

## Item 2

8th October 2024



**Glasgow City Council**

**Environment and Liveable Neighbourhoods City Policy Committee**

**Report by George Gillespie, Executive Director of Neighbourhoods, Regeneration and Sustainability**

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### **Environmental Health Food Law Service Plan 2024**

#### **Purpose of Report:**

To report on the Environmental Health Food Law Service Plan.

#### **Recommendations:**

To note the report and the positive work that the Service is undertaking.

Ward No(s):

Citywide: ✓

Local member(s) advised: Yes ☐ No ☐ consulted: Yes ☐ No ☐

## **1. Service Aims and Objectives**

### **1.1 It is the aim of this Service to:**

- Ensure that food produced, stored, offered for sale or used within the City is authentic, wholesome and safe to eat;
- Protect the safety, health and wellbeing of residents, visitors and others;
- Protect consumers from being misled and to ensure acceptable trading practices in food;
- Inspect or otherwise intervene with businesses in accordance with national guidelines using a risk-based approach as outlined in the Food Law Code of Practice;
- Routinely sample food sold in the City and other food as appropriate;
- Enforce the Food Safety Act 1990 (and associated legislation), the Food Hygiene (Scotland) Regulations 2006, The Food (Scotland) Act 2015 and other relevant legislation as may apply to the Service;
- Develop and implement strategies to improve compliance;
- Advise and assist businesses to comply with relevant current legislation, to promote the adoption of documented food safety management systems and encourage the adoption of best practice.

## **2. Background**

- 2.1 Environmental Health sits within the Community Safety and Regulatory Services arm of NRS.
- 2.2 Food Law Enforcement lies within the portfolio of the Environment and Liveable Neighbourhoods City Policy Committee.
- 2.3 The Group Manager, Environmental Health holds the role of Lead Food Officer for Food Law as defined in Section 4.7 of the Food Law Code of Practice Scotland.
- 2.4 Given the combined nature of the Group Manager position, many aspects of day-to-day management of food law matters are delegated. The Environmental Health service provides the full range of public protective services including; food law, health and safety and public health. The Business Regulation team operates with a food law management team comprising of the Group Manager, two Assistant Group Managers, and three Team Leaders. This team fulfils the overarching Lead Officer role – although the Group Manager retains overall responsibility for performance.
- 2.5 Operationally, the daytime team is split into three geographical teams: south, east and west with a team leader in place for each.
- 2.6 Officers within each team focus upon regular, programmed work in the respective geographic areas. Whilst they work in geographical teams, it is not unusual for officers to be asked to carry out work in other areas where demand necessitates, e.g. to accompany a colleague when formal action is required or to deal with an urgent service request or investigation.

- 2.7 Additionally, a number of officers have specialist experiences which, by nature, means they work across the City. It is the ambition to work to future proof the Service and build resilience in these specialist areas across the full team.
- 2.8 At the time of writing, the distribution of staff within each of the geographical teams is as follows:
- The South Team covers the area south of the River Clyde (Wards 1-8) and the team consists of 1 Team Leader, 4 Environmental Health Officers and 3 Food Safety Technical Officers;
  - The East Team operates within Wards 9 and 17-22 and consists of 1 Team Leader, 2 Environmental Health Officers and 3 Food Safety Technical Officers; and
  - The West Team covers Wards 11-16 and 23 with a Team Leader, 1 Environmental Health Officer and 3 Food Safety Technical Officers.
- 2.9 In addition to the daytime resource above, the Service has one food safety technical officer operating on a shift basis from 17:00 to 03:00.
- 2.10 It should be noted that Ward 10 (City Centre) is shared equally across the three geographical teams.
- N.B.** The figures provided above are not based on Full Time Equivalency and the Service currently has two EHO posts vacant which are to be advertised.
- 2.11 The food law enforcement service is provided in-house within the Environmental Health Group with no external contractors being used. Food Law Enforcement is delivered by a total of 23 officers including management, Environmental Health Officers (EHOs) and Food Safety Technical Officers (FSTOs).
- 2.12 Whilst FSTOs are a resource dedicated to only matters of food law, EHOs have a broader remit covering other aspects of Environmental Health, such as events licensing, port health, health and safety etc. and this ultimately reduces the proportion of time devoted to the food function.
- 2.13 The collection of informal samples is undertaken by Glasgow Scientific Services in liaison with Environmental Health.

