this phase.
- > Demands around health & safety enforcement.
- Demands from other areas of our work such as the registration of special treatments. Additionally there is further work streams on the horizon. An amendment in the Health and Social Care Bill, the service awaits further instruction from the Government in relation to a new licensing regime being introduced in relation to cosmetic treatments (Botox, fillers, laser hair removal etc.). This new licensing regime will need to be implemented by the Council's qualified Environmental Health Officers and will require resources to be committed. However, it is unclear yet when this will be, but projections are within the next 12-24 months.
- > Resource may be required for export certification to enable trade and support economic growth.

#### 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:-

- by telephone: on 01543 308729
  - between 8.45am and 5.15pm Monday to Friday.
  - Out of hours:- 01527 871565
- by e-mail: <u>food.safety@lichfielddc.gov.uk</u>
- by website: https://www.lichfielddc.gov.uk/food-safety-advice

Officers also have remote access to internet and e-mails. Programmed inspections and visits are undertaken out of normal office hours as required to observe high risk activities, e.g. evening opening premises / early morning visits to observe practices / weekend events.

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 and 2020.
- 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.
  - Provide simple and straightforward ways to engage with those they regulate and hear their views.
  - Base their regulatory activities on risk.
  - Share information about compliance and risk.
  - Ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply.
  - Ensure that their approach to their regulatory activities is transparent.

#### 3 SECTION 3: SERVICE DELIVERY

#### 3.1 Food Premises Interventions

- 3.1.1 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.
- 3.1.2 Interventions fall into either official control of non-official control as follows:

Official Control interventions include:- > monitoring > surveillance > verification > audit > inspection > sampling and analysis	<ul> <li>Interventions which are not Official Controls:-</li> <li>targeted education &amp; advice</li> <li>information &amp; intelligence gathering</li> </ul>
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- 3.1.3 Food hygiene inspections are part of the regime for ensuring that food meets the requirements of food hygiene and safety law, including microbiological quality is free from pathogenic microorganisms, and is safe for human consumption.
- 3.1.4 Lichfield has a food hygiene inspection programme that includes all the businesses for which they as a Food Authority have food hygiene responsibility. The programme is based on a risk-based rating system set out in accordance with the Food Law Code of Practice (England) code, which ensures that the businesses which pose the greatest level of risk are visited most frequently.
- 3.1.5 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. Food Businesses serving vulnerable groups in society such as care homes, day nurseries and hospitals receive an additional score which requires that they be inspected more frequently.
- 3.1.6 The following is a breakdown of categories of risk; frequency of intervention and number of premises within the District due in 2024-2025.

Rating	Frequency of Inspection (At least once every)	Number of premises due for intervention up to 31 <sup>st</sup> March 2025
А	6 months	2 (2x visits per year)
В	12 months	33
С	18 months	99
D	2 years	114
Е	3 years	125
Total		373

#### A total of 373 food hygiene inspections for Category A-E premises are due to March 2025.

The risk factors considered when rating premises include the inherent risk associated with the nature and scope of the business activity and secondly the performance of the business in terms of compliance with relevant legislation.

All businesses less than satisfactory (with a food hygiene rating of 0, 1 or 2) will be revisited to ensure that the necessary improvements are carried out. Revisits & appropriate enforcement for all non-compliant food premises (i.e., hygiene rating less than 3) is a requirement under Food Law Code of Practice. Last year 25 were undertaken to ensure businesses had implemented the necessary improvements. It is estimated that **25-30** revisits will be undertaken for 2024-2025 and enforcement action to be carried out where necessary.

In addition, we also get around **156** new businesses per annum to inspect. These all require a full food hygiene inspection to be carried out, to risk rate the business and bring it into the program.

Other additional workload is generated from requests for a food hygiene re-rating inspection, the team receives approximately 30 requests per annum (Food businesses are able to request a re-rating after they have made improvements). There is a charge of £175 (£200 from 1<sup>st</sup> April 2024) for this service as it requires an additional inspection to be carried out.

