

**Food Safety Service Plan 2011/12**

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## **1 INTRODUCTION**

- 1.1 The previous 18 months has seen some major changes and re-organisation to the Food Safety Team. It has been necessary to re-evaluate the approach and type of work undertaken in order to meet local priorities.
- 1.2 In April 2009 the M3 food premises database was remapped to correlate with the then, newly introduced 'Food Law Code of Practice'. Much work was undertaken and controls put in place to improve the reliability and accuracy of the Food Premises Register. This has resulted in greater efficiency and most importantly accuracy and consistency amongst the Team.
- 1.3 The biggest challenge the Food Team are faced with is to continue to focus on the high level of non compliant businesses within the Borough.
- 1.4 The recent appointment of three new Environmental Health Officers to the Food Team should increase the effectiveness of the Service.

## **2 SERVICE AIMS & OBJECTIVES**

- 2.1 The Food Safety Service is provided by the Food Safety Team, located within the Environmental Health group under the Customer Services Directorate. The Food Safety Team contributes to the Council's overall vision of making Lewisham the best place in London to live, work and learn, and of the Customer Services vision of delivering high quality, user focused services and driving improved customer service and user involvement. The Team work to ensure all businesses in the borough comply with the law, and all consumers and residents are aware of their rights and responsibilities.

### **2.2 Aims**

- 2.2.1 The Food Safety Service has five main aims:
  - i) To promote, through education and enforcement, the sale and/or production of food which is safe and wholesome for the final consumer to eat.
  - ii) To protect the interest of consumers to allow them to make informed choices in relation to the food that they consume, in particular to prevent fraudulent or deceptive practices such as the adulteration of food, which may mislead the customer
  - iii) To prevent and control the spread of reportable infectious diseases (including food borne illness) through education and enforcement
  - iv) To respond to complaints from consumers and other stakeholders relating to food safety and food standards if food products have been sold or produced in the borough
  - v) Enforcing regulation fairly and equitably by ensuring that all businesses compete on an equal basis.

## **2.3 OBJECTIVES**

2.3.1 In order to achieve the above aims the objectives are set out below.

- i) To undertake a risk based programme of interventions of food premises in accordance with Food Standards Agency Food Law Code of Practice and Practice Guide.
- ii) To register food businesses within 28 days as required by Article 6(2) EC 852/2004.
- iii) To provide a risk-based response to all notifications of food related illness or suspected illness in order to minimise the effects on the community.
- iv) To carry out food sampling in accordance with nationally and locally set programmes.
- v) To provide information, advice and education on food safety and standards issues to the business and residential community.
- vi) To respond to complaints concerning food safety and food standards within 5 working days and to initiate investigation within 5 days.
- vii) Deliver formal training for food handlers working in London Borough of Lewisham.
- viii) Initiate and respond to Food Alert for Actions from the FSA.

## **3 KEY ISSUES FOR 2011-2012**

3.1 Key issues for the team are:

- Targeting 'non broadly compliant' premises (premises that do not meet the minimum legislative hygiene requirements). Taking robust enforcement action against premises that continually have poor hygiene standards. This has recently proven successful in terms of sending out a clear message to food business owners. This is reflected in the significant improvement in the number of broadly compliant premises.
- To continue to target high risk priorities, reducing the burden on low risk and/or compliant businesses.
- To focus on manufactures, importers and packers in respect to ensuring compliance with food standards (labelling regulations).
- To focus on illegally imported foods on sale in the Borough. Targeting food of animal origin and products of non-animal origin that are subject to additional controls or as identified as high risk by the FSA. To increase sampling of these products and to seize and detain products that fail or are illegal.

## **4 BACKGROUND**

### **4.1 AUTHORITY PROFILE**

Lewisham is an inner London Borough covering an area of 13.7 miles (3,473 hectares). It is bordered by the boroughs of Greenwich (east), Bromley (south) and Southwark (west) with the River Thames to the north. A number of main transport routes run through the borough, with the A20 being a major road traffic route into central London.