## 2.2 Demands on the Food Service

- 2.2.1 There are currently 7,290 registered food premises within Glasgow City Council.
- 2.2.2 This includes twenty-nine businesses involved in the handling of products of animal origin which are approved under Retained EC Regulation 853/2004. These premises are inspected on a rolling annual cycle which is influenced by the risk associated with their operations. There are also eleven establishments that are approved and regulated by Food Standards Scotland (FSS) due to the activities carried out on site. As per the enforcement model, Glasgow is the enforcing authority for only food standards in these premises and there is collaboration between the Council and FSS in relation to these businesses.
- 2.2.3 Other food premises are now subject to a rating scheme which combines food hygiene and food standards. The Service has devised an interventions programme for the current financial year which specifies the interventions that will be carried out over the period. The current programme is influenced by the level of resource available within the Service.

2.2.4 The table below illustrates the Group and associated risk of premises currently registered:

<b>Group 1</b>	<b>Total No. Premises</b>	<b>Group 2</b>	<b>Total No. Premises</b>	<b>Group 3</b>	<b>Total No. Premises</b>
<b>A</b>	20	<b>A</b>	65	<b>A</b>	125
<b>B</b>	128	<b>B</b>	1859*	<b>B</b>	446*
<b>C</b>	46	<b>C</b>	1546*	<b>C</b>	550*
<b>D</b>	9	<b>D</b>	54	<b>D</b>	49*
<b>E</b>	0	<b>E</b>	9	<b>E</b>	1
<b>Unrated</b>	203		2381		1171

\*Indicates a desktop transfer rating from the old Annex 5 rating system.

2.2.5 The level of compliance within the City continues to be relatively low. This is impacting on the ability of the Service to meet targets as the number of revisits being required remains high due to the poor standards being found at inspection. It should be noted that the revisit requirement is often unavoidable due to the risk rating generated for the premises - the highest risk establishments generate a visit within 4 weeks of the initial inspection being carried out. In many instances where enforcement action is taken, including closure of premises, this is sufficient to see a sustained improvement of standards. The post-pandemic effects continue to be felt by businesses whether through staff availability or a result of the rising costs associated with running a business. This has, in many instances, a part to play in the declining standards of cleanliness.

## 2.3 Additional Food Activity

2.3.1 In addition to inspection of food businesses within the City, officers also carry out other food law related activities such as issuing export health certificates for products being shipped overseas, review of documentation to provide support attestations to businesses exporting to Europe, new business guidance, food complaints and other food related enquiries.

## 2.4 Key Performance Indicators

2.4.1 Environmental Health has a set a series of KPIs and updates are provided to NRS Senior Management on a monthly basis.

2.4.2 As a service there is accountability within the process should there be significant deviation from these.

2.4.3 The table below shows the KPIs for the Service:

Number of programmed food law inspections planned for the year
Percentage of programmed food law inspections planned for the year carried out within time
Number of programmed food law inspections where premises found to be PASS
Percentage of programmed food law inspections where premises found to be PASS
Number of food law inspections carried out in new establishments
Number of food law inspections carried out in food business from the missed inspection category
Number of Food businesses in the missed inspection category
Percentage of programmed food law inspections carried out within time at premises rated as requiring intensive Intervention 1 month
Number of programmed food law inspections carried out at premises rated as requiring intensive Intervention 1 month
Number of programmed food law inspections carried out within time at premises rated as requiring intensive Intervention 3 month
Percentage of programmed food law inspections carried out on time at premises assessed as requiring a 3 month inspection
Number of Hygiene Improvement Notices (HINs) served
Number of Remedial Action Notices (RANs) served
Number of Hygiene Emergency Prohibition Notices (HEPNs) served
Number of Export Health Certificates Issued
Number of Food Law Service Requests

