

Kirklees Council

Food Safety

Service Plan 2022





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FOOD SAFETY



1. SERVICE AIMS AND OBJECTIVES

COVID-19 Pandemic Impact Statement

The Covid-19 pandemic resulted in the Food Standards Agency issuing guidance to Local Authority (LA) Food Safety Departments (in March 2020), to pause their inspection programmes and focus on a number of priorities. As a result of this, a significant backlog developed of premises that are now overdue for inspection. At all times during the pandemic, Kirklees Food Safety Team has complied with the requirements of the FSA to ensure the safety of food in the borough and to respond to any food safety risks.

This Food Safety Service Plan for 2022 has been structured around the Food Standards Agency (FSA) "Local Authority Recovery Plan for the period from 1 July 2021 to 2023/24". The recovery plan sets out a framework for re-starting the delivery of official controls with a focus on new businesses and those that are highest risk, to ensure that food safety departments realign with the Food Law Codes of Practice (for England, Wales and Northern Ireland) for new food establishments and for high-risk and/or non-compliant establishments while providing flexibility for lower risk establishments. This should be implemented alongside delivery of:

- official controls where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance that support trade and enable export.
- reactive work including enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints.
- sampling; and
- ongoing proactive surveillance.

The aim is that LA inspection programmes should be back in-line with the Food Law Code of Practice's minimum inspection frequencies by the end of the period specified within the recovery plan. The first milestone required local authorities to have undertaken an on-site intervention at all risk category A premises by 31st March 2022. Kirklees has met this first milestone and does not foresee any current problems in meeting the requirements of the next milestones on 30th June 2022 and 30th September 2022. At the time of writing, the current forecast is that we should significantly exceed the minimum expectations of the FSA Recovery Plan.

1.1 AIMS AND OBJECTIVES

To seek to ensure that all food prepared, offered or exposed for sale is what it says it is and that it is safe and will not cause ill health

To meet the requirements of the FSA Local Authority Recovery Plan and exceed these requirements wherever possible.

To inspect all unrated premises (new registrations).

1.2 LINKS TO CORPORATE OBJECTIVES AND PLANS

The Council's vision is for Kirklees to be a district that combines a strong, sustainable economy with a great quality of life – leading to thriving communities, growing businesses, high prosperity and low inequality where people enjoy better health throughout their lives. This vision is underpinned by the Council's shared outcomes which are:

- Best Start
- Sustainable Economy
- Well
- Safe and Cohesive
- Independent
- Clean and Green
- Aspire and Achieve
- Efficient and Effective
- Shaped by People

In addition, the Joint Strategic Needs Assessment identifies Food and Nutrition as one of its priorities. Furthermore, the link between unsafe food and public health is clear, and therefore, it is important to ensure that food processed, produced and sold in Kirklees is safe and fit for human consumption.

Timely, programmed and risk-based interventions will ensure that food businesses are inspected, and where necessary, proportionate enforcement action is taken. This approach will aim to ensure that problem premises are dealt with before their practices and procedures can have a detrimental impact on public health.

Climate Emergency is a key strategic priority for the Council. Climate change has the potential to significantly impact on food security due to negative impacts on food production (both crops and livestock). It may also have a detrimental impact on food safety through the increased growth and proliferation of pathogenic foodborne micro-organisms both in the UK but also in developing countries where foods may be imported from. It will be necessary for the Food Safety Team to remain vigilant and aware of any new evidence, which indicates food safety issues because of climate change. This should also incorporate increased sampling of imported foods on a more regular and programmed way.

Another significant impact on food supply and the delivery of official controls in relation to food safety is the UK's exit from the EU. From 31st December 2020, the UK has been a 'third country' and some food exports are required to meet EU imported food entry checks.

It also means that some foods coming from the EU now need to meet third country import checks in the UK (though the full requirements intended to commence on 1st July 2022 have been postponed). The other impact from a UK perspective is that foods from outside the EU (third countries) that are

destined for the UK, will no longer be checked at the first point of entry into the EU, this will lead to increased import checks at UK Border Control Points.

The additional controls on imports and exports of certain foods, may also impact on businesses within Kirklees and their ability to operate. Significant work was undertaken in 2019 to contact all food manufacturers within Kirklees to signpost them to the relevant places for information on import/exports to and from the EU in preparation for UK's withdrawal from the EU. We are not currently aware of any businesses in Kirklees who export food subject to third country import controls and therefore do not believe that this is a significant risk.

To date, there have not been any significant impacts from the UK's exit from the EU; however not all import controls for food emanating from the EU are in place. There remains, therefore, the potential for the following impacts upon Kirklees Food Safety Department:

There may be an increase in the requests to Food Safety for export certificates from manufacturers located in Kirklees.

There will be an increase in the quantities of third country imported foods in circulation in the UK (as EU foods will now be third country imports) that may lead to an increased need to inspect / sample / seize / detain etc. imported foods, more than we previously experienced as EU members.

Where third country, imported foods are allowed to leave port (pending results of analysis) to be stored at an External Temporary Storage Facility (ETSF), if results are unsatisfactory, Kirklees food safety officers may be required to take appropriate action to deal with those foods. (Currently there are 2 ETSF facilities located within Kirklees, however neither are currently registered for food storage).

The situation will need to be monitored, especially when full import controls on food emanating from the EU begin.

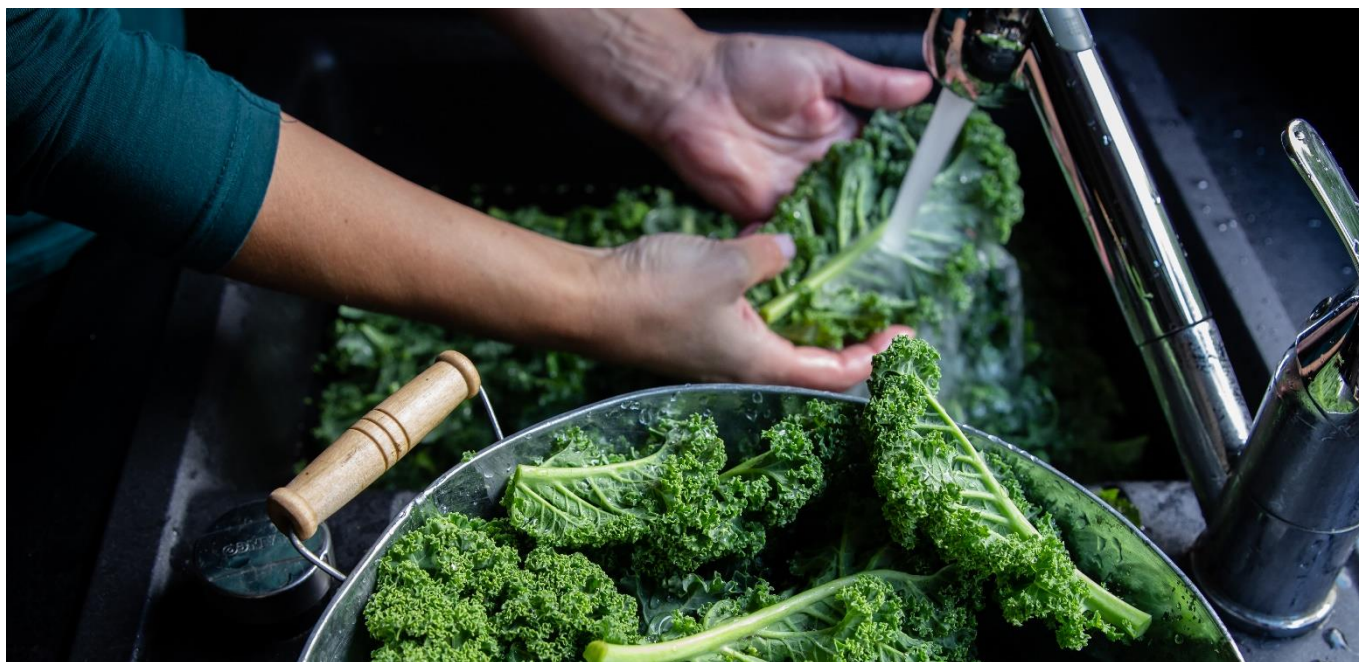
1.3 SUSTAINABLE ECONOMY

The Food Safety Team recognises the importance of engaging with business and how successful business can impact and increase local and council wide economic development. A consistent approach to food safety ensures a level playing field, with compliant businesses receiving recognition (through higher food hygiene rating scores) and failing businesses requiring proportionate enforcement action to secure compliance. The Public Protection Enforcement Policy outlines this graduated approach. This has been prepared in-line with the Regulators' Code.

