Food Safety Report
Feedback on Licence Monitoring and Statutory Duties

Introduction

The management of food safety at the festival remains an important undertaking for Glastonbury Festival Events Limited (GFEL). The professional commitment shown by all involved for this vital and challenging responsibility is commendable. The excellent continuous improvement programme reported on following the 2017 event continued throughout the fallow year planning for 2019 and improving infrastructure to support this aspect of their operation. Their Markets Team once again have worked diligently with traders and MDC officers prior to and during the event to safeguard the hygienic delivery of a wide range of cuisines to suit all tastes. Clear trader information management plans, a summary of areas for focus for 2019, trader and wholesaler information packs and the food safety operational plan were shared with MDC prior to the event.

The commercial markets operation covers not just those traders visible within the well-defined market areas on site, but includes the large central wholesale market, ice cream compound, mobile vendors, crew catering for each performance venue, security compounds and camping fields. Ensuring that all catering across the huge site is identified prior to the event to ensure these can be inspected was a focus area for improvement.

This year's fine weather during the event was certainly a bonus but the care taken by GFEL to protect the ground on site in the wet build period, combined with the well-planned execution of bringing traders onto site, led to significantly improved ground conditions for most caterers and bar operators. The extension of the underground grey water collection system and reduction in the use of awkward IBC's helped to maintain the dry conditions. A few areas of wet ground in and around food stalls were in the main due to traders' poor self-management of their own operations than any failure on the part of GFEL. There were no reported issues with traders coming onto and leaving site.

The GFEL Food Safety Operational Plan outlined the following commitment:

- *To inspect each trader using the general principles of the Food Law Code of Practice (England) – April 2015 Section 5.2*
- *To inspect all 'on-site' traders, (within the steel shield) and 'off-site' traders (outside the steel shield but within the remit of the Festival licence)*
- *To classify every food and beverage trader according to the GFEL Red, Green Amber (RAG) grading system*
- *To identify and bring to the attention of GFEL Markets office any unauthorised food traders*
- *To respond to complaints or concerns from members of the public about food safety*
- *To undertake a brief occupational health and safety review of the traders and their premises*
- *To liaise directly with the Local Authority where issues of significant risk to public health have been found*

The key statistics from the MDC audit of this operation this year are as follows:

- 611 food traders, including 100 bars and 59 crew caterers were recorded as preparing to trade at the start of the week.
- The GFEL Food Safety Team comprised 20 qualified Environmental Health Practitioners.
- MDC engaged 6 Environmental Health Practitioners during the week to undertake inspections of Mendip registered food traders and to audit the work of the GFEL team
- Inspections were conducted across a six-day period, 24 to 29 June with some preparatory work commencing by the Team Leader on site as early as 20 June to offer advice to crew caterers and issues arising during the build phase.
- The GFEL team completed 100% of all planned inspection work by the end of Saturday 29 June, despite the testing working conditions with the exceptional heat. Some final market area sweeps to check standards were being maintained were conducted on Sunday 30th.
- FHRS 5 rating awarded to Goose Hall which operates daily from early June to the end of July each year feeding over 970 crew daily at the peak of the festival.
- 32 Amber cards* were issued by GFEL to food traders during the event, outlining areas of non-compliance. (24 caterers, 2 bars, 6 crew caterers) One regular festival trader was required to stop food production and sales during the festival by GFEL and MDC, due to significant hygiene failures which posed an immediate risk to health. This closure was voluntarily agreed by the operator and both GFEL and MDC officers worked with them to guide on the necessary remedial action. All were revisited to check for improvement. 13 of the traders remained on Amber for the remainder of the festival.
- 3 complaints of allergenic reactions to foods were highlighted to the team during the event – the associated traders were found to be compliant with their obligations in this respect.

