East Herts

Environmental Health:
Food Safety and Hygiene and
Health and Safety Service Plan 2024-2025

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Unless stated otherwise, all figures relate to a data extract undertaken on the 24 April 2024.

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SECTION 1.0 - INTRODUCTION

1.1 Overview

The council is required to produce an annual service plan detailing how it intends to use its resources to ensure that a programme of proactive and reactive enforcement activity is carried out to ensure compliance within local businesses with regards to both food safety legislation and occupational health and safety legislation.

To help provide public confidence with the service, the service plan will be published on the council's website and subject to Executive Member scrutiny on an annual basis.

The service plan covers the period 1 April 2024 to 31 March 2025.

1.2 Purpose of this service plan

The council's duties to enforce both occupational health and safety and food safety legislation in local businesses within East Herts come from the following legislation:

- Health and Safety at Work etc Act 1974[1]
- Food Safety Act 1990[2]
- Food Safety and Hygiene (England) Regulations 2013[3]

In addition to the legislation, the Health and Safety Executive (HSE) and Food Standards Agency (FSA) publish codes of practice which provide local authorities with further guidance on how to meet their legislated duties. These are:

- National LA Enforcement Code[14]
- Local Authority Circular 67/2[15]
- Food Law Code of Practice[16]

This service plan sets out how the council plans to use its resources during the financial year to achieve its legislated duties and ensure national priorities and standards are addressed and delivered locally.

1.3 Accountability

To help ensure local transparency and accountability, this service plan is approved by the Head of Housing and Health, through delegated authority, each year as part of the council's decision-making process. As part of this process, the Executive Member for Wellbeing will also be consulted. When approved the service plan will be made available on the council's website.

Performance against the service plan will be monitored by the Service Manager for Environmental Health, Head of Housing and Health and Executive Member for Wellbeing on a monthly basis while the council is following its recovery action plan (see **section 4.1.2**).

1.4 Who are the Environmental Health team?

Environmental Health is the branch of public health concerned with aspects of the natural and built environment affecting human health and wellbeing. This ranges from the air you breathe, the food you eat and the water you drink, to the home you live in to name a few examples.

Poor health often results from poor environments and by helping to improve the conditions in which people live and work, the Environmental Health team make a huge difference to the public's health and wellbeing.

Within East Herts Council, the Environmental Health team is split into three core disciplines (commercial, environment and residential). Each of these disciplines covers a range of specialisms as detailed in **paragraphs 1.4.1** to **1.4.3** below.

In this service plan, references to the Environmental Health team refer only to the officers undertaking the food hygiene and health and safety functions on behalf of the council.

1.4.1 Commercial:

- food hygiene and safety (including importing and exporting foods)
- occupational health and safety
- private water supplies
- animal licensing (including dangerous wild animals and zoos)
- infectious diseases / outbreak investigations
- skin piercing registration

- caravan site licensing
- smoke-free

1.4.2 Environmental:

- statutory nuisances
- consultation on planning applications
- contaminated land
- permits to control emissions to air
- air quality and monitoring
- exhumations & public health burials
- private drainage

1.4.3 Residential:

- housing standards
- HMO licensing
- filthy & verminous properties
- hoarding
- housing grants/loans.

SECTION 2.0 - SERVICE AIMS AND OBJECTIVES

2.1 Aims and objectives

2.1.1 Ensuring compliance

The Environmental Health team aims to secure the health, safety and welfare of employees, the self-employed and members of the public in commercial premises and to ensure that food and drink sold within the district is safe to eat, free from contamination and is supplied to the consumer in a hygienic manner from premises that are clean and hygienic. It aims to achieve this by:

- using a risk-based approach to inspecting businesses and by using appropriate, risk-based enforcement
- using a risk-based approach to investigate complaints, accidents and incidents to prevent further recurrences and where appropriate to hold businesses to account
- taking and analysing samples of food produced within the district in accordance with local and national sampling programmes.

2.1.2 Providing advice and support

To increase the knowledge and awareness of owners, managers, supervisors, and employees about their legal responsibilities for the maintenance of a safe, healthy and hygienic working environment, the Environmental Health team will:

- undertaking advice visits to the business at the request of business owners
- provide advice on how to comply with the minimum requirements of the law, during interventions
- provide advice on good practice where appropriate.

2.1.3 Customer focused service

To help provide a helpful, professional and customer focused service the Environmental Health team's work will be undertaken in line with all relevant

guidance and by ensuring they are adhering to the Environmental Health Enforcement Policy[4], additionally the council will:

- ensure all of the Environmental Health team are appropriately qualified and competent to undertake the required work
- provide training to the Environmental Health team in line with the Chartered Institute of Environmental Health's Continuing Professional Development and relevant codes of practice requirements
- provide service users with the opportunity to provide feedback on the service they have received through the Council's corporate complaints procedure[5].

2.2 Links to Corporate Objectives and Plans

2.2.1 East Herts Council's Vision & Corporate Priorities

The Environmental Health team is committed to the council's vision[6] "to provide East Hertfordshire residents and businesses with a future that is prosperous and sustainable" and the work of the team is underpinned by procedures and policies which are aligned to the vision and priorities.

The programme of work set out within this service plan works towards the council's corporate L.E.A.F. priorities:

- Listening, open and transparent
- Environmentally focused
- Acting with the community
- Fair and inclusive.

2.2.2 Housing and Health Service Plan

The corporate service planning process remains under review. When completed, this service plan will link into the Housing and Health Service Plan.

2.2.3 Links to other council strategies

The work within this service plan also supports the aims of the following council strategies:

- Economic Development Vision for East Hertfordshire[7]
- Sustainable Community Strategy (2009-2024)[8]
- Health and Wellbeing Strategy (2019-2023)[9]

2.2.4 Performance indicators

Key performance indicators which are relevant for this service plan are detailed in **Appendix A** of this report. The indicators are monitored on a

monthly basis by the Service Manager for Environmental Health and the Head of Housing & Health.

SECTION 3.0 - BACKGROUND TO EAST HERTS

3.1 East Herts Council's profile

East Herts Council was formed following local government reorganisation in 1974. It is the largest of the ten districts in Hertfordshire, covering 480 square miles (approximately a third of the county). The population of the district is estimated to be over 151,700 (nomis[10]), about half of which live in the five main towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. The remainder live in over 100 villages and hamlets.

East Herts Council is not a unitary authority and therefore food standards enforcement is the responsibility of Hertfordshire County Council's Trading Standards team[11].

Information from the Office of National Statistics[12] as detailed in the two tables below, show that the local economy consists predominantly of micro and small businesses (less than 10 employees), which make up 90% of the businesses within East Herts.

