

Food Safety Service Plan 2017-2018 Review of Plan 2016-2017

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1.0 Service Aim, Objectives, Key Tasks and Targets

1.1 Objective, Aims and Key Tasks

- To meet statutory responsibilities in respect of national and European requirements concerning official controls of food in a cost effective and responsible manner in accordance with statutory guidance.
- To encourage best practice and publish advice on Food Safety to businesses and voluntary groups.
- To discharge food safety inspection and enforcement responsibilities in accordance with the Regulators Code and the enforcement policy for Environmental Health and Licensing.
- To implement national and local food sampling programmes and to promote Food Safety.

1.2 Links to Corporate Objectives and Targets

The food inspection service is relevant to several of the current key priorities and core values.

Supporting Business and the Local Economy

By ensuring a level playing field through appropriate and proportional regulatory interventions and providing a degree of trusted technical advice in the fields of food safety, health and safety and pollution control.

Supporting our Community

By ensuring a minimum standard of hygiene in business to reduce the occurrence of ill health through food borne disease and by promoting good hygiene practice in the home.

2.0 Background

2.1 Profile of the Local Authority

The Borough of Epsom & Ewell is situated in the North East of Surrey, with an area of 3,411 hectares, of which over half is open space, particularly to the South and West. The Borough has a population of approximately 75,100 predominantly in suburban areas. There are in the region of 30,250 households in the Borough and the average household size is 2.41 people.

2.2 Organisational Structure

A chart is attached showing the structure of Housing and Community and with the elements involved in food hygiene delivery highlighted.

Specialist services, when required, are provided as follows

- (i) Public Analyst: Public Analysis Scientific Services, 28-32 Brunel Road, Westway Estate, Acton, W3 7XR
- (ii) Microbiological testing: Public Health England, Food, Water and Environmental Laboratory, Manor Farm Road, Porton Down Salisbury Wiltshire SP4 0JG

2.3 Scope of the Food Service

The Food Safety Service exists to ensure that all food produced, purchased, stored or distributed in the Borough is fit for human consumption. Delivery of the service is principally centred on the delivery of Official Controls such as inspections and audits in compliance with UK and European Union requirements followed by appropriate enforcement action as necessary. By providing this service, the Council actively contributes to the maintenance of high standards of hygiene in processes of production, preparation and sale of food throughout the Borough. Advice is given to food businesses and handlers to ensure they meet legal requirements and observe best practice designed to protect public health.

The Service also undertakes routine food sampling, a service which complements and reinforces the overall objective of protecting public health.

The Environmental Health Service, in certain circumstances, works in association with Public Health England in relation to the investigation of notifications of infectious disease and food poisoning.

In addition to programmed food hygiene inspections, and the investigation of complaints related to food and food premises other services are delivered in commercial business premises. These include health and safety interventions, infectious disease investigations and pollution emanating from premises where food is prepared, processed or sold. The full range of the environmental health service includes the varied elements of pollution control, conditions in private sector housing and other public health and public protection obligations.

2.4 Demands on the Food Service

As at April 2017 there were 503 food premises in the Borough. Of these 391 were restaurants, cafes, canteens or other caterers, and 98 were retailers. The remainder are made up of small scale producers and distributors. 157 premises fall into the high risk categories of A to C. Category A requires inspection at 6 month intervals, category B at 12 month intervals and category C at 18 month intervals in accordance with Food Safety Code of Practice issued by the Food Standards Agency. Included in the total number of businesses are 18 premises which are yet to receive an inspection as they are recently opened. Presently there are no approved establishments operating within the Borough. The service advises and inspects the in-house and external catering provision at the Derby Race meetings including the mobile traders.

Environmental Health Services is based at the Town Hall, and the service is available from 9am to 5pm Monday to Friday although a substantial proportion of premises now only open in the evening necessitating out of hours visits. In the event of a major incident or an outbreak of food poisoning, there are arrangements for contacting senior officers outside of normal office hours.

A significant proportion of catering establishments are operated by people whose first language is not English. In rare circumstances arrangements are in place for professional translation of necessary documentation and use of interpreters.

2.5 Enforcement Policy

The Environmental Health Enforcement Policy was revised in 2014 to reflect the national Regulators Code.