4.1.1 The area is mainly residential in nature and contains a number of retail centres, the largest of which is Lewisham town centre with smaller centres at Catford, Deptford, Sydenham and Forest Hill. There are a number of small industrial estates, mainly around the northern part of the borough and a substantial number of small businesses exist (over 550 small and medium sized creative enterprises).

4.1.2 The borough has a population of 249,500 with 51:49 ratios of females to males. The residents of the borough are ethnically diverse; with one third of the overall population and 50% of the pupils in Lewisham schools being from black or ethnic minority communities (the largest groups are of Caribbean and African origin). The population is also changing: the 1991 census showed 1 in 5 people of black or ethnic minority origin which had risen to 1 in 3 by the 2001 census.

4.1.3 There is significant deprivation within the area, four of the Lewisham wards are in the worst 10% of wards for employment in the country, 21 are in the worst 10% for housing, five for education and four for child poverty. There are higher than average levels of teenage pregnancy and lone parents make up 15% of the total (almost twice the national average).

4.1.4 There are approximately 1800 registered food businesses. There are approximately a 30% turn over of food businesses.

### **4.2 ORGANISATIONAL STRUCTURE**

The Food Safety team forms part of Customer Services (under the Environmental Health Section). It is led by the Food Safety Manager who reports to the Environmental Health Manager and then on to the Head of Environment, who report to the Executive Director for Customer Services. An organisational chart can be found in **Appendix A**.

### **4.3 Specialist services**

#### **4.3.1 Food Examiner**

The appointed Food Examiner is the London and South East Region Public Health Service at the Central Public Health Laboratory, 61 Colindale Avenue, London, NW9 5HT.

#### **4.3.2 Analytical Service and Public Analyst**

The Council has appointed Eurofins Scientific Limited of: 28-32 Brunel Road, Westway Estate, Acton, London, W3 7XR +44 20 8222 6070 to provide an analytical service and has appointed Duncan Arthur to act as Public analyst pursuant to the Food Safety (Sampling and Qualifications) Regulations 1990 for analysis of food labelling and composition samples. Lewisham Hospital examines faecal and other clinical specimens associated with infectious

disease control in respect to isolated cases of food poisoning. Barts Hospital (Microbiology Unit) is the nominated centre to process faecal samples in the event of a food poisoning outbreak.

#### 4.3.3 **Enforcer**

The proper officer functions for the purposes of enforcing the provisions of the Public Health (Control of Disease) Act 1984 and associated regulations, lies with the Consultant in Communicable Disease Control (CCDC) of the Health Protection Agency (HPA) and nominated specialist colleagues.

#### 4.4 **SCOPE OF THE FOOD SAFETY SERVICE**

The activities undertaken by the service are as follows:

- 4.4.1 Maintain a database of food businesses in the London Borough of Lewisham, in order to produce a public register of premises rated by inspection category with historic details of previous interventions undertaken within those premises.
- 4.4.2 Provide advice to existing and potential food businesses on all aspects of food hygiene and standards.
- 4.4.3 Identify premises processing, handling and storing food that require approval under EU regulation 853/2004 and 854/2004 ensuring they comply with the additional requirements set out by the regulations.
- 4.4.4 Carry out inspections of food businesses for compliance with food safety, food standards based on risk. Take a variety of enforcement and follow up options including: Service of Hygiene Emergency Prohibition Notices, Improvement Notices, Simple Cautions, PACE Interviews, Prosecutions, Seizure and detention of foods and revisits & re-inspections.
- 4.4.5 Investigate all service requests received relating to items of food, unhygienic premises and practices.
- 4.4.6 Take appropriate, proportionate, risk based enforcement having regard to the Enforcement Policy and in accordance with the adopted principles of the Enforcement Concordat to ensure consistency.
- 4.4.7 Maintain electronic systems to receive and act upon all Food Alert for Actions issued by the Food Standards Agency.
- 4.4.8 Undertake a food sampling programme liaising with the SE Sector Group and other relevant bodies.
- 4.4.9 Provide export certificates to non-EU countries as requested by food manufacturers in the borough.
- 4.4.10 Investigate complaints concerning food related disease, incidents of food poisoning and infectious disease and enforce and advise on precautions and controls.
- 4.4.11 Implement food legislation, codes of practice and guidance and other official documents as proposed by the FSA.