Given the increase in awareness of food safety, and food hygiene rating scores, it is anticipated that customers to compliant businesses will increase and make the businesses more resilient. Similarly, it is anticipated that a consistent approach to enforcement will, in the longer term, ensure greater compliance and reduce the need for enforcement action.

The Service works closely with the UK Health Security Agency (UKHSA) and undertakes a food sampling programme that focuses on national/international food safety concerns and trends. We continue to work with colleagues from the Public Health Team (formerly NHS Kirklees) in relation to Covid-19 and infection prevention and control.

The Food Information and Nutritional Education (FINE) team was previously positioned within the Public Protection Service and worked with the Food Safety Team on a number of projects to promote healthy eating. One such project was 'Healthy Holidays' that was introduced during the Covid-19 pandemic in response to the problem of children not being at school and therefore not being able to access a nutritionally balanced lunch due to school closures and poverty. This project has continued during school holidays since that time and the Food Safety Team ensures that providers are compliant with food hygiene legislation and are providing safe food.



Since 1st April 2022, the FINE Team has now moved under the Public Health Directorate, however the joint working on Healthy Holidays continues, as will future projects, where appropriate.

The Food Safety Team maintains its links with the Consultant in Public Health Medicine in infectious disease control, particularly in connection with food poisoning and foodborne illness. Links have also been maintained with the Consultant in Public Health Medicine in infectious disease control, particularly in connection with food poisoning outbreaks and surveillance, including quarterly operational and strategic meetings, which aim to identify and adopt solutions to larger, more regional issues. Officers from Kirklees Infection Prevention and Control Team also sit on these meetings, which have recently been reinstated, following their suspension during the COVID-19 pandemic. During the pandemic, in the absence of regular meetings, UK Health Security Agency (UKHSA) officers continued to be consulted in relation to individual infectious disease notifications/investigations and suspected outbreaks of food poisoning.

As part of the COVID-19 response, Public Protection collaborated with UKHSA (and Kirklees Public Health) in relation to COVID-19 outbreaks, attending at least weekly Incident Management Team meetings.

Food Safety (and other Public Protection) officers have worked closely with Kirklees Infection Prevention Control officers to investigate outbreaks of COVID-19 in workplaces, particularly those associated with food businesses. These links have been maintained and will ensure continued collaborative working between the departments.



2. BACKGROUND

2.1 PROFILE OF THE LOCAL AUTHORITY

Kirklees is the third largest Metropolitan District with an area of 157 square miles (40,860 Hectares) and measured in population terms is the fourteenth largest local authority (in the UK) with a population currently estimated to be 441,300.

Kirklees is an area of diverse communities, topography, settlement and industrial development. Current ONS figures suggest that 23.3% of the total population are from minority ethnic groups (compared to 19.5% nationally), the largest group being Asian or British Asian (16% of total population).

Under the political structures, the principal executive decision-making body of the Council is a cabinet of councillors, which includes the Leader, and the Lead Members for the Service groupings.

The council employs approximately 6,809 Full-time Equivalent (FTE) staff, as of 2021. (This excludes schools).

Kirklees is a very large food authority and currently supports over 4,200 food premises.

2.2 ORGANISATIONAL STRUCTURE

The Food Safety and Infectious Diseases team sits within Public Protection. Please see appendix 1 for the organisational structure.

In accordance with the Food Law Code of Practice (England) we have appointed the UK Health Security Agency Food, Water and Environmental Microbiology Services Laboratory in York as our food examiner and through West Yorkshire Joint Services, Lancashire Analytical Services as our food analyst, both of whom are suitably qualified.

2.3 SCOPE OF THE FOOD SERVICE

The food safety and infectious disease function is dedicated wholly to food related activities and sits alongside the other core environmental health functions of pollution and noise control and health and safety.

The food safety and infectious diseases team is responsible for undertaking the following work activities:

- Programmed food hygiene interventions
- Provision of advice to food businesses

- Food sampling (including milk and dairy products)
- Investigation of food complaints
- Investigation of food poisoning and outbreak control
- Responding to food standards agency food alerts
- Inspection of food
- Monitoring licensed/approved premises
- Imported food control



West Yorkshire Joint Services are responsible for food standards, feed hygiene and inspection of primary production premises in the Kirklees area.

Kirklees Council's Animal Health Team support the Food Safety Team through the inspection of farms and small holdings; the investigation of animal welfare complaints; and attendance at livestock markets etc.

2.4 DEMANDS ON THE FOOD SERVICE

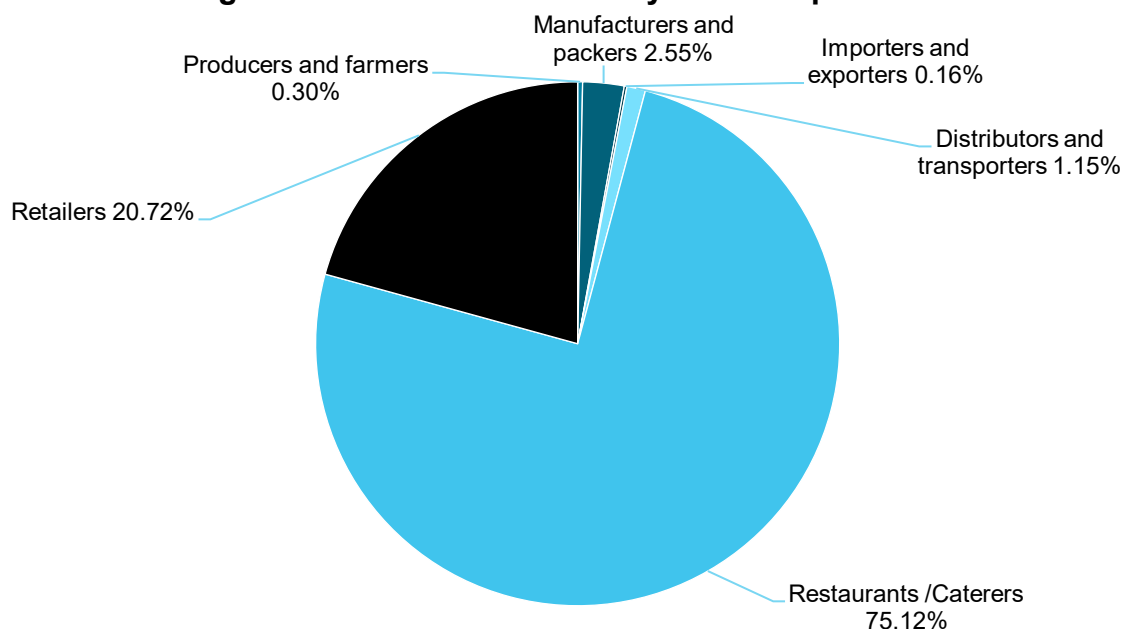
As of 1st April 2022, there were 4,276 food businesses registered with the Food Safety Team.

The table below shows the number of food businesses registered with Kirklees Food Safety Department on the 1st of April 2022. The pie chart below also represents this information.

