

Food Safety Service



LONDON BOROUGH OF BRENT
ENVIRONMENTAL HEALTH

**SERVICE PLAN
FOR
FOOD SAFETY &
OCCUPATIONAL HEALTH AND
SAFETY ENFORCEMENT
2004/2005**

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INTRODUCTION

This Service Plan is dedicated to the food law enforcement functions carried out by the Environmental Health Unit under the provisions of the Food Safety Act 1990 and the Agriculture Act 1970 and the health and safety enforcement functions under the provisions of the Health and Safety at Work etc Act 1974.

Production of a service plan dedicated to food safety enforcement became a requirement for each local authority from April 1st 2001 under the standards published in the *Food Standards Agency Framework Agreement* in September 2000. The standards also require the Service Plan to be submitted to the relevant member forum for approval to ensure local transparency and accountability.

Section 18 of the Health and Safety at Work etc Act requires Local Authorities to perform their duties in accordance with guidance from the HSC and this mandatory guidance requires Local Authorities to produce a service plan detailing the Local Authorities priorities and aims and objectives for the enforcement of health and safety.

The document will be made available to Brent's traders and the local community once approved by the Council's Executive.

The purpose of the service plan is to ensure national priorities and standards are addressed and delivered locally but also to;

- ✧ Focus debate on key delivery issues,
- ✧ Provide an essential link with financial planning,
- ✧ Set objectives for the future and identify major issues that cross service boundaries,
- ✧ Provide a means of managing performance and making performance comparisons.

The Food Standards Agency, through powers contained in the Food Standards Act 1999, actively monitors and audits local authority performance against the requirements of the *Framework Agreement* (including the content of the service plan) in order to ensure they are providing an effective service to protect public health. Monitoring results and audit reports are placed in the public domain by being published on the Agency's web-site and summarised in their annual report.

The HSC actively monitors and audits local authorities through the LAE/1 returns and inter-borough audits in order to ensure they are providing an effective service to protect the health of those working within businesses and of those in contact with those businesses e.g. members of the public.

1.0 FOOD SAFETY SERVICE AIMS & OBJECTIVES

1.1 Annual Objectives

The Food Safety Service is provided by a dedicated team within the Environmental Health Unit. Occupational health and safety is enforced by Food Safety, within Environmental Health, and the Health, Safety and Licensing Service. There is a joint enforcement policy between HS&L and the Food Safety Team which details the responsibilities of each unit. Essentially the Food Safety Service undertakes occupational health and safety inspections and enforcement in food premises, dedicated special treatment premises and residential care homes.

The Food Safety Service aims *“to work in partnership with local people, other agencies and businesses to protect consumers within the borough by ensuring that all foods imported, produced, stored, handled, distributed and consumed within the Borough on a commercial basis, are safe, wholesome and meet compositional and labelling requirements. It also aims to work with these groups to protect the health, safety and welfare of employees, the self-employed and others affected by commercial operations, in the premises in which we enforce”*.

To achieve this aim the following objectives have been set for 2004/5:

- ✧ **Meet upper quartile performance for Best Value performance indicator BV166;**
 - Written enforcement policy
 - Planned enforcement activity
 - Reactive and responsive enforcement
 - Appropriate resources
 - Consultation and satisfaction levels
- ☆ **Meet Corporate response targets for service requests** (*Corporate local indicator*)
 - Service requests receiving a response by target date
 - Telephone calls answered within 5 rings
 - Stage 1 complaints receiving a response within 5 days
- ☆ **Achieve successful outcome in ‘public’ audits by statutory bodies by reviewing new amendments to standards and implementing any changes** (i.e Food Standards Agency, Health and Safety Commission, Audit Commission, etc)
- ☆ **Increase efficiency in data recording and retrieval through IT development** (including the functionality of ACOLAID).
- ☆ **Maintain 100% food safety inspections.**
- ☆ **Maintain 100% of food standards inspections**
- ☆ **Maintain performance on food sampling rate** (*Corporate local indicator*) by taking and analysing at least 650 food samples from food businesses throughout the borough
- ☆ **Continue to apply food safety controls to all butchers' shops through annual licensing and process within target.**
- ☆ **Continue to apply food safety controls to all meat, fish and dairy products manufacturers through a pre-approval system.**
- ☆ **Continue to provide all health certificates for food export within target**

- ☆ **Continuously monitor the safety of private and public water supplies through active sampling**
- ☆ **Continue to supervise exhumations and provide certificates for overseas burials.**
- ☆ **Provide rapid and appropriate responses to notifications of outbreaks.**
- ☆ **Achieve 80% of health and safety inspections.**

