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Food Safety- why does it matter to Torbay?



Access to safe, healthy food is a fundamental basic right of the community of Torbay.

By ensuring that the food produced and sold in Torbay is safe to eat the Food and Safety team plays an important role in improving the health of the public in Torbay.



The National Food Hygiene scheme was launched in Torbay in November 2011 and over 800 food premises are now rated. Because of the scheme many premises have gone from a 0 or 1 to a 5 and we have reduced our number of high risk premises by half.

We do not however currently meet the full range of statutory requirements set down on us by the Food Standards Agency due to the lack of staffing resources. Therefore not all food premises get inspected and hence are not rated under the scheme.

E Coli 0157

The food safety team deal with a number of infectious disease outbreaks in Torbay. In 2012/13 the team dealt with an E Coli 0157 outbreak where a number of cases were hospitalised in intensive care. Without the teams interventions outbreaks such as this may spread further and cause increased illness and infection in the community.



Fishery establishments in Torbay cannot export their product without the support that is given to them by the Food and Safety team. In addition the team signs every Health Certificate that is needed before they can export to countries such as China and America. This help and support has resulted in a number of fishery premises expanding their export trade over the last couple of years.



Recent research carried out by the Food Standards Agency has shown that small to medium sized businesses particularly value the advice and support that local authority food safety teams give to them.

This is also backed up by a recent survey of small businesses in Torbay which identified that the Food and Safety team are their main source and support and advice.

TORBAY COUNCIL FOOD SAFETY SERVICE PLAN 2013/14

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TORBAY COUNCIL FOOD SAFETY SERVICE PLAN

1.0 Service Aims and Objectives

1.1 Aims and Objectives

This Food Safety Service Plan is required under the Framework Agreement by the Food Standards Agency. The plan is concerned with food safety enforcement work for which Torbay Council is responsible for. This plan is a Key Policy document and as such requires member approved to ensure there is transparency and accountability and once approved the plan is published on the Councils website.

The Food Safety Service has the following vision:

 To improve public health and safety through partnership, education and enforcement

Torbay Council's Food Safety Service Aims and Objectives are:

Aim 1: To promote, through education and enforcement, the sale and/or production of food which is fit and without risk to health.

Objective 1.1: To undertake a risk-based programme of inspections and interventions in food premises in accordance with the Food Standards Agency Food Law Code of Practice

Objective 1.2: To register food businesses in accordance with EC852/2004 and the Food Hygiene (England) Regulations 2006.

Aim 2: To prevent and control the spread of food borne illness through education and enforcement.

Objective 2.1: To provide a risk-based response to all notifications of food related illness or suspected illness in order to minimise effects on the community.

Objective 2.2: To carry out pro-active sampling in accordance with nationally and locally set programmes.

Objective 2.3: To provide information, advice and education on food safety and public health issues to the business and residential community.

Objective 2.4: To respond to high risk complaints concerning food and food safety.

Aim3: To take action on a consistent, transparent and proportionate basis.

1.2 Links to Corporate
Objectives and
Plans

The Council's Corporate priorities fed from the Community Plan sets out a number of corporate goals. One of these goals has direct links to the Food Safety Service:

- Working for a healthy, prosperous and happy Bay
- Public Health. With the introduction of the Public Health function now sitting within the Local Authority the Food and Safety Team have an important role to play in some of the aims and objectives of the Torbay Public Health Strategy based on the Joint Strategic Needs Assessment.

2.0 Background

2.1 Authority Profile

Torbay Council is a Unitary Authority which comprises of the three main towns of Torquay, Paignton and Brixham, on the south coast of England. Tourism is the dominant industry with the majority of employees working in the service industry. There is also a fishing industry predominantly based in the port of Brixham where there is a large fish market.

More details on the profile of the Authority can be found on the website www.torbay.gov.uk

2.2 Organisational Structure

The chart attached at Appendix A shows the structure of the Food and Safety Team.

The Food and Safety Team sits within the Commercial Team of the Community Safety Business Unit and comprises both Trading Standards Officers and Environmental Health Officers.

Additional support services:-

Additionally appointed specialist services are provided by the Food Examiner at the NAMAS accredited Health Protection Agency Laboratory in Porton Down and a Public Analyst from PASS Laboratory Services based in Wolverhampton.

Advice and support is also provided by Public Health England.

