



LONDON BOROUGH OF BRENT
ENVIRONMENTAL HEALTH

**SERVICE PLAN
FOR
FOOD SAFETY &
OCCUPATIONAL HEALTH AND
SAFETY ENFORCEMENT
2005/06**

**Executive
12 September 2005**

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TABLE OF ACRONYMS

ABi	Asian Business initiative
FSA	Food Standards Agency
HACCP	Hazard and Critical Control Point Analysis
HELA	Local Authorities Enforcement Liaison Committee
HPA	Health Protection Agency
HSC	Health and Safety Commission
HSE	Health and Safety Executive
HSL	Brent Council, Health Safety & Licensing Unit
LACORS	Local Authority Coordinating Office on Regulatory Services
LFCG	London Food Co-ordinating Group
LPG	Liquid petroleum gas
NW Sector	North West Sector
PHLS	Public Health Laboratory Service
PUWER	Provision and use of work equipment

INTRODUCTION

This service plan describes the food law enforcement functions carried out by Brent Council's Environmental Health Unit under the provisions of the Food Safety Act 1990, the Agriculture Act 1970 and the Health and Safety at Work etc Act 1974.

Production of an annual service plan, approved by elected Council Members, became a requirement for each local authority from 1st April 2001 under the standards published in the *Food Standards Agency Framework Agreement*.

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. Their mandatory guidance requires an annual 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; and
- ✧ 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 website and summarised in their annual report.

The HSC actively monitors and audits local authorities through the LAE/1 returns and inter-borough audits. This ensures that HSC is providing an effective service to protect the health and safety of workers and 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 – the Food Safety Team.

Occupational health and safety is enforced by Environmental Health Unit and the Health, Safety and Licensing Unit. A joint protocol details the responsibilities of each unit – with Environmental Health essentially undertaking occupational health and safety inspections and enforcement in food premises, dedicated special treatment premises and residential care homes.

We aim 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 2005/6:

- ✧ Meet upper quartile performance for Best Value performance indicator 166;
 - Written enforcement policy
 - Planned enforcement activity
 - Reactive and responsive enforcement
 - Appropriate resources
 - Consultation and satisfaction levels
- ☆ Meet Corporate response targets for service requests
 - Non-urgent service requests receiving a response within 3 days
 - Telephone calls answered within 15 seconds
 - 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.
- ☆ Maintain 100% high-risk food safety inspection, and target those due for alternative enforcement.
- ☆ Maintain 100% of food standards inspections
- ☆ Achieve 100% of high-risk health and safety inspections, and target those due for alternative enforcement.
- ☆ Maintain performance on food sampling rate by taking and analysing at least 580 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.

- ☆ Implement monitoring system for approved premises and 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.

1.2 Development Objectives

FOOD SAFETY AND STANDARDS

- ☆ Continuously monitor and advise on the development of food catering and retail in the new Wembley Stadium and Quintain development at the appropriate stages
- ☆ Offer HACCP training for businesses to aid compliance with new Regulations.
- ☆ 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 through the development of food forums and advice for businesses. Including the provision of advice on new and existing regulatory requirements.
- ☆ Raise awareness of businesses to the new requirements for allergens, traceability and genetically modified foods.
- ☆ Align sampling programmes with FSA's campaign priorities for healthy living.
- ☆ Review the use of IT to deliver FSA returns and provision of key information such as imported foods.

OCCUPATIONAL HEALTH AND SAFETY

- ☆ Participate in benchmarking of performance in line with s18 guidance.
- ☆ Implementation of topic based inspections regime to focus on priority programme in line with HSE guidance.
- ☆ Development of training courses for businesses.
- ☆ Raise awareness of occupational health & safety priorities through participation in health and safety week, and Health and Safety Executive initiatives throughout the year, including the moving goods safely campaign scheduled for June.
- ☆ Arranging Consultation forums with local businesses.
- ☆ Review the use of IT to deliver the HSE returns.