1.2 Development Objectives

FOOD SAFETY AND STANDARDS

- ☆ **Review Home Authority arrangements for Food Safety and Standards and adopt Lead Authority Partnership.**
- ☆ **Extend the approvals to ensure that dried milk packers are approved.**
- ☆ **Continuously monitor and advise on the development of food catering and retail in the new Wembley Stadium and Quintain development at the appropriate stages**
- ☆ **Evaluation and implementation of requirements of the new food safety code of practice.**
- ☆ **Achieve greater self-regulation by small food business through targeted business support and in delivery of government target of compliance with requirement for HACCP for small businesses by 2005/6 through the development of food forums and advice for businesses. Including the provision of advice on new compositional and labelling standards.**
- ☆ **Participate in the FSA pilot on the Salford Model for HACCP for small businesses.**
- ☆ **Assist businesses in complying with training element of new hygiene regulations by participating with the Park Royal Partnership in the delivery of European funded training for specific groups.**
- ☆ **Implementation of the Animal By-Products Regulations for the disposal of animal food waste in line with ISO14001.**
- ☆ **Provide improved guidance to Residential Care Homes to enable them to be better prepared in the event of an outbreak**
- ☆ **Review existing guidance with the Primary Care Trust and Health Protection Agency.**
- ☆ **Review the use of IT for food standards inspections through the development of standard paragraphs.**

OCCUPATIONAL HEALTH AND SAFETY

- ☆ **Achieve consistency in enforcement with HS&L.**
- ☆ **Participate in benchmarking of performance in line with s18 guidance.**
- ☆ **Develop competency based training plans required by s18 standard**
- ☆ **Rationalise the inspection programme through the adoption of HELA 67/1(2) guidance on inspection ratings, including the implementation of alternative method of enforcement in low risk premises.**

- ☆ **Raise awareness of occupational health & safety priorities through participation in health and safety week and Health and Safety Executive initiatives throughout the year.**

1.3 Links to Corporate Objectives and Plans

The Environmental Services Directorate, responsible for the Food Safety Service, has published its strategic Service Development Plan 2003-2006 based on the Council's Corporate Strategy and the Council's Best Value Performance Plan. In its Corporate Strategy, the Council has identified five priorities, two of which, '*Achieving service excellence*' and '*Promoting quality of life and the green agenda*' are directly supported by the Food Safety Service.

2.0 BACKGROUND

2.1 Borough Profile

Brent is a borough of stark contrasts in terms of its economic, environmental, ethnic and social make up. It covers an area of 4325 hectares, stretching from Kilburn and Park Royal in the south to Queensbury in the north and Northwick Park in the north-west. The borough is highly developed and consists of two distinct areas, in terms of age of development and the local environment. The densely populated south of the borough was substantially developed between 1890 and 1910 with a number of social housing estates built in the 1960s and 70s. The outer London suburbs in the north of the borough were primarily developed in the 1920s and 30s.

Brent is one of the most culturally and ethnically diverse places in the country. Its 263,000 residents speak over 120 languages and the Black, Asian and Irish communities make up more than 60 per cent of the borough's residents.

Poverty and social exclusion, particularly in the south of the borough, are still significant issues. Five neighbourhoods fall within the top 10 per cent most deprived in the UK. Unemployment is over 15% in some areas of the borough and overall is 40% above the national average. A comprehensive regeneration programme of the area is underway to help eradicate poverty, social exclusion and deprivation. The new national stadium is an important part of the regeneration programme and will act as a catalyst, pulling in further investment.

As a business location Brent has much to offer and makes an important contribution to London's economy. It is well located with good road and rail links to Central London and the rest of the UK. It also contains two of London's largest industrial estates, Park Royal and Wembley, where some of the country's leading companies such as Guinness and United Biscuits are located.

2.2 Organisational Structure

The Food Safety Service Group is part of the Environmental Health Unit which also encompasses Environmental Monitoring, Noise Control, Public Health, Pest Control and Animal Welfare services.

The Service Manager (Food Safety) is responsible for overall service delivery and has specialist responsibility for food hygiene, food standards, feedingstuffs and occupational health and safety.

