



Food Service Plan 2011-2012 Review of Plan 2010-2011

Contents

1.0	Service Aim, Objectives, Key Tasks and Targets.....	2
2.0	Background.....	2
3.0	Service Delivery	4
4.0	Resources.....	7
5.0	Quality Assessment	7
6.0	Review of 2010-2011 service plan	7
7.0	Plan for 2011-2012.....	10

1.0 Service Aim, Objectives, Key Tasks and Targets

1.1 Objective, Aims and Key Tasks

- To meet statutory responsibilities in respect of national and European requirements concerning official controls of food in a cost effective and responsible manner in accordance with statutory guidance.
- To encourage best practice and publish advice on Food Safety to businesses and voluntary groups.
- To discharge food safety inspection and enforcement responsibilities in accordance with the Cabinet Office Enforcement Concordat adopted by the Council in January 1999 and the enforcement policy for Environmental Health Services 2008.
- To implement national and local food sampling programmes and to promote Food Safety.

1.2 Links to Corporate Objectives and Targets

The food service plan is consistent with the vision of the core value contained within the corporate plan “Focusing on Customers” as Environmental Health delivers a service to both residents and businesses in the Borough.

The Core Value “Providing Value for Money” is reflected in the service plans commitment to direct resources to the high risk premises and implement cost effective inspection procedures.

The HM Treasury Rogers Report of 2007 identified food hygiene as a national regulatory priority. Through the use of a risk based approach to food hygiene, the service applies the principals of the Hampton Review ‘Reducing administrative burdens: effective inspection and enforcement’.

2.0 Background

2.1 Profile of the Local Authority

The Borough of Epsom & Ewell is situated in the North East of Surrey, with an area of 3,411 hectares, of which over half is open space, particularly to the South and West. The Borough has a population of approximately 72,700 (2009 estimate) predominantly in suburban areas. There are 30,212 households in the Borough as at January 2011 and the average household size is 2.41 people. There is a working population of approximately 33,000 of whom half commute out each day, with a similar number coming in to employment in the Borough.

2.2 Organisational Structure

A chart is attached showing the structure of Housing and Environmental Services and with the elements involved in food hygiene delivery highlighted.

Specialist services, when required, are provided as follows

- (i) Public Analyst: Eurofins Scientific Services, 28-32 Brunel Road, Westway Estate, Acton, W3 7XR
- (ii) Microbiological testing: The Health Protection Agency (HPA) William Harvey Hospital Kennington Road, Willesborough, Ashford, Kent TN24 0LZ

2.3 Scope of the Food Service

The Food Safety Service exists to ensure that all food produced, purchased, stored or distributed in the Borough is fit for human consumption. By providing this service, the Council actively contributes to the maintenance of high standards of hygiene in processes of production, preparation and sale of food throughout the Borough. Advice is given to food businesses and handlers to ensure they meet legal requirements and observe best practice designed to protect public health. In addition there is the programme of premises inspections followed by enforcement where hygiene standards are found to have fallen below an acceptable level.

The Service also undertakes routine food sampling, a service which complements and reinforces the overall objective of protecting public health.

The Council is a food hygiene training provider and the Town Hall is registered with the Chartered Institute of Environmental Health (CIEH) as a training venue for approved courses. The service has delivered food hygiene training to over 200 food handlers since 2003 mainly from small independent local businesses and has achieved a pass rate of over 90%.

The Environmental Health Service, in certain circumstances, works in association with sections of the National Health Service and the Health Protection Agency in relation to the investigation of notifications of infectious disease and food poisoning.

In addition to programmed food hygiene inspections, and the investigation of complaints related to food and food premises other services are delivered. These include health and safety inspections, smoke free visits, infectious disease investigations, water quality testing and pollution emanating from premises where food is prepared, processed or sold.