Table 1 - Breakdown of the number of business units within East Hertfordshire based on the number of employees

Business Size (Number of Employees)	Number of Business Units	Percentage of Business Units
0 – 4	6,340	80%
5 – 9	825	10%
10 – 19	395	5%
20 – 49	220	3%
50 – 99	70	1%
100 – 249	50	1%
250 +	20	0%
Total	**7,920**	**100%**

Table 2 - Breakdown of the percentage of business units within different industry sectors within East Hertfordshire

Industry	Number of Business Units	Percentage of Business Units

Professional, scientific & technical	1,535	19%
Construction	1,330	17%
Business administration / support services	790	10%
Information & communication	580	7%
Art, entertainment, recreation	520	7%
Production	470	6%
Retail	460	6%
Property	385	5%
Accommodation & food services	350	4%
Wholesale	300	4%
Agriculture, forestry & fishing	230	3%
Motor trades	220	3%
Health	225	3%
Transport & storage (inc. postal)	190	2%
Finance & insurance	160	2%
Education	145	2%
Public administration and defence	30	0%
Total	**7,920**	**100%**

3.2 Organisational structure

East Herts Council operates a 'Leader with Executive' decision-making system. The council's constitution outlines the rules and processes by which this system works. Most meetings are open to the public and are listed in the calendar of meetings on our website.

All councillors meet together as Council. It is the Council which determines the overall policies and budgets.

The Executive is responsible for most day-to-day decisions. There are a number of matters on which the Executive is not allowed, by law, to take decisions on. For example, decisions on planning applications cannot be taken by the Executive.

Responsibility for the functions which form part of this service plan are part of the portfolio of the Executive Member for Wellbeing, Councillor Sarah Hopewell.

The Environmental Health team forms part of the Housing and Health service and operate under the direction of the Head of Housing and Health.

3.2.1 Directly employed officers

The officers delivering this service plan are comprised of a Senior Environmental Health Practitioner, Senior Technical Officer, Environmental Health Practitioners and Technical Officers.

The Environmental Health Practitioners (EHPs) within the team are responsible for all disciplines of Environmental Health work within the district including housing and environmental pollution issues in addition to food safety and occupational health and safety. The estimated breakdown of the officers' time allocated to delivering this service plan is detailed in **Table 3** below.

Table 3 - Funded posts allocated to deliver this service plan

Environmental Health Team Member	Estimated Full Time Equivalent	
	Food Safety	Health & Safety
Senior Environmental Health Practitioner	0.4	0.1
Senior Technical Officer	0.55	0.1
Environmental Health Practitioner	0.6	0.3
Technical Officer	0.9	0.3
Total	**2.45**	**0.8**

The figures in **Table 3** above represent allocations based on the team's base-budget and therefore do reflect any vacancies which may arise during the year.

The current full departmental structure can be found in **Appendix B** of this report.

3.2.2 Key partner organisations

In addition to the team of officers directly employed by the council, use is made of external organisations and private contractors to provide specialist advice and assistance, including;

- Better Business for All (BBfA)
- Consultant in Communicable Disease Control (CCDC)
- Food Standards Agency (FSA)
- Health and Safety Executive (HSE)
- Public Analysts/Food Examiners
- UK Health Security Agency (formally Public Health England)

3.2.3 Use of Contractors

It is the general practice of the Environmental Health team to only engage the services of outside contractors to assist with the inspection of food premises, if:

- there is a backlog of inspections which cannot be completed with the existing staffing resources and
- the cost of the work can be met from within existing budgets (meaning there is an underspend elsewhere within the team's budgets.

Due to a recent FSA performance review, the council has needed to allocate additional resources so that it can appoint contractors to recover the backlog of inspections. See **section 4.1.2** below for further information.

3.3 Scope of the Service

For the purposes of this service plan, the Environmental Health team has responsibility for the following occupational health and safety and food safety issues within the district:

- risk-based interventions, revisits and advisory visits to local businesses
- issuing formal notices, taking prosecutions, issuing simple cautions and other enforcement actions as needed
- maintaining a database of local authority enforced businesses
- registration, licensing or approval of appropriate premises
- consulting and make representations on planning applications
- dealing with enquiries and investigating complaints from businesses and members of the public
- investigating near-misses, accidents and fatalities which occur in premises where local authority enforce health and safety
- responding to food alerts issued by the Food Standards Agency
- infectious disease and food poisoning investigations (including COVID related work)
- food sampling (both proactive and reactive)
- co-ordinating the voluntary surrender and disposal of unfit food
- inland imported food control and issuing of food export certificates
- liaising with Health and Safety Executive (HSE), Food Standards Agency (FSA), Department for Environment, Food and Rural Affairs (DEFRA), the County Council's Trading Standards Officers and any other agencies, including other Councils for the enforcement of legislation.

In order to support this area of work, the following activities must routinely be undertaken:

- review and updating of policies and procedures
- in-house quality monitoring of the services delivered
- statutory returns to the Food Standards Agency, Health and Safety Executive
- training of new staff and continual update training of existing staff and dissemination of necessary information to officers
- attendance at County and regional liaison groups
- budget review and monitoring
- publishing of free advice on our website.

3.4 Demands on the Service

3.4.1 Overview of the risk-based approach to inspections

The Health and Safety Executive in the National LA Enforcement Code[13] and Local Authority Circular 67/2[14] set out inspection priorities based on national statistics and trends.

The Food Standards Agency, in the Food Law Code of Practice[15], categorise businesses into different intervention frequencies, determined by the potential risk posed by the business. Businesses are scored after every primary intervention or audit visit and therefore may move up or down the risk rating system as the businesses improve or deteriorate and the risk changes.

3.4.2 Breakdown of businesses within East Hertfordshire

As of April 2024, the council had 2,353 premises registered on its database where it was responsible for enforcing health and safety and 1,695 registered food premises. These figures will fluctuate each month as businesses open or close. The three tables below show a breakdown of these premises.

Table 4 - Breakdown of premises by business type

Type of Business	Number of Businesses
Catering Service	541
Retail Shop	502
Leisure and Cultural Services	456
Office	435
Consumer Services	232
Other Premises	64

Wholesale Shop etc	57
Residential Care Homes	36
Hotels, camp sites etc	30
Total	**2,353**

Table 5 - Breakdown of premises by business type

Type of Business	Number of Businesses
Primary Producer	16
Manufacturers & Packers	43
Importers / Exporters	10
Distributors / Transporters	21
Retailers	335
Restaurant / Catering	1,270
Total	**1,695**

Table 6 - Breakdown of premises by food hygiene risk ratings

Risk Rating (at last intervention)	Number of Businesses
A	0
B	26
C	243
D	415
E	785
Unrated	224
Total	**1,695**

3.4.3 Approved food premises

Included in the premises listed in **Table 5** and **Table 6** above are three "approved" premises which operate within the district. These are looked at in more detail in **section 4.2**.

3.4.4 Higher-risk and complex food processes

Higher-risk or complex food processes can only be inspected by officers who can demonstrate the necessary competencies set out in the FSA's Competency Framework[16]. The following processes are considered to be higher-risk or complex and will only be allocated to officers with the appropriate competencies:

- canning

- aseptic packing
- pasteurisation and sterilisation
- cook-chill
- vacuum packing and modified atmosphere packing
- sous vide
- air drying
- freeze drying
- cold smoking
- depuration.

3.4.5 Seasonal businesses, festivals, fayres and similar events

East Hertfordshire is host to many festivals and fayres each year. The Environmental Health team, through the council's Safety Advisory Group (SAG), work closely with event organisers to reduce the risk to the public. These events have a significant impact on the officer's available time. More details can be found in **section 6.5** below.

3.4.6 Accessing services

The Environmental Health team is based at the council offices in Wallfields, Hertford, which operates traditional office hours, though the main service delivery point for the services in this service plan would typically be peoples' homes or their businesses.