2.3 Scope of the Food Service

The Food Safety service comprises a range of key functions:

- Programmed food hygiene and food standards inspections of food premises within the Bay.
- Implementing and Promoting the National Food Hygiene Rating Scheme across Torbay
- Programmed High risk health and safety inspections and accident investigations
- Responding to food alerts and incidents of food fraud.
- Investigating food and food related complaints and other service requests on a risk based approach.
- Implementing an annual food sampling programme
- Registering food premises and mobile vehicles
- Assessing imported food and its origin.

- Support and advice to food businesses.
- Investigating cases of food related illness and other infectious diseases.
- Issuing of health certificates for the export of food products.
- Specific duties with regard to regulating Brixham Fish Market and the mussel harvesting beds at Fishcombe.

The Food and Safety Team has the main responsibility for food standards enforcement work, this work is carried out by both qualified Environmental Health Officers and Trading Standards Officers within this team.

The Food Safety service operates from Commerce House between 9.00am and 5.00pm, Monday to Friday. Early morning and late night visits are also undertaken as required.

Emergency food safety issues are currently directed initially to a 24 hour central control team and then onto authorised food officers as required. Community Safety does not have a formal Out of Hours Service.

2.4 Demands on the Food Service

On 1st April 2013 the Council had 1928 registered food businesses. The risk profile of these premises shown in Table 1 has been determined in accordance with the FSA's Food Law Code of Practice.

Table 1

Priority	Premises Category	Frequency of Inspection/ Intervention	Total number of premises in category (April 2013)
Α	High	6 months	4
В	High	12 months	55
С	High	18 months	783
D	Other	24 months	352
E	Other	36 months	609
U	-	Awaiting inspection	124
Total			1928

The range of premises is as follows:- Primary producers 9, Manufacturers and packers 31, Importers and exporters 2, Distributers 8, Retailers 419 and Restaurants and caterers 1446.

Torbay also has 17 Approved fishery establishments which can take up a lot of time and staffing resource particularly in the area of exporting their products outside of the EU.

Brixham Fish Quay is also a significant cost driver to the work of the Food and Safety Team with its daily auction and regular exports to the EU and other nations and involves at least fortnightly food hygiene inspections by officers. There is also a mussel bed off Brixham which requires monthly sampling and has Category B status which means the mussels are required to be purified before sale.

The Torbay area has already been described primarily as a tourist area and there are a large number of hotels and other tourist attractions which are only open during the tourist season between Easter and October. There is also a high turnover of food businesses in Torbay putting an additional pressure on the Food and safety Team, in 2012/13 the turnover of food businesses was 14%.

Additional demands for 2013/14 include:

At the end of the 2012/13 due to budget pressures the Commercial Team lost one food qualified Senior EHO who moved across to the Neighbourhoods Team – the knock on effect of this means that the remaining food officers will be allocated more health and safety work

In 2013/14 the Food Team will be carrying out a gas safety intervention which will involve them auditing food premises in relation to gas safety issues at the same time as carrying out food safety inspections. This work has already shown very effective outcomes so will be continued.

As Torbay is a Unitary Authority, Public Health now sits as a function within the authority. Whilst this is still in the early stages of development the food and safety team will have an important role to play in some of the work that comes out of the Torbay Public Health Strategy.

2.5 Enforcement Policy

The Community Safety Enforcement Policy sets out what food businesses and others being regulated can expect from the service. The Policy is based on the principles contained within the Regulators Compliance Code.

All formal enforcement actions such as prosecutions are taken before the departments Enforcement Panel made up of officers from Community Safety and the Councils Legal team.

The service is committed to ensuring the active implementation and monitoring of the Council's Corporate Equality and Diversity Policy, which states that services will be provided in a fair and equitable way to all groups and individuals in the community.

3.0 Service Delivery

3.1 Food Premises Inspections

Torbay Council has a number of internal performance indicators relating to food safety. For 2013/14 these are as follows:-

- Number of high risk food premises (food hygiene) inspected (Target 100 %)
- Number of high risk food standards premises inspected (Target 100%)

The inspection programme is based on the inspection rating scheme and the intervention Strategy contained in the FSA Food Law Code of Practice. This Code of Practice is due to be amended in June 2013 which may alter how the Food Team carries out its inspections.