The structure of the Service Group is tabulated below:

Posts	No. of posts	No. FTE staff			Primary Duties
		H&S	Food	Other Duties	
Service Manager	1	0.2	0.7	0.1	Group leadership and management and development of services
Team Leaders	3	0.7	1.9	0.4	Performance management, guidance and development of staff
Team Administrator	1	0.1	0.6	0.3	Administrative support
Health & Safety Officer	1	1	0	0	Implementation of systems for Health and Safety, inspections, investigations and enforcement.
Enforcement Officers	9	1.8	6.3	0.9	Inspections, investigations, enforcement (includes contract inspectors)
Technical Officers	2	0.2	0.8	1.0	Investigations and inspections
Food Standards Co-ordinator	1	0	1.0	0	Sampling programme, inspections, investigations
Business Support Officer	1	0	1.0	0	Co-ordinating training courses, information and liaison with businesses
	19	4	12.3	2.7	

To support the services provided directly by the Council, specialist services are provided by the following:

1. Nominated Food Examiners at the Food, Water & Environment Microbiology Unit, Central Public Health Laboratories, Colindale, London NW9 5HT;
2. Nominated Public Analysts and Agricultural Analysts at Eurofins Scientific, 445 New Cross Road, London SE14 6TA, and at Worcestershire Scientific Services, County Buildings, St Mary's Street, Worcester WR1 1TN
3. Proper Officer (under the Public Health [Control of Diseases] Act 1984) at the North West London Health Protection Agency, Harrovia Business Park, Harrow.

2.3 Scope of the Service

The Food Safety Service provides the following services;

- in relation to commercial food and feedingstuffs:

Information, advice and guidance for local businesses to assist them in complying with their legal responsibilities for food safety and promote good practices;

Planned inspection of food premises to ensure they comply with food safety and food standards laws;

Planned sampling and analysis of foods to check their compliance with safety, compositional and labelling laws;

Investigation of alleged contraventions in relation to the sale of food and lawful operation of a food business;

Investigation of complaints in relation to feeding stuffs.

Investigation, prevention and control of outbreaks and incidences of food borne diseases (inc. infectious disease notifications)

Manage food hazard warnings (issued by the Food Standards Agency) as they relate to the local food trade;

Training of staff in safe food handling practices;

Licensing of Butchers' Shops;

Licensing of the temporary caravan site at Wembley Arena

Processing of applications for approval vertical hygiene legislation (meat products, minced meat products, dairy products, fish products)

Issue of food export (health) certificates;

Monitoring of public and private water supplies

Issuing of freezer breakdown certificates

Health promotion initiatives;

Formal enforcement, including the seizure of foods, the immediate closure of premises and the prosecution of offenders.

- **In relation to health and safety:**

Information, advice and guidance for local businesses to assist them in complying with their health and safety responsibilities and promote good practices;

Planned inspection of food premises to ensure they comply with occupational health & safety laws;

Investigation of alleged contraventions in relation to occupational health and safety in food businesses, residential care homes and dedicated special treatment premises;

Investigation of accident notifications;

Investigation of notified lift defects;

Granting of licences with respect to asbestos removal.

Health promotion initiatives and provision of advice on occupational health and safety;

Formal enforcement, including the seizure equipment, prohibition of equipment, processes or premises and the prosecution of offenders.

- **In relation to other activities / services:**

The Service also provides the following additional functions, in order to control non-food related disease, which are not required to be included in the Service Plan:

Licensing of premises offering electrolysis, acupuncture, tattooing, massaging and other special treatments, investigation of complaints and enforcement where required;

Management of the infectious disease notification system

Exercise regulatory control to prevent the spread of communicable disease, including assisting the Health Authority with the control of tuberculosis through obtaining court order.

Issuing of cadaver repatriation certificates, including supervising exhumations.

Sampling of swimming pool water

2.4 Demands on the Service

2.4.1 Premise profile

The business that in Brent that require food safety inspections (as of 1st April) can be categorised as follows:

Types of food business	2003/4	2004/5
Food manufacturers	75	77
Food retailers and wholesalers	717	717
Restaurants and other caterers	1,102	1131
Total number of food businesses	1,894	1,925

The borough is characterised by its large number of manufacturers and local importers (included in Food retailers and wholesalers). Although not based on actual data, it is probably true to say that the make-up of food businesses reflect the multicultural profile of the population of the borough. Consequently there are a high number of proprietors whose first language is not English which places additional demands on the service in order to ensure that complex legal requirements are effectively communicated to proprietors.

The food safety risk profile of businesses has been stable over the last few years and is made up as follows:

Food Safety Risk Category	Proportion of Brent's food businesses
A	1%
B	17%
C	51%
D	13%
E	15%
F	3%
	100%

The food standards risk profile of businesses has been stable over the last few years and is made up as follows:

Food Standards Risk Category	Proportion of Brent's food businesses
High	0%
Medium	21%
Low	79%
	100%

The business that in Brent that require occupational health and safety inspections (as of 1st April) can be categorised as follows:

Types of food business	2003/4	2004/5
Retail shops	538	607
Food wholesalers and warehouses	57	91
Catering, restaurants and bars	568	1072
Tourist Hotels	15	17
Residential care homes	50	85
Total number of businesses	1,228	1,916

There appears to be an increase in all categories of premises, this is attributable to improvements in data collection and now corresponds more closely with the food safety data. We do not inspect manufacturers for health that is the responsibility of the Health and Safety Executive.