Number of food law service requests responded to within 5 days

2.4.4 The table below shows the KPIs for 2023-2024.

Key Performance Indicator (KPI)	Target	Achieved
Number of programmed food law inspections planned for the year	305	305
Percentage of programmed food law inspections planned for the year carried out within time	100%	192%
Number of programmed food law inspections where premises found to be PASS	N/A	273
Percentage of programmed food law inspections where premises found to be PASS	N/A	46%
Number of food law inspections carried out in new establishments	700	387
Number of food law inspections carried out in food business from the missed inspection category	200	228
Number of Food businesses in the missed inspection category	N/A	2609
Percentage of programmed food law inspections carried out within time at premises rated as requiring intensive Intervention 1 month	100%	91%
Number of programmed food law inspections carried out at premises rated as requiring intensive Intervention 1 month	N/A	71
Number of programmed food law inspections carried out within time at premises rated as requiring intensive Intervention 3 month	N/A	144
Percentage of programmed food law inspections carried out on time at premises assessed as requiring a 3 month inspection	100%	80%
Number of HIN served	N/A	69
Number of RAN's served	N/A	73
Number of HEPN's served	N/A	0
Number of Export Health Certificates Issued	N/A	181
Number of Food Law Service Requests	N/A	2043
Number of food law service requests responded to within 5 days	N/A	1807

2.4.5 Number of food law inspections carried out in new establishments. This figure is down on what was initially planned due to resources being utilised for inspections generated by Service Requests that came into the service that required an inspection.

2.4.6 Percentage of programmed food law inspections carried out within time at premises rated as requiring intensive Intervention 1 month. This figure was not achieved on three monthly occasions i.e. September, January and March. This was a combination of annual leave following the summer events season, the

Christmas holiday period and a lag time in data entry, although all the inspections had been carried out.

- 2.4.7 Percentage of programmed food law inspections carried out on time at premises assessed as requiring a 3 month inspection. This figure is lower as the KPI looks for the actual date the inspection is due, however under the Code of Practice, officers have 28 days after the due date to complete the inspection. All inspections had been completed within the timescales permitted.



### **3. Enforcement Policy and Associated Procedures**

- 3.1 The Enforcement Policy, along with the Food Service Plan, is retained electronically within the Council's Electronic Document Record Management System (EDRMS).
- 3.2 The service seeks to adopt a fair and balanced approach to the enforcement of food law and to apply the principles of Better Regulation. The Council strives to ensure that all food law enforcement activities are in accordance with the Scottish Regulators Strategic Code of Practice.
- 3.3 Where possible, an informal, advisory approach is used to ensure that businesses are aware of their legal responsibilities and comply as required. However, formal means of enforcement such as formal notices and prosecution are used where necessary to ensure that the principal objective of public safety is achieved.
- 3.4 Food law enforcement activity is undertaken in accordance with the Council's corporate goals relating to equality, service delivery and customer care. Additionally, the approach taken accords with the requirements of the Food Law Code of Practice 2019 in relation to the principles of Better Regulation and to the statutory duty of contributing to achieving sustainable economic growth without compromising our food law functions.
- 3.5 To achieve the aims outlined within the Enforcement Policy there is a need for consistency within the Service and this is achieved through the implementation of, and adherence to, procedures and peer review. The Food Law Procedures are held within EDRMS where they can be easily accessed by all staff and are subject to review as necessary.
- 3.6 The Enforcement Policy outlines the approach when determining the type of enforcement action to take and reference will also be made to Chapter 3.1 of the Code of Practice.