New potentially low risk businesses are contacted by a business support unit to ensure that they have basic information for compliance and to identity any that might be of higher risk which will then be inspected.

As there is a considerable turnover of premises in Torbay it is currently not possible to inspect them within 28 days however they are all assessed following receipt of the food registration form and those of a high risk nature are given priority.

All premises where a statutory notice has been served or which are found to require significant work to be carried out will be subject to a secondary visit within an agreed timescale. It is estimated that at least 103 re-visits will be carried out in addition to the programmed inspections and alternative intervention initiatives. There may also be a number of businesses formally requesting to be revisited for the purposes of rescoring under the Food Hygiene Rating Scheme. In 2012/13 the number of requests for rescoring was 57.

Environmental Health currently has an estimated FTE of 5.8 officers (See Table 4), working on food safety issues. This is a reduction of 0.7 FTE from last year.

The primary objectives when carrying out interventions are in accordance with the Food Standards Agency Food Law Code of Practice, however, a special emphasis is placed on the level of compliance with the requirements for documented control systems. Specific consideration is also given to whether samples need to be taken during routine food hygiene inspection work.

3.2 Food Complaints

The Environmental Health Service responds to all complaints about food or food premises made to the Council however deciding whether or not they require investigation will be done by using a risk based approach to ensure that resources are used effectively.

There were 31 complaints about defective food received up to the end of March 2013. There were also 623 other service requests received relating to issues such as unhygienic food premises, requests for information and advice that were handled by the Food Safety team in 2012/13.

3.3 Primary Authority Scheme

The previous Home Authority Scheme has now been replaced by the Primary Authority Scheme under the new Regulatory Enforcement and Sanctions Act 2009. This aims for the first time to give companies the right to form a statutory partnership with a single local authority. The objective of this is to provide robust and reliable advice on compliance that other Councils must take into account of when carrying out inspections or dealing with non compliance.

The Food and Safety Team are currently in the process of setting up a Primary Authority partnership with a national company who has its Head Office in Torbay.

3.4 Advice to Business

The Authority is committed to improving food safety standards through both education and enforcement. In order to use limited resources most effectively, advice is targeted and is as follows:

- During inspections and as part of follow up documentation;
- Via electronic Food Safety Newsletters
- New Business advice
- Through guidance information available on the Food Safety teams fully revised website pages
- Distribution of relevant food safety material to food businesses particularly via the website.
- Advice and information is given to businesses requesting guidance either by telephone or e-mail.

During 2012/13 the Food Safety Team further developed links into the business community by working with the Torbay Business Forum, The Business Improvement Districts, The Tourism Company and the Torbay Development Agency to further promote the Food Hygiene Rating Scheme across the Bay.

3.5 Food Inspection and Sampling

The Service has in place a documented and publicised sampling policy and a separate documented procedure and programme.

The sampling programme is drawn up in consultation with the Devon Chief Environmental Health Officers Food Sub Group and the SWERCOTS Food Group, in partnership with the Food Examiner from Public Health England Laboratory covering the Torbay area and the Public Analyst at PASS Laboratory Services.

The programme covers authority, county, national and when required European sampling objectives. Each Authority is allocated sampling credits by Public Health England in order to undertake food hygiene sampling and food standards sampling which is resourced from an allocated budget within the Food Safety overall budget.

During 2012/13 236 samples were taken of a range of products including raw and cooked meat, ready to eat deli foods, environmental swabbing and mussel samples. Food standards sampling also included bread composition, ice cream for composition, crushed ice drinks for added colours, raw and cooked potatoes for added preservatives and alcohol testing to check for substitution. Most of the results from these samples were found to be satisfactory and no further follow up action was required, however some of the samples were found to be unsatisfactory and follow up work was required to secure compliance. For example, in one sample there was a higher than legal limit of added colour and therefore the business was given advice on how to reduce its level of added colour to this prod

3.6 Control and
Investigation of
Outbreaks and
Food Related
Infectious Disease

All formal and informal notifications are recorded on the Environmental Health Service Authority database. Subsequent investigations are based on the type of organism, the number of cases, and are in accordance with Public Health England guidance.

A documented procedure has been produced and agreed with Public Health England and follows the principles established in a countywide procedural document, prepared by the Devon Food Safety Sub Group. During 2012/13 236 infectious disease notifications were received, some of which were serious cases of infectious diseases where the cases were hospitalised and a full outbreak investigation carried out.