4.4.12 Ensure that staff are properly trained and competent to enable them to deliver the above initiatives.

4.4.13 Maintain up to date information on the food pages on the Council's website.

4.5 At times of staff shortage, external contractors are used to assist with programmed inspections and general complaint work. Suitably qualified contractors are selected from external agencies and employed in accordance with the Council's procurement rules.

4.6 The Service is registered as a training centre with the Chartered Institute of Environmental Health to run Food Hygiene Courses and runs approximately 12 courses per year.

## 5 DEMANDS ON THE FOOD SAFETY SERVICE

5.1 The main demands on the food service are:

- Approximately 1800 food businesses within the borough all requires some form of hygiene and standards intervention.

### Number of premises according to FSA Premises Category type

FSA Food Safety Premises Description	Nos.
Manufacturers	22
Packers	3
Importers / Exporters	13
Distributors / transporters	11
Small Retailers Supermarket / Hypermarket Retailer / Other	555
Restaurant /Café/ Canteen Hotel / Guest House Pub / Club Takeaway Caring premises Schools / Colleges Mobile food units Restaurants and Caterers & other	1232
<b>Total</b>	<b>1836</b>

- 5 premises are subject to EC Regulation 853/2004. These premises refer to manufacturers producing products of animal origin resulting in higher and more intense levels of inspection & supervision.
- A substantial increase in the number of businesses run by communities originating outside of the EU. Resulting in increased resources bringing those businesses up to the minimum legal hygiene standard.
- An increasing number of small-scale food producers working from a residential addresses. Often requiring multiple contacts to access the premises.
- A small number of businesses import, distribute and repack foodstuffs. Resulting in additional resources to ensure food has been imported and labelled legitimately.

- 5.2 Increasingly, new foods and illegally imported foods are being identified and detained / seized. Officers are having to attend court on a much more regular basis which is resource intensive.
- 5.3 The main focus of the team is to concentrate on premises that are 'high' risk. All 'high' risk premises will receive a hygiene intervention. This means in the coming year the team will inspect 878 of approximately 1800 premises.
- 5.4 The remaining premises are not all due for an intervention in this 12 month period. 313 premises will be due for an intervention in the next 12 months and this will be carried out by an Alternative Enforcement Strategy (see paragraph 6.2.3).

## 6 SERVICE DELIVERY

### 6.1 Explanation of types of Food Hygiene Interventions

- 6.1.1 Interventions are key to improving compliance with food law by food business operators. The range of possible interventions allows authorised officers to use their professional judgement to apply a proportionate level of regulatory and enforcement activities to each food business.
- 6.1.2 Interventions are applied in a risk based manner such that more intensive regulation is directed at those food businesses that present the greatest risk to public health. Interventions are designed to monitor, support and increase food law compliance within a food establishment.
- 6.1.3 Interventions are made up of 'Official controls' and 'non Official Controls'. 'Official Controls' are defined at Community level at Article 2(1) of Regulation 882/2004. Methods and techniques for carrying out tasks related to Official Controls are specified at Article 10 of Regulation 882/2004.
- 6.2 Interventions 'Official Controls' include;
  - 6.2.1 **Audit** means a systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.
  - 6.2.2 **Inspection** means the examination of any aspect of feed, food, animal health and animal welfare in order to verify that such aspect(s) comply with the legal requirements of feed and food law and animal health and welfare rules.
  - 6.2.3 **Alternative Enforcement Strategy (AES)**, is aimed at low risk businesses and saves wasting officer time. A questionnaire is sent to these low risk businesses, and a determination is made when the questionnaire is returned as to whether the business requires a physical intervention.
  - 6.2.4 **Monitoring** means conducting a planned sequence of observations or measurements with a view to obtaining an overview of the state of compliance with feed or food law, animal health and animal welfare rules.
  - 6.2.5 **Surveillance** means a careful observation of one or more food businesses, or food business operators or their activities.