## 4. Service Delivery

### 4.1 Food Premises Profile

4.1.1 There are currently 7,290 establishments listed within the Food Premises database.

4.1.2 These are categorised as follows:

Primary Producers	6
Manufacturers/Packers	263
Importers/Exporters	19
Caring Premises	461
Retailers	1,178
Supermarkets/Hypermarkets	122
Distributors/Transporters	137
Hotels/Guest Houses	97
Mobile Food Units	366
Takeaways	1,075
Schools/Colleges	211
Restaurants/Cafes/Canteens	1,646
Restaurants and Caterers – Other	1,047
Pub/Club	357
Other Premises	285
<b>TOTAL</b>	<b>7,290</b>

## 4.2 Interventions Planning

4.2.1 Environmental Health has devised a programme of interventions for 2024-2025 which specifies the type of intervention to be carried out in various types of food business:

<b>Category of Premises</b>	<b>Number of Interventions due in 2024/25</b>	<b>Intervention Frequency</b>	<b>Performance Target</b>
Approved Establishments	29	12 monthly	100%
Group 1E, Group 2E and Group 3E	40	1 Month	100%
Group 1D, Group 2D and Group 3D	130	3 Monthly	100%
Group 1C	66	6 Monthly	100%
Group 1B	107	12 Monthly	100%
Group 2C	262	12 Monthly	0%
Group 1A (Manufacturing Premises)	13	18 Monthly	100%
Group 2B	425	18 Monthly	0%

Group 3C	17	24 Monthly	0%
Revisits	As Required	As Required	95%
Missed Premises	200	None	100%
Unrated	700	None	100%
<b>TOTAL</b>	1989		

4.2.2 Officers are instructed to undertake interventions according to the Food Safety Act 1990, Section 40 of the Food Law Code of Practice (Scotland) and in accordance with the internal Food Law Procedures.

4.2.3 It is not possible, in all circumstances, to carry out an intervention in every establishment that is due. Therefore, a prioritisation exercise has been carried out to assist in determining whether an establishment will receive an intervention. This is based on risk.

4.2.4 The order of prioritisation is given below:

<b>Establishment Categories by Order of Priority</b>
Approved Establishments
Group1E, 2E and 3E
Group 1D, 2D and 3D

Group 1C
Group 1B
Unrated (Estimated Group 1 and 2 Premises)
Group 1A
Missed Inspection Premises
Premises only liable for Food Standards Inspections
Group 2B, 2C, 3C
Unrated (Estimated Group 3 Premises)

4.2.5 A variety of options are available to officers when presented with unsatisfactory conditions, including:

- Verbal Warnings
- Informal Warning Letters
- Hygiene Improvement Notices (HIN)
- Remedial Action Notices (RAN)
- Hygiene Emergency Prohibition Notices (HEPN)
- Detention and Seizure of Food which fails to meet the hygiene regulations
- Referral to the Procurator Fiscal
- Suspension and Withdrawal of Approval (Approved Establishments only)

#### 4.3 Approved Establishments

4.3.1 In 2018, Glasgow City Council participated in a national pilot project for the implementation of Official Control Verification (OCV) in Approved Establishments. Whilst the OCV approach has not yet been reflected in the Food Law Code of Practice, the application of this has continued for approved establishments in Glasgow. In July 2023, Food Standards Scotland issued an enforcement letter requiring Local Authorities to implement this approach across all approved establishments.

4.3.2 Under the OCV approach, each establishment is audited over a 12-month cycle. In most instances this requires multiple interventions, both announced

and unannounced, with the actual resource demand varying for each of our twenty nine approved establishments depending on the nature of the operation.

#### 4.4 New Businesses

- 4.4.1 When a food business registration form is received, this will be allocated to an officer who will contact the business to discuss their operational proposals with a view to identifying the appropriate business group for the premises. This will allow for the new business to be recorded in the database correctly and to ensure that intervention is carried out in line with the plan. The Service is continuing to prioritise unrated premises ahead of missed inspections as per the recommendation of Food Standards Scotland in the Audit Action Plan produced in 2022 following their audit.

#### 4.5 Service Requests

- 4.5.1 The Service utilises the Uniform Database to manage the receipt and allocation of Service Requests across the team. The Service currently operates on a 5-day response period and there are detailed procedures in place for processing such requests.
- 4.5.2 A total of 2,091 requests were received by the Service during the period between 1st April 2023 and 31st March 2024. A similar number is anticipated for the current financial year.

