

APPENDIX



Environmental Health

Food Safety Service Plan 2007/2008

SOUTH HAMS DISTRICT COUNCIL

ENVIRONMENT HEALTH

FOOD SAFETY SERVICE PLAN – 2007/2008

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Introduction

This plan outlines the Council's statutory food safety enforcement function and seeks to ensure that national priorities and standards are addressed and delivered locally along with those needs identified by the Council. It seeks to link with the Food Standards Agency's Strategic Plan 2005-2010 'Putting Consumers First' and the key aims for 'food safety' by continuing to reduce food borne illness and 'eating for health' by making it easier for consumers to choose a healthy diet and reduce diet related disease. This plan is a requirement of the Food Standards Agency under the Food Standards Agency's Framework Agreement with local authorities.

This service plan also provides a focus for debate on key delivery issues providing an essential link with financial planning, sets objectives for the future and provides a means of managing performance and making comparisons.

This plan links to the Environmental Health Service Plan, which in turn reflects objectives outlined in the Council's Plan and Performance Plan '2007 and Beyond' (see also paragraph 1.2 below). The document also links with the Environmental Health Services Food Safety Strategy which sets out how we will manage the food safety function.

South Hams District Council's Food Safety Service Plan has been produced to ensure that local food businesses, members of the public and Council officers/Members understand the approach to food safety adopted by the Council. The Plan will help to make sure that the actions of the Council are in accordance with the Government Cabinet Office Better Regulation Unit as regards proportionality, accountability, consistency, transparency and targeting and implement the Hampton agenda. As a Service we believe in fair regulation and reducing unnecessary burdens on businesses. The aims are very broad in order to allow for a wide range of activities in promoting and enforcing food safety and seek to embrace the ever changing food safety intervention programme in the UK.

South Hams District Council attaches primary importance to the planned inspection of food premises and the prompt resolution of complaints and enquiries. Local and national food safety initiatives will be supported to the extent that available resources will allow. A number of these initiatives are detailed within this document.

In implementing its approach to food safety, the Council is mindful of the pressures on local businesses, particularly where, for example, the economy is seasonal and subject to fluctuation. South Hams District Council will seek to continue to work with local businesses by the provision of advice and guidance. However, we will where necessary adopt a more formal approach where these interventions fail or where a risk to the consumer health exists. Our approach to enforcement is detailed in our enforcement policy (January 2006).

In light of Government enforcement and partnership initiatives it is quite clear that the future of local authority food law enforcement activities and their role in public health intervention will alter considerably and require a greater and more varied input. The Council's Food Safety Service seeks to meet this challenge and be fit for the future.

Section 1 Service Aims and Objectives

1.1. Aims and Objectives

1.1.1 The aim of the Food Safety Service is to secure the safe production, storage, distribution and retailing of food and to reduce the risk liability of business enterprises by providing support and advice on food hygiene issues. Our vision is to ensure that food locally is of the highest possible bacteriological quality and is free from contamination through the provision of an effective enforcement service provided by motivated and competent officers. One of our priority objectives is to develop and annually review a strategy to meet our aims and objectives. This was reviewed in 2006.

Service Objectives and Key Action Points are specified in the Environmental Health Service Plan 2006/2010.

1.1.2 The Council believes that everyone in the South Hams District Council area, whether they are residents or visitors are entitled to safe and wholesome food and drink. It also recognises the objective of maintaining and enhancing the prosperity of businesses in the area. It recognises the needs of business especially small businesses and those associated with the rural community and seeks to encourage their development.

1.1.3 The South Hams District Council recognises that it has a duty to act as an enforcing authority under the Food Safety Act 1990, the Food Hygiene (England) Regulations 2006 and the European Communities Act 1972 and to exercise its powers prescribed in these pieces of legislation. The Council also recognises that the offering of advice and guidance to consumers and businesses, is an integral part in ensuring safe food and which embraces the Food Standards Agency's requirements.

1.1.4 The Services main objectives are to:

- Identify potential risks and promote safe and hygienic conditions in food premises and places for which the Council has a statutory responsibility and to secure compliance with relevant legislation.
- Ensure food produced in the South Hams is of the highest microbiological standards and without risk to the consumer. This forms part of our sampling programme.
- Prevent the occurrence and spread of infectious disease and food poisoning
- Engage in activities which encourage the promotion of health and food safety.

- 1.1.5** The Food Safety Service acknowledges the integral part it plays within the Council's Performance Plan and will continually seek to ensure its performance remains compatible with the plan.
- 1.1.6** This policy will be put into effect by the Commercial Division of the Environmental Health Service during the course of its normal work when inspecting premises and also when dealing with service requests. The policy will be supported by procedural documents where necessary to assist staff in delivering a high quality and consistent service. These are updated as and when required. The overall responsibility for implementing the Policy rests with the Head of Environmental Health and the day to day management of the Food Safety Service lies with the Divisional Environmental Health Officer (Commercial) who is the nominated food safety lead officer.

1.2 Links to Corporate Objectives and Plans

- 1.2.1** This plan also links to our Food Safety Strategy 2006 and to the Environmental Health Service Plan and its vision 'To protect the health, safety and welfare of the consumer, those visiting and those employed with the South Hams whilst reducing the risk liability of local businesses by providing support and guidance'. The final link is to the Council's Priorities CP2 and CP5.
- 1.2.2** As with a number of other services having an 'enforcement' role, the food safety service may be subject to criticism or complaint either by a food business operator or member of the public about the service where it is perceived that an alternative approach should have been adopted or where a particular alternative outcome was anticipated. These matters are usually resolved on an informal basis however, if this action fails the Council's formal complaints procedure will be followed. Customer feedback questionnaires are used to monitor our officers' performance.
- 1.2.3** The Service is very much customer orientated and we seek to continue to provide a sound service as part of the 'Customer First' scheme adopted by the Council and deliver both on our own standards, and also corporate service standards.
- 1.2.4** As part of the 'Towards Excellence Plan' being pursued by the Council and 'Our Improvement Vision' statement, we will work to achieve our part in the following set objectives:
- To ensure that we focus our resources in accordance with residents' priorities.
 - To improve how we provide services in ways that make a difference to our customers.
 - To challenge our costs and reduce the cost of administration.