1.3 Links to Corporate Objectives and Plans

The **2003-8 Community Plan** is produced every five years and expresses the shared vision and local strategic partnership of a group of key public sector organisations including Brent Council, know as *Partners for Brent*.

Brent Council's **2002-2006 Corporate Strategy** is a statement of the Council's priorities for the duration of the current political administration – it ends with local elections in May 2006.

The 2005-8 **Environment and Culture Service Development Plan** is a departmental plan, produced annually, which sets out improvement plans, performance targets and budgetary choices for the next three years. This plan specifically develops those aspects of the Corporate Strategy which have relevance for the Environment and Culture Department – of which Environmental Health is part.

The **Local Improvement Plan** is a departmental plan, produced annually, which identifies the top priorities for service improvement linked to the delivery of the Corporate Strategy and the achievement of a excellent rating in the Audit Commission's Comprehensive Performance Assessment. It sets out how we intend to meet the commitment that no BVPIs are in the bottom quartile by 2006.

The **Environmental Health Service Operational Plan 2005/6** This Service Operational Plan is an annual plan which sets improvement priorities and targets for Environmental Health in the coming year, after account is taken of the views of our customers.

The relationship between all these plans and their relevance for this area of service is illustrated on page 42 of the 2005/6 Environmental Health Service Operational Plan.

2.0 BACKGROUND

2.1 Borough Profile

Brent is a borough of stark contrasts in terms of its economic, health, 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 263,464 residents speak over 120 languages and all minority ethnic groups make up more than 71% of the borough's residents.

Poverty and social exclusion, particularly in the south of the borough, are significant issues. Using deprivation indices there are a total of 174 super output areas, 8% of which fall amongst the 10% most deprived in the country. Health and regeneration programmes are underway to help eradicate poverty, social exclusion, health inequalities 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 a number of large manufacturers are located.

2.2 Organisational Structure

The Food Safety Team, together with the Environmental Monitoring Team, comprise the Business Regulation Group within the Environmental Health Unit; which also encompasses, Environmental Improvement, and Environmental Protection Teams.

The Service Manager (Food Safety) is responsible for overall service delivery and has specialist responsibility for food hygiene, food standards, feeding-stuffs, special treatment licensing, the control of infectious diseases and occupational health and safety.

The structure of the Food Safety Team is tabulated below:

Posts	No. of posts	Management & support	No. FTE staff			Primary Duties
			H&S	Food	Other Duties	
Service Manager	1	1	0	0	0	Group leadership and management and development of services
Team Leaders	3	1.5	0.4	1	0.1	Performance management, guidance and development of staff
Team Administrator	1	0.6	0	0.2	0.2	Administrative support
Health & Safety Officer	1	0	1	0	0	Implementation of systems for Health and Safety, inspections, investigations and enforcement.
Enforcement Officers	9	0	1.9	7	0.1	Inspections, investigations, enforcement
Technical Officers	2	0	0.8	0.8	0.4	Investigations, sampling and inspections
Food Standards Co-ordinator	1	0	0	1	0	Sampling programme and investigations
Regulatory Standards Advisor	1	0	0	1	0	Co-ordinating training courses, information and liaison with businesses
	19	3.1	4.1	11	0.8	

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

1. Nominated Food Examiners at the Health Protection Agency, 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 Unit, 3rd Floor, Olympic Way, Wembley, Middx HA9 ONP.

2.3 Scope of the Service

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 microbiological examination and chemical 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 alerts (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 sites;
- 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; and
- Formal enforcement, including the seizure of foods, the immediate closure of premises and the prosecution of offenders.

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

Other activities / services:

We also provide the following additional services to control non-food related diseases, which are not part of this 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; and
- Sampling of swimming pool water.

2.4 Demands on the Service

2.4.1 Premise profile

The businesses in Brent that require food safety inspections (as of 1st April) are:

Types of food business	2004/5	2005/6
Food manufacturers	77	72
Food retailers and wholesalers	717	739
Restaurants and other caterers	1131	1090
Total	1,925	1,891

The borough is characterised by a large number of manufacturers and local importers which mirrors the multicultural profile of the borough. Consequently, a high proportion of proprietors' first language is not English. This presents additional challenges in effectively communicating complex legal requirements to proprietors and Environmental Health is ensuring that all literature is provided in plain English. Literature is available in community languages and translations are provided where required. Environmental Health also adapts and provides training in community languages where it is possible to do so.