#### 4.6 Home Authority Principle

- 4.6.1 The Service acts as Home Authority for food businesses that are based within the City and as such will investigate complaints and enquiries from both consumers and other Local Authorities where required.

#### 4.7 Advice to Business

- 4.7.1 Education, training and advice on matters of food law are an integral part of the food law enforcement service. However, given the current resource constraints, most of the advice is given in the context of programmed intervention and inspection.
- 4.7.2 The provision of Hazard Analysis Critical Control Point (HACCP) based advice assists the food trade in Glasgow in the development and implementation of Food Safety Management Systems. The Service supports businesses through the provision of information materials such as CookSafe. One to one advisory sessions can be provided on request.
- 4.7.3 In addition to the advice being provided during inspection. Officers also provide advice through other aspects of service delivery, for example, when processing license applications for events or for applications relating to liquor license requests.

4.7.4 Advice is given in written and/or verbal form through letters or email. Officers may also direct individuals to sources of information that are available online either on the Council website or from other relevant agencies.

#### 4.8 Food Sampling

4.8.1 Food Sampling is carried out on behalf of Glasgow City Council by Glasgow Scientific Services.

4.8.2 The sampling service is two-fold, with GSS carrying out sampling within the City as part of the National sampling programme, which looks at particular foodstuffs, whilst also sampling premises that are subject to routine food law intervention. There may also be occasions where it is requested that samples be taken following a consumer complaint, a food poisoning allegation or other circumstance that an officer believes would warrant sampling.

4.8.3 On receipt of an unsatisfactory result, the Service will contact the business and provide advice to prevent recurrence.

#### 4.9 Control and Investigation of Communicable Disease including Outbreaks and Food Related Infectious Disease

4.9.1 Glasgow City Council is a signatory to the NHS Greater Glasgow and Clyde (NHS GG&C) Joint Health Protection Plan.

4.9.2 All allegations of food poisoning are reviewed and investigated on receipt and information disseminated to relevant parties as required, e.g. to NHS GG&C Public Health Protection Unit.

4.9.3 Investigations into confirmed food poisoning outbreaks are undertaken in accordance with the Outbreak Control Plan, produced by NHS GG&C and the local authorities within the Board area. Investigations also take cognisance of the guidance produced by Food Standards Scotland and internal procedures and documents.

4.9.4 Dependent on the specific circumstances, personnel from other areas of Environmental Health within Glasgow will be involved in investigating and controlling any outbreak. In addition, in cases of resource difficulty, extra resources can be requested from other units of this Service, within the Health Board area or adjacent Councils.

4.9.5 Examination of control food samples associated with food poisoning outbreaks is undertaken by Glasgow Scientific Services at the Colston Laboratory. This service is accredited by the United Kingdom Accreditation Service (UKAS). In the case of resource difficulties, assistance can be requested from other accredited Food Control laboratories.

#### 4.10 Food Law Incidents and Alerts

4.10.1 When a food incident is identified, relevant information is disseminated by Food Standards Scotland using the CLIO system. The number of incidents being received by the Service is increasing, with the majority of notifications requiring to be followed up by an Officer and an update provided to FSS.

4.10.2 In addition to receiving incidents, the Authority has a duty to report incidents that are identified by Officers whilst carrying out interventions. Examples of the type of notifications that may be made or received include identification of products containing undeclared allergens, products containing ingredients above permitted levels or products produced in an establishment that would require to be approved in terms of EC853/2004.

#### 4.11 Other Food Law Activity

4.11.1 Environmental Health staff carry out a number of other food law activities in addition to programmed inspections. This includes:

- a) Civic Government Licensing – The Service is an internal consultee on licence applications made under the Civic Government (Scotland) Act 1982. There are many different application types received by the service and a number require review for food law matters.

In addition to Late Hours Catering applications, many events operated under a Public Entertainment or Market Operators Licence will have food elements of varying scale and these will also be reviewed by an Officer.