The occupational health and safety risk profile of businesses is made up as follows:

Occupational Health Risk Category	Proportion of inspected food businesses
A	1%
B	54%
C	45%
	100%

2.4.2 Service Points

The Food Safety Service can be contacted in the following ways;

- ♦ **by telephone** (020 8937 5252) between the hours of 8.30am and 5pm, Monday to Thursday, and 8.30am to 4.45pm Fridays, or
- ♦ **in person**, at Environmental Health, Brent House, 349-357 High Road, Wembley HA9 6BZ, between the hours of 9.00am and 5pm, Monday to Thursday, and 9.00am to 4.45pm Fridays, or
- ♦ **by letter** at Environmental Health, Brent House, 349-357 High Road, Wembley HA9 6BZ, or
- ♦ **by e-mail** to env.health@brent.gov.uk which will be received during normal working hours, or
- ♦ **in an emergency, outside of the hours** given above (all year round) by telephoning the Council's main telephone number: 020 8937 1234.

2.5 Enforcement Policy

The Food Safety Service is bound by the Environmental Health Enforcement Policy which embraces the principles of the *Enforcement Concordat* and has regard to the Crown prosecution guidelines, and in addition for health and safety to the Enforcement Management Model.

3.0 SERVICE DELIVERY

3.1 Premises Inspections

This year the Service's inspection policy encompasses the following key elements:

1. Priority is given to the inspection programme to determine when premises are due for inspection.
2. Priority is given to inspections which are the highest risk premises most /overdue for inspection
3. In-house inspectors are used exclusively for the inspection of food safety and food standards of high risk premises and employ contractors to under food safety and food standards inspections in low risk premises.
4. In-house inspectors and contractors are used for the inspection of all risks of food premises for health and safety..
5. Licensable butchers are inspected annually when their licence is due for renewal and not on the inspection due date unless they are 'A' rated.
6. Formal enforcement takes priority over the demands of the inspection programme.

All officers undertaking inspections, taking food samples for formal analysis or examination, or taking enforcement action under the Food Safety Act 1990, meet the qualification and experience requirements as detailed in the Food Safety Act 1990, Codes of Practice.

All officers undertaking inspections meet the competency requirements as detailed in Section 18 guidance.

3.1.1 Food Inspection Programmes for 2004/5

Food safety and food standards inspections programmes are operated in accordance with Food Safety Act 1990, Codes of Practice and guidance issued by the Local Authority Co-ordinating Office on Regulatory Services (LACORS).

The codes require an inspection frequency of each food business based on a risk assessment of their operations. Following the inspection of each food business, they are each assigned a risk category based on the type of the business and the type of food handled as well as the conditions found at the time of inspection. A (or HIGH) risk category premises pose the greatest risk and are therefore inspected at a greater frequency, as follows:

Food Safety:

Risk category	Frequency of inspection required	No. of inspections due on 1st April 2003	No. of inspections due on 1st April 2004
A	6 months	60	38
B	1 year	351	320
C	1 ¹ / ₂ years	602	602
D	2 years	85	151
E	3 years	111	81
F	5 years	7	3
TOTAL		1216	1195

Food Standards:

Risk category	Frequency of inspection required	No. of inspections due on 1 st April 2003	No. of inspections due on 1 st April 2004
HIGH	1 year	0	0
MEDIUM	2 years	170	177
LOW	5 years	59	43
TOTAL		229	220

Changes to the Code of Practice in June will increase the frequency of inspections, the biggest impact will be on vertically approved premises and food standards inspections.

3.1.2 Health and Safety Inspection Programmes 2004/5

All inspections for occupational health and safety are inspected where they are due throughout the year, usually at the same time as a food inspection is due. They are rated in accordance with HELA circular LAC 67/1 (rev/2).

Section 18 Guidance requires that a risk rating system be used for inspection of premises. Following the inspection of each business, they are each assigned a risk category based on the inherent risks of the operation and the management control. A risk category premises pose the greatest risk and are therefore inspected at a greater frequency as follows:

Health and Safety:

Risk category	Frequency of inspection required	No. of inspections due on 1 st April 2003	No. of inspections due on 1 st April 2004
A	1 year	28	17
B1	2 years	21	37
B2	3 years	52	29
B3	4 years	55	14
B4	5 years	37	52
C	7 ½ years	47	86
D	10 years	1	0
TOTAL		194	183

3.1.3 Inspection of Special Treatment Premises

We current have 78 licensed special treatment premises and have taken over the enforcement of health and safety in those premises where they are a dedicated special treatment premises. This means we will be taking over the health and safety responsibility in 39 additional premises as from 2003/4.