Inspections and related visits to premises that do not generally operate during normal office hours are accommodated within the council's existing flexi-time scheme.

Service users may contact officers in the following ways:

- by telephone between 9.00am – 5.00pm, Monday to Friday
- by e-mail (environmental.health@eastherts.gov.uk)
- through our website (www.eastherts.gov.uk)
- by letter.

3.5 Enforcement Policy

The current version of the Environmental Health Enforcement Policy was agreed by the Council's Executive Members at its meeting on the 8 March 2011 and by the Council at its meeting on the 18 May 2011.

The council is currently reviewing enforcement policies across the council with the aim of having a single consolidated policy.

SECTION 4.0 - FOOD SAFETY SERVICE DELIVERY

4.1 Inspections and interventions

4.1.1 Risk-based food safety and hygiene interventions

It is the council's practice to ensure that inspection activity is focused on the higher risk premises as a priority and inspections are carried out in accordance with the Food Law Code of Practice.

Revisits and follow-up action are carried for all food businesses which are not 'broadly compliant' (i.e. those receiving a food hygiene rating of two or less). In addition, revisits are undertaken where significant contraventions are noted or where statutory notices are served.

4.1.2 Performance review recovery plan

In February 2024, following a performance review, the FSA identified that the council was not undertaking inspections in line with the timescales set out in the Food Law Code of Practice and had insufficient staffing resources to undertake the work laid out in the annual service plan.

At the request of the FSA, the council produced an action plan, which has been agreed by them. The action plan sets out when the council will have recovered the inspection programme by and what actions it intends to take with regards to staffing numbers.

Table 7 below sets of the inspection programme for 2024/25, which includes the backlog of inspections. In order to deliver this, the council has appointed a number of contractors specifically to undertake the backlog of inspections.

The main outstanding actions and timescales in the action plan are as follows:

- Backlog of unrated businesses to be cleared by March 2025, or sooner if possible. Inspections will be spread evenly over the next twelve months.
- Backlog of category 'C' inspections to be cleared by December 2024, or sooner if possible. Inspections will be spread evenly over the next nine months.
- Backlog of category 'D' inspections to be cleared by July 2025, or sooner if possible. Inspections will be spread evenly over the next sixteen months.

- Backlog of category 'E' inspections to be cleared by March 2027, or sooner if possible. Inspections will be spread evenly over the next thirty-five months.
- Following the current council-wide review (anticipated to be completed by September 2024), undertake a specific service review of Environmental Health to identify resources and structures to meet food hygiene statutory duties.

Table 7 - Food premises due for an intervention in 2024/25

Business Risk Category	Brought forward previous years	Due in current year	Total Due in 2024/25
A (every 6-months)	0	0	0
B (every 12-months)	0	26	26
C (every 18-months)	63	107	170
D (every 24-months)	93 (124*)	157	250
E (every 36-months)	201 (586*)	29	230
Unrated	224	160**	384
Total	**581**	**479**	**1,060**

* Total number of overdue inspections for this risk category of premises

** Estimated based on historical data

It should be noted that the above figures are guides to the work that needs to be done this year; each inspection has the potential to significantly change these requirements. For example, Category A premises may generate two further inspections and Category B premises may generate a further inspection within the period when inspected.

4.1.3 New food businesses

We aim to inspect new food premises within 28 days of receipt of their food premises registration form, as required by the Food Law Code of Practice. This is however dependant on resources and other demands upon the service. To assist with this, all new food businesses are triaged based on the potential risk they pose to the public.

We currently have a backlog of 224 unrated new food premises that we are working through, prioritising those which involve higher risk activates such as catering.

4.1.4 Alternative enforcement strategy

Very low-risk premises will fall outside of the routine risk-based inspection/intervention programme but must still be assessed as part of an alternative enforcement strategy (AES). The aim of the AES is to allow the council to focus attention on those businesses who present the greatest risk and/or who are failing to meet their legal obligations. **Appendix G** at the end of this document provides more detail on the council's approach.

Table 8 shows the number of businesses we plan to target with our AES during the financial year.

Table 8 - Intervention programme for lower-risk food premises

Intervention / project	Estimated number of premises
Questionnaires for category E premises	230

4.2 Approved Food Premises

The council is required to assess certain food businesses which handle food of animal origin, for approval under Regulation (EC) No 853/2004. Approval inspections generally take longer than a normal food hygiene inspection because of the considerable amount of work needed on the part of the business operator and Environmental Health team.

East Herts Currently has three approved businesses:

- EO / 001 - Keloglan Dairy Limited
- EO / 003 - Dawlicious Jersey Ice Cream
- EO / 004 - Brandon Cooked Meats Ltd

4.3 Outbreaks and infectious diseases

The Environmental Health team will investigate food or water related infectious diseases and outbreaks in accordance with procedures agreed with the Consultant in Communicable Disease Control (CCDC) and other published guidance.

Food related outbreak investigations will usually involve an in-depth inspection of the premises concerned, taking samples from the business and/or ill persons. Any samples taken will be analysed in approved laboratories.

In the event of a large outbreak, the staffing resource will be significantly higher than estimated due to the intensive staffing demands in dealing with such eventualities.

4.4 Food alerts

Food alerts[17] are issued by the Food Standards Agency detailing product withdrawals and recalls ensuring consumers and local authorities know about problems associated with food.

A *Product Withdrawal Information Notice* or a *Product Recall Information Notice* is issued where a solution to the problem has been put in place – the product has been, or is being, withdrawn from sale or recalled from consumers, for example.

A *Food Alert for Action* is issued where intervention by enforcement authorities is required. These notices and alerts are often issued in

conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor.

The Environmental Health team will, on receipt of any food alerts, respond as appropriate and in accordance with the Food Law Code of Practice[15].

4.5 Food and environmental sampling

4.5.1 Overview

The Environmental Health team will use a risk-based approach to target its sampling programme. We will take account of the number, type and risk ratings of food businesses within the district, including statutory sampling responsibilities for approved premises.

Wherever possible the sampling programme will be scheduled to work in collaboration with any national, regional and local sampling surveys, co-ordinating with Food Group sampling programmes.

4.5.2 Areas of Focus

Areas which will be considered for sampling include:

- manufacturers in the district
- business engaged in the handling or preparation of high-risk foods
- businesses identified for sampling as part of nationwide or regional sampling schemes
- businesses subject to consumer complaints
- imported food.

4.5.3 Qualifications

Food sampling will be undertaken in accordance with the Food Standards Agency's Code of Practice and Practice Guidance and the Food Safety (Sampling and Qualifications) (England) Regulations 2013.

All food samples will be taken by authorised officers of the council who are suitably trained, experienced and qualified in accordance with the council's documented procedures.

4.5.4 Food examiners and food analysts

Where appropriate, samples will be analysed and/or examined by the laboratories authorised by the council, in accordance with established guidelines and the Food Law Code of Practice[15].

4.6 Imported Food Control

East Herts Council is not classed as a border inspection post (NB we do not have a sea or airport, so do not have any port health duties). In addition, there are no External Transit Shed Facilities (ETSF) within East Hertfordshire which store food. However, there are some businesses which import and/or export food within the district.

