

# **BABERGH DISTRICT COUNCIL**

## ***FOOD SERVICE PLAN***

***2005/2006***

### **1. INTRODUCTION**

- 1.1 The Government has directed that local authorities should adopt a balanced approach to enforcement. The principles are outlined in the Enforcement Concordat, which is supported by the Council. The Food Standards Agency has issued guidance on how local authorities can achieve a balanced enforcement approach through the issue of Food Safety Service Plans. Each Service Plan must contain details of the food service the Council provides: how those services are delivered; how performance standards are achieved; and it should also include a performance review mechanism.
- 1.2 This document addresses the requirements laid down in the Food Standards Agency's Framework Agreement on Food Law Enforcement to produce a Food Safety Service Plan. It covers all aspects of food safety enforcement within the Babergh Council area.
- 1.3 This is the fourth annual Food Service Plan submitted to the Council as required by the Food Standards Agency. It contains details of the progress made since 2002/2003 on the initial plan approved by the Council in January 2002.

### **2. Service Aims and Objectives.**

- 2.1 The food safety service divisional objectives support the Council's vision and service priorities and are:-
  - to ensure that all food intended for human consumption that is manufactured prepared or sold in the Babergh District complies with food safety requirements;
  - to undertake programmed inspections of food businesses in accordance with Food Standards Agency guidance;
  - to advise and educate consumers, businesses and other service users on food safety matters. This will include assisting businesses to comply with legal obligations;
  - the promotion of food and health issues generally;
  - to investigate and take appropriate action on all complaints relating to food safety matters;
  - to prevent the spread of specified infectious diseases and food poisoning; to carry out a planned food sampling programme; and
  - to ensure that private water supplies such as wells and boreholes used for food production purposes are safe and comply with legal requirements.

All the above activities will be undertaken in accordance with the principles of consistency transparency, and proportionality as laid down in the Council's Enforcement Policies.

- 2.2 This plan cross-links to other plans that support the Service Priorities, including:-
  - The Council's Corporate Service Plan
  - The Environmental Services Corporate Service Plan

- The Health and Safety Service Plan
- Best Value Performance Reviews and Indicators, and Local Performance Indicators
- The Council's policies on Equal Opportunities and Race
- Health objectives of the Council's Local Strategic Partnerships and developing Community Strategies.
- Primary Care Trust Local Health Delivery Plans

### 3. Background

- 3.1 At the last census in 2001 the population of Babergh District had grown to approximately 83,500. This population is divided between 76 parishes. There are a number of areas that support light and medium industries. Apart from arable agriculture, the main food safety sector activity arises as a consequence of the large leisure and tourism industry. Food manufacture is limited to one large company and a handful of smaller producers. The largest number of businesses are involved in catering in public houses, hotels and restaurants. All food businesses are under considerable economic pressure within the community, as a result of which many are seeking to diversify.
- 3.2 Babergh Council has adopted a structure based on the "Streamlined Committee" system. Details of the structure, and the associated management structure, and details of the structure, organisation, and staffing of the Environmental Services Division are shown in Appendices 1 and 2.

### 4. Food Premises Inspections

- 4.1 Food Safety inspections are carried out in accordance with a revised Food Safety Act Code of Practice issued in October 2004 that consolidates and amends the previous 20 individual codes of practice. At the same time new Food hygiene Regulations were introduced to align UK food legislation with European Food Directives. A complete revision of the current Food Hygiene Regulations will be issued in 2005.
- 4.2 Food premises are inspected at intervals determined on their risk rating in accordance with the inspection rating system within the Food Standards Agency Code of Practice. This system rates food premises according to the type of food sold, the trading area and the overall food safety standards of the business. The frequency of inspection is dependent on the rating score obtained for each premise. The exception to the rating system is inspection of butchers, where premises are subject to an annual licence.
- 4.3 The number of premises within each risk category fluctuates to some extent but they were as follows in January 2005. Figures for 2004 in the previous report are given in brackets :-

Category A (6 month interval)	0	(5)
Category B (12 month interval)	48	(55)
Category C (18 month interval)	331	(336)
Category D (24 month interval)	130	(99)
Category E (36 month interval)	208	(201)
Category F (60 month interval)	134	(158)
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Total	851	(854)

The reduction in the numbers of higher risk categories may be attributed to improvements in awareness and food hygiene management at the premises concerned.