3.1.4 Licensing of Butchers' Shops

Last year, 54 butchers who were licensed under the Food Safety (General Food Hygiene) Regulations 1995, and will require re-licensing this year. In the majority of cases improvements were required to achieve compliance placing a greater demand on the service than usual for that category of premise.

3.1.5 Approval of Premises Processing Meat, Fish, Dairy and Egg Products

The number of approved premises in the borough is 35. The approval process, to be effective, requires numerous advisory visits, inspections and meetings, and post-approval checks, placing an additional demand on the Service above that required for usual inspections. It is impossible to estimate the increase in the number of premises requiring approval this year. The new Codes of Practice will require increased surveillance on these types of premises which will have an implication for resources. It is planned that we will identify premises packing milk powders and facilitate their approval.

3.2 Complaints about Food, Food Businesses and Occupational Health and Safety

All service requests are recorded electronically by a team of dedicated staff within Environmental Health and allocated by Team Leaders. Response targets times are applied, as follows:

Urgency of complaint	Response target
Non-urgent issues	Within 3 days
Urgent issues (i.e. existence of an imminent risk to health)	Within 24 hours

Nearly 1200 food complaints and 140 occupational health and safety complaints were made, this was an increase of 27% for food complaints and 60% for health and safety over the previous year. It is intended that the proportion that are responded to within these response times, will be maintained at 98%.

3.3 Home Authority

The Service recognises the value of the Home Authority Principle in securing and improving food hygiene and food standards practices.

Advice is regularly exchanged with Home, Originating and Enforcement Authority links. The Authority has one formal Home Authority partnership with local businesses but continuously acts in an informal capacity with many of the large number of manufacturers in the borough with whom we have no formal agreement.

3.4 Lead Authority Partnerships (LAPS)

The Service recognises the value of the Lead Authority Partnership in securing and improving occupational health and safety practices. The Authority does not have any Lead Authority Partnerships.

3.5 Advice to Businesses

It is the policy of the Food Safety Service to give assistance to local food businesses on food and occupational health and safety matters when requested to help them to comply with the law and to encourage the use of best practice. This is achieved through a range of activities including:

- ✧ Advice given during inspections of and other visits to the premises
- ✧ Provision of advisory leaflets
- ✧ Responding to service requests and enquiries
- ✧ Awareness seminars / advice prompted by new legislation

The Regulatory Standards Advisor is now in post and is working towards developing guidance and facilitating forums for businesses advice for all types of business for food safety and food standards.

3.6 Food Sampling

The borough's food sampling programme aims to achieve the sampling rate of 35 samples per hundred premises which replaces the WHO recommendations. .

Brent's sampling programme is compiled each March in collaboration with the food examiner, public analyst, the North West London Food Liaison Group and Brent's own food enforcement officers. The sampling programme will include the following:

- ✧ All EU, LACORS, PHLS, FSA and NW Sector surveys
- ✧ Local foods/food businesses of concern or interest
- ✧ Manufacturers and importers to fulfil Home Authority responsibilities (regardless of whether a formal agreement is in place)

During the year the service receives further requests to participate in additional national surveys. Brent's participation in these will be determined by available resources.

In 2004/5 the following samples will be taken:

Sample type	Approximate No. of samples	Cost of sample analysis
For microbiological examination	500	0
For chemical analysis (labelling/composition)	150	£16,000

To meet this demand the service requires £16,000 for the cost of purchasing samples and undertaking chemical analysis. As microbiological examination is undertaken by a public body (The Health Protection Agency) Brent, like other local authorities, is given a free allocation. This free allocation currently allows free examination of 500 samples but a charge is made for samples examined in excess of this number. The staffing resources required for this activity are given in appendix 1. There is a planned change by the FSA and the HPA to ensure that all Authorities have a free allocation for microbiological sampling of 1 sample per 1000 population. Brent's allocation is currently 2 samples per 1000 population. In the review that is due this year it is likely that Brent will lose some of its allocation when the HPA equalise current free provision amongst sector groups.

3.7 Control and Investigation of Outbreaks and Food Related Disease

The Food Safety Service has a documented policy in relation to its response to the notification of diseases and outbreaks. In general the Service investigates and seeks to control all incidents of foodborne disease where there is a potential for further spread of the disease. All other diseases are referred to the Consultant in Communicable Disease Control of the Health Authority.

