



LONDON BOROUGH OF BRENT
ENVIRONMENTAL HEALTH

**SERVICE PLAN
FOR
FOOD SAFETY ENFORCEMENT
2006/7**

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TABLE OF ACRONYMS

CMI	CheckMate International
FSA	Food Standards Agency
HACCP	Hazard and Critical Control Point Analysis
HPA	Health Protection Agency
LACORS	Local Authority Coordinating Office on Regulatory Services
LFCG	London Food Co-ordinating Group
NW Sector	North West Sector Food Liaison Group

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 Food Hygiene (England) Regulations 2006

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*.

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.

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. 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*”.

To achieve this aim the following objectives have been set for 2006/7:

- ✧ 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, 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 and identify premises for alternative enforcement.
- ☆ Sample in accordance with our revised allocation at a rate of 20 samples per 100 premises, and identify additional resources for increased sampling wherever possible.
- ☆ Complete review of approved premises under the new Regulations and continue to apply food safety controls to all meat, fish and dairy products manufacturers through the 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 SFBB training, which is based on HACCP principles for businesses to aid compliance with new Regulations.
- ☆ Provide businesses with self-assessment tool kits to help them to understand the areas in which they may, or may not be complying with the Law.
- ☆ Continue to produce a newsletter which gives advice on new and existing regulatory requirements.
- ☆ Align sampling programmes with FSA and HPA priorities for healthy living and choosing health.
- ☆ Target resources on non-compliant businesses through adopting alternative enforcement strategies for low risk compliant businesses.
- ☆ Continue to improve the use of IT to deliver FSA returns and provision of key information
- ☆ Respond to issues raised through customer surveys, including the publication of the outcome of food hygiene inspections, and the implementation of a duty officer system to provide advice to businesses.

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 **Corporate Strategy** is a statement of the Council's priorities for the duration of the current political administration.

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 2006/7** 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 54 of the 2006/7 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	Primary Duties		
			Food	Other Duties	
Service Manager	1	1	0	0	Group leadership and management and development of services
Team Leaders	3	1.5	1	0.5	Performance management, guidance and development of staff
Team Administrator	1	0.6	0.2	0.2	Administrative support
Enforcement Officers	10	0	7	3	Inspections, investigations, enforcement
Technical Officers	2	0	0.8	1.2	Investigations, sampling and inspections

Food Standards Co-ordinator	1	0	1	0	Sampling programme and investigations
Regulatory Standards Advisor	1	0	1	0	Co-ordinating training courses, information and liaison with businesses
	19	3.1	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, 61 Colindale Avenue, London NW9 5EQ..

2.3 Scope of the Service

Commercial food and feeding stuffs:

- 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 the temporary caravan sites;
- Processing of applications for approved premises. ;
- 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.

Other activities / services:

We also provide the following additional services to control non-food related diseases, which are not part of this service plan:

- Undertake occupational health and safety inspections, investigate accidents and complaints and provide advice for food premises, residential care homes and special treatment premises.
- Contingency planning for avian flu and flu pandemic.
- Licensing of premises offering electrolysis, acupuncture, tattooing, massaging and other special treatments, investigation of complaints and enforcement where required;
- Implement the outcomes of the TB Overview through the strategic partnership. Continue to assist the Health Authority with the control of TB through obtaining court orders.
- Exercise regulatory control to prevent the spread of communicable disease and manage the infectious disease notification system;
- 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	2005/6	2006/7
Food manufacturers	72	70
Food retailers and wholesalers	739	732
Restaurants and other caterers	1090	1120
Total	1,891	1922

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.

Implement the outcome of the equalities impact assessment to ensure delivery of equal service across the Borough.

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	46
D	14
E (low)	19
Approved Premises	2
	100%

The rating system for food standards gives the following proportions:

Food Standards Risk Category	Proportion of Brent's food businesses (%)
A (high)	1
B	29
C (low)	70
	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* and the Crown Prosecution Services' *Code for Crown Prosecutors*.

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. Approved premises are inspected in line with their function and required number of visits as defined in the Code of Practice.
5. Food standards inspections will normally carried out at the time of the food safety inspection, irrespective of whether it is due. Separate food standards inspections will be carried out on premises that are importing, labelling, manufacturing or packing.
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.
8. Identify those premises requiring inspection for animal feed law enforcement and ensure that inspections are carried out in accordance with the risk rating.

All officers undertaking food inspections, taking food samples for formal analysis or examination, or taking enforcement action under the Food Safety Act 1990 and the Food Hygiene (England) Regulations 2006 meet the qualification and experience requirements as detailed in the Codes of Practice.

3.1.1 Food inspection programmes for 2006/7

Food safety and food standards inspections programmes are operated in accordance with the Code of Practice and guidance issued by the LACORS.