FOOD BUSINESSES REGISTERED WITH THE FOOD SAFETY TEAM ON 1ST APRIL 2022

Business type	Number
Producers and farmers	13
Manufacturers and packers	109
Importers and exporters	7
Distributors and transporters	49
Retailers	886
Restaurant/Caterers	3212
Total	4276

Food Business Registered with the Food Safety Team 1 April 2022

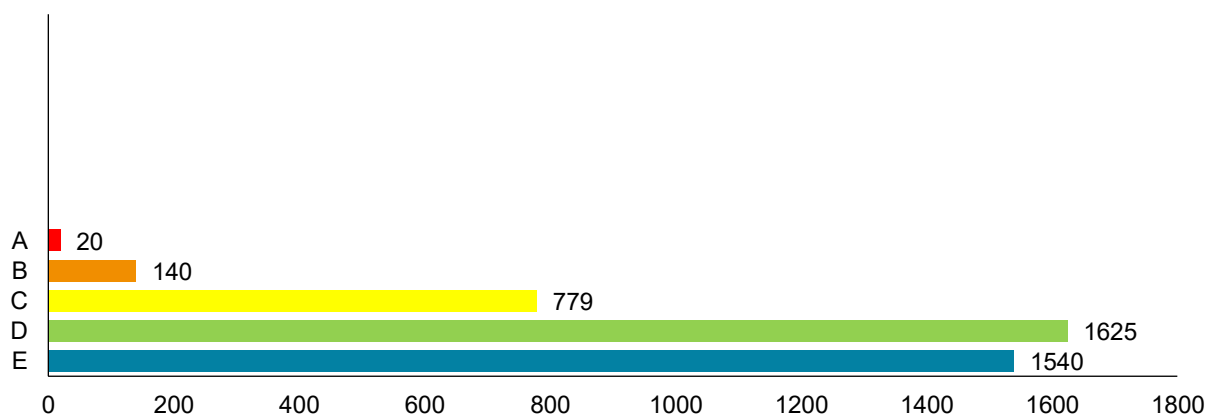


The risk rating relative to the number of food business is provided. The table below shows a breakdown of the number of food businesses that fall into the different risk categories A to E, as detailed within the Food Law Code of Practice. Businesses in risk category A are deemed the highest risk and are therefore inspected the most often; through to category E premises that are deemed the lowest risk and are therefore inspected the most infrequently.

Rated premises profile 1st April 2022

Type of Risk	Type of Premises	Number
A		20
B		140
C		779
D		1625
E		1540
Outside programme		7
Unrated premises		136
Approved premises	Meat/minced meat or meat preparations products	14
	Fishery Products	1
	Cold Stores	11
	Egg Packing	4
	Dairy products	5
Specialist processes	On-darn pasteurisers and dairy products	5
	Bottled water producers	1 on 2 sites

Rated Premises Profile 1 April 2022



Compared to many authorities, we have a large number of on-farm pasteurising dairies within the district and consequently we have two officers specifically trained for this area of work.

The budget allocated to delivering the Food Safety and Advice function is shown in section 4.1.

Service delivery points

Environmental Health operates from Flint Street, Fartown, Huddersfield, HD1 6LG.

Opening hours are Monday to Thursday from 8.45am to 5.15pm, Fridays from 8.45am to 4.45pm.

The public may also access the service from Information Centres located in Huddersfield and Dewsbury.

2.5 REGULATION POLICY

The Enforcement Policy was reviewed and updated in 2019 and incorporates the Enforcement Concordat.

The Policy may be viewed on the Council's website at:

[Kirklees Guide to Enforcement 2019](#)





3. SERVICE DELIVERY

The Food Standards Agency issued a revised Code of Practice in 2021. The code of practice continues to support local authorities in using a range of interventions that allow local authorities to target resources more effectively on those premises that pose the highest risk.

In 2010 a series of alternative interventions was introduced for premises that were risk rated as category C or D; however, this approach is not currently being followed due to the FSA Recovery Plan and, instead, full, on-site inspections or audits are being undertaken. The alternative interventions for category C and D premises will be reviewed, prior to them being reintroduced.

We continue to follow an alternative intervention approach for low risk, category E premises, which have previously been inspected, whereby a 'low risk survey' form is sent to a business asking the food business operator about the types of foods handled and what food safety procedures are in-place at the business. From this, an assessment will be made of the food safety risk. Where there has been a change in food business operator, or if the information provided indicates an increase in risk, an on-site intervention shall be undertaken. Where the form is not returned, an officer will call the business to complete the assessment or will visit to assess the risk. These will also result in a full inspection, should the information indicate an increase in the food safety risk.

The following tables shows the number of interventions undertaken during the 2020/21 and 2021/22 financial years and these are listed according to the type of intervention.

Interventions undertaken 2021/22

The following table shows the number of interventions undertaken during the 2020-2021 financial year and these are listed according to the type of intervention.

Intervention type	Number
Inspection or audit	210
Verification or surveillance (including onsite visits and some remote assessment)	147
Sampling*	11
Advice or education (remote only)	409
Information/intelligence gathering	1
Food Hygiene Rating re-assessments	10
COVID-19 remote assessments**	629

Interventions undertaken 2021/22

The following table shows the number of interventions undertaken during the 2021-2022 financial year and these are listed according to the type of intervention.

Intervention type	Number
Inspection or audit	1195
Verification or surveillance (including onsite visits including revisits, information/intelligence and complaint investigation visits and also some remote assessment)	193
Sampling*	147
Advice or education	151
Information/Intelligence gathering	1
Food Hygiene Rating re-assessments	52
COVID-19 remote assessments**	40

* Excluding routine dairy sampling

** Remote assessments were brought in by the Food Standards Agency to identify food safety risks that would give rise for the need for an on-site visit during the COVID-19 pandemic:

- Monitor compliance at businesses which had a food hygiene rating of 0, 1 or 2 to ensure that food hygiene problems had been satisfactorily addressed (note - an on-site visit would be undertaken if concerns remained).
- Assess any risks posed by newly registered businesses.
- Contact businesses to identify any changes in how they would normally operate during COVID-19 pandemic, e.g.

It can be seen that in 2021/22, the Food Safety Team significantly increased its delivery of official controls and not only met the Food Standards Agency's Recovery Plan minimum requirements, but the numbers of interventions were almost back to pre-pandemic levels.

3.1 INTERVENTIONS OF FOOD AND FEEDING STUFFS ESTABLISHMENTS

During 2021/22 all inspections were undertaken by Environmental Health staff (rather than contractors). We place high value in the importance of consistency in our approach and amongst officers, which is better supported using in-house staff.

The food safety interventions for the 2022/23 period will be based on ensuring that the minimum requirements of the FSA Recovery Plan are met but aiming to exceed these requirements by completing onsite interventions for category D rated premises that are broadly compliant and category E premises. We will continue to prioritise new, unrated businesses for on-site inspections and, based on figures for the last 3 years, we would expect approximately 550 new businesses to register.

The following table shows the number of programmed interventions that are due to be completed up to the 31st of March 2023:

Risk Category of Establishment	Number of premises due inspection in this category to 31.3.23
A due before 31.3.23	18
B due before 30 June 2022 (FSA Recovery Target)	47
B due between 1.7.22 and 31.3.23	88
C less broadly compliant (with a Food Hygiene Rating (FHR) of 0,1,2 due before 30.9.22 (FSA Recovery Target)	37
C that are broadly compliant (with an FHR 3,4,5) and others due before 31.3.23. (FSA Recovery Target)	443
D less than broadly (compliant with an FHR) of 0,1,2 due before 31.12.22	8
Ds that are broadly compliant with an FHR 3,4,5 due before 31.3.23 and others due before this date	1264
E* due before 31.3.23	1124

* Please note that category E businesses will usually receive a low-risk survey either by post or conducted over the phone. Where this identifies that there have been no changes to the businesses and the risks are not deemed to have increased, then an on-site visit is not undertaken. Where there has been a change of food business operator or a change in their business operation an on-site inspection will be undertaken.

The total number of inspections due, in order to meet the minimum requirements of the FSA Food Recovery Plan, is 1,327 This is based on the rated businesses, already in the inspection programme that must be inspected (Category A, B and C premises and category D premises that are less than broadly compliant - as per the table above), the unrated businesses carried over from 2021/22 (136) and the estimate of the number of businesses that will register over the next financial year (approximately 550 based on previous years).

There are currently 9.5 Full Time Equivalent (FTE) officers authorised to undertake official controls. There is a further 1 FTE in training who will be able to assist in information/intelligence gathering visits etc.

With the estimated number of inspections due, it is anticipated that the requirements of the FSA Recovery Plan will be met comfortably. Depending on the number of new business registrations that we receive over the period, it is also anticipated that, in addition to meeting the FSA's minimum requirements, the on-site inspection of category D premises that are broadly compliant will also be undertaken. It is aimed that at least 50% of these businesses will be inspected.

There are also a number of revisits planned, to ensure that businesses who were less than broadly compliant have made the required food safety improvements. The current number due to be completed over the period is 69, but the total for the year will increase as premises are inspected and non-compliances identified. It is anticipated that the total will be around 200, based on data for previous years. These should be completed with the resources available.

The Food Safety Team will also continue to prioritise the new allergen requirements in food businesses, during on-site inspections. These new requirements, commonly known as 'Natasha's Law' require businesses who wrap food for sale (pre-packed for direct sale e.g., packaged sandwiches) must provide ingredients and allergen information on the packaging to inform consumers. This has been a significant

change in the requirements relating to allergens and therefore emphasis is being placed on this during inspections to assist businesses in complying and to keep consumers safe.