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

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

- 3.1.7 Challenges created by the pandemic and staffing resource means that priority has so far been given to the most high risk/ non-compliant food premises (categories A-C) and high-risk new businesses that have not previously been inspected. This means that there are substantial number of food premises in categories D E that have not received their intervention within the minimum frequency as set down in the Food Law Code of Practice.
- 3.1.8 As of March 2024, there are 67 overdue programmed inspections for Cat B-D food premises. There are also 61 new businesses that have yet to be inspected and risk rated.
- 3.1.9 The techniques and interventions we can use by category of risk are outlined in the Food Law Code of Practice (England) 2023
- 3.1.10 In 2024-25 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.

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.

- 3.1.11 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
- 3.1.12 We will aim to inspect new high-risk businesses registering with the authority within 28 days of the business opening for trading or sooner if requested. Low risk new businesses e.g. home bakers will be given less priority and initially targeted through remote interventions. Continuing surveillance for new food businesses that require registration and inspection will continue to take place.

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#### 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 All food complaints are investigated in accordance with the Food Law Code of Practice (England). A total of food complaints 103 were received in 2023-24 these include complaints about foreign body contamination, unfitness of food and about the condition of food premises. In line with previous years expectations of a similar number are estimated. Officers participate in a duty rota, where in the main, it is the duty officer that will respond to these requests for advice as part of their duties.
- 3.2.3 Notwithstanding the above in order to maintain an effective service with significantly reduced costs, further investigations will only be conducted where it is suspected that the issues pose a risk to the public at large. Members of the public will be advised of their civil rights where appropriate. In the case of reports of food premises causing illness, a visit will only be made to the premises if a second complaint from a separate household is received, or a positive microbiological sample is returned.
- 3.2.4 Any food requiring analysis will be sent to UKHSA Food, Water and Environmental Microbiological Network (London & Porton Laboratory) in accordance with the Food Law Code of Practice (England).

#### 3.3 Primary/Home Authority Scheme

- 3.3.1 The Regulatory Enforcement and Sanctions Act 2008 introduced Primary Authority agreements. Companies can enter into agreements on a cost recovery basis with the local authority. National inspection plans and guidelines for other councils are produced to help avoid unnecessary burdens on business. The aim of the home authority principle is to provide businesses with a source of guidance and advice within their home authority. Lichfield District Council supports the principle and uses it to provide effective liaison between local authorities in deciding on the best course of action when investigating food complaints.
- 3.3.2 The Council continues to fully support the National Primary Authority Scheme for businesses. When inspecting businesses which have a primary authority agreement in place with another local authority, officers will have regard to any relevant inspection plans or primary authority advice published on the register.
- 3.3.3 We currently have Primary Authority arrangements for food Hygiene with **Busy Bees Nurseries** Ltd. This supports the key strategic **priority** of '**Prosperous Communities**.' Officers are continuing to work and support Busy Bees Nurseries Ltd for e.g. with advice/review of their food safety procedures, matters arising from inspections carried out by Environmental Health Colleagues nationally.
- 3.3.4 Currently there are two designated officers responsible for maintaining and delivering the partnership, which is done in conjunction with the other range of duties carried out by the team. A charging process is in place to recover costs related to this work.

#### 3.4 Advice to Business

- 3.4.1 The Food and Health & Safety 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
- 3.4.2 A total number of 135 service requests for advice were actioned in 2023-2024. Officers participate in a duty rota, where in the main, it is the duty officer that will respond to these requests for advice as part of their duties.
- 3.4.3 We will also endeavour to, where resources allow, to offer advice and assistance to new and proposed businesses at the planning and pre- planning 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.
- 3.4.4 The service does recognise however that its primary role of law enforcement must be prioritised often at the expense of advisory visits. In order to maintain our inspection and enforcement regimes further emphasis is being placed on channel shifting and the provision of quality information to guide businesses particularly in their infancy with visits being reserved for only the highest risk premises outside of the compulsory inspection regime.