- To work with other authorities in order to improve service delivery and reduce costs.
- To make our services easier to access, at a time and place that is more convenient to our customers.

Section 2 Background

2.1 Profile of the South Hams District Council

The South Hams covers some 88,661 ha of South Devon and is predominantly rural in nature, situated between the unitary authorities of Plymouth and Torbay. It encompasses some 50 miles of coastline to the south and part of the Dartmoor National Park to the north. There is a resident population of approaching 82,800 which increases by nearly 40% during the summer months as a result of tourism. Much of the resident population lives outside the four main towns of Totnes, Ivybridge, Dartmouth and Kingsbridge. The area is designated as an area of outstanding natural beauty.

2.2 Organisational Structure

See Appendix A.

2.3 Scope of the Food Service

2.3.1 South Hams District Council's food safety service is provided in-house by a small team of professional duly-appointed and dedicated officers, the structure of which is set out in the appendix to paragraph 2.2 above.

External expertise is provided in the form of Food Examiners appointed by the Food, Water and Environmental Laboratory at Derriford Hospital, Plymouth, Food Analysts employed by Somerset Scientific Services, Taunton and also Proper Officers for Communicable Disease Control employed by the Devon Health Protection Unit of the Health Protection Agency.

2.3.2 The team delivering the food safety service also has responsibility for occupational health and safety inspections and investigations of accidents, investigation and control of food poisoning and infectious diseases (including zoonoses), smoke-free laws and various licensing and registration issues including food premises, holiday caravan and camping sites, skin piercing activities, premises licences under the Licensing Act 2003, zoos and dangerous wild animals. We also issue registration documents for the movement of shellfish from production areas and certificates for food export.

2.3.3 At present we do not participate in any formal health education training, however, we undertake to give advice/guidance when carrying out routine work. We seek to examine ways of fulfilling our health promotion remit in partnership with others and to secure external funding.

2.4 Demands on the Food Service

- 2.4.1** The sole service delivery point is the South Hams District Council Headquarters at Follaton House, Totnes, however, an out of hours service is available in emergencies.
- 2.4.2** There are some 1310 food businesses within the South Hams registered with the local authority. Predominantly, due to the seasonal tourist influx, these relate to catering and residential accommodation (approximately 70% of total premises). There are some 24 businesses 'approved' under specific hygiene regulations; these reflect the rural and diverse nature of the South Hams and include premises engaged in the processing of fish, shellfish and a range of dairy and meat products.
- 2.4.3** The Council has close links with the local molluscan shellfish industry having designated harvesting areas at 5 locations and 3 purification centres. Much work is involved in the monitoring programmes to ensure acceptable standards are maintained as part of the Council's statutory role in these areas. We are also active regionally and nationally as regards shellfish hygiene issues. Additionally, within the district there are traditional processes associated with the dairy industry i.e. hard/soft cheeses, yoghurt, cream including clotted cream, ice cream. There has been an increase in the production of small on-farm pasteurisation units and premises bottling water. Similarly, traditional crab boiling activities take place in a handful of premises.
- 2.4.4** These specific industry sectors supplying the local, national and international markets attract a particular risk of infection of consumers if not properly controlled and much input by specifically trained staff is needed as a consequence. Full inspections/audits can take 2-3 days and the formal approval process is complex.
- 2.4.5** It is recognised that the seasonal influx of visitors has an impact upon workload as regards new businesses opening up, changes of ownership, officer travel time/leave and additional complaints generated.
- 2.4.6** Inspections are carried out in accordance with risk based criteria which are detailed in Codes of Practice issued by the Food Standards Agency and it is quite clear that available resources must be directed first and foremost to our proactive inspection programme, however, the volume of reactive work is still present and proposals by the Food Standards Agency with effect from 2008 will be requiring a revised intervention strategy for local authority work. This is currently subject to consultation but is likely to include an amendment of the current Codes of Practice to introduce interventions and allow for the new approach to food law enforcement giving local authorities flexibility to focus resources at high risk premises and use different interventions to drive

up compliance. These are likely to include 'scores on doors', food awards and an extension to the alternative enforcement strategy for lower risk premises. There will be output and outcome focused and monitored using new Best Value Performance Indicators and other Food Standards Agency strategies.

- 2.4.7** With the success of the Council's bid in partnership with Teignbridge District Council for the funding of the Safer Food Better Business project, (see paragraph 2.4.10 below), we were able to backfill some of our inspection programme by the use of a contractor and made up for a shortfall in our inspections due to the demands of the project, and staff sickness and maternity leave. However, there are limitations on the use of contractors and we consider that the local delivery of the service should be via a local team.
- 2.4.8** In previous years we have successfully operated the Chartered Institute of Environmental Health Intermediate Certificate in Food Hygiene for food business managers/operators. In addition, we seek to embrace the annual National Food Safety week initiative which promotes food safety work amongst businesses and the general public. Unfortunately, due to other demands we have been unable to deliver these projects recently.
- 2.4.9** We are still able to operate the Junior Life Skills project each October and, although not targeted at food businesses, it does create greater hygiene awareness in the local community particularly in our schools at the Year 5/6 age group. Subject to funding and commitment of all the partners, we intend to continue with this initiative each year. This project also meets a Food Standards Agency target of 'helping children learn about food hygiene'.
- 2.4.10** Given the new legal requirement with effect from January 2006 for all food businesses to have a documented food safety management system based on HACCP (Hazard Analysis Critical Control Point) principles, this has increased our inspection and administration time with businesses. In 2005 we were fortunate to gain a successful bid in partnership with Teignbridge District Council to implement the Safer Food Better Business (SFBB) toolkit developed by the Food Standards Agency along with its various partners which helps small catering businesses comply with the new legal requirements. The national picture has been mirrored locally with the interest in take up of this toolkit and we have been heavily involved in its promotion and implementation both as part of, and outside, the funded project. This project concluded in September 2007.
- 2.4.11** Due to our willingness to provide advice/guidance to business, there remains a demand for greater input with food safety initiatives and this is likely to increase due to changes in approach by the Food Standards Agency indicated above. Advice and guidance will be given in circumstances where resources can be most efficiently used. (See also paragraph 3.4.1).