6.2.6 **Verification** (Part-Inspection) means the checking, by examination and the consideration of objective evidence, whether specified requirements have been fulfilled.

6.2.7 **Sampling** means taking feed or food or any other substance (including from the environment) relevant to the production, processing and distribution of feed or food or to the health of animals, in order to verify through analysis compliance with feed or food law or animal health rules.

6.2.8 In addition to official controls, interventions also include other activities that are effective in supporting food businesses to achieve compliance with food law, such as:

- targeted education and advice,
- information and intelligence gathering.
- **Food Standards Inspections** – Examination of product descriptions & labelling (ingredients) to ensure accuracy. Also includes assessing potential allergens

### 6.3 Frequency of interventions

Food Hygiene Risk Category	Frequency
<b>A Highest risk</b>	At least every six months
<b>B</b>	At least every 12 months
<b>C</b>	At least every 18 months
<b>D</b>	A programme of alternative enforcement strategies or interventions every at least every 24 months
<b>E</b>	A programme of alternative enforcement strategies or interventions every 36 months.

Food Standards Risk Category	Frequency
<b>A Highest risk</b>	At least every 12 months
<b>B</b>	At least every 24 months
<b>C</b>	Alternative enforcement strategy or intervention every five years

### 6.4 Food Hygiene & Standards interventions in Lewisham

It is the policy of the Council to carry out food hygiene and standards inspections in accordance with the Food Safety Act Codes of Practice and associated guidance issued by the Food Standards Agency. The Council therefore operates a programme of inspections using the risk rating system.

6.4.1 Premises are categorised as being A-C for Food Standards (A being the highest risk). For Food Safety premises are categorised A-E. Table 1 below shows the interventions required and the categorisation of the premises.

6.4.2 All A & B premises for food safety are 'non broadly compliant'. Some B (standards) and C (safety) are 'non compliant'. C's (standards) and Ds, Es (safety) are all compliant.

**Table 1 – Interventions and categories of Food Premises**

Food Standards Risk category	Food Safety Risk Category	Intervention
<b>A</b>	<b>A</b>	Inspection/audit
	<b>B</b>	Inspection/audit
<b>B Non-compliant</b>	<b>C Non-compliant</b>	Inspection/audit
<b>B Complaint</b>	<b>C Compliant</b>	Alternate between inspection/audit and other interventions
<b>C</b>	<b>D</b>	Alternative Enforcement Strategy OR Intervention / non official control.
	<b>E</b>	

6.4.3 The number of premises due for inspection for food safety and food standards are detailed in tables 2 and 3 below.

6.4.4 There are five premises outside of the inspection programme which are subject to regulation 853/2004 and this is inspected by a lead officer who has received appropriate training in that area of work.

**Table 2 – Premises due for interventions for Food Safety and Food Standards 2011/12**

**Food Safety**

Risk Category	FSA target no of interventions due	No interventions planned
<b>A</b>	<b>28</b>	<b>56</b>
<b>B</b>	<b>226</b>	<b>226</b>
<b>C Non-compliant</b>	<b>230</b>	<b>180</b>
<b>C Compliant</b>	<b>688</b>	<b>538</b>
<b>D</b>	<b>362</b>	<b>Split between AES* &amp; part inspection</b>
<b>E</b>	<b>184</b>	<b>AES*</b>
<b>Unrated</b>	<b>124</b>	<b>124</b>
<b>Total</b>	<b>1842</b>	<b>1124</b>

\* subject to Alternative Enforcement Strategy

## Food Standards

Risk Category	FSA target no of inspections due	No interventions planned
A	4	4
B	193	193
C	151	151
Unrated	124	124
<b>Total</b>	<b>472</b>	<b>472</b>

### 6.5 Priorities

Food hygiene remains the highest priority for 2011/12. A change in strategy since April 2009 has resulted in a massive improvement across the borough in terms of the number of 'broadly compliant' premises satisfying the minimum legal standard. In 2008/09 we achieved 61.9% and were at the bottom of the London table. In 2009/10 we achieved 73.9% and this year 2010/11 we achieved 76% .