** Amber: Safe to trade at time of visit. Examples of Amber issues will be, temporary interruptions in power or water supply (hot/cold), inadequate cold storage, inadequate dry goods storage, inadequate washing up facilities including wash hand basins. Poor confidence with limited evidence of compliance to a Food Safety Management System will also result in an Amber card. The aspiration is to move Amber graded traders to Green by conducting follow up visits. Improvements required will be noted on the back of the card.*

Red: Unsafe to trade at time of visit. Examples included no Food Safety Management System in place with inadequate controls being demonstrated; inadequate cleaning; inadequate control of CCP's. Non-conformities and an improvement plan will be agreed with the FBO and an experienced member of the team (normally the Food Safety Team Manager) will re-visit prior to re-opening of the stall. If the FBO does not comply with the agreed improvement schedule, permanent closure will be dealt with by the Food Safety Team Manager in conjunction with the Manager of the Main Markets (Jo Blackburn) and the Market Manager. The Local Authority will be advised. Amber will be considered over Red where interim measures are in place to manage risk to food safety.

Feedback on Recommendations from 2017

1. **Further innovation is required to ensure that the compost toilets are provided with weather protection**
   MDC did not observe any significant failings with the compost toilets provided for food handlers this year or issues with weather protection for the toilets themselves. The importance of these facilities was well recognised. A clear plan was implemented to ensure that compost toilets in the trader market compounds were fully constructed and ready for use in advance of the 'loading-in' of traders on the previous weekend. They were personally checked and signed off by the GFEL Markets Office Manager. The large compost totes however remain unprotected from rainwater and a compost scoop solution to cope with solidified, damp compost is still not universal.

2. **Servicing of market compound toilets and hand wash IBC's must continue until traders have left site.**
   The good weather during the event facilitated regular servicing. Toilets and hand wash units were clean and fully operational where inspected. No reports to MDC were made to suggest that this servicing for trader's facilities after the weekend was an issue in 2019 but this must remain planned in for future years.

3. **Further focus is needed on assurance that bars are fully set up, hygiene compliant and ready to trade before sign- off to open to the public. MDC require clear commitment that non-compliant bar operations will be temporarily suspended until satisfactorily resolved to a commercial standard. The message in the Bar Information Pack in 2019 will need further emphasis.**
   Details of all public and crew bars are now processed by the GFEL Markets Office to ensure they are all identifiable. Active liaison between the Markets Office Manager and the DPS in advance of the festival ensured that the bar operators were fully aware of their obligations. There was a pleasing change in commitment to this and clear examples of very good practice across the site, although there remain a few providers who continue to disregard the requirements. These have been identified and shared with GFEL for focus in 2020.

   MDC identified that some bars were issued green cards while not fully compliant. Hygiene checks on all bars by MDC EHO's are not feasible but 37 bars representing a cross section of operators were visited. Unfortunately, it was necessary to issue 7 premises intervention reports in the worst cases for failure to address hand and equipment washing provision, provision of flooring, poor hygiene management and lack of welfare facilities. Four of these reports were for very large, multiple dispense outlets, centrally located and run by the same operator.

   Equipment and hand washing facilities, where provided, were heavily used and bar staff frequently commented on how this has significantly improved their hygiene practices.

   GFEL took a robust line over the use of ice machines, despite the hot weather and only commercial bagged iced was permitted to prevent potential

contamination risks.

GFEL acknowledge late water connections to a few bars in the SE corner.

4. **Bar operators to provide clearly segregated welfare/rest and beverage making facilities for staff with storage areas for personal belongings and change of footwear when required, so that these activities do not impinge on bar servery operations.**
   There were excellent efforts by some bar operators to address this, with the provision of separate tents/gazebos for staff to take rest breaks and respite from the extreme heat, with cold water dispensers, beverage-making and phone charge facilities. However, there is still room for improvement with one large operator and in some of the smaller outlets, where facilities are cramped, and the security of staff personal belongings is a concern.

   There was far less evidence this year of power supplies to bar equipment being unplugged in deference to phones and music equipment. Examples of good practice are planned for the 2020 Bar Information Pack.

5. **Continue improvement programme to include review of all crew catering/crew bar provision not directly booked by Main Markets team to ensure universal delivery of clear information and requirements**
   Active liaison by GFEL with performance area organisers in advance of the festival ensured they were aware of their obligations and 'go-live 'dates for those setting up well in advance of the main festival dates facilitated the early inspection of these outlets. 39/59 (66%) crew caterers had been inspected by the end of Tuesday 25 June. These caterers are now required to be processed through the Markets Team office which considerably improved the dissemination of vital information and guidance and resulted in significantly fewer unlisted catering operations revealing themselves during the inspection programme. Compliance was generally found to be satisfactory and these operators are keen to comply given their key meal provision for crew and performers.