2.4 Demands on the Food Service

As at April 2011 there are 479 food premises in the Borough. Of these 363 were restaurants, cafes, canteens or other caterers, and 108 were retailers. The remainder are made up of small scale producers and distributors. 207 premises fall into the high risk categories of A to C. Category A requires inspection at 6 month intervals, category B at 12 month intervals and category C at 18 month intervals in accordance with Food Safety Code of Practice issued by the Food Standards Agency. There are no approved establishments operating within the Borough of Epsom & Ewell. However the service does advise and inspect the in-house and external catering provision at the Derby Race meetings, and the monthly Farmer's Market that can attract up to 25 itinerant food stalls.

Environmental Health Services is based at the Town Hall, and the service is available from 9am to 5pm Monday to Friday. In the event of a major incident or an outbreak of food poisoning, there are arrangements for contacting senior officers outside of normal office hours.

A significant proportion of catering establishments are operated by people whose first language is not English. As far as possible, on request, printed advice and information is provided in the business owner's first language.

2.5 Enforcement Policy

The Environmental Health Enforcement Policy was revised and approved by the Council in 2008.

3.0 Service Delivery

3.1 Food Premises Inspections

Food premises are inspected in accordance with the Food Law Code of Practice (England) as published by the Food Standards Agency.

Other premises e.g. childminders are not routinely inspected other than at their request or by referral from OFSTED. The Council, in line with other Surrey local authorities have reached an agreement with OFSTED whereby any food hygiene concerns from OFSTED inspectors will be referred to the local authority for follow up.

The number of programmed inspections to be undertaken during 2011-2012 is 244, revisits during the same period will be limited to those that are programmed, those where compliance with notices needs to be assessed and those which have been formally requested by the food business operator as part of the Food Hygiene Rating Scheme. Under present arrangements, the majority of food related work is done by one Environmental Health Officer, most of whose time is spent inspecting food premises.

Any significant increase in the numbers of food related complaints or incidents would place additional demands on the service. Without additional resources this demand could only be met at the expense of the premises inspection programme and/or other areas of environmental health.

3.2 Food Complaints and requests for service

Procedures exist to deal with food complaints which allows for working with Surrey County Council Trading Standards when necessary.

Enforcement of food safety is undertaken in accordance with the Food Safety Act 1990, EU Regulations 852/2004, the Food Hygiene (England) Regulations 2006 and associated legislation. Decisions to bring legal proceedings in appropriate cases are made in accordance with the Service's Enforcement Policy and the Scheme of Delegated Authority to Officers.

3.3 Primary Authority / Home Authority Principle

The Council is committed to the Home Authority Principle and Primary Authority principal whereby, in order to ensure consistency of enforcement, a business can form a partnership with a local authority, normally the authority where its head office exists and enforcement issues can be moderated by that authority.

Epsom & Ewell have no formal partnerships with any food business at this time.

3.4 Advice to Business

The Service carries a range of guidance booklets and leaflets, which are available on the Borough Council's website and freely distributed to businesses on request and at the time of inspections. Officers give guidance on how best to comply with legislative requirements and businesses are advised of published guidance which is readily accessible from a variety of appropriate sources.

The service works with businesses to help them comply with the law by

- Issuing general advice, for example, kitchen layouts in new businesses
- Providing verbal advice during routine visits and inspections
- Answering questions
- Issuing written information and leaflets.

The number of times businesses contact Environmental Health for advice is not separately recorded, but advice is sought during more than 80 per cent of programmed food safety inspections.

The Borough spends considerable time delivering the recommendations of the "Safer Food Better Business" initiative which is a way for business to comply with EU regulations by providing a food safety management system.

3.5 Food Sampling

The authority undertakes planned food sampling in coordination with the Health Protection Agency (HPA) and programmes developed by Local Government Regulation (previously Local Authorities Coordinators of Regulatory Services - LACORS).

Samples may also be submitted to the HPA laboratory or to the Public Analyst in support of food complaint investigations.

3.6 Control and investigation of Outbreaks and Food Related Infectious Disease

In respect of an outbreak of food poisoning or infectious disease, procedures are set out in the Surrey Outbreak Control Plan and the Environmental Health Service will act in conjunction with the HPA under the guidance of the Consultant in Communicable Disease Control (CCDC) acting for the Health Protection Agency.