- 6.5.1 All premises which are not broadly compliant will receive a food hygiene inspection / audit. The momentum must be maintained and this can be achieved by ensuring non – compliant premises are revisited and the appropriate enforcement action taken until such time they achieve broadly compliance. This has proven to be a very time consuming process, often resulting in the service and enforcement of legal notices, simple cautions, closures and prosecutions. This work can only be carried out by full time permanent employees.
- 6.5.2 Compliant C rated premises for hygiene are lower risk, however these are generally premises that could swing either way between being compliant and non compliant. It is therefore essential that these premises continue to receive an inspection. Using 'price per inspection' contractors for the majority of these premises enable the full time permanent officers to concentrate on the worst non compliant premises.
- 6.5.3 All premises which have undergone Emergency Prohibition Procedures or where a Statutory Notice has been served or which are found to require significant work to be carried out will be subject to follow up revisits within an agreed time scale. The Team will have carried out over 450 Revisits and approximately 80 Re-inspections during 2010/11.
- 6.5.4 It is always challenging to estimate the resources required to undertake this function, but approximately 10.5 FTE officers are required. Using the contract staff to carry out approximately 400 Category C 'Broadly compliant' premises visits reduces the permanent officers required to approximately 8.0 FTE.
- 6.6 **Potential Income to the Food Safety Team**  
 In the current economic situation we have been under increasing pressure to generate income. In 2010/11 the Food Team was employed by Leisure Services to audit the catering facilities within the Leisure Centres in the Borough (currently being operated by private companies). This is due to continue in to 2011/12. Whilst the income only equates to £1500 - £2000 it is a step in the right direction.

6.6.1 It is proposed that in 2011/12 we are going to look at charging broadly compliant businesses for re-inspections. It is estimated the charge will be around £150 per re-inspection. It is estimated that we may receive up to 40 requests in the first year, this would bring an income in of approximately £6000. More information on this can be found with section 6.2.2.

### 6.7 Scores on the Doors

Lewisham has been part of the 5 star Scores on Doors Scheme since 2006 and will continue to be for the foreseeable future. The current scheme has been very successful and evidence shows that business owners and the public find it easy to understand. Table 3 below details the number of businesses in the range of scores in the borough.

**Table 3 shows the spread of hygiene scores in the borough.**

Star rating	No of premises in LBL
0	115
1	230
2	290
3	466
4	339
5	159

6.7.1 Lewisham are 1 of 127 contributing Councils to the scheme. Scores can be viewed by accessing <http://www.scoresonthedoors.org.uk/> .

6.7.2 There are proposals from the Food Standards Agency to require all Local Authorities nationally to join a new Food Hygiene Rating Scheme. At this stage no further information on dates for implementation are known, this matter will be revisited as and when the need arises.

### 6.8 Enforcement Actions

#### 6.8.1 Formal closures

A total of 4 Emergency Prohibition Notices (closures) were served in 2010/11. It is likely that this number will increase in 2011/12 due to the fact that there are now more qualified staff in the Team competent to do this work.

#### 6.8.2 Voluntary closures

A total of 6 voluntary closures were issued in 2010/11. This is likely to increase for the same reason as above.

#### 6.8.3 Food Hygiene Improvement Notices

A total of 160 Notices were issued and this is expected to increase in 2011/12.

#### 6.8.4 Seizure and detention of unfit / illegal foods

A total of 54 Notices were issued to seize /detain illegal foods.

#### 6.8.5 Prosecutions

A total of 4 businesses have been successfully prosecuted in 2010/11. Since 2009/10 we have brought in over £26k in fines and costs.

## **6.9 Food Complaints**

All food complaints are recorded on receipt and are then assessed by a member of the Food Safety team. An investigation may then be conducted which can include referral of the complaint to the Public Analyst or to the manufacturer for their own investigation. Where relevant, the home or originating authority will be advised of the complaint for any action as they deem appropriate.