Premises by food category type as at 1<sup>st</sup> April 2004 were as follows.

Primary Producers	12
Slaughterhouses	4
Manufacturers	26
Packers	4
Distributors/Transporters	12
Retailers	202
Caterers	601
Manufacturers selling mainly by retail	3
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Total	864

The division undertakes about 450 routine or initial inspections every year. Each year at least 100 revisits will be required. Additional to these figures are inspections or visits undertaken because of complaints or other demands, such as food poisoning outbreaks, food safety campaigns or national alerts from the Food Standards Agency. Where appropriate some inspections are undertaken out of normal office hours. The FSA have indicated that this informal approach should be regularised, so that premises that are open for business at night should on occasions be inspected at these times even if they are open during the day. A policy of programmed out-of-hours inspections would have resource implications.

- 4.4 All inspections are carried out by competent authorised officers, qualified in accordance with the requirements of Food Safety Act Code of Practice. The original estimated allocated staffing resource for all food hygiene functions for 2003/2004 was 2.19 Full Time Equivalent (FTE) officers. For 2005/2006 this figure has increased to 2.64 FTE. The reasons for this increase are explained in Section 14 - Resources. This allocation is distributed between 4 Environmental Health Officers and 2 Technical Officers. One of the Technical Officer posts is part-time only.

## 5. Food Complaints

- 5.1 Complaints may relate to contaminated food or poor standards at food premises. They arise from members of the public, employees and other local authorities, or via a food hazard warning from the Food Standards Agency. Numbers can fluctuate, but at 89 for 2004 are more or less the same as for 2003. Complaints are investigated in accordance with LACORS (Local Authorities Co-ordinators of Regulatory Services) guidance. This level of complaint per year requires a basic 0.23 FTE staff, but again this figure will increase considerably if an individual case is considered to merit investigation for prosecution. During the year two food premises were prosecuted for food hygiene offences.

## 6. Home Authority Principle

- 6.1 The Division supports the LACORS Home and Originating Authority principle. A Home Authority acts as a single food safety contact point across the country for a given company. The responsible Home Authority is determined by a business's Head Office location. It co-ordinates the investigation of complaints across the country and also gives advice on food safety matters that affect the company's national food safety policies. An Originating Authority acts as a point of contact for food safety enforcement at a particular factory or other premises but does not advise on national procedures.
- 6.2 There are currently five companies in Babergh that fall within the Home Authority/Organising Authority scheme, so Home Authority and resource implications are minor, with a staff demand of about 0.1 FTE

## 7. Advice to Businesses

- 7.1 The Council is fully committed to advice for businesses in accordance with its main objectives. To that end, it works with businesses to provide advice on all aspects of food safety. It will help co-ordinate approaches to other relevant bodies both within the Council and outside, where appropriate. It recognises that while enforcement has a clear role, advice that achieves the same food safety ends, without compromising the Council's resources or legal position, is of great value to all concerned.

Advice routes are:

- Direct contact with businesses, existing or proposed, to assist on food safety issues and legal requirements. Simple telephone calls are not recorded but site visits are, and are actively promoted where it is felt that they would be of benefit to proprietors.
  - Provision of advice during routine inspections. The increase in emphasis on documented food safety management systems as required by the latest European Directives coming fully into force in 2006 will lead to an increase in the time taken to complete inspections. Most small businesses are unaware of the new requirements, and will need help and advice to reach compliance. The FSA has indicated they expect local authorities to put resources into this activity in the transitional period.
  - Provision of a wide range of food safety information booklets, both national and locally developed.
  - Circular letters to businesses on major new food safety topics.
  - Development and publishing of FoodWise food safety information leaflets sent to all food businesses in the district.
  - The provision of a low cost but economic and self-supporting food hygiene training service.
  - Liaison with business groups via the Suffolk Food Liaison Group, a body that co-ordinates food safety enforcement and advice across the county.
- 7.2 In 2004 31 requests for new business advice were dealt with, a small reduction on the 35 requests received in 2003. Although this number has reduced the new requirements mentioned above will increase the commitment. To allow for this, the resource requirements should be increased from the previous estimated level of 0.1 FTE to at least 0.25 FTE. However, there may be scope for some reallocation and redirection of resources explained later. It is not possible to quantify the considerable amount of time spent giving advice and information on the telephone or by e-mail.