All notifications of disease are responded to within 24 hours. Outbreaks of disease are responded to immediately and in accordance with the Outbreak Control Plan agreed by the Brent & Harrow Control of Infection Committee.

In 2003/4, 524 statutory notifications of disease were received from general practitioners. Large outbreaks are rare but have a significant impact on resources, taking priority over all other food enforcement duties, when they do occur.

3.8 Food Safety Incidents

The Food Safety Service manages food safety incidents in accordance with Food Safety Act Code of Practice.

Food Hazard Warnings received from the Food Standards Agency are given an appropriate response which is documented. Any relevant food safety incidents identified within the borough are notified to the FSA. In 2003/4 Brent dealt with 81 food hazard warnings. This is an increase of over 320% from the previous year.

In 2004/5 the Service is likely to receive a similar number of warnings requiring different levels of response, this is due to greater emphasis by the Food Standards Agency on consumer issues.

3.9 Liaison with other Organisations

The Food Safety Service maintains a number of liaison arrangements to ensure its enforcement activities are continually reviewed in a wider context and that its approach is consistent with other enforcement services within the Council and those across north west London. Liaison is maintained with the following agencies:

- ✧ The Community of Brent
- ✧ Health and Safety Commission
- ✧ Local Authority Unit to the Health and Safety Executive (HELA)
- ✧ London Boroughs Health and Safety Liaison Group
- ✧ Health, Safety & Licensing and other partners internal to Brent Council
- ✧ Brent Council's Planning Service
- ✧ North West Sector Food Liaison Group
- ✧ London Food Co-ordinating Group
- ✧ Health Protection Agency and Primary Care Trust
- ✧ Local Authorities Coordinating Office on Regulatory Service (LACORS)
- ✧ Brent and Harrow Trading Standards Service
- ✧ Three Valleys Water
- ✧ Thames Water

The resources required to maintain these arrangements and participate in developments on behalf of these groups is estimated to require 0.5 full time equivalent officers.

3.10 Promoting awareness of Food Safety and Occupational Health and Safety

The Service promotes awareness within the food trade and the local population through the following means:

- ✧ Local and national media including Council magazines
- ✧ Advisory information and links on the Environmental Health website
- ✧ Provision of advisory leaflets in English and other local community languages
- ✧ Participation in Food Safety Week
- ✧ Participation in the annual Health and Safety Week
- ✧ Participation in Respect Day
- ✧ Promotion in HSE initiatives

Improvement in the way the service supports the local food trade is planned this year.

4.0 RESOURCES

4.1 Financial Allocation

The budget for food, health & safety and other environmental health enforcement undertaken by the Food Safety Team for the last two years is tabulated below. The figures do not include the cost of the support services, accommodation, IT and other non-specific services provided within the Environmental Health Service.

	Food enforcement		Health & safety enforcement		Other enforcement duties	
	2003/4 actual (£'000)	2004/5 planned (£'000)	2003/4 actual (£'000)	2004/5 planned (£'000)	2003/4 actual (£'000)	2004/5 planned (£'000)
Expenditure						
Employee expenditure	349	498	77	162	98	109
Legal services	7	5	1	1	2	1
Food analysis	16	16	0	0	0	0
Other supplies & services	51	34	11	11	14	8
TOTAL EXPENDITURE	422	553	89	175	114	118
Income						
Licensing	7	6	0	0	20	12
Health certificates	5	5	0	0	0	0
Training	10	9	0	0	0	0
Other income	15	2	3	0	4	3
TOTAL INCOME	37	22	3	0	24	15
NET EXPENDITURE						
	385	531	86	175	89	103

In 2003/4 we had experienced difficulties in recruitment and retention, and because of this a market supplement has been agreed for a period of 2 years from January 2004. Growth awarded in 2002/3 was instrumental in our obtaining a good outcome in audits undertaken by the Food Standards Agency and the European Union. Both audits were successful in that no key areas for improvement were identified.

Growth of £45,000 has been awarded in 2004/5 to assist in Section 18 compliance for health and safety.

A bid for growth for Food Safety for compliance with new Code of Practice requirements has been made and £110,000 has been awarded in 2004/5. This is to implement the increased frequency of inspections that will arise through changes to the CoP's.

4.2 Staffing Competency

The number of staff working on food law enforcement is tabulated below. Staff duties are expressed in terms of the levels of competency required for food law enforcement with reference to the Food Safety Act Codes of Practice and Section 18 Competency.