In 2009-2010 the Environmental Health Service received 170 notifications of infectious disease including food poisoning, actual or suspected. A small number, typically less than 5%, require investigation under the direction of the CCDC. The remainder are investigated by means of a standard letter and questionnaire sent to the patient.

3.7 Food Safety Incidents

Food Alerts are part of a national system of letting local authorities and consumers know about problems associated with food and, in some cases, provide details of specific action to be taken.

Where necessary a media release or high priority visits to premises are arranged.

In 2010-2011 51 Food Alerts were received, including those relating to bacteriological, chemical and physical contamination of food.

Out of hours contact arrangements are in place whereby the Head of Housing and Environmental Services or the Environmental Health Team Leader can be contacted by national authorities via the Mole Valley out of hours call centre.

The resource implications are very much dependent on the category of any given alert 'For Action' alerts can potentially involve a considerable amount of work contacting and inspecting food outlets, whilst 'For information' may involve less response. To date, all work relating to food alerts has been undertaken by Environmental Health Officers and resources are considered adequate. In the event of a large-scale warning, support staff will be drawn from other areas of the Council as required.

3.8 Liaison with Other Organisations

The authority has in place various arrangements to ensure that enforcement action taken in its area is consistent with that in neighbouring local authorities.

Epsom & Ewell is represented on the Surrey Food Liaison and Study Group that includes the other Surrey local authorities, Surrey County Council Trading Standards and representatives from Local Government Regulation, the Health Protection Agency and the Food Standards Agency.

Joint working with, in particular, Surrey Trading Standards will continue and where possible, inspections will be coordinated as will action on food alerts.

Epsom and Ewell is also represented on the Surrey Infection and Environmental Control Group, which is chaired by a Consultant in Communicable Diseases.

There is formal liaison with the Surrey Primary Care Trust and the local water companies.

The service responds to planning consultations involving new food premises or alterations to existing premises.

Any application received by the Borough's Licensing Service that includes food preparation or sales are individually reviewed for compliance with regulations.

The Service routinely works with organisations such as OFSTED, the Care Quality Commission, Surrey Commercial Services, Business Link, the Inland Revenue and the Health and Safety Executive.

3.9 Food Safety Promotion

Resource constraints are such that food safety promotion is largely confined to the point of service delivery and mostly at the time of food premises inspection.

A Food Hygiene Training course was introduced in June 2003 and was subsequently reviewed, renewed and run every year since.

4.0 Resources

4.1 Staffing Allocation

The number of staff working on food law enforcement and related matters (including infectious diseases) is 1.275 officer full time equivalent. There are no dedicated administrative support staff.

All Environmental Health Officers are authorised in all aspects of Food Safety Enforcement and one EHO has lead responsibility for all food related matters in conjunction with the Environmental Health Team Leader.

4.2 Staff Development Plan

The Council operates a staff appraisal scheme that includes an agreed Personal Development Programme for the forthcoming twelve months following any appraisal. Each year learning needs are identified and may be provided in house or externally depending on the requirement. Those working in food safety enforcement must achieve at least 10 hours of professional development.

5.0 Quality Assessment

Monitoring measures are in place to assess performance, particularly having regard to the number of visits carried out on a month by month basis and is monitored by the Director of Operations.

Any newly recruited officer will be assessed in accordance with the team monitoring procedure involving shadowed visits and follow up. This also applies periodically for EHOs already in post. Team summits address consistency issues within the team and food service matters are discussed.

Throughout the year 'customer satisfaction' survey forms were sent to all businesses that were inspected the results of which are collated into an annual report.

National Indicator 182 – Satisfaction of businesses with local authority regulatory services was dropped by Government in February 2011. It was a measure to inspire local authorities to recognise the important contribution regulatory services make to local and national priorities, and inspire regulatory services to recognise their own role in supporting local business. The service will continue to monitor customer satisfaction.

National Indicator 184 – Food Businesses in the area which are substantially compliant, has been dropped by Government but will still be monitored internally. This indicator provides a measure of the performance of food businesses in the area and thereby indirectly measures the performance of their local authority.