- 2.4.12** Again due to the approach of the Food Standards Agency in dealing with food alerts (formerly food hazard warnings) and now the new food allergy alert system the number of electronic notifications is likely to increase dramatically. 60 notifications were received 2006/2007 however, not all these notifications require prompt action but they do require scrutiny and logging.
- 2.4.13** The number of food poisoning outbreaks fortunately has been minimal, and those occurring have been viral in nature and confined to institutions and whilst we have a role in management, they have not been food related, however, the individual number of notifications of food poisoning/infectious diseases remains static at around 250 per annum. There has been a marked increase in the number of notifications of zoonotic infections, mainly as a result of the upsurge in TB in cattle which has ramifications for milk quality and its acceptance onto the market. There is always the potential for a serious food safety incident to arise such as Ecoli 0157 as was witnessed in Lanarkshire in 1996 and more latterly in Bridgend. We must therefore ensure that we are capable and manage our resources to be able to meet any such local challenges.
- 2.4.14** As part of our Service, food export certificates are issued to businesses in order to provide documentation which satisfies the Government of the importing Country that the incoming product is safe. 220 certificates were issued in 2006-2007. Many of these are required at very short notice in order to meet the needs of business. This service creates an immediate demand at the expense of other food safety functions.
- 2.4.15** Previous requirements for licensing of certain butchers shops engaging in the handling of raw meat and ready to eat foods have been revoked. This has also resulted in a loss of revenue. New requirements imposed this year require all butchers premises to be authorised where specified risk material (certain parts of carcasses) is removed at their premises rather than at the slaughterhouse or cutting plant as part of the BSE control system. Butchers without this written authorisation and signing up to the 'Recommended Method of Operation' will not be able to receive their meat supply. This requirement applies to cattle between 24 and 30 months old and has required greater demands on service and further checks as part of the routine inspection process. Approximately 15 butchers are authorised. This is not a chargeable service.
- 2.4.16** Shellfish registration documents are issued permitting the gathering of shellfish by persons at designated sites. Approximately 150 per annum are issued. Whilst this is a statutory service, again, it is not chargeable.
- 2.4.17** Certificates for the voluntary surrender of unfit food continue to be issued to businesses usually following the breakdown of refrigeration/freezer equipment, although in recent years this has shown a reduction. Certificates are issued after inspection of the affected foodstuffs. These do not have

significant resource implications as the service is used very infrequently. This is a chargeable service and currently, the cost of each certificate is £80.

2.4.18 Reactive work involving visits carried out to advice on particular aspects of food safety continue to detract from inspections. This demand is detailed in paragraph 3.4.

2.4.19 Our current premises profile is set out in paragraph 3.1.5 although this will change from year to year as businesses close or open or change business practice.

2.4.20 With effect from 1st July 2007 all enclosed workplaces and places used by the public (with some minor exceptions) will be smoke free. Paragraph 2.3.2 provides general information about the other demands on the service, however, with the passing of these new laws, the Council's Environmental Health Service and significantly their Commercial Division will have the principal enforcement responsibility for this work which is seen as a major public health intervention. These laws apply to all premises and places and not those historically allocated to local authorities for enforcement. The volume of this additional work is difficult to quantify, however, by utilising a high profile public and business campaign supporting the national campaign and by having a high profile at the outset using additional specific funding provided by Government, we expect to achieve compliance. Ongoing assessment of compliance will now form part of every visit to those premises for which we have enforcement responsibility. A separate policy has been adopted for our enforcement of the smoke free laws.

2.5 Enforcement Policy

2.5.1 South Hams District Council's approach to enforcement reflects the responsibilities placed upon it by the Food Safety Act 1990 and the Food Hygiene (England) Regulations 2006 and the range of powers make available, including regulations and also codes of practice issued by the Food Standards Agency. The primary responsibility for ensuring food safety lies with proprietors of food businesses however, the Council views co-operation with proprietors and others who have duties under the laws as the best way of achieving compliance with them. The Council also takes into account various Industry Guides to Good Hygiene Practice and guidance issued by LACORS when assessing compliance

2.5.2 It is South Hams District Council's policy that enforcement action, be it verbal warnings, the issue of written warnings, statutory notices, or prosecutions, is primarily based upon an assessment of risk to public health and the seriousness of any alleged offence. Where we take legal proceedings, we adopt the Code for Crown Prosecutors issued by the Crown Prosecution Service.

2.5.3 The Council endorses and fully supports the Principles of Good Enforcement as set out in the Enforcement Concordat published by the Cabinet Office in March 1998. The Council formally adopted the Concordat at the meeting of the Environment and Health Committee on 23 July 1998. The Council also endorses the European Convention on Human Rights now enacted into UK law.

2.5.4 The Council has a documented food safety enforcement policy adopted in May 2002 and reviewed in January 2006 and all decisions on enforcement action will be taken following the consideration of the Policy. This links to the Environmental Health Services general approach to enforcement. We also have a separate policy when dealing with food complaints (see paragraph 3.2.4).