Staff resources are organised on a north/south district basis. In addition, some staff have responsibility for specialist areas of work including infectious diseases; meat and dairy products premises etc. We continue to operate the national 'Food Hygiene Rating Scheme' (FHRS). The scheme is supported and promoted nationally by the Food Standards Agency. It helps consumers choose where to eat out or shop for food, by giving them information about the hygiene standards in food premises at the time they were inspected to check compliance with legal requirements, and through this, it encourages businesses to improve their standards.

The map "Food Hygiene Rating Scheme, Number of Compliant or failed Premises" in Appendix 2 shows that there appears to be a correlation between areas of worst deprivation and low food hygiene ratings.

This is an area of work we plan to look at more closely, to try and identify some of the reasons for this and to focus resources to attempt to work with businesses/communities to improve food hygiene ratings in these most deprived areas and also to raise awareness of the food hygiene rating scheme amongst consumers, so that they can make informed choices about the businesses they buy food from.



Part of this will include low-cost training aimed at food businesses, which have a poor food hygiene rating.

A workshop-type approach will be taken and will take place within localities where there is a disproportionate number of businesses with a low food hygiene rating. It is anticipated that this will commence in autumn 2022.

We will also consider the implications of, and wider public health priorities relating to the Food (Promotion and Placement) (England) Regulations 2021, also known as the new High Fat, Salt and Sugar (HFSS) legislation that was due to come into force in October 2022. However, this has now been delayed by the Government. The new legislation places restrictions on businesses in relation to in-store promotions, product location and marketing activities. This is part of the Government's 'Obesity Strategy' and the HFSS legislation aims to encourage adults to change their purchasing behaviour, diet and overall lifestyle. Further promotional work that was planned for 2022/23 with the assistance of West Yorkshire Joint Services, will now be postponed until the legislation comes into force.

Food team officers have been specifically authorised to enforce legislation relating to Imported Food. There are no ports of entry within Kirklees. There are two External Temporary Storage Facilities (ETSF) in Kirklees (ETSFs are HMRC controlled warehouses where foods may be stored until import clearance is given), but neither of these currently receive food goods; therefore, there is only a low level of work involved.

Officers look for imported food on inspections and take appropriate action if required. In 2019/20 officers undertook an imported food sampling exercise (funded by the Food Standards Agency) to check the safety of imported foods being sold in Kirklees. All samples were satisfactory.

There is also a requirement for Food Safety Departments to undertake the sampling of imported foods as part of their sampling programme.

Primary producers (food growers) are inspected in West Yorkshire by West Yorkshire Joint Services Food Feed and Standards officers. Additional support for this is undertaken by animal health officers in conjunction with their farm inspections.

Since the introduction of smoke-free legislation in 2007 premises and vehicles are also assessed for compliance at each inspection and the necessary action(s) taken.



3.2 FOOD AND FOOD PREMISES COMPLAINTS

It is the policy of the food team that complaints received by the Service in relation to food and food premises are investigated in accordance with the relevant guidelines and Public Protection Enforcement Policy.

Complaints which are of a minor nature, and therefore, unlikely to result in formal action receive a limited response.

When a complaint is, or may be, associated with the business' central policies or procedures, where appropriate, the primary, home and/or originating authority are contacted for advice if it is outside Kirklees.

Any complaints received relating to food standards issues are referred to West Yorkshire Joint Services.

In 2020/21 the Food Safety Team received 633 complaints relating to the condition of either food or food premises. In 2021/22, 524 complaints relating to the condition of food or food premises were received (this is consistent with previous years). The type of complaints varied, ranging from bits of plastic in food to complaints of rats in premises. All complaints require a degree of investigation. However, those considered to pose the greatest risk to public health are afforded more time and resources.

The resources allocated to the Food Safety Team are sufficient to enable all complaints relating to food or food premises to be triaged and action taken according to risk and our work instructions regarding such complaints.

3.3 COMPLIANCE AND ENFORCEMENT ACTION

The tables below detail the enforcement action undertaken by the Food Safety Team during 2020/21 and 2021/22.

ENFORCEMENT ACTIONS 2020/21

Enforcement action type 2020/21	Number
Voluntary closure	3
Seizure of food	1
Suspension/revocation of approval/license	0
Emergency prohibition	0
Simple caution	3
Improvement notices	5
Remedial Action and detention notices	2
Written warnings	Data not available
Prosecutions	1

ENFORCEMENT ACTIONS 2021/22

Enforcement Action type	Number
Voluntary closure	13
Seizure of food	0
Suspension/revocation of approval/licence	0
Emergency prohibition	0
Simple caution	3
Improvement notices	93
Remedial action and detention notices	2
Written warnings	972
Prosecutions	1

The enforcement option used depends very much on the risk present at the time of the inspection and varies from a simple report, outlining corrective actions needed, to the service of a hygiene emergency prohibition notice, which requires the business to close immediately. Enforcement, in accordance with the Food Law Code of Practice and Public Protection Enforcement Policy, follows a graduated approach. Our enforcement actions have, historically, been within the top 15 local authority food safety departments nationally.

The enforcement actions during the 2020/21 period reflect the impacts of the COVID-19 pandemic upon the work of the Food Safety Team, who undertook far fewer interventions, due to those officers playing a crucial role in the Council's Coronavirus response.

3.4 ADVICE TO BUSINESS

The Food Safety and Infectious Diseases Team is committed to providing advice to food businesses; this may involve carrying out a visit to assist food businesses to comply with food hygiene legislation. During the 2021/22 period, 151 requests for advice were received. Given the limited resources, and

following Council priorities, we've placed greater information and detail on the Kirklees website, which, coupled with information available on the FSA website, gives prospective businesses all the information they require.

For unique/high risk businesses, officers still visit and provide the advice needed. Ultimately, however, the responsibility to operate and produce food safely remains with the business.

We have also begun to provide advice to food businesses when they register a new business with us. This is done by sending the food business operator an email with advice on how to comply with the legal requirements, with links to further sources of information. The intention is to provide them with the information they need to make sure they are complying with the main elements of food safety law, including the need for documented food safety management procedures. The aim is that this will enable them to get things in place before the inspection so that they can achieve the highest food hygiene rating possible and, of course, to produce safe food.

As part of our commitment to support new food businesses, the Food Safety Team previously operated a 'Getting It Right First Time' course. This has been on-hold due to the COVID-19 pandemic. However, the principal was that we encouraged newly registered businesses to attend this course. It would provide them with information in relation to food safety but other legal requirements e.g., health & safety, fire safety, waste, business support and licensing etc.

However, as a result of the pandemic and from reviewing our data regarding food business compliance and localities, it has been identified that there is a significant correlation between poor levels of food hygiene compliance and businesses being located in areas/wards with high levels of deprivation (please see Appendix 2 – Food Hygiene Rating Scheme, Number of Compliant or Failed Premises). We are therefore, refocusing our resources to supporting these businesses by developing a low-cost training workshop that will be focused on businesses that are less than broadly compliant, particularly those with food hygiene ratings of 0, 1 or 2.

These workshops will take place in localities where compliance is low so that the workshops are easy to access and will provide an opportunity for the food business operators to get one-to-one help and advice.

This will be targeted towards businesses where enforcement action is likely to be taken, should standards not improve. Each business that attends will also receive a free printed copy of Safer Food, Better Business. This approach also links in with the Council's priority of place-based working.



3.5 FOOD SAMPLING

It is the policy of the food team to carry out routine sampling and to take samples where problems with food production have been identified. Other sampling is linked to our food premises interventions programme and where problems associated with high-risk foods are anticipated or are revealed during routine inspections. There is also a focus on sampling at premises that pose a higher risk due to the type of food and the quantities of food produced, e.g., approved premises that manufacture meat/dairy products etc.

This sampling of both food and environmental swabbing provides reliable information regarding the hygiene standards in premises and the safety of food products.



Due to the number of farm dairies in Kirklees, we offer an economical chargeable service for the collection and analysis of dairy products on their behalf. This is considered to be an important area of work given past experience of infections in milk and the high-risk nature of the product. This work has continued during the COVID-19 pandemic. We are also looking to expand this service to other approved premises and manufacturers of high-risk food, such as meat products premises, to assist such businesses in verifying that their food safety management procedures (based on the HACCP principles) are effective. Due to a reduction in the availability of local food microbiology services, we see this as an important area of work that requires development.