3.0 Service Delivery

3.1 Food Premises Inspections

Food premises are inspected in accordance with the Food Law Code of Practice (England) as published by the Food Standards Agency.

Other premises e.g. childminders are not routinely inspected other than at their request or by referral from OFSTED. The Council, in line with other Surrey local authorities have reached an agreement with OFSTED whereby any food hygiene concerns from OFSTED inspectors will be referred to the local authority for follow up.

Additional to programmed inspections, the service also carries out a proportion of revisits during the same period. These are necessary to check whether informal action has been successful, where compliance with notices needs to be assessed and where a formal request has been made by a food business operator as part of the Food Hygiene Rating Scheme.

Any significant increase in the numbers of food related complaints or incidents would place additional demands on the service. Without additional resources this demand could only be met at the expense of the premises inspection programme and/or other areas of environmental health.

3.2 Food Complaints and requests for service

Procedures exist to deal with food complaints which allows for working with Buckinghamshire and Surrey Trading Standards when necessary.

Enforcement of food safety is undertaken in accordance with the Food Safety Act 1990, EU Regulations 852/2004, the Food Safety and Hygiene (England) Regulations 2013 and associated legislation. Enforcement decisions and decisions to bring legal proceedings in appropriate cases are made in accordance with the Service's Enforcement Policy and the Scheme of Delegated Authority to Officers.

3.3 Primary Authority / Home Authority Principle

The Council is committed to the Home Authority Principle and Primary Authority principal whereby, in order to ensure consistency of enforcement, a business can form a partnership with a local authority, normally the authority where its head office exists and enforcement issues can be moderated by that authority.

Epsom & Ewell have no formal partnerships with any food business at this time.

3.4 Advice to Business

Businesses are encouraged to consult the Council's website in the first instance or else the advice displayed on the website of the Food Standards Agency. Enquiries of a specific and/or technically complex nature will normally be dealt with by telephone. However officers frequently advise business during programmed inspections.

3.5 Food Sampling

The authority undertakes planned food sampling in coordination with the Public Health England (PHE) and local initiatives.

Samples may also be submitted to the PHE laboratory or to the Public Analyst in support of food complaint investigations.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

In respect of an outbreak of food poisoning or infectious disease, procedures are set out in the Surrey Outbreak Control Plan and the Environmental Health Service will act in conjunction with PHE under the guidance of the Consultant in Communicable Disease Control (CCDC).

In 2016-2017 the Environmental Health Service received 140 notifications of infectious disease including food poisoning, actual or suspected. A small number, typically less than 5%, require investigation under the direction of the CCDC. The remainder are investigated by means of a standard letter and questionnaire sent to the patient.

One outbreak involving over 30 affected persons was eventually traced to a norovirus incident and poor cleaning standards exposing a large number of people to potential infection. This one incident involved over 60 hours of officer time.

3.7 Food Safety Incidents

Food Alerts are part of a national system of letting local authorities and consumers know about problems associated with food and, in some cases, provide details of specific action to be taken.

Where necessary a media release or high priority visits to premises are arranged.

Out of hours contact arrangements are in place whereby the Environmental Health Team Leader can be contacted by national authorities via the Mole Valley out of hours call centre.

The resource implications are very much dependent on the category of any given alert 'For Action' alerts can potentially involve a considerable amount of work contacting and inspecting food outlets, whilst 'For information' may involve less response. To date, all work relating to food alerts has been undertaken by Environmental Health Officers and resources are considered adequate. In the event of a large-scale warning, support staff will be drawn from other areas of the Council as required.

3.8 Liaison with Other Organisations

The authority has in place various arrangements to ensure that enforcement action taken in its area is consistent with that in neighbouring local authorities.

Epsom & Ewell is represented on the Surrey Food Liaison and Study Group that includes the other Surrey local authorities, Buckinghamshire and Surrey Trading Standards, Public Health England and the Food Standards Agency.

Joint working with, in particular, Trading Standards will continue and where possible, inspections will be coordinated as will action on food alerts.

Epsom & Ewell is also represented on the Surrey Infection and Environmental Control Group, which is chaired by Public Health England.