2.6 Avoiding Conflicts of Interest

Officers employed by the Service are aware of the need to be impartial and free from conflict of interest relating to their functions i. e. training provision, any interest in businesses and contract work.

Section 3 Service Delivery

3.1 Food Premises Inspections

3.1.2 The Council aims to visit and inspect premises for which it has enforcement responsibility on a routine basis. However, in view of the number of premises and the resources available, it is not practicable, and not desirable to inspect all premises at the same frequency. In line with the Food Standards Agency Code of Practice the frequency of inspection is based on the level of risk existing at each premise. The emphasis for inspection will be placed on premises where the level of risk is perceived to be highest. The Council has adopted the Food Standards Agency risk based inspection guidance.

3.1.3 For the lowest risk premises the Agency has allowed for an alternative enforcement strategy to be adopted which removes many of these type of premises (typically, premises selling shelf stable wrapped food, or those handling open low risk food such as fruit and vegetables) from the inspection programme. (Although these premises will receive an initial visit following registration and other occasional visits as necessary). The strategy adopted by this Council (in common with many other local authorities) is to subject these premises to a self-assessment questionnaire and to follow up as appropriate. This strategy is revised for these premises every 3 years. There are currently proposals by the FSA to review this whole approach.

3.1.4 In accordance with the legal requirements, the Council maintains a register of food premises. There are in excess of 1300 premises registered although

this figure does fluctuate due to businesses closing and new ones opening. All applications for registration or approval of premises within the South Hams area will be processed and in accordance with internal procedures.

- 3.1.5** The profile of food premises within the South Hams is as given in 2.4. This is in addition to the 'approved' premises detailed in paragraphs 2.4.2 and 2.4.3 which are subject to a different and more robust inspection programme.

Risk Rating Profile

Inspection Frequency	6 month	12 month	18 month	24 month	36 month
No. of premises	14	136	597	106	376

Premises Type Profile

Premises Type	Primary Producers	Manu facturers	Packers	Distributors	Retailers	Caterers	Manufs. mainly selling retail
No. of prems	26	45	4	20	292	832	10

- 3.1.6** For 2007-2008 the high risk inspection programme expects 96% achievement of the 522 programmed inspections as part of the Council's performance indicators.

- 3.1.7** Given the inspections falling within our programme by virtue of the risk rating scheme, new premises inspections and other visits to food businesses at total of 1700 visits were made last year. Inspections, where necessary, will be undertaken out of the Council's normal working hours when a particular business is operating. Re-visits/re-inspections are determined by conditions found on the initial inspection and are not be necessary in many cases. These 'secondary' inspections are carried out dependant upon the risk to food safety and the seriousness of the breach noted on the initial (primary) inspection. It is anticipated that between 100 and 200 re-visits will be made per annum to assess compliance. The progress being made with the inspection programme is reviewed every 3 months as part of our internal procedures and the Council's performance indicators are calculated accordingly.

- 3.1.8** The following table sets out the Council's past performance in food premises risk related inspections and due to the proposed changes by the Food Standards Agency it will not be able to accurately predict the expectations for 2008-2009. The following table reflects the percentage of inspections achieved against target for the particular year. They do not include other visits and those new premises visits arising within the year. * The 36 month category premises now fall to the alternative enforcement strategy.

Category of Premises	Months	2004/05	2005/06	2006/07	2007/08 est.
	6	11	7	6	14
	12	83	74	112	136
	18	344	335	344	372
	24	60	42	64	56
	36	59	12	0*	0*

3.1.9 In order to undertake this work (and other work assigned to the Commercial team) the human resources shown in organisational structure (see para 2.2 and Appendix A) are provided.

3.1.10 The Council is confident that outside resources such as Food Examiners, Food Analysts and others such as Proper Officers for Communicable Disease Control are readily available and accessible. We have an annual Service Level Agreement with the Food, Water and Environmental Laboratory and, due to the infrequent use of the Public Analysts Laboratory an SLA considered inappropriate.

3.1.11 The Council will ensure that officers engaged in food safety work are appointed and authorised within their competency and ability and that they are appropriately trained and experienced and, this is particularly so in respect of our high risk processes. Authorisation and training are subject to procedural documents. These are in addition to our Investors in People Appraisal Scheme.

3.2 Food Complaints.

3.2.1 Investigation into complaints about food will be commenced within 24 hours of receipt, and will reflect the relevant risk posed and condition of the food.

3.2.2 The Council will liaise with the Home and/or Originating Authority regarding matters associated with the particular company's policies or procedures. The Council will have regard to information/advice received as a result of any such liaison and will advise Home or Originating Authorities of the outcome of enquiries. (See also 3.3).

3.2.3 A number of complaints are received each year about food purchased within the district and about premises or practices within. It is anticipated that there will be little increase in service demand in this particular area. The following table sets out the profile of complaints received.

2004/05	2005/06	2006/07	2007/08 est.
333	138	90	90

3.2.4 Our Food Complaints Policy has been published which was approved in September 2002 and amended to include changes in legislation in 2007.

This sets out what we will and what we will not action. Also an internal procedural document has been issued specifically relating to Food Complaints.

3.3 Home Authority Principle

3.3.1 South Hams District Council has embraced the Home Authority Principle (Council Minute HS33/94 refers). Despite contact being made with a number of local businesses, there has been no request to the Council for partnership, although we remain open to approach and promote the initiative where appropriate. In the event of an approach being made, it is anticipated that this will place an additional burden on resources, certainly during the initial stages. Whilst no formal agreement has been entered into with business we will continue to work in accordance with the Principle on an informal basis as this has worked well in the past. (The Home Authority Principle allows for a partnership to be entered into between a local authority and a food business having regional/national impact so that a co-ordinated approach can be taken about enforcement).