3.7 Food Safety Incidents

The service has a documented procedure which deals with action to be taken following the receipt or initiation of a food alert. The FSA Food Law Code of Practice has required specific recording of actions taken following the receipt of a food alert.

Food alerts are received by a direct email from the Food Standards Agency (FSA), by direct emails to the Principal Environmental Health Officer and the Food Safety email box which is checked every day and by text messages to officers' mobile phones.

The Food Alert warning procedure for food incidents recognises that such issues are required to be dealt with quickly in accordance with the categories for each food alert. The procedure identifies the mechanism for passing on the food alert to the appropriate officer, an outline of the action to be taken. Most food alert warnings received require only a small amount of officer resource.

However on occasions it is necessary to provide more resources to deal with food alerts. Any actions taken on a food alert are documented within the Authority data recording system.

During 2012/13 47 Food Alerts were received by the Food Safety Team, a number of which required local action in food premises in Torbay. During the national horse meat incident the Food and Safety team also carried out some work to ensure the traceability of meat supplies in its schools and hospitals, this work is continuing this year in terms of meat sampling to check authenticity e.g. of meat in kebab shops.

3.8 Liaison with other Organisations

Consistency and value for money is a key feature in all of the Council's Environmental Health functions. With regard to the food safety service, this is achieved by:

- Priority being given to attendance and active participation by the Principal Environmental Health Officer at the Devon Chief Environmental Health Officers' Food Sub Group. This Group co-ordinates peer review and consistency exercises, acts as the discussion forum for topical issues and a means of optimising countywide consistency in enforcement and advice.
- The Food Safety Service also liaises with the following :
 - Public Health England
 - Torbay Development Agency
 - The Food Standards Agency
 - Devon and Cornwall Police
 - o The Immigration Service
 - o TDA Business Forum
 - Trading Standards Sub Regional Group

The Community Safety Service have access to all development and building control applications and acting as a formal consultee on key planning and building control applications and a statutory consultee on all Licensing Act applications.

3.9 Food Safety Promotion

Education and promotional activities are considered to be important aspects in the delivery of a comprehensive food safety service and it is achieved in the following ways:

 Food Safety articles in the bi annual Food and Safety Newsletter e mailed to all food businesses in the Bay.

- Food information available directly from the Food Safety section of the Council website and from the team directly.
- Targeted advice/information sent to relevant groups on issues of county or national significance e.g. on E Coli 0157 guidance.
- Targeted seminars and training sessions are undertaken on various food safety subjects.

4.0 Resources

4.1 Staffing Allocation

The Community Safety Business Unit structure is based on a number of multidisciplinary teams. The Food Safety Team is located within the wider Commercial Team.

<u>Table 4</u> shows the current full time equivalent of staff working on food safety enforcement, broken down by the competency requirements of the Food Standards Agency Food Law Code of Practice (England) - General qualification and experience requirements.

EHRB officers are Environmental Health Officers who are registered with the Environmental Health Officers Registration Board, (EHRB), after attaining the approved qualifications in Environmental Health.

Table 4: Staff resources dedicated to food safety

Environmental Health Officer (Food and Safety Team)	EHORB	FTE	Other
Principal EHO	YES	0.8	No
Senior EHO	YES	0.9	Lead Assessor
Senior EHO	YES	0.9	Lead Assessor
Senior EHO	YES	0.4	Lead Assessor
Senior EHO	YES	0.9	Lead Assessor
Senior EHO	YES	0.9	Lead Assessor
Senior EHO	YES	0.9	No
Senior EHO	Yes	0.1	No
Trading Standards Officers (Food & Safety Team)	Dip TS/DCAT	FTE	Other
Trading Standards Officer x 3 (food standards only)	YES	0.3	New posts in team since April 2010

4.2 Staff Development Plan

All food safety staff are subject to an annual appraisal and one progress review which tracks and identifies training and development needs. Food safety training needs are prioritised in the context of wider Environmental Health requirements identified within the service wide training plan.

All food safety staff complete a training record log to further assist in identifying development and training needs and for monitoring the competency of individual officers. The officers undertaking specific duties, such as dealing with approved premises, are identified and the training requirements assessed accordingly.