The Environmental Health will continue surveying and inspecting for imported food activity while undertaking routine inspections or interventions.

Where the Environmental Health team finds a business has products of animal and/or non-animal origin that have been incorrectly introduced into the country they will take appropriate action in relation to the illegally introduced products in accordance with national guidance and our documented procedure.

4.7 National Food Hygiene Rating Scheme

At the beginning of April 2012, East Herts Council signed up to the Food Standards Agency's national Food Hygiene Rating Scheme[18]. The scheme helps consumers choose where to eat out or shop for food by giving them information about the hygiene standards in restaurants, cafés, takeaways, hotels and food shops. The overarching aim of the scheme is to reduce the incidence of food-borne illness and help encourage businesses to improve hygiene standards.

The ratings for East Herts are available via the Food Standards Agency's website[19].

SECTION 5.0 - HEALTH AND SAFETY SERVICE DELIVERY

5.1 Inspections and Interventions

5.1.1 Risk-Based Health and Safety Interventions

The National Local Authority Enforcement Code requires local authorities to target interventions on those activities that give rise to the most serious risk or where the hazards are least well controlled. This is to be achieved by:

- having risk-based intervention plans focussed on tackling specific risks;
- considering the risks that need to be addressed and use the whole range of interventions to target these specific risks;
- reserve unannounced proactive inspection only for the activities and sectors published by the Health and Safety Executive (HSE) or where intelligence suggests risks are not being effectively managed; and
- using national and local intelligence to inform priorities.

5.1.2 National Priorities

From the national priorities listed in Local Authority Circular 67/2, the Environmental Health team will be focused on the following activities during this financial year:

- Electrical safety in hospitality settings
    - Targeting 40 premises
- Gas safety in commercial catering premises
    - Targeting 40 premises
- Raising awareness of the need to prevent injury to members of the public from accessing large commercial waste and recycling bins
    - Targeting 40 premises
- Visitor attractions to prevent ill health arising from animal contact
    - Targeting 10 premises

Further details on these interventions can be found in Appendix F.

5.2 Accident Investigations

The Council can be notified of work-related accidents or near-misses within local businesses by either telephone or via the HSE website. The type of accident or near-miss could include, fatalities, major injuries, injuries requiring

more than 7 days absence from work, occupational diseases and dangerous occurrences[20].

All accidents will be risk-assessed and investigated in accordance with the department's documented procedures and national guidelines. In cases where we believe a business has failed in its duty to protect its employees or the public, the case will dealt with in line with our published enforcement policy and the Enforcement Management Model[21] (EMM).

5.3 Sampling

The Environmental Health team will use a risk-based approach to target its sampling (including environmental swabbing). Areas which will be considered for sampling include:

- businesses identified for sampling as part of nationwide or regional sampling schemes;
- businesses subject to consumer complaints; and
- swimming pools and spas.

5.4 The Independent Regulatory Challenge Panel

The Independent Regulatory Challenge Panel was set up to look into complaints regarding advice given by either HSE or local authority inspectors about health and safety. Where a business owner believes the information they have been given is incorrect or goes beyond what is required to control the risk adequately, they can raise the issue through the HSE's website - https://www.hse.gov.uk/contact/challenge-panel.htm

The panel consists of independent members who will have the competence and experience to assess advice that has been given on regulatory matters.

Before the business owner raises an issue with the panel, they should have first tried to resolve the matter with the relevant officer (who inspected the premises) and the Service Manager – Environmental Health.

SECTION 6.0 - GENERAL SERVICE DELIVERY

6.1 Complaints about local businesses

The Environmental Health team will apply a risk-based approach to complaints about local businesses, which may mean come complaints will not be investigated, but used as intelligence to build up a picture of the business for future inspections or interventions. The team will investigate complaints where there is a medium to high-risk of harm to the general public or members of staff.

The purpose of investigating complaints includes:

- identifying the cause of the risk and those people affected, removing the risk and ensuring, by advice or enforcement, that it does not reoccur
- the provision of information and advice to industry in order to raise and maintain standards
- to fulfil the duty of enforcement
- to inform future inspection priorities, both nationally and locally.

Complaints are investigated in accordance with the department's documented procedures and are responded to within five working days; where an imminent serious risk is indicated, the response will be quicker.

6.2 Primary Authority

The council supports the Primary Authority[22] scheme. Instances where the Environmental Health team would liaise with the relevant local authority include:

- before taking formal enforcement action, other than prohibition
- after serving a prohibition notice
- where shortcomings are identified in a participating organisations agreed policies or procedures which may require challenge at national level.

Where the business has a primary authority agreement and a published inspection plan, the Environmental Health team will use it as the basis of the inspection or intervention.

At present, East Herts Council does not have any formal partnerships with local businesses. However, there are a number of food manufacturing premises within East Hertfordshire for which the Council acts as the

Originating Authority, these include the approved premises already mentioned.

6.3 Advice to businesses

The Environmental Health team will advise and work with businesses to help them comply with the law. In particular, provide education, information and advice to prospective and existing businesses on matters relating to health and safety and/or food hygiene.

The following activities will be undertaken to assist local businesses:

- on the spot advice during routine interventions
- updating the Council's website with useful information
- sign-posting businesses to relevant information
- responding to health and safety and food hygiene enquiries.

6.4 Liaison with other organisations

The council is committed to ensuring the enforcement approach it takes is consistent with other local authorities. Accordingly regular dialogue and updating on enforcement matters takes place through the following forums:

- Herts and Beds topic groups and regional group meetings
- regular attendance at the Hertfordshire Health Protection Board
- Local Government Regulation updates (formally LACORS)
- regular contact with the Health and Safety Executive
- regular contact with the Food Standards Agency.

6.5 Large Public Events

The council's Safety Advisory Group[23] (SAG) advises on safety at public events. The SAG in East Herts is a multi-agency group that has been established to enable event organisers to seek help and guidance from one central body.

The events held within East Herts can range from 50 people to 10,000 people. It is therefore important that these events, particularly the larger events, are appropriately supported. Members of the Environmental Health team will attend the SAG to advise on any food hygiene or health and safety issues. In addition, the Environmental Health team will work directly with event organisers to provide advice on controls and checks that need to be in place to ensure the event is run safely and that any food is produced hygienically.

The larger events take a considerable amount of staffing resource and are generally clustered around the summer period.

Larger events will often use caterers which are outside East Herts and are therefore unknown to the Council. To help reduce the burden to businesses and the Council, the Environmental Health team will gather intelligence on any potential food vendors from other local authorities and use this information to target higher-risk food outlets at all major events.

SECTION 7.0 - RESOURCES

7.1 Environmental Health Budgets

The budgets for the Environmental Health team are contained with the Housing and Health Services' budgets which for this financial year were agreed by the Council's Executive on 13 February 2024 [24] and by the Council on 1 March 2022 [25].

If legal action needs to be taken by the Environmental Health team, costs have to be met, where possible, from within the overall approved budget. For large food related incidents, the council can also apply to the Food Standards Agency for special funding.

7.2 Staffing Resources

The predicted staffing profile for the Environmental Health team, with respect to this service plan is set in Table 3 above. The food competency profile of the Environmental Health team is given in Appendix C. The figures for competency are given in terms of numbers of authorised officers rather than full time equivalents (FTE).

