DRAFT

ANNUAL FOOD SAFETY SERVICE PLAN

2009/2010

WEST LANCASHIRE BOROUGH COUNCIL

Community Services

FOOD SAFETY SERVICE PLAN 2009-2010

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COMMUNITY SERVICES

FOOD SAFETY SERVICE PLAN 2009/2010

1 Service Aims and C	Service Aims and Objectives		
1.0 Service Aims and Objectives	The aim of the Food Service is to protect the health of residents and the wider community by ensuring that all commercial production of food in the Borough is carried out safely and is fit for human consumption.		
	In order to achieve these aims the service will:		
	Ensure that it acts in accordance with the relevant Food Standards Agency Code of Practice and other official guidance.		
	 Encourage businesses to comply with the law by offering advice. 		
	 Apply the principle of continuous improvement by comparing and measuring its performance and rectifying any shortcomings. 		
	 Responding to local need and ensuring the service is accessible to everyone. 		
	 Ensure that the delivery of the Service is undertaken in a manner so as not to be discriminatory towards equality target groups and accessible to all who request or receive the Service. 		
1.2 Links to Corporate Objectives	The Food Safety Service Plan (formerly produced in a much abbreviated form) is produced annually by the Executive Manager Community Services and the Commercial Safety Manager. Performance reviews are undertaken on a quarterly basis. The results of the annual performance review are also reported to Cabinet.		
	The Council has a number of key corporate priorities and values. The work detailed in the Service Plan specifically contributes to two of these priorities & values by delivering cost-effective services that delight the Customer and are accessible to all and by ensuring local services offer the best possible value.		
	The service works closely with a number of other agencies and organisations eg. Food Standards Agency, LACORS (Local Authorities Coordinators of Regulatory Services), LBRO (Local Better Regulation		

		Office), Cumbria & Lancashire Health Protection Agency, NHS Central Lancashire, HPA Food, Water & Environmental Microbiology Network (Preston laboratory) and other local authorities to ensure a comprehensive and consistent approach to food law enforcement.
2.0	BACKGROUND	
2.1	Profile of the Local Authority	West Lancashire is located in the South West corner of Lancashire in the North West of England. It has a population of 109,800 and covers an area of 347 square kilometres. The area is characterised by a mainly flat intensively farmed agricultural landscape, which rises to the east to form low hills. The area is mainly rural, with the main exceptions being the former New Town of Skelmersdale and the market town of Ormskirk.
		In 2008 13% of enterprises in West Lancashire were involved in the agricultural sector with a similar percentage involved in the retail/wholesale sector.
		Property and business services account for 28% of enterprises in the area, with a further 6% of businesses involved in hotels and Catering Services.
		Public administration, education and health accounted for approximately 10% of the organisations in West Lancashire.
		Over recent years, West Lancashire recorded an employment growth rate that was above the Country and National averages.
		The majority of manufacturing is located in Skelmersdale where there is a large industrial estate.
2.2	Organisational Structure	The organisational structure of the Community Services Division is shown in Appendix 1.
		Food law enforcement duties are undertaken by the Commercial Safety Section, who deal with both food safety and health and safety enforcement matters.
		Administrative support is provided by members of a general Administration Team.
		The Health Promotion Unit also assists in a range of promotional and educational roles in respect of food safety matters.
		The service uses a range of Specialist Services

including: Food Analytical Services Lancashire County Council Public Analyst, plus specialist service providers as necessary. Food Examiner HPA Food, Water & Environmental Microbiology Network (Preston laboratory). Cumbria & Lancashire Health Protection Agency Consultant in Health Protection NHS Central Lancashire Director of Public Health The Council is operating under a political structure involving an executive style Cabinet and a series of Overview & Scrutiny and Review Committees. 2.3 Scope of the Food In respect of food safety matters the Commercial Safety Service Section is responsible for providing the following services: Maintenance of the food premises register • Programmed and reactive inspection of all food premises • Investigation of food complaints and complaints relating to unsatisfactory premises/practices Advisory visits and provision of information Food sampling for survey and monitoring purposes • Investigation and control of infectious disease cases and outbreaks relating to food Responding to food alerts from the Food Standards Agency Maintaining an ISO9001:2008 Quality System relating to food safety matters Promotion of food safety through education and promotional events Notification to the Food Standards Agency of any serious local food problem • Inspection of food premises for hygiene and safety Input to various licensing services on food safety matters • Issue of Health Certificates Monitoring of Shellfish beds Approval of product specific premises. Operating imported food controls There are in total 823 registered food premises in the 2.4 Demands on the Borough. A breakdown of the premises types and their **Food Service**