The Code of Practice requires 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 inspection each food business, is 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. Those premises previously on a 5-year cycle are being changed to a 3-year cycle; a proportion will be inspected with the remainder being subject to alternative enforcement. 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 2005	No. of inspections due on 1 st April 2005
A	6 months	74	94
B	1 year	302	320
C	1½ years	732	561
D	2 years	109	138

E/F	3 years	44	24
TOTAL		1261	1137
Verticals	Dependent on activity	Not previously measured this way	85
E	Alternative enforcement	101	101 visits

Food Standards:

Risk category (from 2005/2006)	Required inspection frequency	No. of inspections due on 1 st April 2005	No. of inspections due on 1 st April 2006
HIGH (A)	1 year	0	23
MEDIUM (B)	2 years	97	53
LOW (C)	5 years	55	127
TOTAL		152	203

Secondary inspections are those counted as revisits to check progress, sampling and advisory visits. Revisits will be carried out by the inspecting officer.

Inspections may be carried out at any time so that those premises that only operate in the evenings, early hours and at weekends are inspected during their normal operating hours.

Food safety information is sent to new businesses and they are inspected on a quarterly basis. Those that would meet approval status are inspected immediately.

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

The number of approved premises in the borough is 40. Inspections are based on the activity of the premises. We are reviewing all premises in line with the new Regulations at the time the inspection is due. All inspections to approved premises are currently inspected as primary inspections. We will develop a protocol for issues for secondary inspections.

3.1.3 HACCP Implementation

We are continuing to deliver the Safer Food Better Business (SFBB) HACCP system in partnership with the FSA and CMI and as part of the London-wide project.

3.1.4 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 6-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 will continue to undertake alternative enforcement visits for those rated as low-risk food safety to ensure that the business is still undertaking the same activity and for key issues to be checked. We will visit every 6 years and provide information in between that time. Where the business is not operating a documented HACCP system and is required, guidance will be provided. Where the activity of the business has changed an inspection will be carried out. It is planned that we will implement an alternative enforcement system for low risk food standards inspections which will be effective only after an inspection under the new rating system.

3.2 Complaints about Food, Food Businesses

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 2005/6 1026 requests for service for food safety and 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 Advice to Businesses

We give assistance to local food businesses on food 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

It is planned that we will develop a toolkit to enable businesses to undertake self-assessment. It is also planned that more comprehensive business advice will be provided.

3.5 Food Sampling

The sampling allocation from the HPA for microbiological examination has been reduced by over 50%. Our sampling target will be reduced accordingly. We continue to have the same level of funding for chemical sampling and will continue to participate in sampling programmes funded by the FSA. Our target for sampling is 20/100 premises.

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 2006/7 the following samples will be taken:

Sample type	Approximate no. of samples	Cost of sample analysis
For microbiological examination	195	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.

3.6 Feeding stuffs

The Feed (Hygiene and Enforcement) Regulations 2005 expanded those requiring approval / registration to include those transporting and storing animal feed. It is our intention to scope whether there are any businesses which these regulations apply to, and ensure that inspections and sampling is undertaken in line with FSA priorities set out in ENF/E/05/052/AFS/543.

3.7 Imported Foods

This Authority is an inland authority and actively seeks food premises who are importing foods. We have an operational procedures for dealing with imported foods and will usually undertake deferred inspections where requested to do so and where we have the operational capacity to do so.

3.8 Control and Investigation of Outbreaks and Food Related Disease

Environmental Health has a documented policy in relation to it's 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 Unit.

In 2005/6 560 statutory notifications of disease were received from general practitioners. There were no substantiated outbreaks during this year.

3.9 Food Safety Incidents

We manage food safety incidents in accordance with the FSA 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 2005/6 Brent dealt with 89 food alerts.

In 2006/7 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.

Where suspect of illicit activities are found we will supply details of this activity to the FSA for inclusion in the National Food Fraud Database.

3.10 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;
- ✧ 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 has made arrangements with the Corporation of London for them to undertake inspection 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 ensuring staff have the skills to undertake this work.

3.11 Promoting awareness of Food 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; 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 is held within the Environmental Health budget and detailed in the Service Operational Plan.

The Food Team secured additional funding in 2005/6 from the FSA to implement our HACCP Strategy for businesses to enable them to comply with new legislative requirements for HACCP. This funding is based on demonstrating the activities undertaken are in addition to service provision in terms of delivery of the SFBB programme and is not allowed to be used for staff costs.

4.2 Staffing Competency

The number of staff working on food law enforcement is tabulated in Section 2.2. This table details those authorised for all enforcement activities for food safety and standards with reference to the Codes of Practice.

Staff Profile	Total Staff	Competencies		
		Food Safety		Food Standards
		Full Enforcement	Part Enforcement	
Service Management	4	3	1	4
Enforcement Officers	9	8	1	8
Technical Officers	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 delivering the Service Operational Plan and ensuring 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.