By monitoring trends, inspection data, using time recording data and horizon scanning for likely demands on the service, it is possible to predict the likely staffing resources needed to deliver this service plan.

A comparison of the predicted staffing resources needed to deliver this service plan compared with the predicted available staffing resources can be found in Appendix D and Appendix E.

7.3 Staff Development

The Service Manager - Environmental Health will ensure that the Environmental Health team are appropriately qualified and receive regular training to maintain and improve their level of competency, including adherence to written working procedures and policies.

Staff development is monitored as part of the council's internal performance and development review scheme.

SECTION 8.0 - QUALITY ASSESSMENT

8.1 In-house Quality Assessment

In addition to the training and development arrangements already mentioned in section 7.3 above, the following monitoring arrangements are in place to assist in the consistency and quality assessment of the work carried out by the Commercial Team:

- review by the Senior Environmental Health Practitioner (Commercial) and/or Service Manger – Environmental Health of selected post-inspection paperwork;
- meetings with the Service Manger – Environmental Health where any legal action is anticipated;
- inspection audits by peer review and by the Senior Environmental Health Practitioner (Commercial) and/or Service Manger – Environmental Health;
- review of feedback from the Council's corporate complaints procedure[5];
- regular team meetings to update the Environmental Health team and share experiences; and
- regular Performance and Development Review meetings with line managers and subsequent one to one meetings.

8.2 External Quality Assessment

8.2.1 Inter-authority Audits

The Environmental Health team will participate in any inter-authority audits organised by the Herts and Beds topic groups. Currently there are none planned.

8.2.2 Food Standards Agency Audit

In June 2013, the Food Standards Agency undertook a "Delivery and Compliance" audit of East Herts Council. The audit focused on the Council's arrangements for the management of the food premises database, food premises interventions, and internal monitoring. This included a reality check at a food business to assess the effectiveness of official controls implemented by the Authority at the food business premises and, more specifically, the checks carried out by the Authority's officers, to verify food business operator (FBO) compliance with legislative requirements. The scope of the audit also included an assessment of the Authority's overall organisation and management, and the internal monitoring of food hygiene law enforcement activities.

Full details of the Food Standards Agency's findings can be found in their report[26] which is published on the National Achieves Website.

In February 2024, following a performance review, the FSA identified that the council was not undertaking inspections in line with the timescales set out in the Food Law Code of Practice and had insufficient staffing resource to undertake the work laid out in the annual service plan. Further details can be found in section 4.1.2 above.

SECTION 9.0 - REVIEW

9.1 Review against this Service Plan

Review of the activities covered by the Environmental Health team will take place on an annual basis by the Service Manager - Environmental Health. In addition, ad-hoc reviews may take place as a result of:

- changes to legislation and guidance;
- observations during joint visits;
- post-inspection checks on officer's paperwork; or
- feedback from businesses, customers, staff etc.

The outcome of the review(s) will be recorded and reported each year as part of the service planning process.

9.2 Review against Key Performance Indicators

Information about the Council's performance indicators which are relevant to the work of the Environmental Health team are listed in Appendix A.

These performance indicators are reviewed on a monthly basis by the Service Manager - Environmental Health, Head of Housing and Health and Executive Member for Wellbeing; any deviation from the council's agreed target are accounted for and reported formally via the council's corporate software solution, "Pentana" to which Members have full access and receive regular reports detailing the council's performance.

9.3 Areas of Improvement

Any service issues identified during the annual reviews, from customer feedback, staff reviews or by monthly routine performance monitoring will be recorded and where appropriate an action plan produced to address those service issues.

SECTION 10.0 - CONCLUSION

10.1 Staffing resource (food hygiene)

Given potential demands and current work processes, it is estimated that the optimum staffing complement would be 3.8 FTE (full-time equivalent). See **Appendix D** for details.

The current Environmental Health team has 2.45 FTE posts funded to undertake food safety and hygiene work. Of this allocation:

- 1.10 FTE are currently classified as trainees and cannot undertake official controls; and
- 0.55 FTE is vacant.

There is a continuing need to address these service pressures via service redesign in terms of officer deployment, process re-engineering and automation. Also as part of the FSA action plan discussed in section 4.1.2 above, the team will be undergoing a structure review this year.

Where possible, impacts resulting from the differences between the optimum staffing complement and current staffing commitment will be limited to lower risk activities and raised with the Head of Housing and Health and Executive Member for Wellbeing.

10.2 Staffing resource (health and safety)

Given potential demands and current work processes, it is estimated that the optimum staffing complement would be 0.83 FTE. See **Appendix E** for details.

The current Environmental Health team has 0.8 FTE posts funded to undertake food safety and hygiene work. Of this allocation:

- 0.4 FTE are currently classified as trainees and cannot undertake the full range of enforcement activities; and
- 0.1 FTE is vacant.

Where possible, impacts resulting from the differences between the optimum staffing complement and current staffing commitment will be limited to lower risk activities and raised with the Head of Housing and Health and Executive Member for Wellbeing.

SECTION 11.0 - APPENDICES

Appendix A - Key Performance Indicators
Appendix B - Environmental Health Structure Chart
Appendix C - Current Food Officer Competency Profile
Appendix D - Staffing Resources (Food Hygiene)
Appendix E - Staffing Resource (Health and Safety)
Appendix F - Health and Safety Intervention Plan
Appendix G - Food Hygiene Alternative Enforcement Strategy
Appendix H - Service Improvements
Appendix I - References

Appendix A - Key Performance Indicators

* Following the FSA performance audit in February 2024, the performance indicators were reviewed, so historic data is not available for this appendix.

Indicator Description	2024/25		2025/26		2026/27		2024/25
	Target	Achievement	Target	Achievement	Target	Achievement	Target
The percentage of food businesses assessed as risk category 'A' which are overdue for inspection.	0%						0%
The percentage of food businesses assessed as risk category 'B' which are overdue for inspection.	0%						0%
The percentage of food businesses assessed as risk category 'C' which are overdue for inspection.	0%						0%
The percentage of food businesses assessed as risk category 'D' which are overdue for inspection.	0%						0%
The percentage of food businesses assessed as risk category 'E' which are overdue for inspection.	0%						0%

Indicator Description	2024/25		2025/26		2026/27		2024/25
	Target	Achievement	Target	Achievement	Target	Achievement	Target
Percentage of responses to food hygiene requests for services actioned within target times	98%						98%