- 6.9.1 All complainants are advised that the authority cannot become involved in claims for compensation and are notified either in writing or by telephone of the outcome of the investigation.

In 2010/11, 183 complaints were received (that includes food complaints, and complaints about the standards in a food premises).

## **6.10 Home Authority**

At the current time, the authority does not act as home authority for any businesses. There are however, a number of small scale manufacturers, small importers and re-packagers who are based in the borough and informal advice is given to these businesses. Sampling from some of these businesses was carried during 2010/11 and further sampling is planned for 2011/12.

## **6.11 Advice to Businesses**

The provision of advice to businesses is an important function of the Food Safety team. This will be carried out during inspections, at other times via contact with the district officers and through information distributed direct to businesses.

- 6.11.1 Advice is provided in the following ways:

- Via the council's website
- Leaflets, SFBB packs,
- Provision of Food Hygiene Courses
- Newspaper articles

- 6.11.2 In 2010/11, 51 enquiries were recorded as being received from new businesses or those requesting information.

## **6.12 Food Sampling**

The inspection and sampling of foods is a key supplement to the food hygiene and standards inspection programmes. It is undertaken to identify areas where standards should be improved and to ensure compliance with legislative standards. It can also be used to assist in the identification of poor practices in food preparation.

- 6.12.1 An annual programme of food sampling is drawn up by the Principal EHO and this is discussed and agreed with the Food Safety Manager. The programme contains relevant suggestions from the South East Sector of the London Boroughs Food Liaison Committee and local issues which have been identified either as a part of routine inspections or complaints received relating to products which have been manufactured, packed, retailed or imported at premises with the borough. It is expected that all officers within the team will be involved in carrying out the programme.

6.12.2 The authority has appointed a public analyst to carry out the analysis of food complaints and samples for chemical and microbiological matters and written reports are provided. An agreement has also been reached with the Health Protection Agency who will examine samples for microbiological matters and provide a written report. These are then followed up with the manufacturer, producer or retailer of the product as appropriate.

6.12.3 **For 2011/12** the Team will aim for approximately 150 samples to be taken. Samples will include bacteriological, chemical and compositional analysis. In addition to this we will be targeting 'high risk' products of non animal origin that have been imported from **NON EU** countries. In these foods we will be testing for: excess levels of pesticide, aluminium, aflotoxins, salmonella, and sudan dyes.

### 6.13 **Control and Investigation of Outbreaks and Food Related Infectious Disease**

It is the responsibility of Food Safety Team officers to undertake infectious disease control in conjunction with the Clinical Director for Communicable Disease Control (CCDC) at the Primary Care Trust.

6.13.1 The authority has, in conjunction with the CCDC, produced procedures relating to the control and investigation of both single case notifications and outbreaks using a risk based approach. This means that unless indications are received that a person suffering from a notifiable disease is a food handler or there is reason to suspect an outbreak is, or has occurred, a questionnaire is either sent to notified cases or completed via the telephone.

6.13.2 Replies to the questionnaire are checked by the Food Safety Team officers and further investigations are conducted as appropriate. In general, investigations will only be conducted where the notification is received within seven days of the onset of the illness as information available from cases becomes unreliable after this time.

6.13.3 Where an outbreak has occurred (or is believed to have occurred), the local outbreak control plan is implemented irrespective of any delay between the onset of illness and receipt of the notification and full liaison with the CCDC will occur throughout this process.

### 6.14 **Out of hours**

In the event there is an outbreak outside of regular office hours there is a procedure in place with the Council's Emergency Planning Team. Food Officers can be contacted (Environmental Health Manager, FSM & PEHO) via their mobile telephones.

6.14.1 In 2010/11, 275 notifications of infectious disease were recorded.

### 6.15 **Food Safety Incidents (Food Alert for Action).**

The service operates a procedure and has arrangements in place to ensure that it is able to implement the requirements of the Food Law Code of Practice.