#### 3.5 Food Sampling

- 3.5.1 To monitor the safety of food within Lichfield the Food and Health & Safety Team carry out sampling in accordance with the Food Law Code of Practice (England).
- 3.5.2 Where resources permit 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.
- 3.5.3 The Council supports all relevant nationally co-ordinated food sampling programmes organised by the Food Standard Agency and the UK Health Security Agency (formally known as PHE) Laboratory Services as well as any relevant cross regional surveys coordinated by the Food and Water Laboratory.
- 3.5.4 The general principle of this strategy is to make announced surveillance visits with businesses being informed of both the sample collection and results. Unannounced sampling is occasionally used to verify complaint allegations and suspicions of contraventions arising from inspection visits.
- 3.5.5 Samples requiring microbiological examination are sent to the Food, Water & Environmental Services based at London or Porton or otherwise are sent to a public analyst.
- 3.5.6 A total of 40 samples were taken in 2023-2024 and resource permitting, a similar number is projected for 2024-2025.

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#### 3.6 Food Safety Incidents

- 3.6.1 The Council complies with Food Safety Act Code of Practice in relation to handling food alerts. All the officers within the Environmental Health Commercial Team are alerted to food alerts via Food Standards Agency E-mail alerts.
- 3.6.2 We respond to all food alerts that **require action** within 1 working day.
- 3.6.3 Based on previous years it is anticipated that approx. 75 food alerts (not including allergy alerts) will be notified in 2024/2025 with approximately 5/6 requiring action.

#### 3.7 Liaison with Other Organisations

3.7.1 To ensure consistency in enforcement and approach in all food safety matters, the Food and Health and Safety Team has a number of formal and informal liaison arrangements with other local authorities, Government bodies, and local liaison groups. These includes playing 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 are represented as well as Shropshire. Other organisations include the Chartered Institute of Environmental Health, Consultant in Communicable Disease Control, UKHSA, Drinking Water Inspectorate, Staffordshire Police and with other departments within the Authority.

#### 3.8 Food Safety Promotional Work and Education

- 3.8.1 Press releases will continue to be issued to report on public interest information, e.g., outcomes of prosecutions, food hygiene ratings
- 3.8.2 The Food Service Plan will be published on the Council's website.
- 3.8.3 Food related webpages have been updated and will continue to be so in order to provide accurate and up to date advice. All correspondence contains short cuts to relevant web addresses.
- 3.8.4 Twitter can be used to disseminate public information messages on food safety.
- 3.8.5 There will be an enhanced approach to allergen awareness by the 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 (Amendment) (England) Regulations 2019 which amended the Food Information Regulations 2014 and is otherwise known as 'Natasha's law'.
- 3.8.6 Trading Standards at Staffordshire County Council are authorised to undertake enforcement of these legal requirements. So, we will proactively report matters to their service and carry out joint visits where necessary to support their investigations and in order to drive up compliance with these matters.
- 3.8.7 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 Trading Standards in relation to reactive/enforcement cases and greater awareness and understanding within the team.