3.4 Advice to Businesses

3.4.1 The Service supports the Council's Objective to maintain and enhance the prosperity of business, and accepts the need to provide advice to businesses both prior to setting up a venture and at any time the business is in operation. Advice to businesses and individuals detracts from the food safety inspection programme but we recognise that a balance needs to be drawn between the benefits to the business and cost to the Council. An assessment is made as to which is the most effective use of Council resources. Time spent giving advice to businesses at the outset can make a saving at a subsequent inspection. Dependant upon the nature of advice required, unless requested during the course of a visit, advice will initially be provided via telephone or postal system, mail shots or press releases. Only where it is deemed necessary to visit in the best interest of the business and the consumer, or a where it is expedient to the Service, will advice be given on site as a special visit. Advisory visits to food manufacturers (particularly those approved) is common and allows for better administration of the Council's approval process and reduces the burden on business.

3.4.2 Business advice is also likely to be part of the Food Standards Agency review of food law enforcement and, as a result we are examining the information and guidance available on the Council's website. A wide range of guidance literature is always readily available in hard copy in the office and we can readily signpost businesses/individuals to other information sources. Our profile is as follows and reflects all food related service requests:

Requests for Advice

2004/05	2005/06	2006/07	2007/08 est.
106	87	67	70

3.4.3 We will review our advice strategy throughout this year and identify what additional resources are needed and identify various ways of providing advice so as to meet our service demands and the requirements of the Food Standards Agency and we will also continue to seek to work with all our partners both internally and externally to ensure that the most accurate advice is given in the most appropriate manner.

3.5 Food Inspection and Sampling.

3.5.1 We have published our approved Food Sampling Policy and our food-sampling programme is operated each year. This reflects the nationally required programmes, our statutory requirements under specific regulations and requirements of the Food Standards Agency. Local initiatives and local products are also included. The programme incorporates any work following liaison with the Devon Food Liaison Group or LACORS (Local Authorities Coordinators of Regulatory Services) and the local laboratory.

3.5.2 Reactive sampling takes place as a result of food poisoning investigations or complaints received. It is anticipated that sampling levels for complaints will remain static but our proactive programme will be somewhat underachieved due to resources available. The Council's statutory role as regards shellfish harvesting area sampling and toxic algae monitoring programmes will remain unaffected as resources are appropriately allocated, however, enhanced monitoring required this year by Government as regards toxic algae will create a considerable additional burden at the expense of the normal food sampling work. Only one or two samples are submitted to the public analyst each year following food complaints and these are separate chargeable items.

3.5.3 Arrangements under the Service Level Agreement with the local Food, Water and Environmental Laboratory allow our sampling programme to operate by a mechanism of 'credit' values and the more complex the examination or type of food sample, the greater the credit utilisation. This is a non-chargeable service under the auspices of the Health Protection Agency. In the event of the allocation being exceeded, charges will be made. To date, the Council has not exceeded its allowance and, by careful management with other participating neighbouring authorities to the laboratory, credit utilisation permits all the local authorities to fulfil their programmes. New measures introduced have increased the credit value for various tests and,

under utilisation of the allocation may result in charging for wasted resources. This will be kept under careful scrutiny.

3.5.4 The shellfish harvesting monitoring programme falls outside any credit scheme and cost of this, both in officer time and finance continues to be a drain on resources. Examination of the samples is undertaken by the CEFAS laboratory (Centre for the Environment, Fisheries and Agriculture Science), a Government Agency.

3.5.5 The profile for food samples is as follows:

2004/05	2005/06	2006/07	2007/08 est.
84	111	172	140

These figures do not include shellfish harvesting area monitoring which necessitates 144 samples per annum and, in respect of the algal toxin monitoring programme for shellfish, a further 100 samples are taken. This increases where action levels in results are exceeded.

3.6 Control and Investigation of Outbreaks and Food related Infectious disease.

3.6.1 A procedural document gives specific guidance on this issue and links in with the Outbreak Communicable Disease Control Plan developed by the Devon Health Protection Unit of the Health Protection Agency.

3.6.2 The profile for notifications of infectious diseases, food poisoning and zoonoses is as follows:

	2004/05	2005/06	2006/07	2007/08 est.
No. of Notifications – all infections	276	356	341	390

The number of notifications of zoonotic infections (i.e. those infections transmissible between animals and humans) has increased and this is principally due to TB in cattle.

3.6.3 The Service undertakes to commence investigation where appropriate of all relevant notified or suspected cases of food poisoning and infectious diseases within 24 hours and to investigate all notified cases of zoonoses within 72 hours. However, in the case of outbreaks or infections of high significance we will commence our enquiries immediately. Current systems in place and resources available permit this target to be met, although this may be at the expense of other proactive work. (See also paragraph 2.4.13)

3.7 Food Safety Incidents

3.7.1 South Hams District Council recognises that an immediate initial response is necessary to all food alerts received from the Food Standards Agency. In accordance with Food Standards Agency Code of Practice, appropriate action is taken dependant upon the category of notification, i.e. 'For Action' or 'For Information'. These have shown a yearly increase – See also 2.4 'Demands'. Figures for notifications are as follows:

2004/05	2005/06	2006/07	2007/08 est.
74	100	60	130

3.7.2 Ad hoc notifications have an immediate resource implication, however, the Council is satisfied that adequate resources can be made available but at the detriment of other food safety services.

3.7.3 The Council has an out-of-hours emergency service whereby food safety incidents can be acted upon where necessary.

3.7.4 With the advent of allergy alerts being notified by the Food Standards Agency this year our workload will increase. The Council has the capability of receiving food hazard warnings by fax, e-mail, mobile phone, access to the FSA and LACORS website and BT Connect.

3.7.5 A documented procedure for responding to food safety incidents is in place.

3.8 Liaison with Other Organisations

3.8.1 The Council's Food Safety Service is represented and actively participates in the Devon Food Liaison Group where topical issues of mutual concern and policy/procedural matters are debated. Formal meetings are held every six weeks and specialist officer working groups are set up to consider particular issues who then report back to the main group. Ad hoc meetings are held where necessary to consider emerging and urgent issues so as to ensure a common approach and understanding. The Group also liaises with similar groups in Somerset and Cornwall.