Staff Profile	Occupational Health and Safety No. of staff (FTE's)	Food Safety and Standards No. of staff (FTE's)
Environmental Health Officer	2.3	8.4
Holder of the Ordinary certificate in food premises inspection		0.8
Equivalent health and safety qualifications	1.2	
Staff undertaking non-enforcement duties	0.3	2.4
Service management	0.2	0.7
TOTAL	4	12.3

4.3 Staff Development Plan

The majority of training opportunities provided to all members of the Team is aimed at ensuring their enforcement skills keeps pace with best practice. Training needs of each member of staff is documented through Performance Management and Development interviews and collated as a training plan for the entire service. It is planned that continuous professional development targets are achieved for individuals for food safety. Specific training is planned to upgrade the level of competence of key staff in relation to the Section 18 Guidance as follows:

Prosecution / Enforcement:

- ✧ Enforcement Management Model for health and safety
- ✧ Investigations and PACE

Technical – Food Safety

- ✧ Food Safety Codes of Practice
- ✧ Meat examination
- ✧ Adopted HACCP standard for all businesses
- ✧ Risk Ratings for Food Standards

Technical – Health and Safety

- ❖ Fork Lift Trucks
- ❖ Assessing Risk Assessments
- ❖ Electrical Safety
- ❖ Gas Installations, including LPG
- ❖ Warehouse training
- ❖ PUWER – guarding
- ❖ Manual handling
- ❖ New Regulations

5.0 QUALITY ASSESSMENT

5.1 Quality Assessment

The majority of the following arrangements are in place to assess the quality of food and occupational health and safety enforcement work and ensure expected standards are maintained.

- ◆ Daily monitoring and support provided by senior enforcement officers
- ◆ Monitoring of notices and letters
- ◆ Shadow inspection audits
- ◆ Post inspection audits of records and enforcement decisions
- ◆ Monthly team meetings
- ◆ Regular one-to-one work reviews
- ◆ Six-monthly Performance Management and Development interviews
- ◆ Use of specialist officers to co-ordinate enforcement in high risk and complex operations.

In addition the Unit holds the following accreditations as a result of external audits:

- ❖ Investors in People
- ❖ Charter mark
- ❖ ISO14000
- ❖ Compliance with Food Standard Agency Enforcement Standard
- ❖ Compliance with European Union Enforcement Standard

6.0 REVIEW

6.1 Review against the Service Plan

Performance indicators covering response times to complaints, sampling rates, inspections rates form part of the Council's local Performance Plan, which is subject to quarterly review by senior management and the Executive. The service's actual past and expected future performance is tabulated below:

(e) = estimate

	2002/3	2003/4	2004/5	Comment
FOOD SAFETY INSPECTIONS				
No. food businesses/units in food safety programme at year start	1994	1961	1925	
No. inspections due at year start	1381	1229	1176	
%age completed of those planned	99	100	100(e)	Achieved 100% inspections of all risks of premises.
No. inspections overdue from previous years at 1 st April	12	0	0	

FOOD STANDARDS INSPECTIONS				
No. food businesses/units in food standards programme	1962	1957	1925	
No. inspections due at year start	573	280	220	
%age completed of those planned	75%	100%	100(e)	Achieved 100% inspections of all risks of premises.
No. inspections overdue from previous years at 1 st April	51	1	0(e)	

	2002/3	2003/4	2004/5	Comment
FOOD SAMPLING				
No. samples taken for microbiological examination	370	428	500(e)	There have periods when the HPA have asked us not to sample during the year.
No. of samples taken for compositional analysis	191	174	150(e)	Exceeded the target due to additional funding for sampling being obtained from the FSA
Total food samples taken	561	602	650(e)	
Total samples taken per 100 premises	34	31	34(e)	

LICENSING				
Butchers' shops licensed	66	54	54(e)	

FORMAL ENFORCEMENT				
No. of premises served with improvement notices	66	44	-	
No. of premises from which food was detained or seized	6	5	-	
No. of premises against which emergency prohibition order were obtained	13	2	-	
No. of prosecutions and formal cautions	1	0	-	
Number of premises (per 1000 premises) against which formal enforcement was taken	43	33	-	

FOOD HYGIENE TRAINING				
No. candidates trained	179	193	266(e)	

	2002/3	2003/4	2004/5	Comment
OCCUPATIONAL HEALTH AND SAFETY INSPECTIONS				
No. of premises in occupational health and safety programme at year start	Not comparable	1266	1916	
No. inspections due at year start	Not comparable	303	183	
%age completed of those planned	Not comparable	75%	80%(e)	Completed additional inspections.
No. inspections overdue from previous years at 1 st April	Not comparable	60	76	
NATIONAL INDICATOR				
Compliance with BV166 checklist	Not kept	80%	100%(e)	

6.2 Variation from the Service Plan

The Food Safety Team achieved the 100% of food safety inspections that were planned. It was anticipated that only 85% of food standards inspections would be completed and the team achieved 100%. The Team also completed more health and safety inspections than planned. You will note that whilst there is an increase in premises for inspection there is a reduction in inspections due. This is attributable to improvements in data retrieval and in compliance from businesses. The Team maintained the response to service requests at 98% responded within the target date. Best Value compliance in health and safety has been improved.