The Food team also participates in cross regional and national surveys organised through UKHSA.

In addition, samples are taken following referrals of sample failures from other local authorities; by officers following or during routine inspections; and/or in response to complaints. All sampling is undertaken by officers in accordance with quality procedures and relevant sampling protocols. Formal samples are taken in accordance with the Food Law Code of Practice. Samples are submitted to either the UKHSA Food and Water Laboratory or Lancashire Analytical Services Laboratories.

In 2020/21, 213 samples were taken which includes those taken for sample studies as well as those taken to verify process/environmental hygiene within businesses. In 2021/22, 248 samples were taken in total. Of this number 147 were non-dairy sampling and were undertaken as part of studies or for surveillance at food businesses. It is anticipated that once the food inspection programme is fully

recovered (following the Covid-19 pandemic) we will increase our sampling to be more in-line with previous years. We will also begin to increase our sampling for surveillance purposes due to having additional staffing resources available in the form of 3 officers undertaking studies to become Environmental Health Officers/Senior Technical Officers who, once competent, will undertake sampling as part of our surveillance of food hygiene standards and food safety at businesses.

3.6 CONTROL AND INVESTIGATION OF FOOD RELATED INFECTIOUS DISEASE AND OUTBREAKS

The Food Safety Team's policy concerning investigation of food poisoning notifications and outbreak control is contained in a joint procedure manual, produced in conjunction with UKHSA and other West Yorkshire Authorities. The document is known as the "Protocol for investigation and management of sporadic cases and outbreaks" and "Kirklees Infectious Disease Outbreak Protocol".

Communicable diseases investigated up to the years 2018/19, 2019/20, 2020/21 and 2021/22 can be found in Appendix 3.

In the event of a serious outbreak, staff resources are utilised from the food team and across the whole Service if necessary. In 2020/2021 we investigated one suspected outbreak of food poisoning. In 2021/22 we dealt with three suspected outbreaks of food poisoning, one of which required significant investigation and resource allocation. During these instances, we work closely with UKHSA and Kirklees Public Health colleagues. There is also a Memorandum of Understanding (MOU) between the West Yorkshire authorities that would permit colleagues from neighbouring authorities to assist us, should there be the need.

From a review of Appendix 3, it can be identified that the number of total communicable diseases reported has declined, particularly during the period 2020/21, which has been replicated in 2021/22. It is unclear whether this correlates to the Covid-19 pandemic, in that fewer people travelled overseas (travel often being a factor associated with some diseases); people were required to remain at home for significant parts of those periods and may therefore have been less-exposed to food-related infections; and/or the public health messaging regarding handwashing as part of the pandemic, may have led to a reduction in cases. It will be interesting to see how the trend in the overall incidence of food-related infectious diseases develops over the coming year.

3.7 FOOD SAFETY INCIDENTS

Procedures for dealing with Food Alerts and food safety incidents are clearly documented in a specific quality guideline in order to comply with the Food Law Code of Practice (England). All food officers are required to be signed up to the FSA Smarter Comms system, whereby officers will receive food alerts directly. Those food alerts that are 'for action' will be acted upon by officers and the Food Lead Officer will co-ordinate the response and direct officers to take appropriate action should a food alert be received that relates to food or premises located within Kirklees.

Where the Food Safety Team are contacted directly by the FSA in relation to a food incident, relating to a business within Kirklees, action will be taken immediately. This will also extend to responding to urgent food standards issues, in order to assist West Yorkshire Joint Services in responding quickly to an issue. This will be to identify whether the affected item is present and to take steps to remove it from sale etc.

Where a significant food safety incident occurs, all of the Food Safety Team would be made available to respond. This might include a national recall etc. However, these incidents are generally infrequent and, as such, all necessary resources are available. Should this not be the case, other officers from Environmental Health would be called upon to assist and/or other West Yorkshire colleagues would be requested to assist under the MOU.

3.8 LIAISON WITH OTHER ORGANISATIONS

This authority has liaison arrangements with other West Yorkshire authorities through the West Yorkshire Food Lead Officers Group (WYFLOG) and also at Chief Officer level with West Yorkshire Authorities.

The Environmental Health Group Leader attends the WYFLOG meetings on a six-weekly basis. Other agencies also attend these meetings, namely: UKHSA Food, Water & Environmental Microbiological Laboratory; Food Standards Agency (FSA) Imported Food; and FSA Relationship Manager and West Yorkshire Joint Services (Trading Standards).

This enables consistency between the five West Yorkshire authorities, which is particularly important for businesses who may have outlets in more than one of the West Yorkshire authority areas to ensure that there is consistency in enforcement. To this end, all five authorities use the same aide memoire and other documentation for inspections, including approved premises to ensure consistency.



Regular liaison takes place with the Council's Licensing department in response to proposals for new food premises, whereby licensing officers notify us of any changes to licensees at food businesses.

There are also close links established with the UKHSA colleagues and internally, with Kirklees Public Health, in relation to communicable diseases and infection prevention and control.

3.9 HOME AUTHORITY PRINCIPLE AND PRIMARY AUTHORITY SCHEME

There are a number of large food manufacturing businesses within Kirklees' borough that distribute foodstuffs nationally and some internationally. There are also a number of food businesses that operate multiple outlets. However, there are currently no primary authority agreements, relating to food safety, between Kirklees Council and businesses.

We do, however follow the Home Authority Principle, in that we provide assistance to other competent authorities in relation to facilitating the sharing of intelligence or investigating any concerns regarding a product produced within Kirklees or by a company located within Kirklees.

The Food Safety Team follows the Home Authority (HA) principal when undertaking regulatory duties and would contact the HA should there be any concerns regarding the food safety compliance at the business or in relation to a complaint.

The Food Safety Team also verifies whether there is a Primary Authority Agreement in place at businesses, prior to undertaking official controls and would verify whether there was any relevant assured advice/inspection plans etc. to be considered prior to on-site visit. Any proposed enforcement action would be considered following consultation with the primary authority, except in emergency situations where there was an imminent risk to health.

The lack of any food safety Primary Authority Agreements means that this area does not currently require any resource. The Service would openly consider establishing a primary authority partnership should it be approached.

Resourcing both the Home Authority Principle and Primary Authority Scheme does not require significant resource at this time, as officers undertake their duties with reference to these principles when undertaking official controls at businesses.



3.10 FOOD SAFETY PROMOTIONAL WORK AND NON-OFFICIAL CONTROLS INTERVENTIONS

To assist businesses with the introduction of the new allergen requirements in food businesses, commonly known as 'Natasha's Law' all food businesses were written to advising them of this significant change to labelling requirements of foods that are pre-packed for direct sale. Further promotional work is planned for 2022/23 through producing materials to leave with businesses and possible workshops to assist businesses. This will be undertaken with the assistance of West Yorkshire Joint Services. Officers also spend time explaining these requirements to businesses during onsite interventions.

In relation to non-official controls interventions, the Service also undertakes compliance interviews with businesses that have been found to be failing over a period of time. The aim is to try to achieve an improvement in standards, without the need to take enforcement action. The focus of the interview is to discuss the food hygiene contraventions with the Food Business Operator (FBO), away from the business where they have time to discuss and understand the issues at the business and for food safety officer and Environmental Health Group Leader (EHGL) to understand the reasons for the contraventions and for the FBO to provide some pledges as to how they intend to rectify the problems and to maintain an hygienic and compliant business. These pledges are recorded at the time of the interview and both the FBO and the EHGL both sign the agreement. Should future interventions identify that the business has failed to implement the required improvements or maintain previous improvements, then formal enforcement action will be taken.



4. RESOURCES

4.1 FINANCIAL ALLOCATION

The Service has, as have all local authorities continued to face financial constraints. The team continue to focus limited resources in a proportional risk-based approach. The budget allocated to delivering the Food Safety and Infectious Disease functions for 2021/22 and 2022/23 is shown below.

	2021/22	2022/23
Expenditure	Food Team Budget	Food Team Budget
Staffing	£610,997	£615,102
Training	£2000	£2000
Travel and other subsistence	£3083	£3083
Supplies and services	£702	£702
ICT*	£0	£0
Sampling	£8650	£8650
Total Expenditure	£625,432	£629,537

* No actual IT budget as forms part of the corporate charges. However, £4,000 committed to trial a mobile working solution for food safety interventions.

