

# Consultation response template



**Name:** Click or tap here to enter text.

**Organisation:** Belfast City Council

**Email:** Click or tap here to enter text.

**Question 1. Does the layout / presentation of the proposed revisions to the Code facilitate consistent interpretation? If not, how could they be improved?**

Belfast City Council Food Safety Officers agree that the presentation and layout of the revisions of the Code facilitate consistent interpretation.

**Question 2. Do you agree that the proposed changes to the food standards intervention rating scheme provide DCs with the ability to deploy current resources more effectively by improving the way in which the levels of risk and compliance associated with a business are assessed? If not, why not? (Please specify any aspects of the new model which require further consideration, and why).**

Belfast City Council Food Safety Officers agrees that the proposed changes to the food standards intervention rating scheme does provide District Councils with the ability to deploy current resources more effectively as the proposed matrix will enable focus on non-compliant businesses. The proposed scheme provides for a more realistic assessment of risk by assessing inherent risk and business compliance separately which provides for a more proportionate and targeted enforcement regime.

**Question 3. Do you agree that the proposed frequencies for official controls, specified in the decision matrix, within the new food standards intervention rating scheme are appropriate based on the levels of risk and compliance associated with the business? If not, please identify any concerns you have with the proposed frequencies.**

Belfast City Council Food Safety Officers are of the opinion that the proposed frequency of 6 & 10 years is too long a period to leave a business uninspected, as business activities could significantly change in this time. They also believe that the priority intervention frequencies of 1 month will be onerous especially as these require an inspection, partial inspection or audit. The FLCOP should be clear if a rescore can be undertaken after assessment of the non-compliance identified in the priority intervention rather than completing a full inspection, partial inspection or audit provided other areas of the businesses activities have remained the same.

**Question 4. Do you foresee any problems with the proposals under consultation? If yes, please outline what these problems are and what, if any, solutions we should consider?**

Belfast City Council Food Safety Officers foresee problems in the mapping of data for the new FS model and subsequent implementation. In particular problems may be encountered in the mapping of data across from the current scheme, as some of the required fields in the risk assessment have not been scored previously in this format. Management information systems will require significant revisions, that will take considerable time and verification to ensure the data has mapped correctly. The Food Safety Officers also anticipate a large volume of premises will require an inspection in the initial period of operating the new model, which will put additional resource pressures on the unit. The officers are aware that a number of proposals such as the Scenario rule (page 91) and the additional compliance risk factor for allergen information (page 90) were not included in the pilot undertaken by Armagh, Bandbridge and Craigavon Borough Council and therefore the impact on workload has not been assessed. The Food Safety Officers would anticipate a significant increase in priority interventions resulting from these changes and would request that the FSA evaluate the potential impact of these changes. They also anticipate difficulties with food service planning due to the reactive nature of the new model. It will be difficult to estimate the numbers of planned interventions as a premises requiring a priority intervention may require multiple interventions in the inspection year. In addition this will be further complicated due to the intelligence element of the model, whereby unplanned inspections have to be undertaken due to reactive complaints or issues found during sampling.

**Question 5. Do you agree with our assessment of the impacts on DCs and our assumptions on familiarisation resulting from the proposed changes to the Code? If not, why not?**

Belfast City Council Food Safety Officers do not agree that the assessment on impacts accurately reflect the true costs of implementation of the proposed scheme. The assessment specifies FTE of 31 officers within the 11 DC's. This is a significant underestimation of officers due to the fact that officers in NI undertake combined Food Hygiene (FH) and Food Standards (FS) work so the true number should be a combination of FH and FS FTE figures. The Food Safety Officers do not believe that 1.7 hours per officer will be sufficient for familiarisation. The FSA should include ongoing consistency exercises during the initial role out and implementation of the revised scheme to ensure consistency in application across Northern Ireland. There is an unknown cost specified for updating of management information systems and mapping data to the new model. Belfast City Council anticipates that this will be a major cost, both in terms of officer and IT resource, and would appreciate clarification on financial support available for this.

**Question 6. Do you foresee any other impacts from the implementation of the main proposals detailed beyond those we have identified? Where possible, please explain your views and provide quantifiable evidence (for example, costs associated with updating existing procedures, the benefits of greater flexibility to allocate staff to activities).**

Belfast City Council do not foresee additional impacts other than those noted in the previous question.