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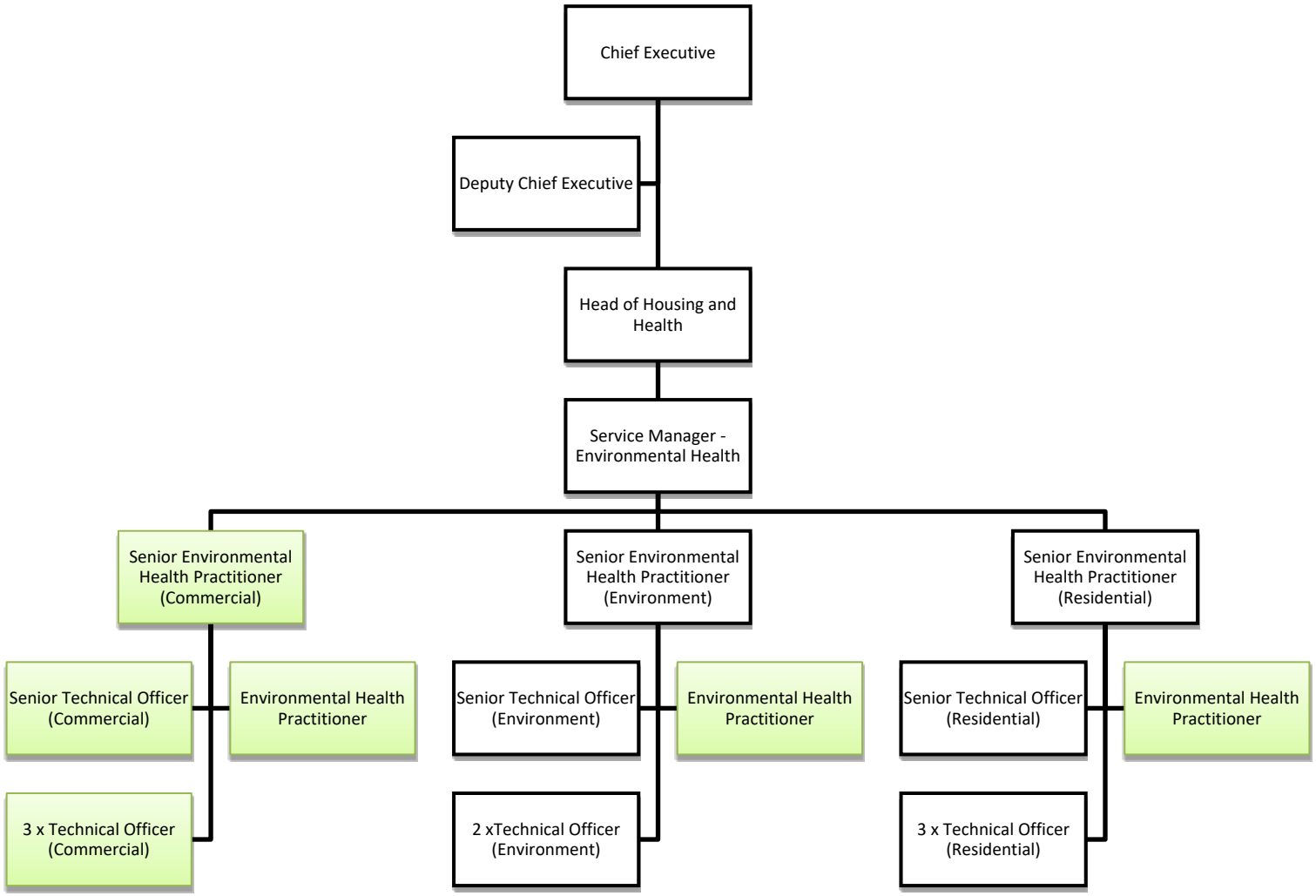
Appendix B - Environmental Health Structure Chart

Highlighted posts indicate those who undertake food hygiene and health and safety work



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Appendix C - Current Food Officer Competency Profile

Level of Authorisation (April 2024)	SEHP	STO	EHP 1	EHP 2	EHP 3	TO 1	TO 2	TO 3
Powers of Entry, Examination and Investigation	x		x	x	x	x	x	X
Inspection, Detention and Seizure of Food Stuffs	x			x	x			
Informal procurement and analysis of samples	x			x	X			
Medium/lower risk premises (Category C to E):								
• Inspection of medium / lower risk premises	x			x	x			
• Service of hygiene improvement notices	x			x	x			
• Formal procurement and analysis of samples	x			x	x			
Higher risk premises (Category A and B):								
• Inspection of higher risk premises	x			x	x			
• Service of hygiene improvement notices	x			x	x			
• Formal procurement and analysis of samples	x			x	x			
Service of emergency prohibition notices	x				x			
Service of remedial action / detention notices	x				x			
Inspection of approved premises	x				x			
High-risk and/or complex processes:								

Level of Authorisation (April 2024)	SEHP	STO	EHP 1	EHP 2	EHP 3	TO 1	TO 2	TO 3
• Canning								
• Aseptic packing								
• Pasteurisation and sterilisation	x							
• Cook-chill	x							
• Vacuum or modified atmosphere packing	x							
• Sous vide	x							
• Air drying								
• Freeze drying								
• Cold smoking	x							
• Depuration								

Appendix D - Staffing Resources (Food Hygiene)

Area of Work	Predicted Volume for Current Year[1]	Estimated Hours per Activity[2]	Estimated FTE Required for Current Year
Primary interventions/inspections (risk category A to D)	446	4.0	1.2
Approved premises interventions/inspections	2	6.0	0.0
Alternative enforcement strategy	230	2.0	0.3
Extra visits as a result of findings from the AES (estimated at 20%)	46	4.0	0.1
New premises interventions/inspection	384	4.0	1.0
Revisits (estimated at 10%)	83	2.5	0.2
Advice visits	2	2.5	0.0

[1] Based on the average case work undertaken by the team over the past three years (excluding COVID period)

[2] Based on time recording undertaken by officers when undertaking these activities.

Area of Work	Predicted Volume for Current Year[1]	Estimated Hours per Activity[2]	Estimated FTE Required for Current Year
Sampling visits	24	6.0	0.1
Requests for service (including complaints)	200	4.0	0.6
ID investigations / food poisoning / outbreak investigations	22	2.0	0.0
Dealing with large events	10	25.0	0.2
Enforcement (excluding prosecutions)	4	6.0	0.0
Training and other back-office functions	8	12.0	0.1
			3.8

Appendix E - Staffing Resource (Health and Safety)

Area of Work	Predicted Volume [3]	Estimated Hours per Activity[4]	Estimated FTE Required
Intervention programme as detailed in section 5.1.1 above	130	5.2	0.47
Revisits	10	2.6	0.02
Advice visits	0	0	0
Sampling visits	28	2	0.04
Requests for service (including complaints)	30	6.5	0.1
Accident reports and investigations	56	2.5	0.1
Enforcement (excluding prosecutions)	2	6	0.01
Management, training and other back office functions	8	6	0.04
			0.71

[3] Based on the average case work undertaken by the team over the past three years (excluding COVID period)

[4] Based on time recording undertaken by officers when undertaking these activities.

Appendix F - Health and Safety Intervention Plans

Electrical safety in hospitality settings	
Intervention Details	The Electricity at Work Regulation 1989 requires that any electrical equipment which has the potential to cause injury is maintained in a safe condition. Officers are asked to increase awareness to improve standards of compliance. They are asked to remind dutyholders to ensure both the fixed installation and electrical appliances are inspected by a competent person at appropriate intervals.
Supporting Evidence	National Priority – see LAC 67/2 The pandemic has meant that many hospitality venues have extended their space to make the most of outdoor areas. Pubs, restaurants and cafés are urged to ensure outdoor electrical equipment such as lights and heaters are specifically designed for outdoor use, installed by a competent person and checked regularly for damage or water ingress.
Sectors and Activities to be Targeted	Hospitality venues, particularly public houses
Planned Intervention	Initially raising awareness with duty holder of their legal obligations, unless there are causes for imminent concern.