6.0 Review of 2010-2011 service plan

As part of a restructure, the position of Environmental Health Service Manager was removed and responsibilities split between the Head of Housing and Environmental Services and the Environmental Health Team Leader. Across the Environmental Health team there was 1.275 full time equivalents working in food safety.

6.1 Interventions

- There were 479 registered food premises by the end of the year
- 257 interventions were due (interventions typically meaning an inspection)
- 295 inspections and audits were carried out. It is common to visit more premises than were due owing to the number of new ownerships and new businesses which start during the year.
- 52 visits were made for the purposes of verification and surveillance, sampling and advice and education

In addition the service held two workshops in local venues in support of the national Food Hygiene Rating Scheme which is now in effect in the Borough. In total 40 businesses were represented and given the chance to learn about and adapt to the publication of their ratings.

Performance of the service was directly monitored by monthly return to the Director of Operations. Owing to unforeseen circumstances for the first time in many years the service did not achieve 100% of high risk inspections within +/- 28 days from their due date. However all were achieved by the year end.

Additional Epsom Derby full food hygiene inspections were carried out plus detailed negotiations with catering contractors and subcontractors. Those vehicles that are registered with another borough were required to produce their most recent inspection report, which were discussed and any outstanding issues dealt with.

The service met its target of maintaining the number of businesses that are “broadly complaint”. Overall 93 percent of food businesses met this criterion. It is felt that this is the limit of achievement, as new businesses that open often require support to help them achieve their potential and this figure varies considerably within the year.

The service continued to monitor an increase in the number of people wishing to establish themselves as home caterers. It is understood that this has been linked with the economic downturn. In response to this new demand, an information leaflet was designed for new home caterers to educate them as to their food hygiene responsibilities and provide information about where to go for planning and insurance advice.

6.2 Complaints

In total 19 complaints were received and investigated concerning both complaints about food and of food businesses. These ranged from allegations of food poisoning, complaints about foreign bodies in food, unfitness of food and hygiene of premises.

100 percent of complaints were responded to within the times outlined in the Service Standards, exceeding the service target of 96 percent.

6.3 Sampling

In 2010-2011 10 samples were submitted to the Health Protection Agency (HPA) Environmental Microbiological Service. These consisted of cooked meats and environmental surface swabs. Eight samples were found to be unsatisfactory and work is underway to with those businesses to improve practices.

The Health Protection Agency financial allocation for Epsom & Ewell in 2010-2011 was set at £2836 and this was found to be adequate. This allocation facilitates bacteriological and qualitative sampling and analysis of food, water and environmental monitoring.

6.4 Education and information

Two Food Hygiene Training courses were held which resulted in 26 people achieving a recognised CIEH Food Hygiene qualification.

6.5 Partnership working

Representation was made on the Surrey Liaison Group which includes trading standards officers to develop joint working relationships such as sampling initiatives and procedural guidance.

6.6 Document review

The Service carries a range of guidance booklets and leaflets many of which are accessible from the Council's web site. The service also maintains a range of advisory booklets from other organisations such as the Food Standards Agency.

6.7 Business Service satisfaction survey

The food service exceeded the target of 80 % of businesses which were strongly agreed or agreed that they "were treated fairly", achieving a result of 89%. 96% "felt the contact was helpful" against a target of 80%.

6.8 Enforcement

72 written warnings were issued, no improvement notices or prosecutions were necessary. However non compliance found in the final month of the year has resulted in improvement notices being served in April 2011. This will be reported in the 2012-2013 service plan.

6.9 Food Hygiene Rating Scheme

Following a similar successful bid in the 2009-2010 financial year, the service was awarded £3,500 to fund final preparations for the launch of the Food Hygiene Rating Scheme.

The national Food Hygiene Rating Scheme is a partnership project between the Food Standards Agency and Local Authorities and involves the publication of the food hygiene performance of individual food premises. The scheme went live on the national website on 1 March 2011.

