

Food Safety Service



LONDON BOROUGH OF BRENT
ENVIRONMENTAL HEALTH

SERVICE PLAN FOR FOOD SAFETY ENFORCEMENT 2003/2004

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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.

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. The document will be made available to Brent's trades 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.

1.0 FOOD SAFETY SERVICE AIMS & OBJECTIVES

1.1 Aims & Objectives

The Food Safety Service is provided by a dedicated team within the Environmental Health Unit.

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”*.

To achieve this aim the following objectives have been set for this year:

- ☆ Achieve upper quartile performance for Best Value Performance Indicator, BV166
- ☆ Achieve successful outcome in 'public' audits by statutory bodies (e.g. Food Standards Agency, Audit Commission, RIPA Commissioner, etc)
- ☆ Achieve Unit's published *Service Guarantees* (refer to Appendix 1) in responding to requests for service
- ☆ Achieve greater self-regulation by small food business through targeted business support
- ☆ Apply further food safety controls to all butchers' shops through annual licensing
- ☆ Apply further food safety controls to all meat, fish and dairy products manufacturers through a pre-approval system
- ☆ Provide all health certificates for food export within target
- ☆ Continuously monitor the safety of private and public water supplies through active sampling
- ☆ Take and analyse at least 660 food samples from food businesses throughout the borough
- ☆ Audit, review and standardise enforcement decisions to provide a consistent approach
- ☆ Continuously monitor and advise on the development of food catering and retail in the new Wembley Stadium at the appropriate stages
- ☆ Review the system of dairy and fish processor approvals (This is part of an ongoing process of reviewing how we regulate businesses posing greatest risk to food safety)
- ☆ Review Home Authority arrangements
- ☆ Increase efficiency of data recording and retrieval through IT development

1.2 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 and feedingstuffs.

The structure of the Service Group is tabulated below:

Posts	No. FTE staff		Primary Duties
	2001/2 Actual	2002/3 Planned	
Service Manager	0.7	0.7	Group leadership and management and development of services
Team Leaders	1.9	2.2	Performance management, guidance and development of staff
Team Administrator	0.8	0.8	Administrative support
Enforcement Officers	5.2	5.7	Inspections, investigations, enforcement (includes contract inspectors)
Technical Officers	0.6	1.2	Sampling, investigations, licensing
Food Standards Co-ordinator	1.0	1.0	Sampling programme, inspections, investigations
Business Support Officer	0	1.0	Co-ordinating training courses, information and liaison with businesses
	10.2	12.6	

The structure for last year has been amended to take account of the actual equivalent staff that were available. This takes account of temporary absences of staff (through leaving, long term sickness, etc)

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;
3. Authorised 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 Food Safety 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 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, 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
- Health promotion initiatives;
- Formal enforcement, including the seizure of foods, the immediate closure of premises and the prosecution of offenders.

The Service also provides the following additional functions, in order to control non-food related disease, which are not covered further by this Service Plan:

- 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;
- Licensing of premises offering electrolysis, acupuncture, tattooing, massaging and other special treatments;
- Management of the infectious disease notification system
- Issuing of cadaver repatriation certificates.
- Supervision of exhumations.
- Sampling of swimming pool water

2.4 Demands on the Food Safety 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	2002/3	2003/4
Food manufacturers	90	75
Food retailers and wholesalers	785	717
Restaurants and other caterers	1,208	1,102
Total number of food businesses	2,083	1,894

The borough is characterised by it's 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	2%
B	18%
C	48%
D	12%
E	16%
F	4%
	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. A number of more specific policies and procedures are also in place, along with monitoring systems to ensure a consistent approach in their implementation is maintained.

3.0 SERVICE DELIVERY

3.1 Food Premises Inspections

3.1.1 Inspection Programmes

Food safety and food standards inspections programmes are operated in accordance with Food Safety Act 1990, Codes of Practice Nos. 8 & 9 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 INSPECTIONS				
Risk category	Frequency of inspection required	No. of inspections due on 1st April 2002	No. of inspections due on 1st April 2003	Estimated numbers of re-visits following inspections this year
A	6 months	73	60	
B	1 year	407	351	
C	1 ¹ / ₂ years	744	602	
D	2 years	130	85	
E	3 years	48	111	
F	5 years	57	7	
TOTAL		1459	1216	182

FOOD STANDARDS INSPECTIONS				
Risk category	Frequency of inspection required	No. of inspections due on 1st April 2002	No. of inspections due on 1st April 2003	Estimated numbers of re-visits following inspections this year
HIGH	1 year	17	0	
MEDIUM	2 years	411	170	
LOW	5 years	167	59	
TOTAL		595	229	34

The number of inspections due has fallen from last year probably as a result of a combination of factors including rationalisation of the food business database to reduce segmentation of businesses into sub-units, each separately due for inspection. This has resulted in fewer inspections of single businesses (albeit, different parts of the business) being due within the same year. Improvements in standards will also tend to reduce the risk category of the business, so that less high risk (or A or B rated) businesses are due for inspection. This is highlighted by the fact that no high risk food standards inspections are due this year and that there are more E risk category food safety inspections due this year.