	risk rating category is provided in Section 3.1
	The Borough has a cross-section of food businesses which include primary producers, manufacturers, retail and catering premises. Most of these premises are small to medium enterprise businesses. Caterers and retail form the major part of these premises.
	These businesses can be divided into the following classifications:
	Producers 20 Slaughterhouses (seasonal) 2 Manufacturers/Processors 22 Packers 10 Importers/Exporters 1 Distributors/Transporters 19 Retailers 188 Restaurants/Caterers 551 Materials & articles/
	manufacturers & suppliers 10 Of these, 8 are approved under product specific regulations.
	The Borough has a diversity of premises with product specific approval needed under EC Regulation 853/200. These relate to:
	Fishery Products (3 premises)
	Meat Products (3 Premises)
	Dairy Product (2 Premises)
	The Authority has adopted a street trading consent scheme for mobile retail and catering vehicles. This places additional demands on the service with 31 vehicles requiring compliance inspections per year on average.
2.5 Service Delivery	Commercial Safety Section Community Services West Lancashire Borough Council Westec House 52 Derby Street

	0169	5 585235/585242 (direct)
	Fax: 0169	5 585126
	Opening Hours: Out of Hours:	08.45 – 17.00 (Monday-Thursday) 08.45 – 16.45 (Friday) Emergency Service is available by contacting 01695 577177
	hours 7 days a v Environmental Hea	emergency service is available 24 veek. An appropriate officer of the alth Service can be contacted through an emergency eg. food poisoning
2.6 Enforcement Policy	Environmental Ser Members during 20 interested parties.	orcement Policy for the then vices was produced and approved by 002/2003, after wide consultation with This Policy covers all environmental functions, including the Food Safety
	Agency Service F	es aspects of the Food Standards Plan requirement and is in line with e Enforcement Concordat Principles.
	 and intends to act Setting out performance Openness the service Helpfulness 	in providing clear information about provided ectively with complaints
	Environmental Ser take account of guidance. When a developed and	eric Enforcement Policy for the then rvices is currently being reviewed to changes in legislation and national a new Enforcement Policy has been agreed by Members, support officers will also be developed for the Policy.

3.0 SERVICE DELIVERY	
3.1 Food Premises Inspections & Int	erventions
3.1.1	It is West Lancashire Borough Council's Policy to carry out programmed inspections and interventions of premises in accordance with:
	(a) the minimum inspection frequencies and requirements detailed in the Food Standards Agency Food Law Code of Practice (June 2008)
	(b) the Council's Enforcement Policy
3.1.2	The proposed Inspection and Intervention Programme for 2009/2010 is as follows:
Premises No of	No of Programmed
Risk Premises as Category at 1.4.09	inspections & interventions Estimated Number of Revisits due (1.4.09- 31.3.10)
A 7	14 4
B 94	94 10
C 406	284 29
D 113	50 5
E 184	55 6
F 8	8 1
Total 812	505 55
Non-rate -	-
3.1.3	The revised Code of Practice, published June 2008, introduces the term "broadly compliant". This term originates from NPI 184 and is based on the specific risk ratings given for compliance using the new statutory code of practice. It shows how well a food business operator is complying with food safety standards at the time of the inspection. The Code of Practice also allows authorities some limited flexibility in dealing with businesses' compliance with food safety legislation, so as to try to achieve an improvement in the number of businesses who are "broadly compliant".
3.1.4	Revisits are undertaken if a further visit is needed to assess compliance with an enforcement notice or if contraventions found during an inspection are of such a risk that enforcement action may be required before the next programmed inspection.
3.1.5	The qualifications, experience and training of staff is sufficient to ensure that the Authority has the expertise to ensure competent inspection of the premises and processes in our area.
3.2 Food	Food complaints are investigated in line with procedures