6.10 Pennington Report

In 2009 the Public Enquiry into the September 2005 Outbreak of *E.Coli* O157 in South Wales (the Pennington Report) was published. The service reviewed its training and procedures to ensure that the recommendations made to Local Authorities were taken into account. The Epsom & Ewell progress report and action plan are appended to this plan.

6.11 Competency

In 2010-2011 considerable effort was put into building up and maintaining the competencies of Officers who do not carry out the bulk of the inspection work but who still contribute to the intervention programme. It is hoped that this will make the service more robust and allow for increased operational flexibilities.

7.0 Plan for 2011-2012

7.1 Programmed inspections 2011-2012

In 2011-2012 246 premises inspections are due, broken down as follows.

Category	Number	
A	4	High risk
B	40	
C	114	
D	60	Low risk
E	28	

It is planned to undertake all high risk (category A-C) premises inspections within +/- 28 days of their due date. This will include evening and weekend visits. It is anticipated that the service will also be able to carry out all lower risk (category D and E) interventions within +/- 28 days of their due date.

It should be noted that within the due inspection programme additional inspections are also required for new food premises and business premises that close and re-opened as a different category operation and those that change management.

The inspection of food businesses at the Derby is once again a priority. Prior to the event, discussions will be held with the racecourse management and the contractors for food supply to ensure best practice in food and health & safety.

The local performance indicator of 100% of due high risk inspections complete will continue to be monitored. A target of 80% of businesses who feel they have been fairly treated and felt the contact was helpful will be maintained. Although NI194 (food businesses broadly compliant) is no longer reported nationally it will continue to be monitored but no target is proposed as this figure is subject to factors outside the control of the Council.

7.2 Accuracy of database

The accuracy of the commercial premises database will be ensured by the following means:

- Liaison with OFSTED regarding childminders in the borough
- Liaison with the Care Quality Commission regarding care homes in the Borough
- A periodic cross check against web based directories for changes to businesses in the Borough

- Updating of details during other regulatory visits such as smoke free advice/enforcement visits, licensing visits and health and safety visits
- Use of local knowledge
- Use of Yellow Pages
- Liaison with Trading Standards.

7.3 Sampling

A budget of £1000 has been allocated for chemical sampling of food and water. An allocation of around £2,800 is expected from the Health Protection Agency for the routine microbiological sampling of food and water but this is yet to be confirmed.

7.4 Complaints

The performance indicator target is still being maintained: 96% of complaints/service requests receiving a first response within the target times set in the Environmental Health Service Standards.

7.5 Quality Assessment

Following Government's removal of the requirement for local authorities to report on satisfaction of business with local authority regulatory services (NI182), the post visit questionnaire will be reviewed to ensure it is still able to gather information on the quality of inspections as perceived by food business operators.