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

1. Priority is given to the food safety inspection programme to determine when premises are due for inspection.
2. In-house inspectors are used exclusively for the inspection of high risk premises and employ contractors to inspect low risk premises.
3. Subject to (2) above, priority is given to the highest risk premises most overdue/due for inspection
4. Licensable butchers are inspected annually when their licence is due for renewal and not on the inspection due date unless they are 'A' rated.
5. Formal enforcement takes priority over the demands of the inspection programme.
6. 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, Code of Practice No.19.

To complete the two inspection programmes detailed above it is estimated that nine full-time equivalent inspectors are required. This is based on the current inspection rate which includes investigatory duties carried out in response to requests for service but does not take into account the health and safety inspection programme and other non-inspection food enforcement duties.

3.1.2 Licensing of Butchers' Shops

Last year, 66 butchers who were licensed under the Food Safety (General Food Hygiene) Regulations 1995, 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.

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

The number of approved premises in the borough over the past year, rose from 23 to 35, an increase of over 34%. 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.

These premises potentially pose the highest risk to food safety. For this reason a systematic review of all approvals was begun in 2001 after appointing a lead officer to co-ordinate the review and all new approval applications. The review of meat products premises was completed in 2002 and a review of fish and dairy products premises will be completed this year.

3.2 Complaints about Food and Food Businesses

All service requests (including complaints about food and food businesses) 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

Last year we received 445 service requests and enquiries concerning food and food premises and this is likely to increase this year. It is intended that the proportion that are responded to within these response times, will be maintained at 98%.

3.3 Home Authority Principle

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 Advice to Businesses

It is the policy of the Food Safety Service to give assistance to local food businesses 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 prompted by new legislation

The number of enquires we will receive in 2002/3 is expected to be in excess of the 369 recorded last year. This is likely to be a vast underestimate as many direct calls or approaches to officers go unrecorded.

A business support service is under development to form greater links with the local food trade, particularly small high street businesses, to assist them to comply with complex food legislation and overcome barriers such as language difficulties and interpretation.

3.5 Food Sampling

The borough's food sampling programme aims to achieve the sampling rate recommended by WHO based on the size of the borough's population.

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 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 2003/4 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)	160	£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 Public Health Laboratory Service) 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.

3.6 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 2002/3, 600 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. The staffing resources required to process notifications and investigate allegations of food poisoning are estimated at 0.7 full time equivalent officers (refer to appendix 1).

3.7 Food Safety Incidents

The Food Safety Service manages food safety incidents in accordance with Food Safety Act Code of Practice No.16.

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 2002/3 the Service received 25 warnings requiring different levels of response and assuming a similar number this year, the demand on the Service would equate to approximately 0.1 full time equivalent officers.

3.8 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:

- ✧ North West London Food Liaison Group
- ✧ Three Valleys Water
- ✧ Thames Water
- ✧ Local Authorities Coordinating Office on Regulatory Service
- ✧ North West London Health Protection Agency
- ✧ Brent & Harrow Trading Standards Service
- ✧ Brent Council's Planning Service

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.

3.9 Promoting awareness of Food Safety & Standards

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 the annual National Food Safety Week
- ✧ Provision of regular food hygiene courses in English and other local community languages

The effectiveness of food hygiene courses is actively evaluated from comments provided by candidates completing a course.

The priorities of the service focused on the assessment and enforcement of standards and provision of support to food businesses. Improvement in the way the service supports the local food trade is planned this year. Participation in National Food Safety Week will provide a opportunity to raise awareness about food hygiene issues in the local population.

The staffing resources currently allocated to this activity is approximately 1.2 full-time equivalent member of staff.

4.0 RESOURCES

4.1 Financial Allocation

The expenditure for food enforcement over the last three 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.

	2001/2 actual (£'000)	2002/3 actual (£'000)	2003/4 planned (£'000)
Staffing	332	396	489
Sampling & analysis	14	17	16
Legal services	0	6	1
Supplies and services	25	32	13
EXPENDITURE (total)	371	451	519
INCOME (total)	32	29	13
TOTAL BUDGET	339	422	506

Increases in staffing resources between 2001/2 and 2002/3 reflect growth of £64,000 to improve performance against the FSA's *Framework Agreement* and an internal reorganisation. There was also a significant underspend on the salaries in 2002/3 as a result of loss of staff and difficulties with recruitment of new staff.