Complaints	laid down in the Quality System. Action is determined by
	the nature of the complaint and the potential threat posed to public health.
	Complaints about food hygiene practices or the condition of a food premises are also actioned according to the potential to cause harm. Follow up action may be immediate or delayed to the next programmed inspection provided the time period is not excessive.
	On average the section receives 25 food complaints per year and 60 complaints about food premises.
	The length of time taken to resolve a complaint can vary considerably.
	It is the policy of West Lancashire Borough Council to give a first response within 3 working days to all food premises complaints/service requests.
3.3 Home Authority Principle	West Lancashire Borough Council subscribes to the current Local Authorities Co-ordinators of Regulatory Services (LACORS) Home Authority Principle (HAP). The authority has not been approached by, nor is aware of, any local company who wish to enter into a formal agreement within the remit of the HAP.
	West Lancashire Borough Council, however, does take on the role of "Originating" authority for several businesses that operate on a regional and/or national basis and gives advice on food safety matters.
	Much of the input from the service is generated by requests for service from other enforcement authorities.
	It is anticipated in the annual work programme that 4 originating authority referrals will be made and 4 received per year.
3.4 Primary Authority Scheme	On 6 April 2009, under the Regulatory Enforcement and Sanctions Act 2008, the Primary Authority Scheme (PAS) came into force to ensure a consistent approach between local authorities and companies having a number of outlets throughout the country.
	The operation of the PAS will be the statutory responsibility of the Local Better Regulation Office (LBRO) whose role will be to register partnerships, issue guidance and resolve disputes. The scheme enables companies the right to form a statutory partnership with a single local authority. That authority then provides robust and reliable advice for other councils to take account of when carrying

		out inspections or dealing with non-compliance.
		Councils are now required to contact the Primary Authority for a company covered by the scheme before taking enforcement action.
		The scheme is in its very early stages and will be monitored closely.
3.5	Advice to Businesses	West Lancashire Borough Council is committed to providing advice to any business within its Borough or to members of the public.
		It is anticipated in the work programme that on average 50 requests will be dealt with verbally and 30 requests will result in a visit and written response. The response time required by performance indicators is 10 days.
		The enforcement policy has been published on the Council's website and all recipients of letters and notices relating to food safety issues are advised of this.
3.5	Food Sampling and Inspection	West Lancashire Borough Council's policy is to sample food and drink supplied, produced and sold within the district, in accordance with a planned sampling programme to assess its safety and quality and where necessary, in response to food complaints/investigations. Further details can be found in the Council's Food Sampling Policy for 2009/2010.
		The Council will participate in Lancashire-wide, national and European sampling programmes. Further details can be found in the Council's Food Sampling Programme for 2009/2010.
		Samples are analysed by the HPA Food, Water & Environmental Microbiology Network (Preston laboratory) (Microbiological) and the Public Analyst Laboratory in Preston (chemical and content).
		West Lancashire Borough Council participates in the radioactivity monitoring in Lancashire (RADMIL) sampling scheme which surveys radioactive contamination of food grown in Lancashire. Samples are analysed at Lancashire County Council's Public Analyst Laboratory in Preston and at Lancaster University.
		West Lancashire Borough Council has cockle & mussel production beds in the Ribble to the North of the district. Routine microbiological and algal toxin samples are taken and monitored through the Centre for Environment and Aquamarine Culture and Science (CEFAS).

		There are a small number of private water supplies monitored by West Lancashire Borough Council and water complaints are investigated.
3.6	Food Safety Incidents	It is the policy of West Lancashire Borough Council to comply with the Food Standards Agency Code of Practice in relation to the handling of food alerts. Procedures are documented as part of our ISO 9001:2008 quality system. The number of notifications have increased since the
		commencement of the Food Standards Agency. It is estimated that the Service will respond to approximately 70 alerts per year.
3.7	Control & Investigation Of Outbreak & Incidents Of Food Related	This work will be undertaken through contact between Environmental Health Officers, Consultants in Health Protection, Director of Public Health and Control of Infection Teams.
	Infectious Disease	Investigation procedures & outbreak control will be undertaken in line with agreed written procedures & documentation.
3.8	Liaison With Other Organisations	Liaison arrangements exist with a number of organisations to ensure a consistent approach to enforcement action. Such arrangements include liaison with the following organisations: • LACORS • Environmental Health Lancashire (EHL) • Lancashire Food Officers Group • Cumbria & Lancashire Health Protection Agency • HPA Food, Water & Environmental Microbiology Network (Preston laboratory) • Lancashire County Analyst • NHS Central Lancashire • United Utilities Plc • Lancashire County Council Trading Standards The Service intends to refer information to other regulators where there is a wider regulatory interest.
3.9	Food Safety Promotion	The service recognises the importance of food safety promotional work and as a result undertakes the following activities: • Food Safety Week
		 CIEH Level 2 Award in Food Safety in Catering Courses Specific Seminars/Initiatives as appropriate Promotion of the FSA's Safer Food Better Business