In 2023-24, the Service received thirty seven Late Hours Catering, nineteen Market Operators and one hundred and twenty one Public Entertainment Licence applications. Each application is reviewed and assessed as to whether officer intervention is required. Due to the variance of activity the officer time associated with each is difficult to quantify, for example, an event like TRNSMT which has a large volume of food caterers will require significantly more resource than a small community gala day.

- b) Licensing (Scotland) Act 2005 – There is a requirement under the act whereby anyone wishing to sell alcohol is required to obtain a Certificate of Suitability in terms of food hygiene. This is commonly referred to as a Section 50 Certificate. The Section 50 is issued by Environmental Health on review of layout plans prior to works being completed and this will be followed up with a confirmation visit by an Officer from the Service to ensure that the premises has been completed in accordance with the plan submitted. The Service received forty nine applications in the year from April 2023 to March 2024 and each of these were allocated to an Environmental Health Officer for review. The time spent on each depends upon the quality of the application and the level of detail provided on the plan when it is first received.



- c) Street Trader Inspections – An individual who operates as a mobile street trader selling food is required, as part of the licensing process, to obtain a Certificate of Compliance from a “food authority”, this being Environmental Health. Glasgow received one hundred and nine applications in the year from 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024 and each application generates an inspection by an Environmental Health Officer to assess the method of compliance with the Food Hygiene Regulations.

#### 4.12 Food Crime

4.12.1 Glasgow City Council, Environmental Health will work with partners to help prevent Food Crime

4.12.2 The Service supports this agenda in several ways, including:

- Partnership working with the Scottish Food Crime and Incidents Unit (SFCIU). This will include activities relating to criminal activity involving food, food recalls and local, national and international food incidents.
- Utilising the CLUE intelligence database.
- Regular updates of intelligence logs and action on intelligence regarding criminal activities within the City.
- Active participation within food crime networks to advise and influence policy/strategy.
- Adherence to the Food Crime Memorandum of Understanding between Food Standards Scotland and the Society of Chief Officers of Environmental Health in Scotland.

#### 4.13 EU-Exit

4.13.1 Post EU-exit, the process for export of shellfish/live fishery products to Europe changed and businesses are now required to provide an export health certificate to allow such products to enter Europe. Due to financial and operational reasons, there are currently no Glasgow businesses exporting Products of Animal Origin directly to Europe, with product instead being exported via distribution hubs. To use the distribution hubs, businesses require a Support Attestation, issued at a frequency based on the Risk Rating for that business. Currently two businesses in Glasgow request support attestations every 6 months. An officer will carry out either a physical or documentary check prior to issue.

#### 4.14 Export Health Certification

4.14.1 Environmental Health issues health certificates to businesses which export foodstuffs where the importing authorities require such a certificate.

4.14.2 The products for which certificates are required include live shellfish, fishery products, activated carbon, coffee, confectionery, soft drinks, beer, gin and whisky. All relevant businesses are subject to inspection by Environmental Health. The Council levies a charge of £113 per certificate.

4.14.3 There are currently nine businesses actively exporting produce outside the EU.

4.14.4 A total of two hundred and thirty two export certificates were issued in the 2023/24 financial year.

#### 4.15 Liaison with other Organisations

4.15.1 The Service takes the view that a strong commitment to liaison and partnership with other agencies and Local Authorities is vital to the delivery of a quality food enforcement service. Attendance and participation in a range of committees and working groups enables Glasgow to contribute to the development of policy and procedure at both regional and national level.

4.15.2 Changes to working practices and the general acceptance of virtual meetings has enhanced the ability to engage with others across Scotland and with a lesser impact on Service delivery than in person attendance.