The 2021/22 budget was reprofiled to provide extra resources for this important area of work. This has continued into the 2022/23 budget with a view to finalising recruitment and to assist with staff retention. It is hoped that this will bring the FTE more in-line with the national average (average number of food premises to Full Time Equivalent officers (FTEs): Nationally is 416:1; in Kirklees, this ratio has previously been 560:1, but is now at 451:1.

It should be noted that due to the Food Law Code of Practice qualification and Competency Framework requirements for food safety inspectors, it is very difficult to recruit suitably qualified and experienced officers. In the previous Food Safety Service Plan, it was intended to engage external contractors to assist with the delivery of official controls to meet any shortfall in the inspection programme. As a result of the Covid-19 pandemic, most LAs are now experiencing a significant backlog of inspections and these contractors are in high demand and availability is low. Therefore, Kirklees will continue to train and develop in-house members of staff to meet these recruitment needs. This is also part of the wider

workforce planning, in response to expected retirements in the coming years. There are currently three officers training to be either EHOs (2) or a STO (1).

The sampling element within the above budget information, relates to sampling income from undertaking the sampling service that is provided for dairies and other 'approved' premises.

We receive sampling credits from the UK Health Security Agency's Food, Water and Environmental Laboratory in relation to sampling as part of surveillance or as part of a formal investigation, which enables the Food Safety Team to undertake good levels of sampling. As previously described in Section 3.5, it is intended that sampling levels will increase to pre-Pandemic levels, as we progress through the FSA's Recovery Plan.



4.2 STAFFING ALLOCATION

The current staff resources covering Food Safety and Infectious Diseases work at 1st April 2022:

1 Environmental Health Group Leader (Food Lead Officer)

1.76 Full Time Equivalent Senior Environmental Health Officers (SEHO)

5.74 FTE Environmental Health Officers (EHO)

2.0 FTE Senior Technical Officer (1 officer in training and not able to undertake official controls at the time of writing)

1 Business Support Officer

The staffing resource to the Food Safety Team has increased in recent years and, as can be seen in 4.4 above, the ratio of food businesses per food safety officer has significantly reduced. Having reviewed the trends in relation to the number of businesses registering and the risk rating distribution of food businesses within Kirklees, it is proposed to provide further resources to the team to ensure that all statutory obligations are met. It is also hoped that this will enable the team to undertake more proactive work as well as surveillance and intel gathering to minimise food safety risks to the public.

When all posts are recruited to, it is intended to have 11 FTE delivering official controls.

4.3 STAFF DEVELOPMENT PLAN

Each individual staff member has an annual appraisal meeting with their line manager (plus a six-monthly review) to evidence individual contributions in achieving our stated goals and identifying any development needs. This is in addition to regular, ongoing 1-2-1s.

Nationally, food safety officers are required to be competent according to the Food Law Code of Practice and the FSA's Competency Framework, which identifies the key areas of skills and knowledge that a food safety officer must have in order to be deemed competent for the delivery of official controls. The Competency Framework covers a wide range of food safety disciplines, with officers now requiring authorisation for each specific section.

The new competency framework is a fluid document, requiring regular updates but also acting as a guide as it identifies development and training needs to ensure officers remain competent in relevant areas. Officers are required to review this document at least annually, usually prior to their annual appraisal. The new Competency Framework and new Food Law Code of Practice and associated Practice Guidance were published in March 2021 and all officers who were not deemed 'competent' before 1st March 2021 have been through the new competency framework. Their knowledge and skills have been assessed by the Food Lead Officer through discussion and from observation during accompanied visits and where this has been identified as satisfactory, they have been deemed competent and authorised accordingly.

As part of the competency framework and requirements of the Food Law Code of Practice, all officers are required to maintain at least 20 hours Continuing Professional Development (CPD). This is also reviewed at the annual appraisal.

Importance is given to the need to ensure continuing professional competence in technical areas of work. Training/development was challenging due to the Pandemic; however, CPD has been maintained through online training and from in-house training.

In-house training consists of regular consistency meetings as well as undertaking training focused on specific areas of official controls, e.g., inspection of approved premises. These training sessions are led by the Food Lead Officer or other senior member of staff to impart their knowledge and experience to colleagues.

Regionally organised training also takes place, twice a year, focusing on national drivers as well as regional training needs and requirements. e.g., UKHSA undertake microbiology training for the five West Yorkshire authorities at least annually. There is also £2,000 allocated towards staff training in the budget.



5. QUALITY ASSESSMENT

5.1 QUALITY ASSESSMENT AND INTERNAL MONITORING

In addition to training, the Food Lead Officer and/or Senior EHOs ensure the competency of officers delivering official controls, through accompanied visits (minimum annual frequency) and ongoing by conducting monthly audits of officers' work

These monthly quality checks comprise the supervisor reviewing 10% of an officer's completed worksheets and assesses them against a number of parameters, focusing on consistency and accuracy in the application of legal requirements, updating of information and consistency in the application of the Food Hygiene Rating Scheme and risk rating of businesses. Where inconsistencies are identified, these will be discussed with the officer and training provided. This process may also identify a wider training need within the team and will inform the subject area for internal or external training.

In addition, 'accompanied visits' are also undertaken to ensure officers are undertaking the role in accordance with the Code of Practice and that actions are consistent with our Enforcement Policy.

The Food Safety Team also takes part in the FSA's National Food Hygiene Rating Scheme Consistency Exercises. The Team's findings have always been in-line with the published results. This supports our internal checks that officers are correctly administering the Food Hygiene Rating Scheme.

During the first year of the Covid-19 pandemic, routine food hygiene inspections were temporarily suspended. This significantly affected the percentage of the inspection programme achieved for the period 2020/21 as can be seen below. Since then, the Food Safety Team has been following the FSA's Recovery Plan and has met its obligations in relation to this. Therefore, the percentage of the inspection target completed is not relevant for the period 2021/22. As detailed in point 3.1, it is anticipated that we will comfortably meet the minimum requirements of the FSA Recovery Programme and expect to significantly exceed the requirements. The data for the periods 2018/19, 2019/20 and 2020/21 are listed below. The impact of COVID-19 on the 2020/21 inspection programme can clearly be seen from these figures. Data for the 2021/22 period is not relevant due to the requirements for the Food Safety Team to follow FSA Recovery plan.

Percentage of the Food Safety Inspection Programme Achieved

2018/19	93.46%
2019/20	95.11%
2020/21	9.93%
2021/22	Data not relevant



6. REVIEW

6.1 REVIEW AGAINST THE FOOD SAFETY SERVICE PLAN 2021

At the time the 2021 Food Safety Service Plan was approved, the requirements of the FSA's Recovery Plan were not yet published. It was therefore, identified that we would continue to meet the requirements of the FSA. We have met the requirements of the recovery plan almost entirely, with only 5 premises still being outstanding for inspection. At the time of writing these have all now received an onsite intervention.

The following table provides the data on the interventions undertaken during 2021/22 that were under the scope of the FSA Recovery Plan to be completed by the first milestone of the Plan on 31st March 2022:

FSA Recovery Plan Milestone Requirement	Date for completion of the milestone	Number of premises	Number completed	Outstanding
Prioritisation of all new businesses based on risk	30 September 2021	Data not available		0
All category A establishments to receive onsite intervention	31 March 2022	20	26*	0
All new businesses prioritised as higher risk to receive onsite intervention	31 March 2022	489**	450	5

* As category A premises are inspected every 6 months, some category A premises were inspected twice within the 12-month period so there are more interventions listed than the number of category A premises.

**This total includes new businesses that were regarded as low risk and therefore did not require an onsite intervention before the milestone under the Recovery Plan.



The Food Safety Team delivered beyond the minimum requirements of the FSA Recovery Plan and the following table shows the number of interventions undertaken at existing businesses with a risk category that was not part of the FSA Recovery Plan up to 31st March 2022:

Risk Category of Business	Number of Interventions Undertaken
Category B	127
Category C	262
Category D	204
Category E	126

Details of enforcement action taken are detailed in section 3.3 above. It has been noted that some enforcement actions for the 2021/22 period are lower than in pre-pandemic years, e.g., service of Hygiene Improvement Notices. However, other enforcement actions are higher than in previous years, e.g., voluntary closure of businesses due to there being an imminent risk to health. This is believed to be as a result of the need to prioritise onsite interventions according to risk and a focus on ensuring all new businesses are inspected.