Some of the specific food safety training undertaken by staff during 2012/13 include:-

- FSA E Coli and Cross contamination training
- FSA Vacuum Packing training

5.0 Quality Assessment

5.1 Quality Assessment

The provision of quality services is one of the Council's three guiding principles and food safety is no exception. With regard to food safety the quality agenda is pursued via a number of methods.

Management Monitoring

The documented quality management procedure includes specific monitoring arrangements that are in place for example checking of inspection letters and notices and joint consistency/quality monitoring visits undertaken by the Principal Environmental Health Officer. Complaints against the service are monitored on a Service and Corporate basis.

Food Standards Agency

The service is required to submit an Annual return, detailing the inspections, enforcement and educational activities undertaken, to The Food Standards Agency who closely monitor performance to ensure compliance with the FSA framework agreement.

The FSA also has the power to set standards and to monitor local authority food law enforcement services under the Food Standards Act 1999. The FSA collects information from all United Kingdom food authorities and submits the information to the European Commission.

As detailed in section 3.8, the Principal Environmental Health Officer attends meetings of the Devon Food Sub Group to discuss relevant issues on a regular basis. This group comprises of representatives of all the District and Unitary councils, and Public Health England.

This forum offers the opportunity to discuss, in detail, a wide

range of quality and consistency issues relevant to food safety.

During 2012/13 the Food and Safety Team received an internal audit and are still waiting for the report of this audit.

6.0 Review Process

6.1 Review against the service plan

As detailed within Section 1.2, the Council has an established performance management board to monitor the performance of its services.

From an operational perspective the Principal Environmental Health Officer reviews the key performance measures and service improvements contained in the plan on a quarterly basis. Table 5 shows some of the internal indicators covering service delivery and performance as well as the national indicator for food safety and the wider key indicators on the Community Safety Balanced Scorecard that the Food Safety Team feed into and it is those which are reported to management team and members through their internal SPAR performance boards.

In addition, regular one to one meetings are held with staff involved in the Food Safety Service. This is to ensure that ongoing projects and improvements outlined in this service plan are effectively monitored and managed. The notes for these meetings are documented, along with actions and timescales for relevant staff.

Table 5 – Food Safety Service Performance Indicators

SERVICE DELIVERY INDICATORS		2010/11	2011/12	2012/13
Number of Category A and B risk food hygiene premises (due every 6 months)	Target	100%	100%	100%
inspected	Outcome	87%	100%	100%
Number of Category C high risk food	Target	100%	100%	100%
hygiene premises (due every				
12months) inspected	Outcome	27%	53%	54%
Number of high risk food standards	Target	100%	100%	100%
inspections carried out				
	Outcome	88%	88%	100%

6.2 Identification of achievements and any variation from the service plan

Table 6 below identifies the status of planned service improvement actions from 2012/13. Any remaining improvement objectives are shown in the table below along with the reason for the delay and a revised target, which will be included in the work programme for 2013/14 where appropriate.

Table 6 Achievements and variance from Service Plan 2012-13

Action	Planned Outcome/Output	Achieved Or reason	New Target Date
To raise the standards of food hygiene within food premises in Torbay	Implement the FSA's Food Hygiene Rating Scheme to ensure both hygiene standards are raised and that consumers have better access to information on food businesses and thereby making informed choices on where they wish to	Achieved – 800 premises now rated under the Food Hygiene Rating Scheme. 91 requests for rescoring visits received all but 3 have gone up mainly to a 4 or 5. The number of high risk A and B premises have dropped by over half although there are still a number of low rated premises which need to improve.	Ongoing work.
To implement the recommendations of the new FSA E Coli guidance for businesses and enforcement officers.	To assess butchers and catering premises compliance with the FSA's E Coli Guidance	Achieved- Food officers attended FSA E Coli course and guidance is addressed on every food safety inspection.	Ongoing work
To inspect all high risk food premises in the Bay in line with the statutory FSA Food Law Code of Practice	To ensure they are compliant with food safety legislation	Achieved; - 100% of A and B risk inspections achieved. Target not achieved for C risk statutory interventions	Ongoing work
To inspect/carry out an intervention in all D and E risk premises in line with the statutory FSA Food Law Code of Practice	To ensure they are compliant with food safety	Target not achieved for medium/low risk D and E risk premises.	Ongoing work
To continue cross professional working pilot to make effective use of resources	To ensure that intelligence from other teams within Community Safety is used effectively.	Achieved – FAB's project completed and evaluated. This project had some good outcomes for businesses	

6.3 Targets and areas of Improvement for 2013/14

Targets for 2013-14 are in Table 7 and the current planned improvements for 2013/14 are outlined in Table 8.