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

- 3.9.1 Environmental Health in liaison with the UK Health Security Agency and the Consultant in Communicable Disease Control, works to investigate and control both sporadic cases and outbreaks of food related illnesses.
- 3.9.2 UKHSA notifies Environmental Health of every case of food related illness and any suspected food poisoning/food related outbreaks. Investigations (with the exception of Campylobacter notifications) are then undertaken in order to attempt to identify the source of the illness, prevent further spread of illness, raise awareness of hygiene issues and carry out food hygiene visits or any necessary enforcement action. All cases of Campylobacter are followed-up with a standard letter.
- 3.9.3 For consistency with other Local Authorities, the investigation is undertaken using a standard detailed questionnaire prescribed by UKHSA. Officers also offer verbal advice to those involved to help prevent the spread of infections and signpost them to up to date information.
- 3.9.4 In extreme cases officers may apply to the magistrates' court to obtain a court order to exclude ill persons from work or education settings where they pose a risk to the public at large (for example if they work as a food handler whilst infectious).
- 3.9.5 The time spent by officers and clerical staff undertaking Infectious Disease Control is approximately 2/3 hours per week however this figure is difficult to measure and fluctuates significantly. During an outbreak situation, several officers may dedicate 100% of their time to this task.
- 3.9.6 During 2023/2024 there were 132 cases of confirmed food poisoning investigated. Slight year on year upward trend over previous three years. Estimated number of 140 for 2024-2025.

#### 4 SECTION 4: RESOURCES

#### 4.1 Financial Allocation

- 4.1.1 A breakdown of expenditure for Regulatory Services by activity for 2020-2024 is included in Appendix
   4.
- 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 remains constant. To ensure the viability of our service we have implemented ways to deliver our service in a number of different ways such as:-
  - Utilising Covid-19 grants paid by Staffordshire County Council to support with the backlog of routine food safety work that was created as a result of staffing resources being diverted to delivering the Staffordshire outbreak management plan and enforcing specific Covid regulations. This is being achieved by retaining budget for one food safety consultant for 2024-2025 and funding some overtime payments.
  - The continued implementation of a new database system to enable more efficient and support hybrid/remote working.
  - Raising income through the delivery of services and 'Primary Authority' arrangements
  - Prioritising food safety interventions based on risk and compliance and in line with the FSA Food Law Code of Practice.
- 4.2.2 The permanent staff resources available to undertake food law enforcement during 2022 2023 and 2023-2024 was equivalent to 2.1 full time officers, this was short of the requirement necessary and that detailed within the food service delivery plan of 3.3 full time equivalents. This was as a result of the loss of two full time posts. Following the submission of a business case a full time environmental health officer has been recruited.
- 4.2.3 The permanent staff resources available to undertake food law enforcement for 2024-2025 (Since 7/5/24) are equivalent to 2.8 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 action plan that follows, which has been agreed by the Food Standards Agency. 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 (Full Time) from 7/5/24	0.7
Environmental Health Officer (Pt time/ 3days)	0.4
Environmental Health Officer (Pt time/2.5days)	0.3
Food Safety Officer	0.7
Food Safety Support Officer (Pt time/ 4days)	0.1
Total (FTE)	2.8

- 4.2.4 The Food Safety Officer is qualified to undertake food safety work, having the Higher Certificate in Food Premises Inspection. The Food and Health & Safety Manager and EHOs are qualified to undertake the whole range of food safety work.
- 4.2.5 Support for our service comes from our Food Safety Support Officer who supports the team with their full range of admin functions not just food safety enforcement.
- 4.2.6 In addition, there is currently 1 part time Environmental Health Contractor (FTE 0.3) supporting the service with routine food safety inspection work. This is to support and bridge the staffing resource by loss of posts and catch up work following COVID and is funded by the COVID- 19 grant from Staffordshire County Council.

#### 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 (CPD) 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 attain 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 Safety and Health & 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 Uniform 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 and Health & 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 Areas of Improvement

The following areas of improvement have been identified for 2024-2025:

- > To increase the use formal enforcement sanctions for consistently poor performing food businesses
- > To carry out a food sampling program where resources permit.
- To implement the triaging of new/unrated premises to allow for more effective prioritisation of new business registration and to bring froward those of high risk for inspection to fall into the inspection programme.

#### 6.4 Action Plan

6.4.1 An **Action plan** has been developed as part of this Service Plan, details of which can be found in the tables below (Section 6.4.2).