The increase in the number of voluntary closures is likely to be as a result of us focusing on high-risk businesses, but also prioritising complaints relating to businesses that have resulted in a business being required to close.

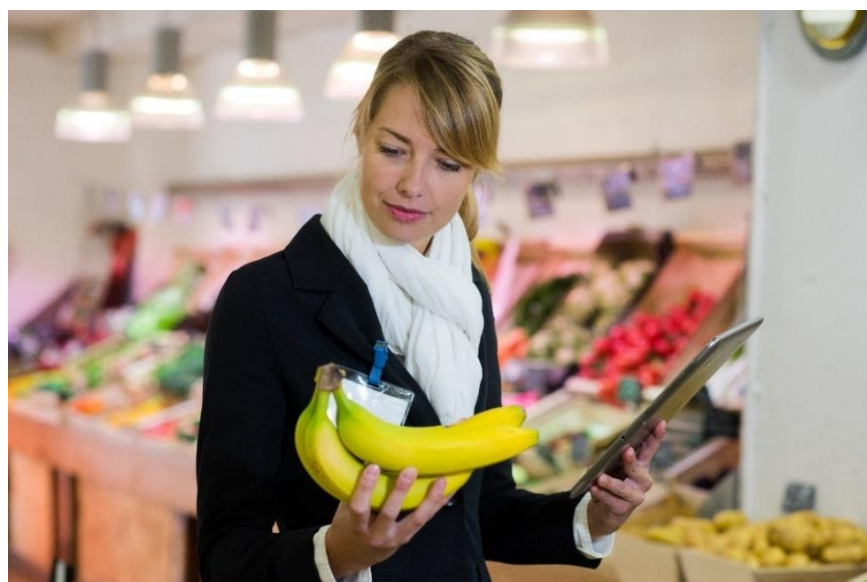
With regards to the decrease in the number of Hygiene Improvement Notices, this is a reflection on the priority to inspect all new businesses. As we follow a graduated approach to enforcement, it would be unlikely that a new business would receive legal notices upon first inspection. Instead, an educative approach would be taken, with a detailed report being provided to the food business operator detailing the necessary actions to rectify any contraventions found. Only if they then failed to make the required improvements, would a legal notice be served.

6.2 IDENTIFICATION OF ANY VARIATION FROM THE SERVICE PLAN 2021

6.2.1 INSPECTIONS

The Food Safety Team undertook 1,195 inspections or audits over the 2021/22 period. This was a significant achievement in considering the need to ensure inspections were undertaken in a Covid-secure way, which often made inspections longer and sometimes required officers to return on a second occasion to ensure the inspection could be undertaken safely. This obviously impacted on the number of inspections that could be undertaken.

The FSA Food Recovery Plan was not fully met, in that, five businesses which had been identified as higher risk and required an onsite intervention were not completed before the 31st March 2022. However, some of these premises had registered in March 2022 and therefore they were still within the 28-day period for inspection as detailed in the Food Law Code of Practice. It should be noted that at the time of writing, all these interventions have now been completed.



The team exceeded the Recovery Plan in terms of undertaking onsite interventions at premises that were not under the scope of the Recovery Plan. These inspections were undertaken to focus on risk – category B premises and category C premises that were less than broadly compliant.

There were also a number of inspections undertaken at premises that were not within the scope of the Recovery Plan, but where complaints had been received and it was deemed appropriate to inspect.

A good number of category E premises were also assessed by officers needing to work at home due to self-isolation etc by following our alternative intervention strategy for category E premises.

A total of 524 complaints were received by the Service. All complaints receive some level of response and officers follow a work instruction in relation to when action, including an onsite visit to the premises needs to be taken. As a minimum, complainants will be contacted and be given information about the action that will be taken.

In cases where the complaint is of a low-risk nature (e.g., food being sold beyond its best before date) the complainant will be informed that a note will be placed on the premises file and the officer will look at this at the next routine inspection.

For anything more serious, e.g., contaminated food; poor hygiene practices observed by a customer or undercooked foods then an onsite intervention will be undertaken.

A total of 972 written warnings were issued to businesses for various contraventions of the hygiene regulations. This is approximately 81% of businesses receiving a written warning, following an on-site intervention. This is consistent with pre-pandemic years.

6.2.2 REQUESTS FOR A REVISIT UNDER THE NATIONAL FOOD HYGIENE SCHEME (FHRS)

During the 2021/22 period, 55 requests for a revisit (reassessment of their food hygiene rating) were received. This demand remains high, as a low food hygiene rating can impact on a business' ability to trade e.g. on online food platforms, such as Just Eat and also from the negative publicity that a low food hygiene rating can attract, particularly on social media or in local media who regularly publish the details of businesses with a 0 or 1 food hygiene rating. On 31st March 2022, all but 2 of these businesses had received their reassessment inspection. The remaining two were still within the 3-month period, permitted under the FHRS, for the reassessment to be undertaken.

6.2.3 REVISITS TO NON-COMPLIANT PREMISES

During 2021/22, a total of 183 revisits were undertaken at food premises to ensure compliance with contraventions identified during a previous inspection or complaint visit. Revisits are undertaken in accordance with the Food Law Code of Practice and all businesses that are less than broadly compliant receive a revisit. This high number of revisits reflects the focus of officers in ensuring any risk-related matters are addressed and to ensure that a food business is operating hygienically and is being well-managed.

6.3 AREAS OF IMPROVEMENT FOR 2022/23

The following priorities for improvement have been identified for the Food Safety & Infectious Disease Team. They take into account the requirements of the FSA Recovery Plan and our own ambitions to ensure that food that is produced or sold in Kirklees is safe for our residents and visitors. We will achieve this through improving the hygiene standards at food businesses by better focusing our resources on areas and businesses with low levels of compliance and by providing additional support to such businesses:

Continue to delivery official food controls in accordance with the FSA Recovery Plan and any other instruction that is received during the year.

Maintain the implementation of the National Food Hygiene Rating Scheme and ensure that the requirements of the 'Brand Standard' are followed and that food hygiene ratings are being correctly issued across Kirklees.

Review the alternative intervention approach to ensure food official controls are being delivered in line with the Food Law Code of Practice for category C, D and E premises.

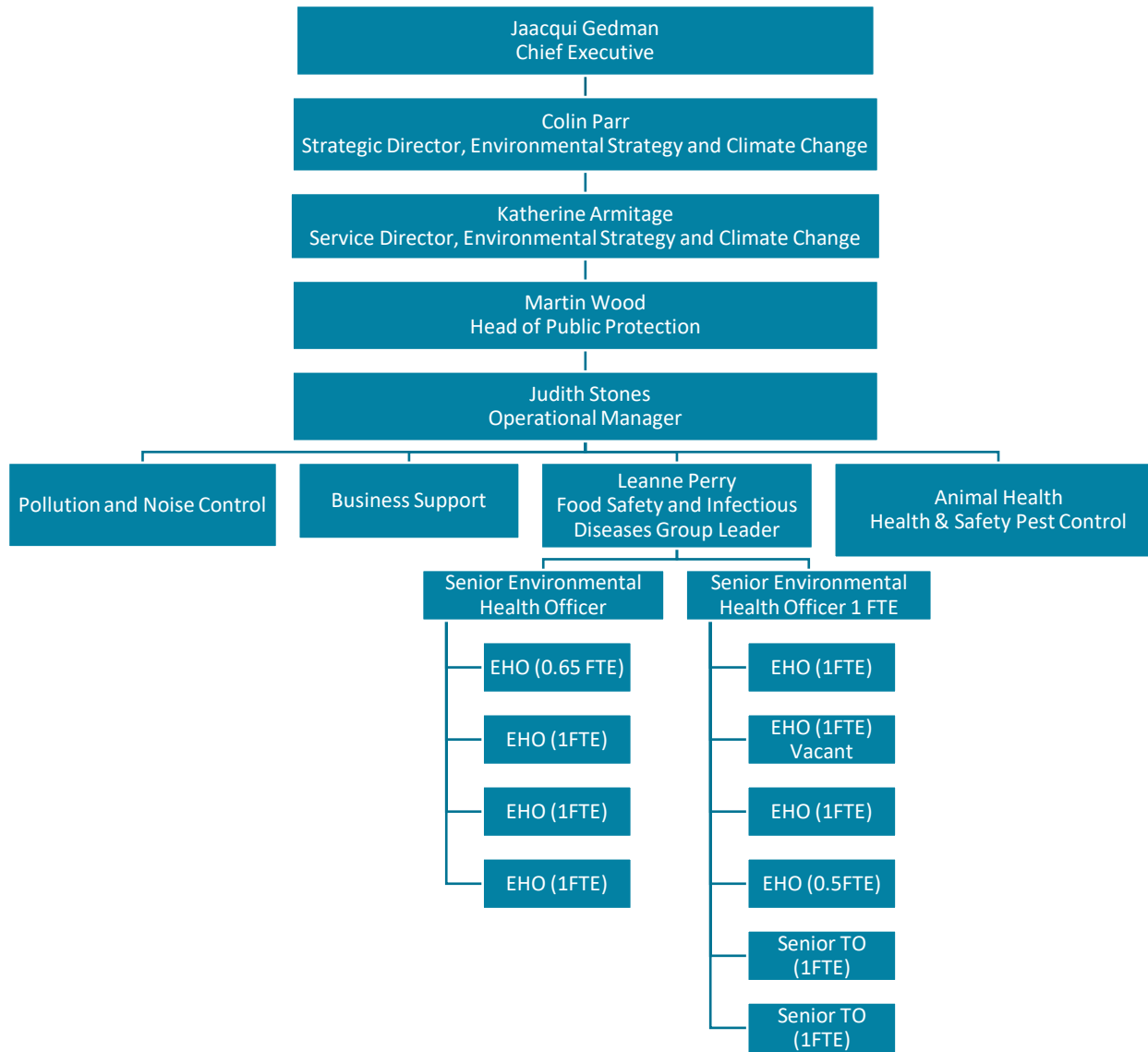
Maintain staffing levels as per the budget and consider additional resources to ensure compliance (an additional 1 FTE food safety officer and through engaging a contractor and/or by offering additional hours to existing staff etc. to address any shortfalls).