The service responds to planning consultations involving new food premises or alterations to existing premises.

Any application received by the Borough's Licensing Service that includes food preparation or sales are individually reviewed for compliance with regulations.

The Service routinely works with organisations such as OFSTED, the Care Quality Commission, the Inland Revenue and the Health and Safety Executive.

3.9 Food Safety Promotion

Resource constraints are such that food safety promotion is largely confined to the point of service delivery and mostly at the time of food premises inspection.

The service will seek to publicise any enforcement action which results in a fine or other sanction issued by the courts.

4.0 Resources

4.1 Staffing Allocation

The number of staff working on food law enforcement and related matters (including infectious diseases) is 1.25 officer full time equivalent. There are no dedicated administrative support staff.

All Environmental Health Officers are authorised in all aspects of Food Safety Enforcement with appropriate supervision as necessary. The service operates a competency checking procedure utilising document review and occasional shadowed visits.

4.2 Staff Development Plan

The Council operates a staff appraisal scheme that includes an agreed Personal Development Programme for the forthcoming twelve months following any appraisal. Each year learning needs are identified and may be provided in house or externally depending on the requirement. The Food Law Code of Practice requires at least 20 hours of continuing professional development per authorised officer.

5.0 Quality Assessment

In line with the Food Law Code of Practice, monitoring measures are in place to assess performance of EHOs and adherence to standard working methodology.

Any newly recruited officer will be assessed in accordance with the team monitoring procedure involving shadowed visits and follow up. This also applies periodically for EHOs already in post. Team meetings address consistency issues within the team and food service matters are discussed.

6.0 Review of 2016-2017 service plan

6.1 Interventions

- There were 502 registered food premises by the end of the year.
- 265 interventions were due (interventions typically meaning an inspection)
- 270 interventions were carried out. It is common to visit more premises than were due owing to the number of new ownerships and new businesses which start during the year and businesses requests for re-inspection as part of the Food Hygiene Rating Scheme.
- 46 visits were made for the purposes of verification and surveillance.
- 31 self assessment questionnaires were issued and reviewed in support of the low risk business alternative enforcement policy.

Performance of the service was directly monitored by the Environmental Health Team Leader.

Additional Epsom Derby full food hygiene inspections were carried out plus detailed negotiations with catering contractors and subcontractors.

The service monitored the number of businesses that are “broadly complaint”. Overall 84% percent of food businesses met this criterion, down by three percent from the previous year.

The service continued to monitor a higher number of people wishing to start their own catering business either conventionally in commercial premises or from home. The service supports these businesses by offering advice through the Council’s website. These businesses are additionally subject to inspection.

6.2 Food Hygiene Rating Scheme

2016-2017 was the seventh year the service operated the national Food Hygiene Rating Scheme (FHRS), having been an early adopter. Official food hygiene ratings appear on a national website available for public information at www.food.gov.uk/ratings. All food businesses were given window stickers and certificates to record their achievement and continue to have their rating revised upon inspection. Ratings run from zero to five with five being the highest score.

Following a series of negative media stories, the service launched a new scheme to utilise social media to publicise five rated premises. Additionally a revised report template was adopted utilising elements of nudge theory with the aim of achieving improved compliance.

6.3 Complaints

In total 46 complaints were received and investigated concerning both complaints about food and of food businesses. These ranged from allegations of food poisoning, complaints about foreign bodies in food, unfitness of food and hygiene of premises. Complaint numbers were the highest in recent years due, in part, to the Food Standards Agency implementing an improved system of emailing complaints received centrally to individual Local Authorities.

6.4 Sampling

In 2016-2017 the service did not take any samples of food owing to a staff shortfall which persisted for much of the year. The focus was on completion of the inspection programme which was achieved with the assistance of outside contractors.

The financial allocation set aside for Epsom & Ewell in 2016-2017 was at £2800 and this was found to be adequate. This allocation facilitates bacteriological and qualitative sampling and analysis of food, water and environmental monitoring.

6.5 Education and information

The service does provide a degree of free advice to business who either make contact independently or request advice during inspections. Environmental Health Officers are also in the position to be able to refer potential new businesses to the Economic Development Support Officer, the local Growth Hub and in the possible sources of funding.