6. **GFEL Markets team to further review the trader checklist sign off process to ensure that 'Awaiting Inspection' blue cards are displayed until the GFEL food safety inspection has been carried out.**
   GFEL and MDC agree that food outlets should not commence trading until they have completed & signed off their traders' checklists which takes them through all the compliance requirements as a clear reminder. These are intended to be handed into their local market office in exchange for the 'Awaiting Inspection' Blue cards for display to the public. This also aims to help MDC officers quickly identify traders still awaiting GFEL inspection.

   The 2019 Trader Inspection pack contained 5 separate references to these cards throughout the document. Yet some operators still seemed to be unaware of the requirement and too many continue to ignore the essential advice the pack offers, particularly those who are seasoned traders on the festival circuit. This then consumes valuable inspection time whilst officers advise on remedial action for compliance, sometimes at the most basic level. This also necessitates frequent officer revisits. This will be a further area of focus for 2020.

7. **Trader Information pack to highlight risks of certain catering practices such as vacuum packing of foods and sous vide.**
   The 2019 Trader Inspection pack was reviewed during the fallow year and shared with MDC officers for comment. The document features a helpful 'new for this year and reminder' section in the front pages so traders are well advised. GFEL clearly identified the high-risk practices that would not be permitted through this information pack, their online trader portal and in the documentation sent to traders with the offer of their pitch. It states: ***High risk activity*** *such as vacuum packing and sous vide must not be undertaken on site. Ice should always be considered as 'food'. Following safe food handling guidelines is of paramount importance to reduce the chance of contamination or illness. Rare or medium rare burgers are to be avoided.*

Compliance with Event Management Plan 2019 & Statutory Requirements

Daily meetings were held with the GFEL Food Safety Manager and the Markets Officer Manager throughout the event to share information and update on matters of concern.

MDC undertook a daily review of the GFEL Food Safety team progress from Wednesday 26 to Sunday 30 June.

The MDC audit team regularly reviewed with the GFEL the reports on all Amber traders. Audit checks were carried out by MDC to verify that satisfactory progress had been made where serious contraventions had been flagged up.

MDC has reviewed with the GFEL Markets Office Manager and Food Safety Manager those agreed matters for improvement to be taken forward in 2020.

Recommendations for 2020

1. Continue to build on this years' successful improvement programme, ensuring that all bar operators are fully conversant with and conform to the regulatory hygiene standards and the best practice requirements outlined by GFEL and MDC for this event. Revision of the GFEL Bar Information pack with illustration of best practice is recommended.

2. Maintain the successful policy of declining catering operators who repeatedly demonstrate poor compliance and deflect officer time from the planned inspection programme.

3. Red – Amber – Green RAG cards will be modified annually to prevent the display of green cards from previous years by traders who may seek to mislead the public.

4. Consider an online mechanism for completion of trader checklists to facilitate pre-inspection checks, the issue of 'Awaiting Inspection' cards for display and to support inspecting officers when non-compliance with hygiene or GFEL trading requirements are found.

5. Consider focused guidance information for the ‘off grid’ caterers in the Tipi Field and similar areas based on good practice observed in 2019 by some of these traders, to improve wider compliance, support the area manager and release inspection time for officers.

6. Review the reporting mechanisms for suspected food-borne illness and allergenic food reactions from the medical services to ensure that they collect appropriate information to support prompt and effective follow up.

7. Ensure that compost tote sack provision for toilets used by food handlers is not compromised by wet weather and seek a solution to provide durable scoops to ensure the compost can be used effectively.

8. Provide details in the Food Safety Operational plan to demonstrate the competency assessment employed for GFEL Environmental Health Practitioners to meet the Food Law Code of Practice and 10 hours core CPD requirement.

Officer:	**Jenny Thomson**	**Date:**	**27 September 2019**