7.6 Publicity

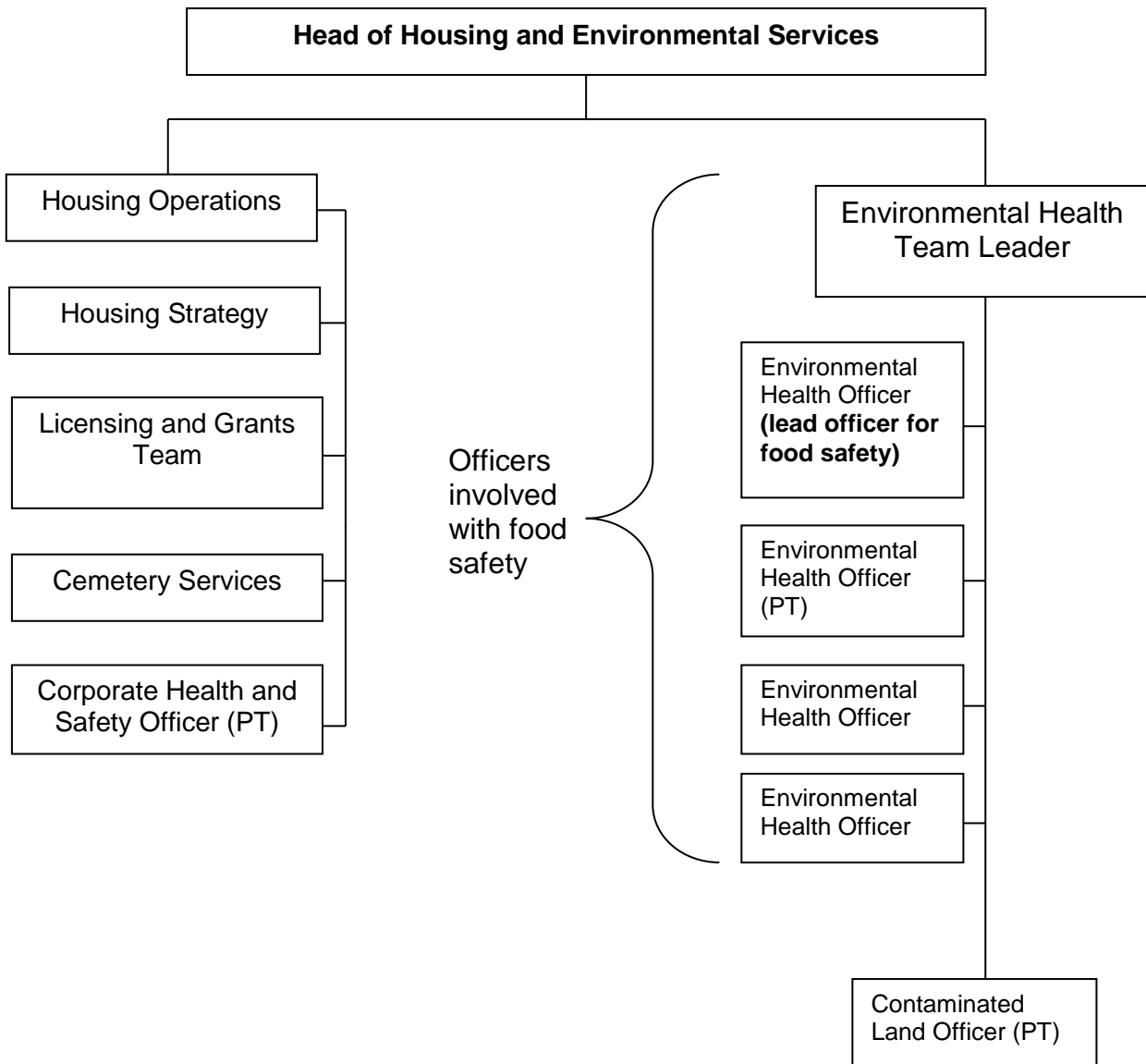
The Service will seek to publicise successful initiatives which are of benefit and interest to the public.

7.7 Young Report

Lord Young published his report "Common Sense, Common Safety" on 15 October 2010 and called for, amongst other things, food hygiene interventions to be coordinated with health and safety inspections. At Epsom & Ewell since the same team deal with both it is intended that the existing system be continued and food interventions as far as possible will be combined with health and safety inspections.

7.8 Inter Authority Audit

In 2011-2012 the service will undergo an inter authority audit as part of a Surrey wide initiative aimed at ensuring each authority is operating in accordance with the Food Law code of Practice and the Framework Agreement on Official Food and Feed Controls.



As well as Food Safety the Environmental Health Team cover private sector housing enforcement, health and safety at work, infectious disease investigation, pollution control, noise nuisance, waste enforcement and other public health matters

Structure of Housing and Environmental Services

**Epsom & Ewell Borough Council Pennington Report Progress
Completed March 2011**

The Public Inquiry into the September 2005 Outbreak of E.coli O157 in South Wales produced 24 recommendations. Epsom & Ewell Borough Council wish to ensure its compliance with the recommendations to help protect public health within the Borough. The following table lists the 9 recommendations relevant to EEBC's food service and comments on compliance/what must be done to ensure compliance by EEBC.