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

Food safety risk category	Proportion of Brent's food businesses (%)
A (high)	2
B	17
C	52
D	13
E (low)	16
	100%

The rating system for food standards has been revamped and substituting categories A, B and C for the previous of ratings of High, Medium and Low gives the following proportions:

Food Standards Risk Category	Proportion of Brent's food businesses (%)
A (High)	0
B (Med)	29
C (low)	71
	100%

The businesses regulated by Environmental Health that require occupational health and safety inspections (as of 1st April) are:

Types of food business	2004/5	2005/6
Retail shops	607	547
Food wholesalers and warehouses	91	77
Catering, restaurants and bars	1072	676
Tourist Hotels	17	12
Residential care homes	85	70
Consumer Services	-	83
Total number of businesses	1,916	1,465

There has been a drop in the number of premises with health and safety cycles. This is attributable to our improved surveillance and data systems. The enforcement allocation protocol between Environmental Health, Health, Safety and Licensing and the HSE, has been revised, transferring responsibility for inspection of dedicated special treatment premises to Environmental Health. We do not inspect manufacturers, or businesses operating from domestic premises, as these are the Health and Safety Executive's responsibility.

The occupational health and safety risk profile of businesses regulated by Environmental Health is:

Occupational health risk category	Proportion of inspected food businesses (%)
A (high)	1
B	50
C (low)	49
	100%

2.4.2 Service Points

Environmental Health can be contacted in the following ways;

- ♦ **by telephone** (020) 8937 5252 between 9am and 5pm, Monday to Friday, or
- ♦ **in person**, at Brent House, 349-357 High Road, Wembley HA9 6BZ, between 9.00am and 5pm, Monday to Thursday, and 9.00am to 4.45pm on Friday, or
- ♦ **by letter** to Environmental Health, Brent House, 349-357 High Road, Wembley, Middlesex HA9 6BZ, or
- ♦ **by e-mail** to env.health@brent.gov.uk which will be received during normal working hours. (there is a dedicated email address for the Food Standards Agency use), or
- ♦ **in an emergency**, outside of the telephone hours and days given above by telephoning the Council's main telephone number: (020) 8937 1234.

2.5 Enforcement policy

Brent Environmental Health is bound by Brent Environmental Services Enforcement Policy. This policy embraces the principles of the *Enforcement Concordat*, the Crown Prosecution Services' *Code for Crown Prosecutors*, and the HSE's *Enforcement Management Model*.

3.0 SERVICE DELIVERY

3.1 Premises Inspections

This year's inspection programme 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 and/or most overdue for inspection
3. In-house inspectors are used exclusively for the inspection of food safety, food standards and health and safety of high risk premises. Contractors are employed to undertake food safety and food standards inspections in lower risk premises.
4. Licensable butchers are inspected annually when their licence is due for renewal and not on the inspection due date unless they are 'A' (in which case they would be inspected twice during the year).
5. Approved premises are inspected in line with their function and required number of visits as defined in the Code of Practice.
6. A proportion of low-risk food safety inspections will be carried out with the remaining being subject to alternative enforcement.
7. Formal enforcement takes priority over the demands of the inspection programme.

All officers undertaking food 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 health and safety inspections meet the competency requirements as detailed in Section 18 guidance.

3.1.1 Food inspection programmes for 2005/6

Food safety and food standards inspections programmes are operated in accordance with Food Safety Act 1990, Codes of Practice and guidance issued by the LACORS.