The Statutory Guidance requires 100% of C risk premises to be inspected. This hasn't been achieved for a number of years as can be seen from Table 7 below. The target has therefore been set at 50% of all C's for this year. Although there is been a reduction in A and B rated premises due to improving food hygiene ratings this is off set by the team having a 0.7 FTE reduction in staff overall and in addition a member of staff on maternity leave. In an attempt to still meet previous years figures for C inspections a 6 months contract for a part time member of staff has been awarded.

Table 7 – Targets for 2013-14

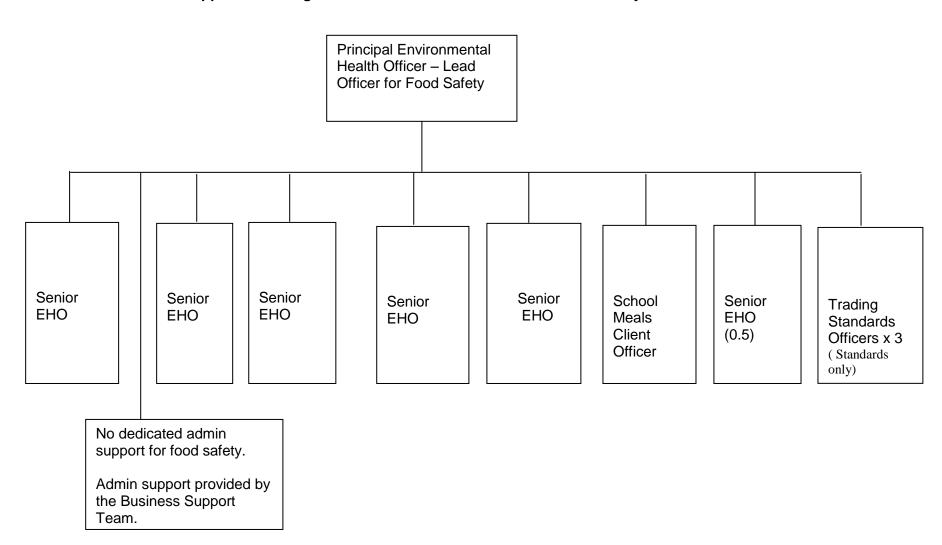
SERVICE DELIVERY INDICATORS		2010/11	2011/12	2012/13	2013/14
Number of Category A and B risk food hygiene premises (due every 6 months)	Target	100%	100%	100%	100%
inspected	Outcome	87%	100%	100%	
Number of Category C high risk food	Target	100%	100%	100%	50%
hygiene premises (due every					
12months) inspected	Outcome	27%	53%	54%	
Number of high risk food standards	Target	100%	100%	100%	100%
inspections carried out					
	Outcome	88%	88%	100%	

Table 8 Areas of Improvement for 2013/14

Service Improvement	Planned Outcome/Output	Link to FSA framework agreement	Target Date
FABs cross professional working project	Following the evaluation of the cross professional working project, determine whether or not there is merit in progressing this work further	All areas of framework agreement	July 2013
To explore the opportunities and any joint working that can be undertaken with the new Public Health team now within the Local Authority and also with other Devon Local Authorities to share resources in this field of work.	Initially to understand each other's roles and identify where the Food Team can play a part in the implementation of Torbay's Public Health strategy particularly in relation to infection control issues relating to childcare and residential homes settings. To implement public health interventions agreed by the Devon Food Sub Group particularly in relation to food	All areas of Framework Agreement	March 2014