## 8. Food Inspection and Sampling.

- 8.1 Food samples are taken in response to complaints, as part of the Council's proactive surveillance procedures for ensuring that food produced and/or sold in Babergh is safe to eat, or as part of an investigation into food poisoning outbreaks. The Council also participates in a regional sampling programme across Norfolk, Suffolk, Essex and Cambridgeshire. This programme also incorporates LACORS and European Community/Food Standards Agency national sampling demands. 186 sampling visits were made, and 226 samples taken. These figures do not include the sampling of private water supplies that are funded through a separate budget.
- 8.2 Most samples are taken for microbiological purposes. Non-microbiological samples (for example the identification of physical contaminants), are submitted to the Public Analyst.

- 8.3 Samples are taken in accordance with procedure compliant with Food Standards Agency and LACORS sampling guidance. Routine samples are taken unannounced and as customers where possible. All businesses subject to sampling are sent sample results and guidance on their interpretation.
- 8.4 Public Analyst expenses vary from year to year, but are usually about £1,200 p.a. Equipment costs are minimal.
- 8.5 Staff resources allocated to sampling should remain at 0.3 FTE for the time being

## 9. Control and Investigation of Outbreaks and Food Related Infectious Disease

- 9.1 The investigation of cases of food-related infectious disease is carried out in accordance with written local procedures based on advice agreed with the Suffolk Food Liaison Group and liaison with the Consultant in Communicable Disease Control (CCDC). Both patient and public safety concerns are taken into account and information leaflets are available. The investigation of outbreaks is covered by written procedures that incorporate the Outbreak Control Plan for Suffolk, agreed between the CCDC and Suffolk CEHOs.
- 9.2 There were no major outbreaks recorded during the year, although four potential outbreaks received an initial investigation.
- 9.3 Incidents involving the contamination of water supplies are covered by a separate plan with Anglian Water that covers their supply region.
- 9.4 During 2004 the staff participated in a programme devised by the CCDC to determine (if possible) the causes of a higher incidence of cryptosporidiosis in eastern England than the average for the rest of the country. The survey will continue into 2005/2006, and is in accordance with the aims of the Food Standards Agency Strategic Plan for 2001/2006 to reduce the incidence of food-borne illnesses.
- 9.5 144 cases of infectious disease and food related illnesses were recorded during 2004, and appropriate investigations undertaken. This shows a decrease of 18% on the figure for 2003. History suggests that at least one outbreak will usually occur each year, and an appropriate allocation must be made to cover for it. Current resource requirements include some time for exceptional events and should remain at 0.25 FTE.

## 10. Food Safety Incidents

- 10.1 Food Hazard warnings are issued by the Food Standards Agency by email and are categorised according to the action that the Food Standards Agency requires of local authorities. They are followed up in accordance with local procedures that incorporate the requirements of the Food Safety Act Code of Practice.
- 10.2 Food Hazard Warnings are intermittent and variable in number. In the year 2001 there were 53 warnings, a figure that decreased in 2002 to 28. In 2003 this figure rose again to 57, and again to 74 in 2004. The number of staff days required to deal with these matters varies greatly according to the category assigned by the Food Standards Agency and may involve extensive staff involvement where scores or hundreds of businesses are affected. A single incident could require 20 staff days (0.1 FTE) or more depending on the level of seriousness and the number of businesses potentially involved.