6.15.1 The authority has procedures in place to respond to notifications of food incidents from the Food Standards Agency. These are received via the Outlook email system which all Food Safety Officers have access to. It is the

responsibility of either the Principal Environmental Health Officer or Food Safety Manager to monitor the [FSAenforcement@lewisham.gov.uk](mailto:FSAenforcement@lewisham.gov.uk) and take the appropriate action.

6.15.2 It is the responsibility of the PEHO and FSM to make a determination in respect to the level of action required, and to, where necessary, disseminate to the Team and issue further instructions.

6.15.3 It is the policy of the authority that responding to food incidents will take priority over other work and if necessary, resources will be bought in from other teams to assist. There are arrangements in place for out of hours contacts should a warning requiring immediate action be received.

6.15.4 Where officers become aware of an incident which has implications beyond the boundary of the borough, the relevant Food Safety Manager and or Principal Environmental Health Officer are informed and the FSA duly notified for any action that they deem appropriate.

#### **6.16 Liaisons with other organisations**

The authority is aware of the need to try to ensure consistency of enforcement between neighbouring local authorities. The Environmental Health Manager or Food Safety Manager uses the following methods to try to ensure that this occurs and information is disseminated to team members:

- Attendance at the Association of London Environmental Health Managers group.
- Attendance at the South East London Food Liaison Group, which is attended by neighbouring authorities as well as a representative from the Public Analyst and HPA. Contact is also made via email in between the quarterly meetings,
- Attendance at the Environmental Health Working Group (EHWG) along with other LA representatives, PCT's, CCDC and microbiologists,
- Information updates which are regularly received from LACORS and the FSA,
- Officers are encouraged to attend professional meetings, such as the London Food Study group, where there is a benefit to the authority,
- Officers attend regular training in food safety matters to ensure that they are up to date (and all officers attended consistency training on use of the food inspection rating system during 2010/11)
- The Food Safety team also consults on planning applications related to commercial premises and attends planning committee meetings, if requested,
- All officers have access to EHCnet through the Outlook email. The Food Safety Manager and Principal Environmental Health Officer also have access to the FSA dedicated mailbox.

#### **6.17 Food Safety promotion**

Educational and promotion activities are considered to be important aspects in the delivery of a comprehensive food safety service.

Promotion of food safety issues is achieved in the following ways:

- Ensuring formal activities such as legal proceedings, are publicised
- Contributing press releases on activities of the service
- Advisory information and links on the Council's web site

- Where resources permit, take active participation in annual National Food Safety Week for communicating messages to the general public and consumers in the Borough.
- Provision of regular food hygiene courses to food handlers to CIEH Level 2.

## 7 Resources

### 7.1 Financial Allocation

The budget available for 2011/12 for food law enforcement is as follows:

<b><u>Income</u></b>	<b>£</b>
Food hygiene training	8000
<b><u>Expenditure</u></b>	<b>£</b>
Salaries	320,000
Consultants	39,000
Training (additional training can be accessed via central budgets)	3000
Transport	10,000
Equipment (books, mobile phones, office expenses and miscellaneous)	1,000
Sampling	10,000
Central overheads and support charges(including legal)	139,000
Total	522,000
<b><u>Net total</u></b>	<b><u>£514,000</u></b>

### 7.2 Staffing allocation

At the present time, the team is staffed by the following officers who are authorised to undertake enforcement in food premises:

<b>POST</b>	<b>FTE</b>
Food Safety Manager	1
Principal Environmental Health Officer	1
Environmental Health Officers	2
Temporary Environmental Health Officer (Filling vacant post)	1
Senior Food Safety Officers	2
Food Safety Officer (authorised to undertake only lower risk enforcement actions as defined in the Code of Practice)	1
<b>Total</b>	<b>8</b>

Currently 0.5 FTE temporary admin support is allocated to Food Safety.



7.2.1 All food safety staff are subject to annual appraisals and 6-8 weekly one to one interviews, which track and identify training and development needs. It is the responsibility to the FSM & PEHO to ensure that staff maintain adequate CPD hours to maintain competencies.