6.6 Partnership working

Representation was made on the Surrey Food Liaison Group which includes trading standards officers to develop joint working relationships such as sampling initiatives and procedural guidance.

6.7 Document review

The majority of documentation now exists on the internet and the service no longer carries hard copies of leaflets. The Council's website contains information for businesses and the consumer whilst the Food Standards Agency website contains more technical information for those involved in food production and catering.

6.8 Enforcement

134 Written warnings were issued, four improvement notices were served and three premises were closed down on an emergency basis due to there being an imminent risk to health. Typically this involves deployment of council resources in both assessment of the conditions and the legal processes involved with court hearings to ratify the decisions made at the time of the closure.

6.9 Alternative Enforcement Strategy (AES)

The service continued to operate an alternative enforcement policy for low risk food premises involving a self assessment process. The aim of this strategy is to enable the Council to focus attention on those businesses which present the greatest risk to

consumer safety and/or who are failing to meet their statutory obligations whilst relieving low risk businesses from a proportion of formal inspection.

7.0 Plan for 2017-2018

7.1 Programmed inspections 2017-2018

In 2017-2018 185 premises inspections are due broken down as follows.

Category	Number
A	4
B	33
C	56
D	50
E	42 (AES)

It is planned to undertake all high risk (category A-C) premises inspections within +/- 28 days of their due date. This will include evening and weekend visits. It is anticipated that the service will also be able to carry out category D interventions within +/- 28 days of their due date. Category E interventions will be achieved in batches as per the Alternative Enforcement Strategy.

It should be noted that within the due inspection programme additional inspections are also required for new food premises and business premises that close and re-opened as a different category operation and those that change management. This number is largely unpredictable as is the number of business who request a re-inspection as part of the safe guards employed under the Food Hygiene Rating Scheme.

The inspection of food businesses at the Derby is priority based on the large number of visitors to the event and the hugely diverse food offering from a large number of caterers. Prior to the event discussions will be held with the racecourse management and the contractors for food supply to ensure best practice in food and health & safety.

Following a period of negative publicity regarding the number of food premises rated zero, one and two, the service intends to launch a project aimed at achieving sustained compliance amongst chronically non-compliant premises with a target of reducing the number of such businesses by ten percent.

7.2 Accuracy of database

The accuracy of the commercial premises database will be ensured by the following means:

- Liaison with OFSTED regarding childminders in the borough
- Liaison with the Care Quality Commission regarding care homes in the Borough
- A periodic cross check against web based directories for changes to businesses in the Borough
- Updating of details via intelligence gathered during other Council visits and reported to the Environmental Health team.
- Use of local knowledge

7.3 Sampling

A budget of £300 has been allocated for chemical sampling of food and water. Where this is insufficient, underspends will be looked for to supplement the budget. An allocation of around £2,500 is expected from Public Health England for the routine microbiological sampling of food and water.

7.4 Complaints

Complaints and enquiries from members of the public will be assessed and priority given to situations representing immediate or urgent public health risks. In some circumstances it will be appropriate to follow the matter up at the next routine inspection.