#### 6.4.2 Action Plan 2024-2025

Link to Lichfield District 2050 Strategy	<ul> <li>Confident communities – regulating business and protecting residents.</li> <li>Prosperous communities – supporting new and existing businesses to comply with legal requirements and ensure prosperous trading conditions.</li> <li>Greener Communities – adapting our ways of working to contribute to a sustainable and carbon efficient manner.</li> <li>Active Communities – ensuring residents have access to wholesome, safe food which will promote healthy living and positive health outcomes.</li> </ul>								
Link to Regulation and Enforcement Service Delivery Plan	nforcement Service To achieve 100% compliance with this Food Safety Service Delivery Plan								
Subject	Food Hygiene and Safe	ety							
Objective	Action	Performance Measure with Key Milestones Quarters 1 – 4)	Achieved 2023-2024	Target 2024-2025	Responsibility	General comments / how supports corporate policies etc			
To ensure that all food premises within the District comply with food hygiene legislation.	Carry out food hygiene interventions in accordance with The Food Standards Agency's Food law Code of Practice.	All Quarters: Inspect all due category A-D food business premises. Inspect Cat E's when identified through local surveillance/ intelligence and as part of a project undertaken by Apprentice EHO Triage all new businesses for inspection as appropriate.	A total of 328 food hygiene interventions were carried out during the year Category A-E incorporating new/unrated.	<ul> <li>100% due of Category A- D's to be achieved by Oct 24 with ongoing requirement of 100% target monthly thereafter in accordance with agreed action plan approved by FSA.</li> <li>314 premises Cat A-D due (including 67 carryover)</li> <li>190 Cat E's due (including 65 carryover) <i>To extend</i> <i>past 2025 in accordance</i> <i>with agreed action plan</i> <i>approved by FSA.</i></li> <li>New premises triaged and inspected as appropriate.</li> <li>61 outstanding new businesses requiring inspection as of 1/4/24.</li> <li>Estimated 156 new food businesses will start to operate within the borough during the year. To achieve 100% by March 2025.</li> <li>Estimated Intervention total (minus Cat E's) 531</li> </ul>	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	Supports Lichfield 2050 strategy supporting food business proprietors to understand & comply with legislation.			

FS Service Plan 2024-25

To ensure that all food premises within the District comply with food hygiene legislation.	Carry out revisits to all businesses which are not broadly satisfactory	All Quarters All businesses less than satisfactory (with a food hygiene rating of 0, 1 or 2) will be revisited to ensure that the necessary improvements are carried out.	25 revisits were undertaken to ensure businesses had implemented the necessary improvements	100% revisits to all less than broadly satisfactory businesses Estimated 25-30 revisits and enforcement action to be carried out where necessary	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	Revisits & appropriate enforcement for all non- compliant food premises (i.e., hygiene rating less than 3) is a requirement under Food Law Code of Practice. Please note that a food hygiene rating is not revised at the time of a food hygiene revisit. A food Hygiene Rating will only be reassessed once an application is submitted, and the appropriate fee is paid
To ensure that all food premises within the District comply with food hygiene legislation.	Complete routine surveillance to identify unregistered food businesses.	Quarters 2 & 4 Twice yearly identify unregistered food businesses and pursue registration using a variety of means including online searches, social media, and mobile food ordering platforms, planning applications & officer surveillance.	156 new food registrations made in 2023-24	Identify and register new food businesses all year (estimated at 156)	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO/Food Safety Support Officer	
To ensure that all food premises within the District comply with food hygiene legislation.	Investigate all complaints relating to the hygiene of premises as appropriate	All Quarters 100% investigated	27 complaints investigated.	100% to be investigated Estimated 30 service requests during the year	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	These complaints relate to hygiene of food premises, the condition of food premises, food handling practices, pest issues etc
To ensure food placed on the market is safe	Investigate all complaints, as appropriate, relating to the sale of food which does not comply with food safety requirements.	All Quarters 100% investigated	76 complaints investigated	100% to be investigated Estimated 80 complaints throughout the year.	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	These complaints relate to food itself foreign body contamination, fitness for human consumption, accuracy of food information eg allergens