Gas safety in commercial premises	
Intervention Details	The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas.
Supporting Evidence	National Priority – see LAC 67/2 HSE has obtained information from Gas Safe Register which suggests that commercial caterers are not fully aware of their duties under the Gas Safety (Installation and Use) Regulations 1998 and this can lead to appliances being unsafe. These appliances include boilers, cooking ranges and more specialised equipment such as tandoori ovens and chapatti flamers.
Sectors and Activities to be Targeted	Catering establishment which use gas appliances.
Planned Intervention	Initially raising awareness with duty holder of their legal obligations, unless there are causes for imminent concern.

Raising awareness of the need to prevent injury to members of the public from accessing large commercial waste and recycling bins	
Intervention Details	HSE's Waste & Recycling sector supports the strategic industry initiative to prevent people being injured or killed after entering large commercial bins (typically 660 litres capacity and above).
Supporting Evidence	National Priority – see LAC 67/2 There have been numerous cases where members of the public have gained access to commercial bins for shelter and then been injured or killed when those bins were emptied into collection and compaction vehicles.
Sectors and Activities to be Targeted	Retail premises that use commercial waste bins.
Planned Intervention	Initially raising awareness with duty holder of their legal obligations, unless there are causes for imminent concern.

Intervention: Visitor attractions to prevent or control ill health arising from animal contact	
Intervention Details	All animals naturally carry a range of microorganisms, some of which can be transmitted to humans. Diseases passed from animals to humans are known as zoonoses. Some zoonotic diseases are more serious than others. There are a range of zoonotic diseases that could be acquired from animal contact at visitor attractions including E. coli O157 and Cryptosporidium parvum.
Supporting Evidence	National Priority – see LAC 67/2 Increase cases of zoonotic illnesses.
Sectors and Activities to be Targeted	Zoos, open farms and other similar premises
Planned Intervention	Initially raising awareness with duty holder of their legal obligations, unless there are causes for imminent concern.

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Appendix G - Food Hygiene Alternative Enforcement Strategy

G.1.0 Introduction

The Code of Practice on Food Law (CoP) issued by the Food Standards Agency provides the option for local authorities to use an Alternative Enforcement Strategy for low-risk food businesses to ensure their compliance with the law. It outlines a range of interventions as an alternative to inspections for local authorities to implement. The strategy targets low-risk food businesses assessed as such where inherent hazards are not significant by virtue of their trading activities or the number of consumers they supply.

G.2.0 Aim

The Alternative Enforcement Strategy (AES) will allow the council to focus on the businesses that pose the highest risk to consumer safety and those who are failing to meet their statutory obligations. This will enable the council to provide information and advice to low-risk businesses where appropriate while ensuring they are subject to official controls. The strategy will allow the council to maintain regular contact with low-risk businesses while focusing resources on higher-risk businesses.

G.3.0 Low Risk Definition

All new food businesses will receive a food hygiene inspection and will subsequently be given a risk-rating. The risk-rating will determine how frequently the business will need to be inspected. Low risk businesses are businesses that receive an inspection rating of 30 or less (risk category E). Businesses may move in or out of this category as a result of the information gathered and any changes to the activities undertaken.

Low risk businesses can be excluded from the planned inspection programme as long as they are subject to an alternative enforcement strategy every three years. This does not include unrated premises.

G.4.0 Strategy

All businesses must have been subject to an initial formal inspection and risk rated before being included in the AES.

These businesses will be allocated to an officer. The business team will send out letters with links to online self-assessment questionnaires for businesses to complete.

When the questionnaire is completed, the case officer will evaluate the response and risk rate the business accordingly. It is likely that the business will remain a category E and therefore, in most cases, there will be no need for further contact for another three years.

In some cases the response to the questionnaire may indicate an increase in the risk to customer safety. Where the business receives an increased risk rating they will usually fall within the proactive inspection plan. In these cases further action will be required to inspect and ensure appropriate measures are in place. Uniform must be maintained to accurately record the actions undertaken.

G.5.0 Scope

A number of industries usually fall under the low-risk category. The following business types will likely form part of the AES:

- Public Houses that only sell drinks and confectionary
- Newsagents that only sell low risk foods – sweets, and wrapped food items
- Food businesses operating from domestic premises
- Sports and Social Clubs that only sell drinks and confectionary
- Village/Church halls where only occasional catering takes place

G.6.0 Questionnaires

Our main approach will be to use self-assessment questionnaires. The questionnaires will be sent out to all low-risk (Category E) businesses that are in the list of priority industries as detailed above.

Low-risk business will be sent a letter together with a link to an online self-assessment questionnaire to complete every three years. Some questionnaires will be industry-specific to allow clearer assessment of the business activities.

From time to time, targeted interventions or project-based interventions for lower-risk premises may be initiated by the council themselves or form part of joint-working initiatives with other local authorities.

G.7.0 Follow up

If the questionnaire has not been returned within the following 28 days, the case officer will telephone the business. Officers will issue a reminder or where appropriate carry the questionnaire out over the phone. If the questionnaire has not been received within a further 14 days the business will be subject to a food hygiene inspection. This will be arranged within the following 28 days.

A number of verification visits may be undertaken by a qualified officer to check the information supplied. This approach will help maintain the accuracy of the council's records by identifying where businesses have closed, changed ownership or nature of the premises.

G.8.0 Inspections

Although the strategy aims to minimise the number of visits made to low-risk food businesses, intelligence may identify issues that require further intervention. There are a number of cases where officers may carry out an inspection:

- Where the response received indicates a change of trading activity and poses an increased risk to customer safety
- Change in the number of consumers the business supplies
- Where the business fails to return the self-assessment questionnaire
- To investigate complaints relating to the business
- Where a questionnaire is received indicating a change in ownership
- As part of an investigation into a food poisoning outbreak
- In response to actions requested by Food Alert
- At the request of the proprietor/manager