3.8.1.1 The sub group provides a framework for various policies and procedures which in turn are implemented into the Council's documented system dependant upon local circumstances. These relate in the main to the requirements of the Food Standards Agency or Health Protection Agency.

3.8.1.2 The core of the Food Safety Liaison Group comprises of food safety lead officers in other Devon Local Authorities, Food Water and Environmental Laboratories (Plymouth and Exeter), Devon Trading Standards, Health Protection Agency, Food Standards Agency and Meat Hygiene Services.

3.8.2 The Council is also represented on:

- Devon Health Protection Advisory Group
- Devon and Cornwall Zoonosis Liaison Group
- Food, Water and Environmental Laboratory/ EHO Liaison Group (Plymouth)
- Devon Shellfish Liaison Committee

3.8.3 Additionally, officers attend Branch and Centre meetings of the Chartered Institute of Environmental Health and seek to maintain their CPD credit status as members of their professional bodies.

3.8.4 Officers maintain regular working contact and have good liaison with the Health Protection Agency, Devon County Council Trading Standards, Food Water and Environment laboratory, Food Standards Agency, LACORS, CEFAS, DEFRA, Environment Agency, South West Water, Devon Sea Fisheries officers on day to day issues. The Service has good internal liaison with all other Council Services.

3.8.5 The Food Safety Service recognises along with all other services, the need to be cost effective and deliver their service in an efficient manner. We also need to look forward to the 'bigger picture' in service delivery and partners who can assist this objective. There is a need not only to move forward with the changes proposed with the new interventions by the Food Standards Agency but also strategic partnerships on larger public health and health promotion initiatives.

3.8.5.1 By working in partnership we will be able to participate more fully in meeting the Food Standards Agency key aims in reducing food borne illness and also eating for health and make it easier for consumers to choose a healthy diet and improve their quality of life by reducing diet related disease. We will also be able to respond more easily to those emerging technologies raising food safety concerns and meeting the challenges of shared training and knowledge.

3.8.5.2 We also seek to work in accordance with the Food Regulation Statement of Intent 'Strengthening the Central/Local Government Partnership' (March 2007) between the Food Standards Agency, LACORS and Local Government Association.

3.8.6 We benchmarked our Service as part of our Fundamental Service Review in 2002 and have subsequently benchmarked our service in various related service areas within our benchmarking group and other local authorities. We have performed favourably and seek to improve where the opportunity arises.

3.8.6.1 We have performed favourably in many areas, although it has proved difficult to ensure that we have operated on a level playing field and that identical criteria are used by all participating local authorities so as to demonstrate an accurate exercise and meaningful results which reflect the true picture.

3.8.7 Over recent years we have forged close links with Teignbridge District Council in the delivery of our services and this has been particularly successful with the Safer Food Better Business project. This year we will explore ways of also working with West Devon Borough Council to the mutual benefit.

3.8.8 In addition, given that the Food Standards Agency now has regional representation at Government Office South West, there are further opportunities of working with a national government agency at a more local level and in particular we seek to work within the framework of the Local Area Agreement initiative introduced by Government.

3.9 Food safety promotion

3.9.1 The Council recognises the contribution that health promotion makes to food safety and the merits in providing training and support to business. The Council is a Registered Centre for the Chartered Institute of Environmental Health Foundation Certificate and Intermediate Food Hygiene Certificate in Food Hygiene courses and many of our food safety team are registered trainers for these courses.

3.9.2 Due to available resources, the Council does not currently undertake food hygiene training instead, the need is met by other local authorities, private enterprises and Community Colleges. We participate in National Food Safety Week in May/June as a partnership venture where we are able. This links with the local community and business sectors. Officers do, when time permits, provide talks to local interest groups or specific business sectors.

3.9.3 Paragraph 2.4.10 refers to Safer Food Better Business initiative and this provided the opportunity to work in partnership with Teignbridge District Council. This project has again allowed us to work with our local small food businesses by providing a mechanism for training and coaching to assist compliance with the new legal requirement. All relevant small catering businesses were approached across both districts in the expectation that they would take an opportunity of attending one of the 60 planned workshops. The project plan was approved by the Food Standards Agency and funding of £79,000 was awarded. The project concluded in September 2007 with the evaluation report. In total across both districts 421 businesses and 640 participants attended the workshops with a further 127 businesses opting for individual coaching sessions following the workshops. We are

currently seeking funding to operate the project specifically with out ethnic minority caterers.

3.9.4 Whilst food safety promotion is a requirement of the Food Standards Agency we will look at the best use of our resources. Working in partnership with other local authorities (principally West Devon Borough Council and Teignbridge District Council) we are to explore better ways of delivery of health promotion and the wider public health agenda. This is hoped to include the Food Standards Agency aims in responding to a changing world where trend about eating convenience foods and eating out more frequently are now common. This has associated problems with the increase in poor diets, availability of choice of healthy food options. In addition we seek to look at ways of ensuring that today's consumer preparing food at home and promote awareness of key steps everyone needs to take to ensure the safety of their food. Clearly without partnership working and effective planning we will not have the necessary resources to deliver food safety or health promotion expectations.

3.10 Statistical returns

3.10.1 We seek to ensure that accurate statistical returns are made to the appropriate Government body i.e. Food Standards Agency in a timely manner.

3.11 Imported Food Control

3.11.1 The Food Safety Service has the necessary arrangement in place to deal with imported food. Relevant officers have received the training by the Food Standards Agency and authorised to act in the event of illegally imported food being identified. The Service's Sampling Plan and inspection procedures reflect the need to maintain imported food controls.