The codes require an inspection frequency for approved premises based on function and on all other premises, the frequency is 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. The new Code of Practice has removed the previous F (*or LOW*) rating. To ensure all those premises previously on a 5-year cycle are changed to a 3-year cycle it is planned that an additional proportion will be inspected in each of the following 3 years. The premises to be inspected this year are as follows:

Food Safety:

Risk category	Required inspection frequency	No. of inspections due on 1 st April 2004	No. of inspections due on 1 st April 2005
A	6 months	38	74
B	1 year	320	302
C	1½ years	602	732
D	2 years	151	109
E	3 years	81	44
F	5 years (Category deleted 2005/6)	3	Category no longer used
TOTAL		1195	1261
Verticals	Dependent on activity	Not previously measured this way	First inspection included in risk rating. Additional 63 inspections due in year
E	Alternative enforcement	-	101 visits

Food Standards:

Risk category (from 2005/2006)	Required inspection frequency	No. of inspections due on 1 st April 2004	No. of inspections due on 1 st April 2005
HIGH (A)	1 year	0	0
MEDIUM (B)	2 years	177	97
LOW (C)	5 years	43	55
TOTAL		220	152

The change to the Code of Practice will increase the risk rating of most food standards inspections and of food safety inspections where there is an additional score for vulnerable groups. It also requires additional inspections of vertical premises.

3.1.2 Health and Safety Inspection Programmes 2005/6

All inspections for occupational health and safety were previously inspected when a food inspection was due. They are rated in accordance with HELA circular LAC 67/1 (rev/3). The change to topic-based inspections will mean that additional visits will now be required as it will not be possible to co-ordinate food inspections with topic-based programmes. It is planned at least 60% of our inspections will be based on the priority programmes and that we will run thematic inspection programmes based on the Health and Safety Executives priority programme:

- Slips, trips and falls from height May – July 2005
- Moving Goods Safety June 2005
- Workplace Transport Sept – Nov 2005
- Musculoskeletal disorders Dec – Feb 2006

Section 18 guidance requires that a risk rating system be used for inspections 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 2004	No. of inspections due on 1 st April 2005
A	1 year	17	17
B1	2 years (18 months from 2005/6)	37	20
B2	3 years (2 years from 2005/6)	29	75
B3	4 years (3 years from 2005/6)	14	17
B4	5 years	52	20
C	Alternative enforcement	86	59
TOTAL		183	170

3.1.3 Inspection of Special Treatment Premises

We currently have 79 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.

3.1.4 Licensing of Butchers' Shops

Last year, 82 butchers were licensed under the Food Safety (General Food Hygiene) Regulations 1995. There will be no requirement to licence when the new food hygiene regulations come into force on 1st January 2006 this is because the new Regulations will require a documented food safety management system as was previously required under butcher shop licensing.

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

The number of approved premises in the borough is 39. Inspections will be based on the type of premises and changes to the computer system will be required to enable the provision of data under the new reporting arrangements.

3.1.6 HACCP Implementation

We are planning to work with other providers to ensure that more businesses achieve compliance with the new requirements for a documented HACCP system. This will include the provision of HACCP training workshops .

3.1.7 Alternative Enforcement

The Code of Practice allows for alternative enforcement for low-risk food businesses that operates outside of the inspection programme, and that this be on 3-yearly basis rather than the previous 5-year inspection regime. Our experience has shown that providing information by mail is not an effective method of communicating. We are planning to implement alternative enforcement for those rated as low-risk food safety and for visits to be undertaken to ensure that the business is still undertaking the same activity and for key issues to be checked. Where the business is not operating a documented HACCP system, guidance will be provided. Where the activity of the business has changed an inspection will be carried out.

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

All service requests are recorded electronically and allocated by for action within the following target response times:

Urgency	Response target
Non-urgent issues	Within 3 days
Urgent issues (e.g. imminent risk to health)	Within 24 hours

During 2004/5 924 requests for service for food safety and standards and 95 for occupational health and safety were receive. It is intended that we will respond to at least 98% of service requests within these response times.

3.3 Home Authority

We recognise 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 two formal Home Authority partnerships 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. No Lead Authority Partnerships currently exist, but we do plan to develop a Lead Authority Partnership with one business this year.