It was planned that the team would submit 500 samples for food examination and 428 were submitted. This was an improvement over the previous year where 370 were submitted. The team also trained additional candidates in foundation food hygiene. It is anticipated that additional candidates will be trained in food hygiene this year due to European Funding, the courses will be run in English, Urdu and Cantonese.

In the areas for improvement the completion of the review of fish processors and the implementation of the audit and review system for enforcement decisions were completed.

The implementation of the food safety compliance strategy was hindered through recruitment and retention difficulties, which have now been addressed.

6.3 Areas for Improvement

Areas for improvement are determined by the management team for the Food Safety Service. An action plan is document and progress regularly reviewed and updated by the team. The provisional Improvement Action Plan for this year is as follows:

Action	Completion target
1. Develop and implement a HACCP enforcement strategy to achieve greater self-regulation by small food business through targeted business support and in delivery of government target of compliance with requirement for HACCP for small businesses by 2005/6 through the development of food forums and advice for businesses	June 2004 for strategy and measurement of current compliance
2. Implement requirements of the new Food Safety Act Codes of Practice.	June 2004
3. To extend our approvals of dairy premises to include those packing milk powders.	June 2004
4. Implement the requirements of The Animal By-Products Regulations.	June 2004
5. Develop competency based training plans for s18 compliance	June 2004
6. Rationalisation of health and safety inspection programme	June 2004
7. Rationalise inspection programme for adopting HELA 67/1(2) ratings and implement alternative method of enforcement for C-rated premises.	June 2004
8. Provide guidance on infection control in Residential Care Homes	June 2004
9. Implementation of standards paragraphs for food standards and health and safety	Oct 2004
10. Pilot the Salford Model for documented system for small businesses	Oct 2004
11. Benchmark inspection and complaints investigation services to maintain compliance with BV166	Dec 2004
12. Participate in Park Royal Partnership with delivery of European funded training	Dec 2004
13. Review Home Authority arrangements	Dec 2004
14. Benchmark performance in H&S in line with Section 18 guidance	Dec 2004
15. Participate in HSC and HSE initiatives	March 2005
16. Monitoring and advice of Wembley Stadium and Quaintain development	Ongoing
17. Review existing guidance with the PCT and HPA	Ongoing

APPENDIX 1: Service Guarantees

When you contact Environmental Health, we promise that you will:

- always receive respectful, courteous and fair treatment;
- be treated with confidentiality, unless you consent to us disclosing your identity;
- be told the name of the person dealing with your enquiry or problem;
- be given clear and correct advice;
- receive the best help that we can give to help resolve your problem;
- be able to make a complaint about our service, that will be investigated in an open-minded way, if you cannot get the service you want; and,
- receive a response within the timescales shown below ...

15 seconds	All telephone calls
5 minutes	All personal visitors to Brent House.
Rapid response Priority will be given to incidents involving greatest public health concern where more than one incident occur together.	Incidents requiring rapid response, include: <ul style="list-style-type: none"> • Imminent and significant public health risk (see <i>examples below</i>) at any time. • Ongoing nuisances, including noise occurring during our extended service hours. • Dangerous dogs incidents Monday - Friday 9am - 5pm.
3 working days	All other service requests.
5 working days	Complaints about the service that we provide.
15 working days	Internal consultations, <i>e.g. from Planning and HSL.</i>

Outside of our operating hours, we provided a limited service that is designed to deal with emergency situations. This is restricted to **imminent and significant public health risks** only.

For example this would include:

- An infectious disease notification from a GP, Hospital or Official;
- Food poisoning affecting people from more than one family / household;
- Incidents requiring immediate treatment by a Doctor;
- Major pollution incidents;
- Contact from Government, public bodies and the 'blue light' services;
- Contact from another Brent Council stand-by officer.

For example this would exclude:

- An infectious disease notification from a member of the public;
- Food poisoning only affecting people from the same family / household;

- Minor incidents involving no immediate treatment by a doctor;
 - Noise, smoke, bonfires & other nuisances (We have a dedicated out-of-hours service for this);
 - Requests for pest control treatment;
 - Request for the removal of animal carcasses including rodents;
 - Enquiries about lost or found animals;
 - Hypodermic syringes on the highway or Council land / property;
 - Abandoned vehicles;
 - Refuse or dumped rubbish.
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