To ensure food placed on the market is safe	Undertake microbiological sampling of food sold or manufactured within the borough. Sample in accordance with Food Standards Agency Code of Practice.	All Quarters Microbiological samples taken routinely throughout the year in accordance with the Food Sampling Programme.	40 samples taken	35-40 samples to be taken in accordance with the Food Sampling Programme	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	Samples taken will include samples taken as part of regional and national sampling projects.
Facilitate Partnership Working	To continue to develop our working arrangements and partnership where we act as a primary authority. Increased areas of work through the ongoing review and development of management systems for food safety and H&S with Busy Bees.	All Quarters	30 hours	30 hours estimated, up to a maximum of 50 hours as per contract.	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	Two Officers designated as Primary Authority Contacts.
Facilitate the removal of hazardous/risk product from the food chain.	Respond immediately where necessary and disseminate information as directed by Food Standards Agency. Report incidents to the Food Standards Agency Sharing intelligence with the NFCU	All Quarters 100% to be responded to in accordance as directed by the FSA	3 notifications received from the Food Standards Agency requiring action.	To action all Food Alert notifications (for Action) received during the year, as necessary (Estimated 5-6 will require action)	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	
Prevent the transmission of food related infection within the District.	Investigate all confirmed cases of food poisoning, including the investigation of practices and processes identified as sources of infection at	All Quarters Respond to100% food related illness notifications within 24 hours, except campylobacters. 100%	Total number of cases received was 132 with 28 requiring contact within 24 hours.	Respond to all notifications, other than Campylobacter within 24 hours Respond to cases of Campylobacter by providing information by post within 5 working days	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	No outbreaks in 2023- 2024

	commercial premises. Respond to potential outbreaks of food borne related illness in conjunction with UKHSA and in line with Outbreak Plan.	campylobacters within 5 days.		(estimated 140). 100% same day response to suspect outbreaks		
To advise on food hygiene matters	Respond to requests for advice from businesses and members of the public	All Quarters 100% of enquiries responded to	135 service requests received and responded to.	Estimated 140 service requests to be received during the year.	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	
To promote good standards of hygiene in food premises	Continue to publish results of food hygiene inspections on the Food Hygiene Rating Scheme (FHRS) website with a link to this page on the Council's website	All Quarters Update and publish food hygiene ratings every 2 weeks. Action all requests for early publications as necessary Action Right to Reply requests	Upload to Food Standards Agency's FHRS website carried out every 2 weeks or as required, such as early publication requests	Upload to Food Standards Agency's FHRS website to be carried out every 2 weeks or as required.	FHSM/Food Safety Support Officer	
		Deal with all appeals to FHRS ratings Carry out FHRS reassessment visits within time periods laid down in the Food Standards Agency's FHRS Brand Standard.	<ul><li>2 food hygiene rating appeals received from businesses.</li><li>15 food hygiene revisits requests received from businesses</li></ul>	Respond to all Food hygiene rating appeals within 21 days Undertake FHRS Reassessment requests within 3 months. Estimated at 30		
To promote good standards of hygiene in food premises	Increase proportion of food premises broadly compliant with the law	All Quarters 91% of food premises broadly compliant with the law	The broadly compliance figure for business (excluding those awaiting inspection) at the end of the year was determined as 94%.	Achieve >91% for proportion of inspected food premises broadly compliant with food hygiene law.	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	