Section 4 Resources

4.1 Financial Allocation

Details are shown in 'Appendix B'

4.1.1 There is no separately identifiable sampling budget for the food safety service except that a core budget of £4,000 is provided so as to fulfil our statutory shellfish sampling role, although due to increased costs and further sampling demands the budget is exceeded. The cost of the microbiological examination of food is carried out by a system of credit allocation based upon our sampling performance in 1991/92 and costs are met by Central Funds, see paragraph 3.5.

4.1.2 In the event of successful legal proceedings being taken, the Council endeavours to recover all costs from the defendant where possible. No separately identifiable budget within the Environmental Health Service is provided for legal action. Resources are provided within the corporate budget.

4.2 Staffing Allocation

4.2.1 This Service Plan recognises the need for staff engaged in food safety issues to be adequately trained and competent (see para. 3.1). It also has been stated that the team providing the food safety service also undertakes various other functions (see para. 2.3).

4.2.2 Details of the food safety human resources are detailed in para. 2.2 (Appendix A). From the total resource it is estimated that current staff input is approximately 4.5 FTE into actual food safety inspection work. This includes management input. It is recognised that this is a considerable proportion of the overall establishment and that other non-food safety work such as health and safety enforcement might not always receive the necessary priority, however, where there is a need to react to a health and safety (or other intervention), resources are transferred from the food safety function).

4.2.3 All Environmental Health Officers hold either the Diploma or Degree in Environmental Health supplemented by additional subject specific training or qualifications. Two Technical Officers hold the Chartered Institute of Environmental Health Higher Certificate in Food Premises Inspection whilst one has the Ordinary Certificate in Food Premises Inspection. Again further training is provided to supplement these qualifications though the most appropriate training is not always available locally. The Council is satisfied that staff are appropriately trained and competent in accordance with the Food Standards Agency Code of Practice. This is subject to internal procedures retraining, authorisation and quality monitoring.

4.3 Staff Development Plan

4.3.1 The Council has been awarded IIP status and operates an appraisal system. Individual work plans are produced which also seek to develop professional expertise. Additionally, team meetings are held which may highlight the need for training in particular areas. This training is provided where both the mutual needs of the individual officer and the Council are met.

4.3.2 Inspection staff are actively encouraged to attend training courses so as to enhance competency in specialist areas. This has been achieved with respect to HACCP evaluation, shellfish, milk pasteurisation, cheese making, canning and aseptic packaging, food factory enforcement, butchers' shop licensing, Police and Criminal Evidence Act, imported food enforcement and

ISO 9000 Lead Auditor. Records of staff training and appraisals/core competencies are kept as required by the framework agreement on Local Authority Food Law Enforcement issued by the Food Standards Agency. Assessment of competency is on-going and forms part of a quality monitoring process.

4.3.3 The Council is committed to ensuring Environmental Health Officers are able to meet their CPD training requirement and this includes at least 10 hours per year for food safety. All staff are trained to a high standard linked to their level of authorisation and training records show very few shortcomings.

4.3.4 Whilst an ideal objective would be for all members of the food safety team to be trained in all subject areas, it is recognised that this is not necessary on a day to day basis because one or more officers have received specific training in particular fields e.g. dairy products, shellfish etc. they are viewed as the specialist or expert in that field. Accordingly, that knowledge is put into effect by targeting specific inspections/complaints to that officer and also ensures that other officers use their particular specialism as a reference source. However, we are mindful to ensure that a balance is struck so that expertise is available to the Team at times of leave and sickness etc and that other staff do not become 'deskilled'. With the proposal for partnership working, we should be able to seek the assistance of other local authorities, and be able in turn to provide our own services where a need is demonstrated and achieve a 'best of both' situation.

Section 5 Quality Assessment

5.1 Quality Assessment

South Hams District Council seeks to ensure that a quality service is provided so as to achieve its aims and objectives. These needs are met by internal quality assessment of written work completed, auditing against this Service Plan, our performance plans, individual work plans, peer review and other documented procedures. A monitoring programme for the quality of inspections in accordance with the Food Standards Agency Code of Practice is in operation.

5.2 Auditing

In addition to internal monitoring, the Council's food safety service embraces inter-authority auditing as a measure of quality performance with other authorities within Devon. A round of audits has been completed which included inspections, complaints, authorisations, training, hazard warnings, infectious diseases and sampling. This exercise is to be repeated in line with the Food Standards Agency requirements and a programme will be drawn up during the year with other Devon local authorities.

Section 6 Review

6.1 Review Against Service Plan

The Environmental Health Service Plan is subject to scrutiny and includes performance relevant to food safety. The key target is for high risk premises inspections (see paragraph 3.1.6). This is reported on a quarterly basis.

6.2 Identification of any Variation from the Service Plan

Statistical data is available for the interim years and much is reported within this Plan. There have been changes to food law enforcement over past years but in the main we have been able to reach our inspection target (although this becomes increasingly difficult). The number of complaints and service requests has decreased but the amount of administration has increased to meet the demands of the organisation and the Food Standards Agency.

The premises profile has altered due to 'approved' premises being taken from the routine programme and subject to an alternative and more stringent programme.

Additionally, there has been a change to the number of high risk premises requiring an annual inspection due to changes in the Food Standards Agency risk rating scheme. However, low risk premises have been taken from the programme and subject to an alternative enforcement strategy. This takes the form of a self-assessment questionnaire. This approach is part of the FSA review coming into effect in 2008.