		Scheme
		Such work is undertaken in conjunction with the Authority's Health Promotion Unit.
3.10	Food Safety Training For Officers	Staff development is primarily assessed through the Employee Development Appraisal Interview undertaken annually.
		The Authority also participates in the Environmental Health Lancashire (EHL) Food Safety Annual Training Programme.
3.11	Imported Food Controls	The Food Safety Service will undertake work necessary for the enforcement of the legislation relating to imported foods, through the following:
		 Food Safety Act 1990 European Communities Act 1972 The General Food Regulations 2004 The Official Feed & Food Controls (England) Regulations 2006 (as amended) Products of Animal Origin (Third Country Imports) (England) Regulations 2006 (as amended)
		 Products of Animal Origin (Import & Export) Regulations 1996 as amended EU Regulation 882/2004, 178/2002 & 852/2004 Contaminants in Food (England) Regulations 2007 The organic products (Imports from Third countries) Regulations 2003 The Food Hygiene (England) Regulations 2006 (as amended)
		Documented procedures are in place for the enforcement of the legislation relating to imported Products of Animal Origin (POAO) and imported Food Not of Animal Origin (FNOA).
4.0	RESOURCES	The Food Cofety Coming financial and a service of
4.1	Financial Allocation	The Food Safety Service financial costs are contained within the main "Health Services" budget.
		The total cost of the Food Safety Service is £215,314 which comprises of the following:
		Staff & associated costs - £158,260 Equipment, materials, sampling Specialist fees etc £13,660 Health Management/Administration - £43,394

4.2 **Staffing Allocation**

Staff resources for food safety matters are provided from the Commercial Safety Section which consists of:

- Commercial Safety Manager (1FTE)
- 4 Senior Environmental Health Officers (3 FTE)
- 3 Environmental Health Assistants (1½ FTE)
- 1 Health & Safety Officer (1FTE)

The Commercial Safety Section is responsible for food safety, health and safety, infectious disease control and some public health matters.

The resources allocated from the Commercial Safety Section solely for food safety matters equate to 3.65 FTE. This is comprised of the following:

Commercial Safety Manager (0.5 FTE)

Senior Environmental Health Officers (2.1 FTE)

Environmental Health Assistants (1.05 FTE)

In view of the organisational downsizing project being undertaken in the early part of 2009-2010, the level of resources allocated to the Food Safety Service may be reduced.

Inevitably, this would then impact on the level of service which could be provided. For example, if the staffing of the Commercial Safety Section was reduced by 0.5 FTE, the effect on the Food Safety Service would lead to a reduction of approximately 10% in the level of service available for the key areas of work which are detailed below.

The staffing allocation to key areas of the Food Safety Service is currently as follows:

STAFFING ALLOCATION - FOOD SAFETY SERVICE

3.65 FTE 785 Officer Days

		100 Officer Days		
	%	FTE	Officer Days	
Food Hygiene				
Inspections	63	2.2995	494.55	
Food complaints	6	0.219	47.1	
Advice	3	0.1095	23.55	
Sampling	5	0.1825	39.25	
Food poisoning				
investigations	5	0.1825	39.25	
Food Alerts	3	0.1095	23.55	
Liaison with other				
organisations	4	0.146	31.4	
Food safety promotion	2	0.073	15.7	
Officer training	1	0.0365	7.85	

		Imported Food	1	0.0365	7.85
		Food safety management inc Safer Food Better	7	0.2555	54.95
		Business TOTAL	100	3.65	78
4.3	Staff Development Plan	The Authority, in accordance Agency Food Law Code of File is committed to providing each Service with a minimum of training each year. Records of training needs are as part of the Environment System.	Practice th mer f 10 h	e (publishe nber of the nours ong npetency le	ed June 2008 e Food Safet oing/updating evels are kep
		Attendance on appropriate t and is complemented by i developments during meeting	n-hous	se training	g on specifi
5.0	QUALITY				
5.1	Quality Assessment	It is our policy to undertake a Service in accordance with the Environmental Health Se	the pi	rocedures	laid down i
		The Service is accredited to as part of an overall Environmental Health Service	Qualit		
		External audits by ISOQAR intervals. Internal audits a Environmental Health Service	re und		
		Requirements of the Quality work, identification of non-coout of customer satisfaction s	onform	ances and	
		The Authority is an active representation of the Lancashire area and FOG's liaison, training, auditing, benchmarking and of the Lancashire area.	ood Of is cor peer	ficers Gro mmitted t review,	up (FOG) fo o developing inter-authorit
		Through FOG, the Authority auditing of the Food Safety Sthe Standard laid down by the	Service	s in Lanca	ashire agains
6.0	REVIEW				
6.1	Review Against The Service	Performance was monitored • Monthly performance		_	-