Ensure officer development continues as required in the FSA competency framework and officer authorisations reflect the individual competency matrix.

1. Increase business resilience by improving the information that we have available for businesses on the website.
2. Continue to develop/sharing expertise across WYFLOG.
3. Continue to respond to, and where necessary, lead on FSA issued alerts and requests for action.
4. To develop and begin to deliver a low-cost food hygiene workshop aimed at food businesses with 0, 1 or 2 food hygiene ratings.

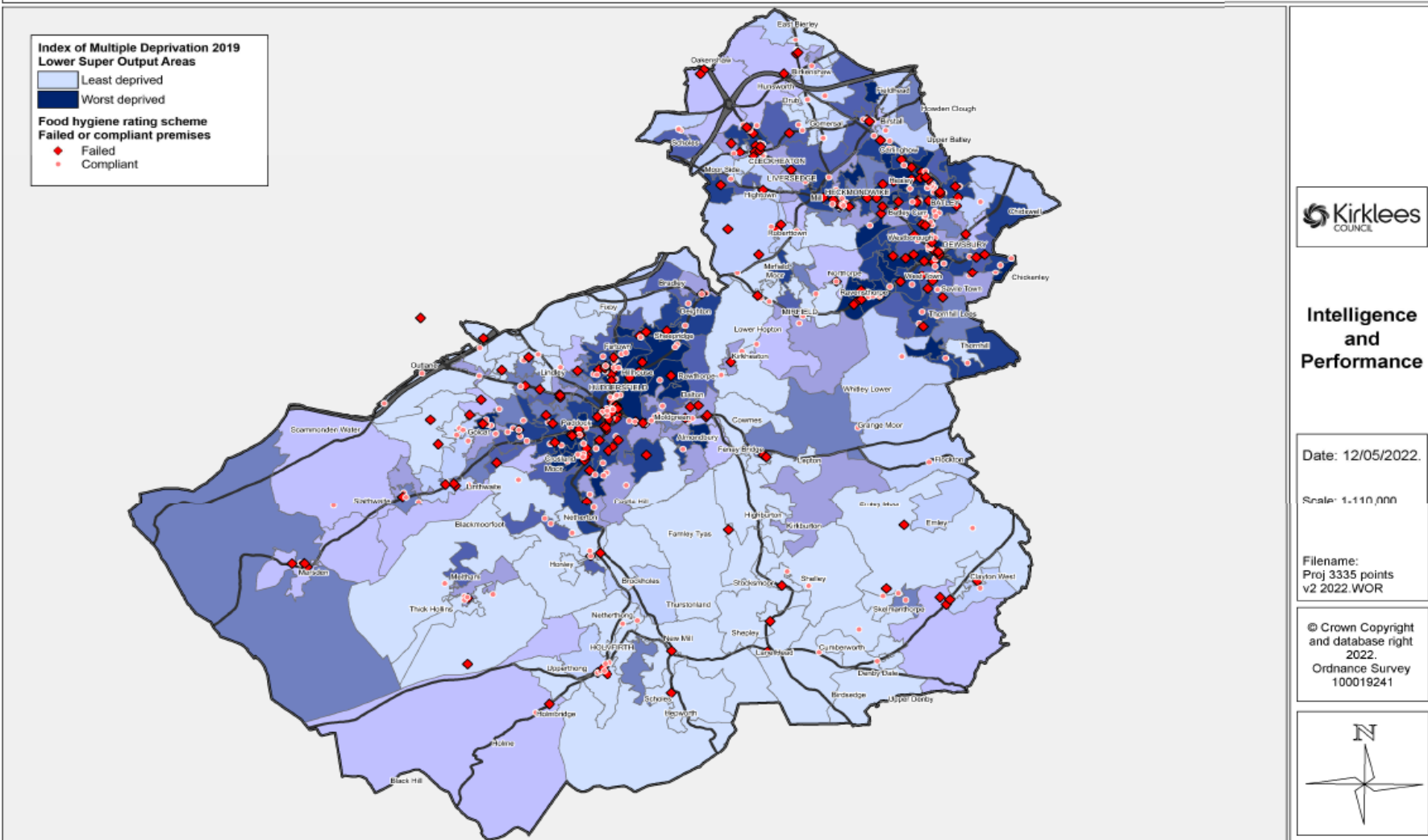
5. To develop our place-based working approach through the review of data on poor levels of food hygiene compliance and localities to identify focus resources appropriately.
6. To explore and develop potential commercial opportunities in relation to the skills and expertise within the Food Safety Team. E.g., consultancy service work; primary authority agreements etc. This will look to enhance the support to businesses both within and outside of Kirklees.
7. Further promote the changes to food labelling requirements through the introduction of 'Natasha's Law' by producing materials for businesses and in partnership with West Yorkshire Joint Services.
8. To complete the trial of a mobile working solutions with a view to roll it out to all officers to improve efficiency and to provide a high-quality report to food business officers at the time of inspection.

APPENDIX 1 – ORGANISATIONAL STRUCTURE



APPENDIX 2 – FOOD HYGIENE RATING SCHEME, NUMBER OF COMPLIANT OR FAILED PREMISES

Food Hygiene Rating Scheme (FHRS), Number of Compliant or Failed Premises, IMD 2019



APPENDIX 3 - INFECTIOUS DISEASES DATA

Disease		2018/19	2019/20	2020/21	2021/22
Viral Hepatitis A		1	4	2	0
Cholera		1	0	0	1
Dysentery	Entamoeba Histolytica	1	0	0	0
	Shigella Boydii	1	1	0	1
	Shigella Dysenteriae	1	0	0	1
	Shigella flexneri	2	1	0	1
	Shigella sonnei	9	6	2	2
	Not typed	0	0	0	0
Food Poisoning	Bloody diarrhoea	0	0	0	0
	B.cereus	0	0	0	0
	C.botulinum	0	0	0	0
	C.perfringens	0	0	4	0
	Campylobacter	374	273	184	182
	E.coli 0157	3	4	8	6
	Listeria	0	1	0	1
	Salmonella	70	48	19	9
	Suspected food poisoning	5	0	1	3
	Yersinia	0	0	0	0
	Not typed	0	0	0	2
Gastro Enteritis	Cryptosporidium	53	29	7	5
	Giardia	9	12	5	4
Respiratory Disease	Legionella	10	7	1	4
Paratyphoid Fever	Salmonella	3	5	0	0
Typhoid Fever	Salmonella	3	5	0	0
Total		543	390	233	225