	businesses.		
To ensure that the food safety web pages are up to date, relevant and user friendly for businesses and explore the use of social media such as Twitter and Facebook	To take part in the wider Community Safety work to improve the department's web pages and to ensure we target information to businesses in the best and most appropriate ways.	All areas of Framework agreement	March 2014
To improve the links between the business community and the local authority food safety service.	To continue the work with the Torbay Development Agency and the Town Centre Company to increase the marketing opportunities around the Food Hygiene Rating Scheme in the Bay. To run a Food and Safety Update day to update food businesses on food and health and safety matters.	All areas of Framework Agreement	March 2014
To undertake work around the traceability and authenticity of food to ensure any food fraud in Torbay is detected and dealt with	To complete annual food safety and food standards sampling plans and also incorporate more work on the authenticity and traceability of food in Torbay.	All areas of the Framework agreement	March 2014
To ensure a consistent approach to rating premises under the National Food Hygiene Rating Scheme	To ensure that all authorised food officers undertake regular peer review exercises both internally and with the rest of Devon Local Authorities	All areas of the Framework Agreement	March 2014
To drive up standards of food hygiene in mobile food vehicles registered with Torbay	To implement the Passport system being developed by the Devon Food Sub Group and ensure that all mobile food business operators are aware of how to comply with food hygiene requirements.	All areas f the Framework Agreement	March 2014

Appendix A - Organisational Structure Chart for Food and Safety Service

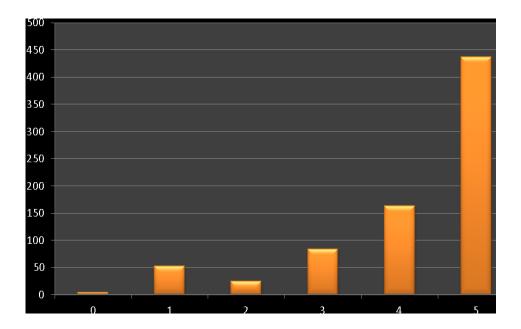


Appendix B Food Hygiene Rating Scheme - how are we doing?

From the evaluation of businesses

- 90% of the respondents were positive or very positive about the usefulness of the information given
- 91% were positive or very positive about the report left at the time of the inspection
- 83% were positive or very positive about the score they got
- 66% thought that the impact on the business was positive or very positive, compared with 73% thinking that the impact on the staff was positive or very positive
- 22% thought that the score had no impact on customers
- 48% felt neutral about using the score to publicise their business
- 69% felt that the scheme is having a positive or very positive scheme in Torbay

Chart 1: FHRS Score (24 May 2013)



- 91 rescores (12%)
- 3 rescored premises did not improve their original score

Chart 2: Spread of re-score

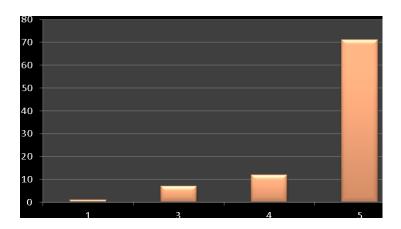


Chart 3: Overall factors for low score (less than 3)

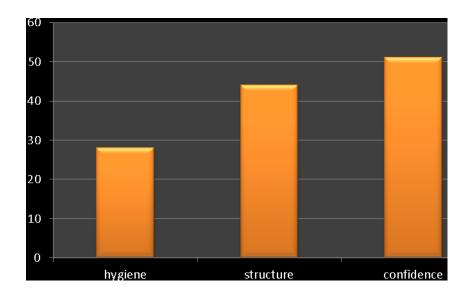


Chart 4: Single reasons for low score (less than 3)

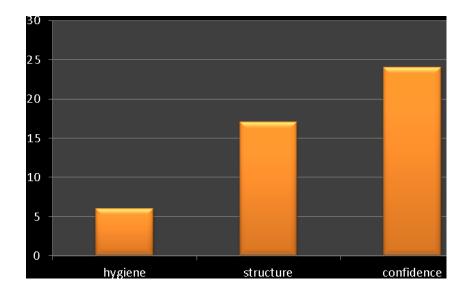


Chart 5: Percentage of satisfactory scores per premises type

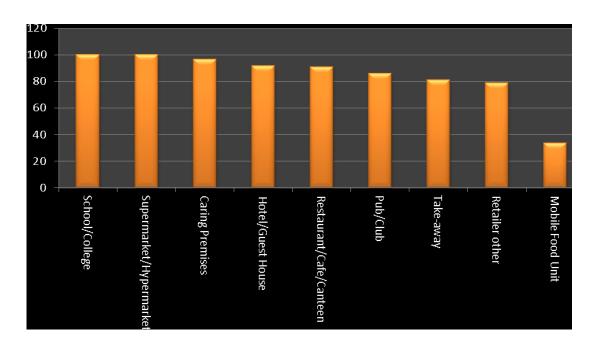


Chart 6: Percentage of score 5 per premises type