4.2 Staffing Allocation

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.

Level of Food Law Enforcement	No. of staff (FTE's)
Environmental Health Officer or equivalent	6.0
Holder of the Ordinary certificate in Food Premises Inspection	0.8
Staff undertaking non-enforcement food safety duties	4.0
Service management	1.8
TOTAL	12.6

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 aimed at upgrading the level of competence of key staff in relation to the Food Safety Act Codes of Practice is planned as follows:

- ✧ Investigations and PACE
- ✧ Imported Food Regulations (including amendments)
- ✧ New Food Safety Act Codes of Practice (when implemented)
- ✧ Food Standards for key officers
- ✧ New Compositional Regulations e.g. Meat Products

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.

5.0 QUALITY ASSESSMENT

5.1 Quality Assessment

The following monitoring arrangements are in place to assess the quality of food 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 coordinate enforcement in high risk and complex operations

In addition the Unit holds the following accreditations:

- ❖ Investors in People
- ❖ Charter mark
- ❖ ISO14000

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:

	2000/1	2001/2	2002/3	2003/4	Comment
FOOD SAFETY INSPECTIONS					
No. food businesses/units in food safety programme at year start	2197	2086	1994	1894	The reduction is due to database de-unitisation and not due to a reduction in premises
No. inspections due at year start	1603	1306	1381	1216	The reduction is due to database de-unitisation and not due to a reduction in premises
%age completed of those planned	91%	89%	99%	100%(e)	
No. inspections overdue from previous years at year end	338	130	12	0(e)	

FOOD STANDARDS INSPECTIONS					
No. food businesses/units in food standards programme	2271	2128	1962	1890	The reduction is due to database de-unitisation and not due to a reduction in premises
No. inspections due at year start	732	595	573	229	The reduction is due to database de-unitisation and not due to a reduction in premises
%age completed of those planned	100%	78%	75%	85%(e)	
No. inspections overdue from previous years at year end	201	252	51	35(e)	

	2000/1	2001/2	2002/3	2003/4	Comment
FOOD SAMPLING					
No. samples taken for microbiological examination	479	494	370	500(e)	The reduction this year has been due to the unavailability of the PHLS laboratory undergoing improvement works
No. of samples taken for compositional analysis	175	175	191	160(e)	
Total food samples taken	654	669	561	660(e)	
Total samples taken per 100 premises	30	32	32	33(e)	

LICENSING					
Butchers' shops licensed	N/A	54	66	67	

FORMAL ENFORCEMENT					
No. of premises served with improvement notices	-	16	66		
No. of premises from which food was detained or seized	-	0	6		
No. of premises against which emergency prohibition order were obtained	-	2	13		
No. of prosecutions and formal cautions	-	0	1		
Number of premises (per 1000 premises) against which formal enforcement was taken	N/A	9	43	50(e)	Anticipate a rise next year with implementation of new enforcement policy

FOOD HYGIENE TRAINING					
No. candidates trained	-	-	179	160	The target this year is 160 candidates to be trained

NATIONAL INDICATOR					
Compliance with BV166 checklist	35%	70%	100%	100%(e)	

(e) = estimate

6.2 Variation from the Service Plan

The number of staff available for food enforcement was less than expected, primarily due to reorganisation within the team leading to temporary vacancies. In spite of this, almost all planned food safety inspections were carried out resulting in the highest inspection rate for Brent in many years. The number of food standards inspections overdue from previous years was also greatly reduced.

The number of food samples taken, although high, was less than expected due to temporary loss of a sampling officer and to periods of closure (three months in total) of the public health laboratory to implement system improvements and as a result of a local outbreak.

Formal enforcement (in response to serious breaches or warning letters being ignored), increased significantly from last year in all respects; service of improvement notices, seizure of unfit food and forced closure of businesses. This reflects the more formal stance being taken by Brent in response to breaches of food law.

On the other hand, a post (the 'Business Support Officer') has been created to assist businesses to comply with these laws through the provision in better information and advise to enable small businesses, in particular, to understand their duties and how to meet them. To complement this function, the team continued to provide basic food hygiene training for food handlers.

All actions in last year's improvement action plan were completed or significant progress made. Notably a review of all Brent's meat products processors was completed to ensure they adhered to the stricter rules applied to this type of business due to the high risk to food safety posed by meat and meat products.

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. Review fish processors in accordance with legal requirements	June 2003
2. Implement a system of audit and review of 'enforcement decisions' to provide consistent approach	July 2003
3. Implement food safety compliance strategy for small food business	August 2003
4. Review home authority arrangements	October 2003
5. Review all dairy processors in accordance with legal requirements	December 2003
6. Improve sampling performance	March 2004

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 (<i>see 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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