4.15.3 Organisations and partners that the Authority regularly engage with includes:

- Food Standards Scotland
- Scottish Food Crime and Incidents Unit (SFCIU)
- Scottish Food Enforcement Liaison Committee (SFELC) and associated working groups
- The Scottish Government
- NHS Greater Glasgow and Clyde
- West of Scotland Food Liaison Group
- Society of Chief Officers of Environmental Health in Scotland
- Police Scotland
- UK Borders Agency
- Deliveroo/Just Eat/Uber Eats
- Marine Scotland
- HMRC
- Trading Standards Scotland
- Scottish Prison Service
- Royal Environmental Health Institute of Scotland
- Catering and FM
- Property and Land Services
- Glasgow City Council – Area Partnerships
- Glasgow City Council – Environment, Sustainability and Carbon Reduction City Policy Committee
- Environmental Health Uniform Users Group
- Glasgow City Council Uniform Users Group

## **5. Staffing**

### **5.1 Staff Resources**

- 5.1.1 Food law delivery is carried out by the Business Regulation team which comprises of twenty two Officers including Managers, Environmental Health Officers and Food Safety Technical Officers.
- 5.1.2 The Service is currently operating in a reduced staffing position and has experienced many changes in the post-Covid19 period with staff leaving through retirement or for alternative employment in neighbouring local authorities.
- 5.1.3 The resource issues being faced in Glasgow is reflective of the position many other local authorities currently face and is a result of a national shortage of suitably qualified staff. This shortage is recognised as a significant risk by both Food Standards Scotland and the Scottish Government.
- 5.1.4 Food Standards Scotland invited all local authorities in Scotland to participate in a Time Management exercise in March 2024. The exercise, conducted over a three-month period, sought to capture the time being spent by officers across the full spectrum of food law with a view to updating the resource calculation carried out in 2021. The final submission was returned at the end of May and FSS are working to compile the data from across Scotland and the output is anticipated by October 2024.

### **5.2 Staff Development and Training**

- 5.2.1 The Service is committed to the ongoing training and development of all staff within the team.
- 5.2.2 All officers involved in food law enforcement are required to receive a minimum of 10 hours food law-orientated CPD training each year to comply with the requirements of the Food Law Code of Practice.
- 5.2.3 A mixture of both internal and external training is utilised to ensure that Officers are competent to fulfil their roles. The Service strives to ensure that staff can achieve the necessary CPD each year to meet the terms of the Code of Practice.
- 5.2.4 A record of officer training is maintained by means of a spreadsheet within the Electronic Document Record Management System (EDRMS). This spreadsheet holds details of the training undertaken each year and Officers have a folder within the EDRMS where they store evidence of their training.
- 5.2.5 Training needs are identified by Team Leaders, Assistant Environmental Health Managers and the Group Manager.
- 5.2.6 The Service also applies the Scottish Food Enforcement Liaison Committee (SFELC) Food Law Enforcement Service Matrix to ensure that officers are

suitably experienced and trained in relevant food hygiene and standards matters. Officer competence is assessed by the Food Safety Management Team and officers are restricted in their duties – according to their competence level.

- 5.2.7 Officers are also encouraged to undertake training in other matters as may be applicable. In instances where attendance is restricted, cascade training will be provided for topics of particular significance.

### 5.3 Student Training

- 5.3.1 In addition to the ongoing training of existing staff, the Service is committed to the development of future Environmental Health staff.

- 5.3.2 The Service meets this aim in a number of ways:

- Development of Existing Staff – last year it was reported that a Food Safety Technical Officer who was in possession of a Degree in Environmental Health was working towards their Diploma in Environmental Health. This individual was successful in achieving the qualification and is now working as an Environmental Health Officer. The Service has also extended this offer of development to a second Technical Officer who was in the same position, and is scheduled to sit the professional examinations in October 2024.
- University of West of Scotland Placements – the University of the West of Scotland is currently the home of the only Royal Environmental Health Institute of Scotland (REHIS) accredited Environmental Health degree course. The course was revised ahead of the 2021-22 academic year to incorporate a professional practice element. This addition means that every registered student will spend their third year on placement with a Local Authority achieving 39 of the 48 weeks training required to sit the REHIS diploma examinations. The student returns to the Authority in their 4<sup>th</sup> year to complete the remaining 9 weeks and to prepare for the examinations.