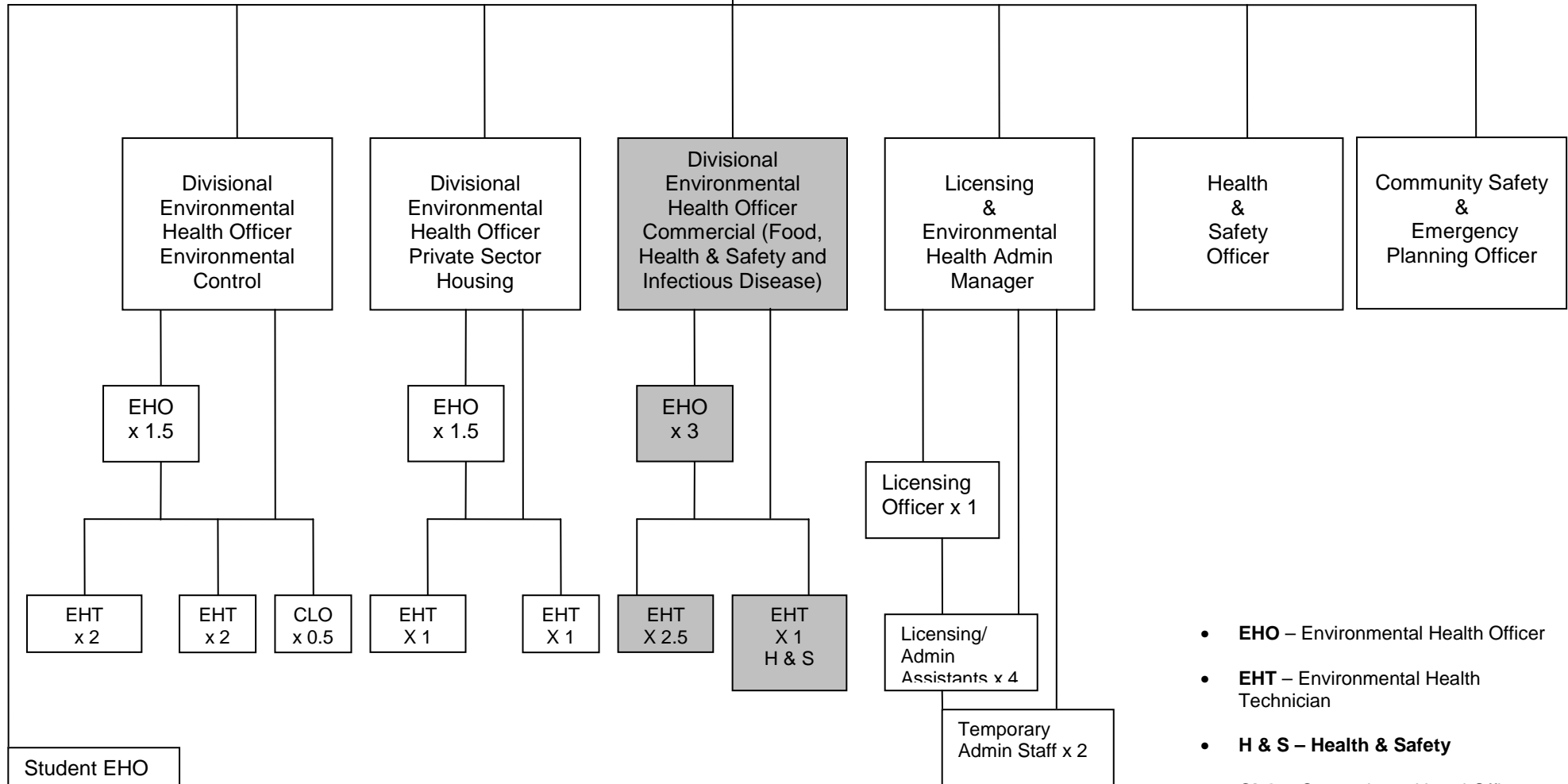
6.3 Areas for Improvement and Future Development

- Develop where necessary with partners, the agenda for health promotion and the wider public health agenda linking where possible to Local Area Agreements.
- Develop more fully the alternative strategy for low risk premises
- Identify areas for shared services and partnership working in connection with the food safety service.
- Develop a strategy with other Devon local authorities in accordance with the Audit Commission's guidelines for Key Lines of Enquiry for service inspections so as to respond to and support community needs.
- Examine how we work with our customers to ensure that we can continue to provide a good service and embrace the 'Customer First' scheme and

the 'Towards Excellence Plan' as part of the continuous improvement process.

- Continue to benchmark with other similar local authorities but ensure that clear and comparable criteria are used so as to be meaningful and reliable.

The Service Plan will be reviewed annually by the Head of Service to take into account the needs and aspirations of internal and external stakeholders, changes in levels of service, new legislative requirements and directions from Government. Review of the Service plan is subject to Member approval.



- **EHO** – Environmental Health Officer
- **EHT** – Environmental Health Technician
- **H & S** – Health & Safety
- **CLO** – Contaminated Land Officer

Environmental Services: ENVIRONMENTAL HEALTH - FOOD SAFETY

APPENDIX B

Cost Code: CJ

Head: I Bollans

REVENUE BUDGET 2007/2008

Actual 2005/06		Estimate 2006/2007 (At Nov.05 Prices) £	Estimate 2007/2008 (At Nov.06 Prices) £
£			
208,400	Employees - Headquarters	204,200	209,900
4,116	Supplies & Services	4,200	4,200
5,900	Support Services	5,800	11,000
17,000	FRS 17	-	18,900
235,416	TOTAL EXPENDITURE	214,200	244,000
(395)	Income	-	-
235,021	NET TOTAL COST OF SERVICE	214,200	244,000

MAIN VARIATIONS

2007/2008 Estimate compared to that of 2006/2007

	Inflation £	Growth £	£
2006/2007 Budget provision brought forward			214,200
Employees - Headquarters	5,700		
Supplies & Services			
Support Services	200		
- review of allocations		5,000	
FRS 17 - revised accounting treatment		18,900	
	5,900	23,900	29,800
TOTAL ESTIMATED NET COST OF SERVICE 2007/2008			<u>244,000</u>