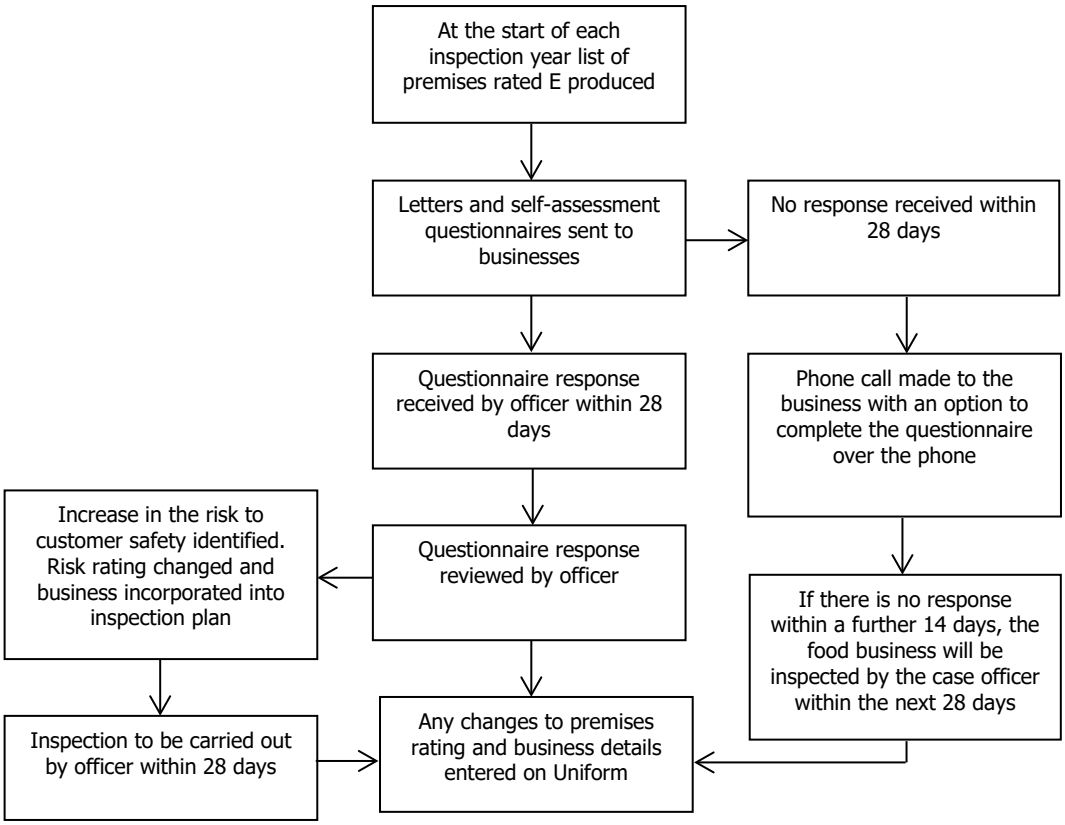
It is recognised that the strategy largely relies on the honesty of the business. Therefore these inspections will help the council assess the adequacy of the scheme and the validity of the responses received.

G.9.0 Performance Indicators

The overall objective of the strategy is to maintain a rolling AES for food hygiene standards for low-risk category businesses. In order to monitor the effectiveness of this approach and ensure businesses are inspected within the Code of Practice timescales, performance will be measured against the following indicators:

- The number of questionnaires completed each year
- The number of questionnaires leading to further interventions (such as inspection)
- The number of businesses moving out of the low-risk strategy each year due to a change in the level of risk presented.
- The percentage of food businesses assessed as risk category 'E' which are overdue for inspection.

G.10.0 Flowchart of AES Procedure


At the start of each inspection year list of premises rated E produced
Letters and self-assessment questionnaires sent to businesses
No response received within 28 days
Questionnaire response received by officer within 28 days
Phone call made to the business with an option to complete the questionnaire over the phone
Increase in the risk to customer safety identified. Risk rating changed and business incorporated into inspection plan
Questionnaire response reviewed by officer
If there is no response within a further 14 days, the food business will be inspected by the case officer within the next 28 days
Inspection to be carried out by officer within 28 days
Any changes to premises rating and business details entered on Uniform

Appendix H - Service Improvements

As detailed in Section 8 of this report, the Service Manager - Environmental Health will undertake regular reviews of the work of the Environmental Health team. Any significant service improvements which come about as a result of this process will be reported in this Appendix.

H.1.0 Service Improvements During 2021/2022

- None.

H.2.0 Service Improvements During 2022/2023

- None.

H.3.0 Service Improvements During 2023/2024

- None.

Appendix I - References

This service plan has a number of hyperlinks to different web pages which are embedded into the text. If you are viewing this document electronically, you simply need to click on the blue text to access the referenced document or website. If you are viewing this in paper format, then the main website addresses are listed below for your convenience.

Please note, external links were selected and reviewed when this service plan was produced. However, East Herts Council is not responsible for the content of external websites; therefore the link and/or content could change without the Council's knowledge or agreement.

[1] Health and Safety at Work etc Act 1974
www.legislation.gov.uk/ukpga/1974/37

[2] Food Safety Act 1990
www.legislation.gov.uk/ukpga/1990/16

[3] Food Safety and Hygiene (England) Regulations 2013
www.legislation.gov.uk/uksi/2013/2996/made

[4] Environmental Health's Enforcement Policy
https://www.eastherts.gov.uk/environmental-health/environmental-health-enforcement-policy

[5] East Herts Council's Complaints Procedure
https://www.eastherts.gov.uk/contactus/make-formal-complaint

[6] East Herts Council's Vision and Corporate Priorities
https://www.eastherts.gov.uk/about-east-herts-0/vision-and-corporate-priorities

[7] East Herts Council's Economic Development Vision for East Hertfordshire
https://www.eastherts.gov.uk/planning-building/east-herts-district-plan/evidence-library/economy-employment-and-retail-eer

[8] East Herts Council's Sustainable Community Strategy
https://www.eastherts.gov.uk/about-east-herts-0/sustainable-community-strategy-2009-2024

[9] Health and Wellbeing Strategy
https://www.eastherts.gov.uk/about-east-herts-0/health-and-wellbeing-strategy-2019-23

[10] nomis
https://www.nomisweb.co.uk/reports/lmp/la/1946157224/report.aspx?town=east%20hertfordshire

[11] Hertfordshire Trading Standards
www.hertfordshire.gov.uk/business/tradingstandards/

[12] Office of National Statistics – UK Business Activity, Size and Location 2016
www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/datasets/ukbusinessactivitysizeandlocation

[13] National Local Authority Enforcement Code
https://www.hse.gov.uk/lau/la-enforcement-code.htm

[14] Setting Priorities and Targeting Interventions
https://www.hse.gov.uk/lau/lacs/67-2.htm

[15] FSA – Food Law Code of Practice
https://www.food.gov.uk/about-us/food-and-feed-codes-of-practice

[16] Food Standards Agency Competency Framework
https://www.food.gov.uk/sites/default/files/media/document/competency-framework.pdf

[17] FSA – Food Alerts
http://www.food.gov.uk/enforcement/alerts/

[18] FSA – Information on the Food Hygiene Rating Scheme
http://www.food.gov.uk/policy-advice/hygieneratings/

[19] FSA – National Food Hygiene Ratings Scheme Website
http://ratings.food.gov.uk/

[20] HSE – Reporting of Injuries, Diseases and Dangerous Occurrences
http://www.hse.gov.uk/riddor/reportable-incidents.htm

[21] HSE – Enforcement Management Model
http://www.hse.gov.uk/enforce/emm.pdf

[22] Primary Authority Scheme
https://www.gov.uk/government/publications/primary-authority-overview

[23] East Herts Council – Safety Advisory Group Information
https://www.eastherts.gov.uk/community-and-health/community-event-guidance

[24] East Herts Council Committee Report – Executive (13/02/2024)
https://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=119&MId=4213&Ver=4&J=3

[25] East Herts Council Committee Report – Council (28/02/2024)
https://democracy.eastherts.gov.uk/ieListDocuments.aspx?CId=158&MId=4218&Ver=4&J=5

[26] Food Standards Agency's 2013 Audit of East Herts Council
https://webarchive.nationalarchives.gov.uk/ukgwa/20171207145729/https://www.food.gov.uk/enforcement/auditandmonitoring/auditreports?f%5B0%5D=im_field_nation%3A17