7.2.2 Officers will be assisted in achieving 20 hours CPD Continual Professional Development (minimum 10 hours food law related), where resources permit.

## **8. QUALITY ASSESSMENT**

### **8.1 Quality assessment – internal arrangements**

8.1.1 With regard to food safety, the quality agenda is pursued via a number of methods:

- Daily monitoring and support by PEHO and FSM
- Validation and accompanied inspections
- Regular Team Meetings
- PES and 1 to 1's
- Cascade training and briefings
- Training exercises which are organised to achieve consistency eg. Risk rating.

### **8.2 Quality assessment – External arrangements**

8.2.1 The service is required to submit an Annual Return, detailing the inspections, enforcement and educational activities undertaken, to The Food Standards Agency via the LAEMS system. The FSA monitor performance to ensure compliance with the FSA framework agreement.

The FSA has the authority to set standards and to monitor local authority food law enforcement services under the Food Standards Act 1999. The Information is collated from all the UK authorities.

8.2.2 The FSA can undertake audits of Local Authorities. An intensive audit includes the following key areas:

- Staff interviews
- Staff competencies
- Organisation / management of the food safety service
- Sampling and complaints
- Internal monitoring
- Accuracy of computer database & consistency
- 3rd party audits and reviews
- Random check of premises files
- Enforcement decisions, in respect to formal / voluntary action including service of notices and prosecution

8.2.3 Inter Authority Audits

The SE Sector of neighbouring authorities carry out benchmarking exercises and these will continue in to 2011/12 with the aim of comparing resources and outcomes across the individual authorities.

## 9 REVIEW OF 2010/11

- 9.1 The Service has reviewed its performance for 2010/11 against 2009/10 and the figures are set out in table 4 below. Overall the performance has significantly improved over the last 12 – 24 months.

**Table 4 – Comparison of Annual Performance**

Activity	2009/10	2010/11
Audit / Inspections	1029	1082
Re-inspections	89	94
Revisits	68	450
Formal closures	4	4
Prosecutions	0	4
Improvement Notices	83	160
Seizures and detention Notices	12	54

Activity	08/09	09/10	10/11
Broadly compliant premises	61%	73.9%	76 %

### 9.1.1 Sampling

During the year approximately 50 samples were taken. **For 2011/12** the Team will aim for approximately 150 samples to be taken. Samples will include bacteriological, chemical and compositional analysis. In addition to this we will be targeting 'high risk' products of non animal origin that have been imported from **NON EU** countries. In these foods we will be testing for: excess levels of pesticide, aluminium, aflotoxins, salmonella, and sudan dyes.

### 9.1.2 Infectious Disease

275 cases of infectious diseases were reported to the Team last year. It is estimated that a similar number will be reported in 2011/12. The team works in partnership with the Health protection Agency to deal with these cases. Not all cases require investigation, incidents of food borne illness and E.Coli do require our intervention and can require a substantial amount of time in ensuring that it is not part of an outbreak or source within the borough.

### 9.1.3 Service Requests

Corporate KPI's currently require 96% of Service Requests to be responded to within agreed time scales (within working 3 days). The Service received approximately 200 requests for service in 2009/2010.

## 9.2 REVIEW AGAINST THE SERVICE PLAN

Monthly reports will be provided to the Environmental Health Manager on performance of the Food Safety Service against performance targets detailed in the service plan.

- 9.2.1 Performance is reviewed through a variety of mechanism. These include:

- Annual Performance Appraisal (PES)
- Six monthly performance review

- Six- weekly one to one meetings
- Monthly Section Meetings

**9.3 VARIANCE FROM THE SERVICE PLAN**

Reasons for significant variance from expected performance achievements are reported as part of the monthly monitoring.

Any variance in meeting the Food Service Plan will be identified in the review together with the reasons for the variance.

**10 CONCLUSION**

- 10.1 This service plan seeks to address relevant national and local issues and can demonstrate clear links to corporate objectives and priorities. Progress against the plans will be monitored and reported as part of the Directorate performance review system.