- 5.3.3 Since its introduction, the Service has welcomed at least one student each academic year.

- 5.3.4 Last year saw the first students on the revised course sit their professional examinations and both students who were placed with Glasgow sat, and passed, their professional examinations. The Service was pleased to be able to retain both as Environmental Health Officers.

- 5.3.5 The student who was placed with the Service in 2022 is currently preparing for the examination diet taking place in October 2024.

- 5.3.6 As a number of vacancies exist within the Service, it is hoped that they will remain with the Authority on achieving their diploma.

5.3.7 The Service welcomed two further students for their third-year placement in September 2024.

- Alternative Route – The Service has also employed two individuals with an Environmental Health qualification, and the skills required to work as Public Health Technical Officers. These individuals are, whilst working, undertaking elements of the 48 week professional training that they require to sit the examinations in October 2024.
- Trainee Food Safety Technical Officers – in addition to the development of Environmental Health Officers, the Service has taken on two trainee Food Safety Technical Officers. The individuals will receive the training, guidance and support necessary to enable them to sit the Higher Certificate in Food Practice in October 2024.

5.3.8 Longer term, the Service is keen to support existing staff in achieving the qualifications required to progress and to try and offset some of the risks faced by the Service.

5.3.9 In addition to training, the Service is keen to promote the profession and to encourage future generations to consider a career in Environmental Health. To that end, one of the newly qualified officers has volunteered to work alongside colleagues from other local authorities and the Society of Chief Officers of Environmental Health in Scotland to develop an Ambassador Network. It is hoped that the Network will work collaboratively to help raise awareness of the profession through engagement with schools and higher education establishments. The Service is fully supportive of involvement with this and will assist where it can.

## 6. Monitoring

- 6.1 Monitoring procedures are in place and implemented routinely to ensure consistent Service Delivery.
- 6.2 Where deficiencies are noted these are discussed on a one to one basis with the officer and, if required, additional support and training provided to drive improvement.

## 7. Areas for Development

- 7.1 The Service recognises that there continues to be a reliance on one or two individuals in the more specialised areas of Food Law delivery. The programme to broaden the expertise of the workforce continues. The Service is able to retain the current four trainee Environmental Health Officers and two Food Safety Officers on completion of the examination diet in October 2024 and the addition of six officers will assist in spreading the workload.
- 7.2 Last year, improvements were made to the management database and the suites of reports available for monitoring purposes.
- 7.3 Non-compliance within food businesses continues to present a problem to the Service and resources continue to be diverted because of the requirement for enforcement action and subsequent revisits. Strategies to improve compliance continue to be reviewed.

## 8. Policy and Resource Implications

### Resource Implications:

<i>Financial:</i>	Funding through existing budget.
<i>Legal:</i>	See section 1.1.
<i>Personnel:</i>	Delivered by existing council staff.
<i>Procurement:</i>	Not Applicable

**Council Strategic Plan:** Grand Challenge 4 - Deliver Essential Services in a Sustainable, Innovative and Efficient way for our Communities.

### Equality and Socio-Economic Impacts:

<i>Does the proposal support the Council's Equality</i>	Reducing health inequality.
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*Outcomes 2021-25?  
Please specify.*

*What are the  
potential equality  
impacts as a result  
of this report?*

No significant impact.

*Please highlight if  
the policy/proposal  
will help address  
socio-economic  
disadvantage.*

This work will help address socio-economic disadvantage.

### **Climate Impacts:**

*Does the proposal  
support any Climate  
Plan actions?  
Please specify:*

N/A

*What are the  
potential climate  
impacts as a result of  
this proposal?*

N/A

*Will the proposal  
contribute to  
Glasgow's net zero  
carbon target?*

N/A

### **Privacy and Data Protection Impacts:**

Are there any potential  
data protection impacts  
as a result of this report  
Y/N

No

If Yes, please confirm that  
a Data Protection Impact  
Assessment (DPIA) has  
been carried out

## **9. Recommendations**

- 9.1 To note the report and the positive work that the Service is undertaking.