To ensure the Council complies with its legal obligations in enforcing Food Safety legislation	To produce an annual Service Plan incorporating the delivery of food hygiene and food standards service.	To update the annual Food Service plan in accordance with the Framework Agreement.	Service Plan produced for the Food Team taking into account the requirements of the Food Standards Agency's Food Law Code of Practice	Update the Food Service Plan taking into account current Food Standards Agency requirements.	FHSM	Report to be taken to Regulatory and Licensing Committee outlining the main achievements of the work undertaken by the Food Team.
To ensure the Council complies with its legal obligations in enforcing Food Safety legislation	To make the statistical returns to the Food Standards Agency as required.	All Quarters Complete all Food Standards Agency's requests for performance information. Likely to continue with quarterly 'Temperature Check' requests.	Quarterly 'Temperature Check information requests completed	100% Food Standards Agency's return to be completed as required.	FHSM	
To ensure the Council complies with its legal obligations in enforcing Food Safety and Food Standards legislation	To review documented procedures in respect of Food Safety.	All Quarters Review and update procedures, to prioritise those predating 2022.	Not completed due to resourcing	Completion of procedure review, to be updated by the end of the year, March 2025.	FHSM	
To ensure the Council complies with its legal obligations in enforcing Food Safety legislation.	Attend Central England Food Group (specialist group for food hygiene)	All Quarters Participate, as appropriate, in all planned food group activities.	4 Central England Food Group meetings attended.	Attend where possible planned Central England Food Group (4) meetings either in person or virtually. Disseminate update information to the whole team.	FHSM	
To ensure the Council complies with its legal obligations in enforcing Food Safety legislation.	All officers undertaking food safety work to have received at least 20 hours training in relevant subject areas	All Quarters	100% achieved	Ensure 100% completion	FHSM/Environmental Health Officers/ Food Safety Officer / Apprentice EHO	

### REFERENCES

- 1 Framework Agreement on Local Authority Food Law Enforcement 2010
- 2 Lichfield District Council Strategic Plan 2050 https://www.lichfielddc.gov.uk/strategicplan
- 3 Food Standards Agency Food Safety Act 1990 Code of Practice & Practice Guidance Notes (2023 and 2021 respectively) Food and Feed Codes of Practice | Food Standards Agency
- 4 Lichfield District Council's Regulatory Services, Enforcement Policy (updated) <u>https://www.lichfielddc.gov.uk/licensing-permits/enforcement-policy-regulatory-services-housing-health</u>
- 5 UK Health Security Agency WM Centre Outbreak Control Plan
- 6 Equality Statement 2024, Lichfield District Council <u>https://www.lichfielddc.gov.uk/downloads/download/170/equality-statements</u>

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Appendix 1 - Team Structure

## Food and Health & Safety Team



(Total FTE) FTE resource designated to food safety enforcement

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Appendix 2 – Cabinet Structure – To be inserted

# Appendix 3 - Useful Contacts

Lichfield District Council 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:- <u>fwem@ukhsa.gov.uk</u>	
UK Health Security Agency (UKHSA) 6th Floor 5 St Philip's Place Birmingham B3 2PW	Tel:- 0344 225 3560 E-mail address:- <u>bat@ukhsa.gov.uk</u> Web address:- <u>UK Health Security Agency - GOV.UK (www.gov.uk)</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 - A Breakdown of Net Expenditure for Food and Health & Safety Team from 2021/22 to 2025/26

			Forecast		
	Actuals	Actual	Budget	Budget	Budget
	2021/22	2022/23	2023/24	2024/25	2025/26
	£	£	£	£	£
Expenditure					
Employees	190,161	196,318	197,140	201,200	205,350
Transport	5,720	5,433	5,450	5,450	5,450
Supplies and Services	7,528	6,421	3,160	3,160	3,160
Overheads	210,212	188,852	149,620	151,040	154,350
Capital Charges	0	0	0	0	0
Total Expenditure	413,621	397,023	355,370	360,850	368,310
Income					
External Sources	24,294	14,006	17,290	17,620	17,620
Internal Recharges	92,110	92,110	92,110	92,110	92,110
Total Income	116,404	106,116	109,400	109,730	109,730
Net Expenditure	297,216	290,907	245,970	251,120	258,580

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