## 11. Liaison with other Organisations

11.1 The Council ensures that its approach to food safety is consistent with other local authorities by liaison with local authority and professional organisations. It also promotes communication with the public via local press and radio. The key bodies involved are:

- The Suffolk Food Liaison Group. Members include lead food safety officers from all Suffolk Councils, including Trading Standards. There is full-time representation from the Public Health Laboratory Service and the Meat Hygiene Service. The CCDC is also invited for relevant issues as and when they arise. This group is the principal liaison mechanism for these bodies and is overseen by the Suffolk Chief EHOs' Group, to whom it reports.
- The Eastern Region Co-ordinated Food Sampling Group establishes the sampling programme and procedures for East Anglia, as well as disseminating sample result summaries.
- Chartered Institute of Environmental Health forums and meetings on food safety that all food safety staff are actively encouraged to attend.
- LACORS and Food Standards Agency briefings and updates attended by the section manager and/or the Lead Food Safety Officer.
- Liaison with Suffolk West and Central Suffolk Primary Care Trusts' public health divisions as appropriate.
- Direct mail to businesses on food safety topics.

11.2 Resources required for these arrangements are at least 25 days per year staff time or 0.12 FTE.

## 12. Food Safety Promotion

12.1 The Council provides and promotes the CIEH Foundation and Intermediate Certificates in Food Hygiene for food business staff.

12.2 The Council participates in National Food Safety Weeks promoted by the FSA. These events often receive extensive coverage in the local press. The section will continue to develop this activity, and will participate in the campaign again in 2005.

12.3 Food safety information on the Council's website was reviewed and updated during the year.

12.4 Two issues of the well-received FoodWise leaflet were produced and delivered to all food businesses in the district.

12.5 These activities will continue to require at least 25 days per year of staff time, or 0.12 FTE.

## 13. Imported Food Controls

13.1 New duties imposed by the Imported Food Regulations made under the European Communities Act 1972 may involve staff in the inspection and seizure of imported foods particularly from countries outside the European Community.

13.2 Appropriate staff in the Environmental Health Division have been authorised for this work.

## 14. Resources.

- 14.1 The qualified staff in the Commercial section of the Environmental Services Division consists of a section manager (who is a qualified EHO), 3 Senior EHOs, and 4 Technical officers, two of whom have the Higher Certificate in Food Premises Inspection. In addition to food control, the section carries out duties in relation to health and safety at work, internal health and safety, pollution control including private water supplies, animal welfare, infectious diseases and food poisoning, air quality management, contaminated land, and entertainment and other licensing issues. The section also provides management of the environmental health database on the department's computer system. The Administration Section assists with clerical support.
- 14.2 During the year the Council one of the Senior Environmental Health Officers left the employment of the Council. As a replacement officer was appointed fairly rapidly it was not necessary to employ a contractor to assist with inspections. Any contractor employed by the Council is required to meet the requirements of the Food Safety Act Code of Practice. In order to carry out their duties food hygiene staff are required to be qualified and to be able to demonstrate and maintain competence in accordance with FSA Code of Practice. An allowance of a minimum of 10 days or 0.05 FTE must be made for staff training in each year.
- 14.3 The staff resource requirement for **2005/2006** is estimated to be **2.64 FTE**. This allows for possible food prosecutions (paragraph 5.1) or food poisoning outbreaks (section 9) If no such demand arises, the allowance can be easily absorbed into the additional activity required for the anticipated increase in inspection time/business advice during the transitional period on the implementation of the European Directives. (See paragraph 7.1 above). These figures do not take into account any additional resources required to implement a programme of out-of-hours inspections in accordance with the FSA guidance.
- 14.4 These resource allocations indicate a steady increase in personnel resources devoted to this function from 2.16 FTE in 2002/2003. This is because the previously allocated resources did not take into account capacity needed for emergencies such as a major food poisoning incident, or a national food hazard warning involving extensive groundwork. A further increase will probably be needed in 2006/2007 when the requirements relating to food safety management systems (Paragraph 7.1) become imperative. The detailed procedural requirements of the FSA Framework Agreement are constantly being updated and amended. In spite of this, progress has been made on the implementation of the Action Plan. The proposed Business Support Officer (when approved) would free up some further time from existing officers.
- 14.5 The estimated total cost of the food enforcement function for the year 1 April 2004 to 31 March 2005 is £132,600. The total I.T. recharge for the Commercial Section of Environmental Services Division (which includes the food safety enforcement function) will be approximately £23,700.
- 14.6 Legal action is taken whenever necessary. During the year 2 prosecutions of food businesses were undertaken in relation to food hygiene offences. There is no specific budget for legal action within the food hygiene service estimates as this has been taken back into the Legal Services Business Unit at their request.
- 14.7 A sum of £500 has been allocated in the 2005/2006 estimates to support all Health Promotion activities.