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 (t) = target

	2004/5	2005/6	2006/7	Comment
FOOD SAFETY INSPECTIONS				
No. food units / businesses in food safety programme at year start	1925	1891	2023	
No. inspections due at year start	1176	1300	1278	
%age completed of those planned	100	99.6%	100(t)	Increased closures at end of year resulted in 4 inspections due as at 1/4/06. .
No. inspections overdue from previous years at 1 st April	0	4	0(e)	

FOOD STANDARDS INSPECTIONS				
No. food businesses/units in food standards programme	1925	1267	1998	
No. inspections due at year start	220	152	309 (t)	
%age completed of those planned	100	95.9%	100(t)	Increased enforcement resulted in 4 inspections overdue as at 1/4/06. .
No. inspections overdue from previous years at 1 st April	1	5	0(t)	

FOOD SAMPLING				
No. samples taken for microbiological examination	465	508	195(t)	Reduced allocation from 1/4/06.
No. of samples taken for compositional analysis	184	241	190(t)	Exceeded the target due to additional funding for sampling being obtained from the FSA
Total food samples taken	649	749	360(t)	
Total samples taken per 100 premises	34	40	20(t)	

FORMAL ENFORCEMENT				
No. of premises served with improvement notices	21	24		
No. of premises from which food was detained or seized	8	2		
No. of premises against which emergency prohibition order were obtained	8	18		
No. of prosecutions and formal cautions	1	2		
No of premises where voluntary closure accepted	14	14		
Number of premises (per 1000 premises) against which formal enforcement was taken	21	32		

FOOD HYGIENE TRAINING				
No. candidates trained	248	224	176(e)	
HACCP training provided	72	460	316(e)	To assist with compliance with new legislative requirements

NATIONAL INDICATOR				
Compliance with BV166 checklist	80%	100%	100%	

6.2 Variation from the Service Plan

We achieved 99.6% of food safety and 95.9% of food standards inspections due in 2005/6. We had planned to inspect 100% of both food safety and standards but were unable to do so because of a number of emergency prohibition notices that were served at the end of the year. We maintained our response to service requests at 98% within the target date.

We submitted an increased number of samples for both microbiological examination and chemical analysis. The increase in chemical analysis was due to an increased budget for analysis and from participating in the FSA funded imported food sampling and other sampling projects. A condition of the FSA funding is that samples are taken in addition and not as a method of transferring costs.

We were successful in our bid for funding for delivering the FSA's Safer Food Better Business food safety management system both as an individual authority and as part of the London-wide bid. The provision of HACCP training has resulted in a reduced uptake for the Foundation Level Food Hygiene training.

6.3 Areas for Improvement

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

Action	Completion target
1. Continue to implement the 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 through food forums, advice for businesses and training and developing partnerships..	Ongoing
2. Work in partnership with CMI, the FSA and the London-wide Scheme to provide mentoring and training in food safety management systems to food businesses	March 07
3. Continue to monitor and advise Wembley Stadium and Quintain in relation to food safety	Ongoing
4. Participate in food safety week, co-ordinating with the PCT on smoking cessation.	June 06
5. Incorporate health inequalities considerations, nutritional considerations in our 2006/7 food sampling plan. We will explore options for directly supporting Brent teaching Primary Care Trust's <i>Shop Stock</i> pilot scheme through food sampling.	March 07
▶ Work with Brent teaching Primary Care Trust to implement a smoking cessation project that targets food handlers. This is will also reduce the risk of cross-contamination from smoking-related poor hygiene practices, and assist the PCT to meet their targets for this.	March 07
6. Improve IT capability to enhance data retrieval	March 2007
7. We will provide businesses with a self-assessment tool-kit to help them understand the areas in which they may, or may not, be complying with the law.	March 2007
8. We will provide businesses with a greater, and more comprehensive, range of advice and information to help them comply with the law.	March 07
9. Reduce officer time at broadly compliant businesses through alternative enforcement for a greater number of premises.	March 07
10. We will seek consent of the Food Standards Agency to increase the resources that we devote to the most persistently non-compliant businesses, with the aim in bringing about a more sustainable improvement in compliance.	March 07
11. We will respond to the issues raised in the customer survey 2005 survey, by publishing performance data more widely, publishing the outcome of food hygiene inspections and introducing a duty officer system.	March 07

12. We will work to simplify our service planning and improve its effectiveness, by incorporating the statutorily required Annual Service Plan for Food Safety Enforcement ¹ into this annual Environmental Health Service Plan.	March 07
13. We will scope the impact of the changes required by the new Food (Hygiene and Enforcement) Regulations 2005.	Sept 2006
14. Work with PCT and Brent Sports to develop health inequality plans	March 07
15. Modify our service delivery to redress inequalities in delivery for particular ethnic groups in terms of training and information	Dec 06
16. Participate in the Scores on the Doors project	March 07

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 or we are required by law to us disclose 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	7 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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