- Submission of performance figures against target figures to members on a quarterly basis
- Performance was subject to Audit Commission scrutiny and data provided to the Food Standards Agency on an annual basis
- Performance was reviewed at Team Meetings and at the half-yearly Food Quality System Management Reviews
- Percentage of food premises inspections that should have been carried out and were carried out for high risk premises (categories A,B & C) 2007/2008 Performance Target 100% Achievement 100%
- Percentage of food premises inspectors that should have been carried out and were carried out for lower risk premises (categories D,E & F) 2007/2008 Performance Target 100% Achievement 100%
- Percentage success in responding to food safety service requests within 3 working days.

2008/2009 Performance Target 95% Achievement 95%

The Environmental Health Services Quality Management System was originally accredited to the ISO 9001:2000 Standard on 11 May 2006. The Service has now been accredited to the new ISO 9001:2008 Standard on 11 May 2009. The Environmental Health Services Quality Management System now covers food safety, health & safety enforcement, health promotion, environmental protection, pest control, dog control and animal welfare services.

The Environmental Health Services Quality Management System was audited twice during 2008-2009. The Quality System was found to be working satisfactorily and the accreditation to the new ISO 9001:2008 Standard was achieved.

Accreditation to this Standard is internationally recognised as showing commitment to quality, customers and a willingness to work towards improving efficiency.

Policies, procedures and standards relating to complaints about a third party, requests for service, statutory notifications and referrals to other regulators (on information received where there is wider

	regulatory interest) are monitored and reported on, and any variations are addressed within this Service Plan.
6.2 Identification Of Any Variations From Service Plan 2008/2009	Some staff absences occurred during 2008-2009 due to long-term sickness. Additional intervention visits to premises were required during 2008-2009, to undertake verifications following 'Safer Food Better Business' mentoring which took place following a successful bid by the Authority to the Food Standards Agency. During the year, officers were again involved in work to further develop, maintain and extend the Environmental Health Services Quality Management System, incorporating the Food Safety Service.
6.3 Areas For Improvement (2009/2010) *	The target inspection rate for 2009/2010 is 100%. This target is in line with the stepped improvement targets over the last few years leading up to 100% in recent years.
* - (Subject to outcome of organisational downsizing project currently being undertaken.)	The target response rate to food safety requests within 3 working days is 96% for 2009/2010.
	To further develop and implement the new M3 computer software system used for the recording, programming and monitoring of the Food Safety Database of Premises and the Food Safety Premises Inspection Programme.
	To develop and implement the new Food Standards Agency (FSA) Local Authority Enforcement Monitoring System (LAEMS). This is a new computerised system introduced by the FSA for Local Authorities to provide the FSA with details of their enforcement activities.
	To implement, as appropriate, changes to the Food Standards Agency Code of Practice & Guidance which may arise from the Changes to Local Authority Enforcement (CLAE) project, currently being undertaken by the FSA.
	 To develop a methodology for addressing key issues at those premises which do not achieve the level of being 'broadly compliant' so that that this level of compliance can be achieved. Thereby,

increasing the percentage of food businesses who are 'broadly compliant'.

- Maintain and develop the food safety part of the Environmental Health Services ISO 9001:2000 Quality Assurance Accreditation.
- To produce at least one Commercial Safety Newsletter for businesses which will include sections on important food safety issues.
- Further develop and implement, in partnership with the Lancashire County Council Trading Standards Service, the Recipe 4 Health Award Scheme.
- To continue to promote the FSA's "Safer Food Better Business" Food Safety Management System

 so as to help businesses sell and produce safe food and comply with new legal requirements.

ORGANISATIONAL CHART FOR THE COMMUNITY SERVICES DIVISION (AS AT 01.04.09)