7.6 Publicity

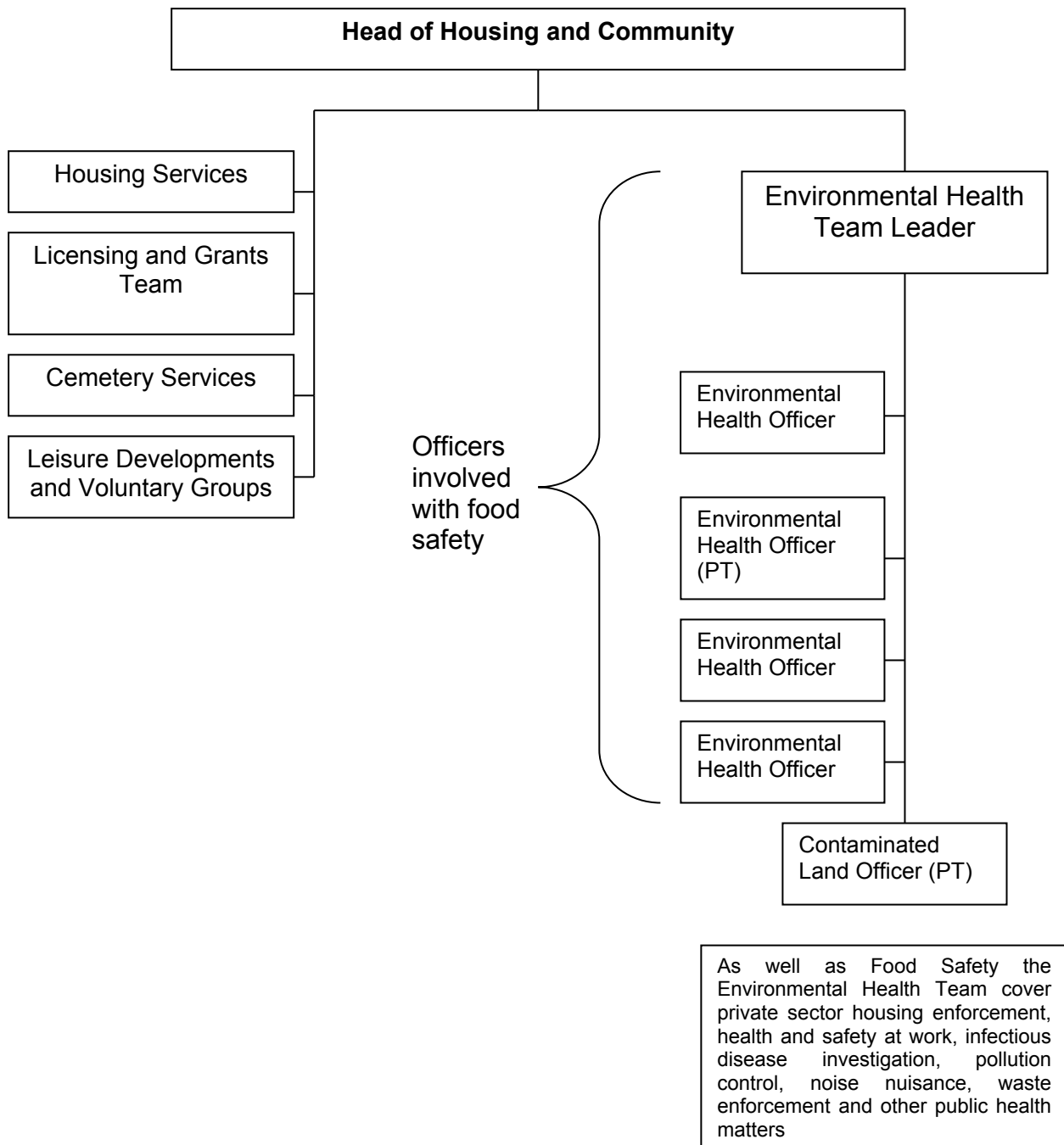
The Service will seek to publicise successful initiatives which are of benefit and interest to the public. In particular the service will utilise the Council's social media channels to inform, advise and alert the public to issues pertaining to food safety and food businesses which score the maximum five out of five. Additionally the service will explore the options of proactively publicising highly rated businesses as a way of aiding consumer choice and rewarding those better performing businesses.

7.7 Young Report

Lord Young published his report "Common Sense, Common Safety" on 15 October 2010 and called for, amongst other things, food hygiene interventions to be coordinated with health and safety inspections. At Epsom & Ewell since the same team deal in both it is intended that the existing system be continued and food interventions as far as possible be combined with health and safety interventions.

7.8 Charging for Food Hygiene Rating (FHRS) Scheme Re-Visits

Subject to Committee decision, the service will implement a charge for non statutory re-visits undertaken as part of the Food Hygiene Rating Scheme. Along with the "right to reply" and appeals process, the re-visit procedure is a safeguard built in to the FHRS standard to mitigate against businesses having to wait for their next programmed inspection in order that their score can be revised. Typically 10-12 such requests are received per year and a suitable fee will be charged to cover the Council's costs on these inspections which are not part of the annual programmed inspection plan.



Structure of Housing and Community Services