3.5 Advice to Businesses

We 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 businesses;
- ✧ advisory leaflets;
- ✧ responding to service requests; and
- ✧ seminars.

The service has been enhanced during 2004/5, and we now have a Regulatory Standards Advisor who supports businesses through guidance and business forums, for food safety, food standards and HACCP implementation.

3.6 Food Sampling

As a result of allocation from the HPA and increased funding for chemical sampling, we have extended our food sampling programme to 30 samples per hundred premises, up from the 28 specified in our 2005/6 Service Operation Plan.

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 LFCG 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 2005/6 the following samples will be taken:

Sample type	Approximate no. of samples	Cost of sample analysis
For microbiological examination	390	Part of free allocation
For chemical analysis (labelling/composition)	190	£20,000

To meet this demand the service requires £20,000 for the cost of purchasing samples and undertaking chemical analysis. To improve this element of consumer protection we aim to participate in FSA sponsored surveys.

Our microbiological examination is undertaken by The Health Protection Agency. Brent, like other local authorities, is given a free allocation of 390 samples with a charge made for samples examined in excess of this number. The staffing resources required for this activity are given in Appendix 1. The HPA are reviewing allocations, and they have indicated that Brent's allocation is likely to be reduced in favour of other boroughs in the near future.

3.7 Control and Investigation of Outbreaks and Food Related Disease

Environmental Health has a documented policy in relation to its response to the notification of diseases and outbreaks. In general, we investigate, and seek to control, all incidents of foodborne disease where there is a potential for spread of the disease. All other diseases are referred to the Consultant in Communicable Disease Control of the local Primary Care Trust.

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 Health Protection Agency.

In 2004/5 357 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

We manage food safety incidents in accordance with the Food Safety Act Code of Practice.

Food alerts 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 2004/5 Brent dealt with 96 food alerts.

In 2005/6 we are likely to receive a similar number of warnings requiring different levels of response, due to greater emphasis by the Food Standards Agency on consumer issues.

3.9 Liaison with other Organisations

Environmental Health maintain 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 with other external agencies, including:

- ✧ 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;
- ✧ Internal partners to Brent Council e.g. Health, Safety & Licensing, Streetcare, Trading Standards and Planning;
- ✧ North West Sector Food Liaison Group;
- ✧ London Food Co-ordinating Group;
- ✧ Health Protection Agency and Brent Primary Care Trust;
- ✧ Local Authorities Coordinating Office on Regulatory Service (LACORS);
- ✧ Three Valleys Water; and
- ✧ 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.

Brent is also setting up a partnership with the Corporation of London for them to undertake our responsibilities under animal health movements and inspections. This will ensure that those with the necessary skills undertake this work, and the reporting, so that we do not need to invest in IT facilities and skilling staff for this work.

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:

- ✧ local and national media, including Council magazines;
- ✧ advisory information and links on our website;
- ✧ provision of advisory leaflets in English and other local community languages;
- ✧ participation in Food Safety Week;
- ✧ participation in Health and Safety Week;
- ✧ participation in Respect Day;
- ✧ promotion of HSE initiatives; and
- ✧ participation in Area Consultation Meetings.

Continued support of 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 Environmental Health for the last two years is tabulated below. The figures do not include the cost of all support services, accommodation, IT and other general services.

	Food enforcement		Health & safety enforcement		Other enforcement duties	
	2004/5 actual (£'000)	2005/6 planned (£'000)	2004/5 actual (£'000)	2005/6 planned (£'000)	2004/5 actual (£'000)	2005/6 planned (£'000)
Expenditure						
Employee expenditure	485	535	210	242	29	59
Legal services	7	6	3	2	1	1
Sampling	20	20	0	0	8	6
Other supplies & services	49	28	21	13	3	3
TOTAL EXPENDITURE	561	589	234	257	41	69
Income						
Licensing	7	2	0	0	19	15
Health certificates	7	5	0	0	0	0
Training	14	9	0	0	0	0
Other income	73	0	0	0	16	8
TOTAL INCOME	101	16	0	0	35	23
NET EXPENDITURE	460	573	234	257	6	46

In 2004/5, Brent Council provided additional funding to employ 3 additional inspectors, 1 to undertake health and safety Section 18 compliance and 2 for a range of activities to meet the additional requirements for the FSA Codes of Practice.