- 14.8 All staff are interviewed twice yearly as part of the Council's appraisal and performance related pay schemes. During these appraisals any special training needs are highlighted and included in each staff member's development plan. The Council is ensuring that each member of the food enforcement team receives at least ten hours of update training as required by the Food Standards Agency each year to maintain and improve competency levels.

## 15. Quality Control and Review.

- 15.1 The following monitoring arrangements are in place to assist in the quality assessment of the work being carried out:
- Review by the section manager of all post-inspection paperwork including Hazard Analysis inspection sheets
  - Regular team meetings
  - Annual performance appraisal system
  - Use of questionnaires on customer satisfaction.
  - Full participation in inter-authority and peer review system operating in Suffolk.
- 15.2 Performance indicators covering response times to complaints and the level of programmed inspections form part of the Environmental Service Division's service and performance plan. This plan is subject to review annually by Council. The implications of all activities and operations referred to in this plan will be taken into account when the Divisional plan is reviewed.
- 15.3 Any service issues identified during routine performance monitoring will be recorded and an appropriate action plan to address them will be formulated and agreed with the division's Head of Service.

## 16. Action Plan 2004/2005

- 16.1 The Action Plan for 2004/2005 is given below. Progress on each item is shown in italics. Some items are of a longer term nature, and depend on the demands of external bodies over which the Council has no control.

- To publicise the existence of this Service Plan. *Plan placed on Council's website and advertised in local newspapers*
- To support health-related initiatives arising from implementation of the Community Strategies. *Support given to and participation in Smoke Free Suffolk campaign jointly with other district councils*
- To take account of and contribute to the targets in the Food Standards Agency Strategic Plan for 2001/2006. *Participation in cryptosporidium survey and provision of all statistics and information as required.*
- To increase the public awareness of the food service provided by the Council by improving the quality and quantity of information on the Council's website. *Council's website and information thereon completely revised and reviewed.*
- To produce at least one further FoodWise newsletter during the year *Done. Two further issues produced.*
- To promote Health Education and the development of schemes to promote excellence in the food trade. *Foundation level food hygiene training courses offered*

- To provide improved public consultation by carrying out satisfaction surveys and acting upon them. *Stakeholder and user satisfaction surveys carried out and contents noted. No major areas of dissatisfaction found.*
- To maintain proper document control, and to update where necessary policies and procedures. *Ongoing activity*
- To resubmit this Service Plan for review and confirmation to the Council. *Done*

## 17. ACTION PLAN 2005/2006

17.1 The Action Plan for 2005/2006 is broadly similar to that of last year. A major undertaking will be the institution of new inspection regimes and activities required by new legislation.

- To publicise the existence of this Service Plan.
- To prepare for and institute the major changes in legislation and enforcement procedures to be instituted in 2005.
- **To review the out-of-hours inspection regime.**
- To support health-related initiatives arising from implementation of the Community Strategies.
- To take account of and contribute to the targets in the Food Standards Agency Strategic Plan for 2001/2006.
- To produce at least one further FoodWise newsletter during the year.
- To maintain proper document control, and to update where necessary policies and procedures.
- To resubmit this Service Plan for review and confirmation to the Council.

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