We separately secured additional funding in 2004/5, for two years, to initiate our HACCP Strategy for businesses, and in 2005/6 to continue this support for businesses to enable them to comply with new legislative requirements for HACCP.

4.2 Staffing Competency

The number of staff working on food law enforcement is tabulated in Section 2.2. This table expresses the competency of staff against Section 18 for health and safety and those authorised for all enforcement activities for food safety and standards with reference to the Food Safety Act Codes of Practice.

Staff Profile	Total Staff	Competencies				
		Occupational Health and Safety		Food Safety		Food Standards
		Full Enforcement	Part Enforcement	Full Enforcement	Part Enforcement	
Service Management	4	4		3	1	4
Enforcement Officers	10	10		8	1	8
Technical Officers	2		2		2	
Regulatory Standards Advisor	1				1	1
Food Standards Co-ordinator	1				1	

4.3 Staff Development Plan

The majority of training opportunities provided to all members of the Team is aimed at ensuring their enforcement skills keep 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:

Technical

- ✧ Meat examination
- ✧ Adopted HACCP standard for all businesses (FSA's, Safer Food Better Business model)
- ✧ Rating changes under Codes of Practice and LAC67/1
- ✧ Topic inspection programmes
- ✧ Electrical Safety
- ✧ Gas Installations, including LPG
- ✧ Warehouse training
- ✧ PUWER – guarding
- ✧ 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

6.0 REVIEW

6.1 Review against the Service Plan

Performance indicators covering response times for 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 past and expected future performance is tabulated below:

(e) = estimate

	2003/4	2004/5	2005/6	Comment
FOOD SAFETY INSPECTIONS				
No. food businesses/units in food safety programme at year start	1961	1925	1891	
No. inspections due at year start	1229	1176	1300	
%age completed of those planned	100	100	100(e)	Achieved 100% inspections of all risks of premises.
No. inspections overdue from previous years at 1 st April	0	0	0(e)	

FOOD STANDARDS INSPECTIONS				
No. food businesses/units in food standards programme	1957	1925	1267	
No. inspections due at year start	280	220	152	
%age completed of those planned	100	100	100(e)	Achieved 100% inspections of all risks of premises.
No. inspections overdue from previous years at 1 st April	1	1	0(e)	

	2003/4	2004/5	2005/6	Comment
FOOD SAMPLING				
No. samples taken for microbiological examination	428	465	390(e)	There have periods when the HPA have asked us not to sample during the year.
No. of samples taken for compositional analysis	174	184	190(e)	Exceeded the target due to additional funding for sampling being obtained from the FSA
Total food samples taken	602	649	580(e)	
Total samples taken per 100 premises	31	34	31(e)	Additional funding from the FSA enabled additional sampling to be undertaken

LICENSING				
Butchers' shops licensed	54	82	18(e)	Those that are due before the requirement is repealed

FORMAL ENFORCEMENT				
No. of premises served with improvement notices	44	21		
No. of premises from which food was detained or seized	5	8		
No. of premises against which emergency prohibition order were obtained	2	8		
No. of prosecutions and formal cautions	0	1		
No of premises where voluntary closure accepted	5	14		
Number of premises (per 1000 premises) against which formal enforcement was taken	26	21		

FOOD HYGIENE TRAINING				
No. candidates trained	193	248	300(e)	
HACCP training provided	0	72	186(e)	To assist with compliance with new legislative requirements

	2003/4	2004/5	2005/6	Comment
OCCUPATIONAL HEALTH AND SAFETY INSPECTIONS				
No. of premises in occupational health and safety programme at year start	1266	1916	1465	
No. inspections due at year start	303	183	149	Excludes C risk
%age completed of those planned	75%	96%	100(e)	Completed additional inspections in 2004/5.
No. inspections overdue from previous years at 1 st April	60	7	0	Of those planned to be inspected
NATIONAL INDICATOR				
Compliance with BV166 checklist	80%	100%	100%	

6.2 Variation from the Service Plan

We achieved the 100% of food safety and standards inspections that were due. We also completed more health and safety inspections than were planned. This is attributable to improvements in data retrieval and in compliance from businesses. We maintained our response to service requests at 98% within the target date.

Best Value compliance in health and safety has been improved. We have continued to improve our data for health and safety ensuring that inspections are assigned to the team with enforcement responsibility through referral to our Policy on the Enforcement Regulations.

We submitted the planned number of samples for microbiological examination and 200 samples for chemical analysis, the increase was due to funding from the FSA on imported foods. A condition of the FSA funding is that samples are taken in addition and not as a method of transferring costs.

We secured European Social Skills funding for food hygiene training and overall 248 candidates were trained. This was an increase of 55 candidates at Foundation Level and the running of our first Intermediate Food Hygiene training. We had planned to run a number of the courses in community languages but the interest was too low to be feasible despite intensive marketing to promote the courses.

We piloted the FSA's Safer Food Better Business scheme. Through this scheme, we supported 54 businesses to complete their documented food safety management system. This has enabled us to gauge the level of resources that would be required to implement this system across the Borough.

6.3 Areas for Improvement

We have determined the following areas for improvement. Our action plan is documented and progress regularly reviewed and updated. The improvement action plan for this year is:

Action	Completion target
1. Implement 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, advice for businesses and training and developing partnerships..	Ongoing
2. Work in partnership with ABi to provide mentoring and training in food safety management systems to food businesses	Dec 2005
3. Further collaboration with Food Standards Agency, working with Check Mate International (CMI) to provide mentoring and training in food safety management systems to food businesses	Dec 2005
4. Monitoring and advice of Wembley Stadium and Quintain Development	Ongoing
5. Run an awareness raising event during national food safety week	Sept 2005
6. Align food sampling programme with FSA campaign for healthy living	April 2005
7. Develop system for tracking inspections of vertically approved premises	March 2006
8. Improve IT capability to incorporate imported food inspection data	March 2006
9. Raise awareness of businesses to the new requirements on control of allergens and genetically modified organisms in food	Sept 2005
10. Participate in HSC and HSE initiatives, in raising awareness of priority issues	March 2006
11. Incorporate thematic health and safety inspections into the annual programme	Sept 2005
12. Develop a Legionella Outbreak Plan	Dec 2005
13. Participate in the development of clinical waste guidance for the community	July 2005
14. Develop a newsletter for businesses, and raise awareness of new requirements	2 per year
15. Develop a strategy for repeat offenders	July 2005
16. Develop health and safety training courses	May 2005
17. Run an awareness raising event on priority programme	March 2006
18. Seek adoption of new Special Treatment Licensing conditions	Sept 2005

APPENDIX 1: Service Guarantees

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

- always receive respectful, polite, 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;
- be given clear and correct advice;
- only receive written correspondence that is understandable, jargon-free and accurate;
- receive the best help that we can give to help resolve your enquiry;
- receive, upon request, correspondence in a format or language that is understandable to you;
- be able to make a complaint about our service, that will be investigated in an open-minded way, and,
- receive a response within the timescales shown below ...

All telephone calls	15 seconds
All personal visitors to Brent House.	5 minutes
Incidents requiring rapid response, include: <ul style="list-style-type: none"> • Imminent and significant public health risk at any time. • Ongoing nuisances, including noise occurring during our extended service hours. • Dangerous dogs incidents Monday - Friday 9am - 5pm. 	Rapid response 1 day Priority will be given to incidents involving greatest public health concern where more than one incident occurs together.
All other service requests.	3 working days
Complaints about the service that we provide acknowledged within	5 working days
Written communication, including letters, emails, faxes and e-forms responded within Internal consultations, <i>e.g. from Planning and HSL.</i>	7 working days

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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