Part 1 – Performance table as at July 2010

No	Recommendation	EEBC progress	Compliant
1	Regulatory and enforcement bodies should keep the choice of "light touch" enforcement for individual food businesses under constant review.	The national Food Law Code of Practice allows for an alternative enforcement policy whereby low risk establishments can submit questionnaires and "self certify" in exchange for not receiving a formal inspection by EEBC. EEBC has decided not to adopt this flexibility but to keep the situation under review. In a document from 2008 it was determined that the time and effort to print, distribute and follow up questionnaires was better spent visiting food businesses.	Compliant
2	The inspection of HACCP plans must be audit-based.	Three officers attended the FSA course "Effective Evaluation of Food Safety Management Systems" course in February 2010. The standard "premises report for file" template allows for the recording of evidence for the assessment of HACCP based systems. Learning and development activities programmed for 2010-2011 including online courses will allow for training in the audit style of inspection.	Partially compliant
3	Training provision should be developed to ensure that all officers in Wales who check HACCP and HACCP-based plans, including those responsible for overseeing the work of those officers, have the necessary knowledge and skills.	In this context, EEBC have taken this recommendation to include enforcement officers more widely than just Wales. The Head of Housing and Environmental Services, the Lead Officer for Food and The Environmental Health Team Leader attended the FSA course "Effective Evaluation of Food Safety Management Systems" in February 2010.	Partially compliant
4	Environmental Health Officers should obtain a copy of a business's	Where it is deemed necessary EHOs will obtain a copy. However it is not proposed to copy or remove to be copied HACCP plans from	Complainant but see

	HACCP/food safety management plan at each inspection, which should be held on the business' inspection file.	national chains where a lead authority or home authority exists. Additionally, where the management system consists of SFBB or similar, it is practically difficult to take the folder away from the business or to copy it on site. Unless there is a pressing reason to do so, it is proposed not to proceed with this recommendation to the fullest extent.	progress column
5	A system of logging issues, concerns or potential problems, whether by "red flagging" specific documents or by file notes, should be standard practice.	As part of the premises report for file template, space is allocated for alerting future officers to concerns or potential problems. Additionally the departmental database contains a free text field in the "IVA" screen to record the details of the inspections and concerns they may have. Review of the file is carried out prior to each inspection	Compliant
6	Decisions about confidence in a business's management of food safety should be evidence-based.	No aspersions are cast on the professionalism of Environmental Health Officers when judging confidence in management. However there is no routine recording of evidence used to generate the score and therefore no audit trail that evidence based judgement is exercised.	Non compliant
7	All inspections, primary and secondary, must be unannounced unless, exceptionally, there are specific and justifiable circumstances or reasons why a pre-arranged visit is necessary.	It is routine procedure to carry out unannounced inspections in line with the food law code of practice. Pre arranged visits are confined to where revisits are necessary to speak with the owner/manager or where the intervention is for the purposes of advice or education.	Compliant
8	Discussion with employees must be a standard part of food hygiene inspection visits.	Discussion with employees is general practice but has acknowledged difficulties when dealing with members of staff who do not speak English. Where possible discussion with employees takes place.	Compliant
9	The Food Standards Agency should develop, as part of its Audit Scheme or as an adjunct to it, a means of assessing how food hygiene inspections are undertaken by local authorities, including the assessment of HACCP and HACCP-based plans.	Epsom & Ewell await any adjustments to the national audit scheme but in the meantime is participating in the Surrey wide intra authority audit scheduled for Q4 2010-2011.	Compliant

Part 2 – Action Plan for non compliant or partially compliant elements

Recommendation	Action to ensure full compliance	Timescales	
The inspection of HACCP plans must be audit-based.	Participation by all officers in the current identified training needs for EHOs involved in food safety enforcement. Reminder during team meetings that the expectation is that food interventions be audit based and involve more than just identification of contraventions of law. Ideally the standard will be that Officers audit the business against their own HACCP plan/food safety management system and record evidence of non compliance with this and with the applicable EU directives and regulations.	By March 2011	✓
Training provision should be developed to ensure that all officers in Wales who check HACCP and HACCP-based plans, including those responsible for overseeing the work of those officers, have the necessary knowledge and skills.	<p>Participation by all officers in the current identified training needs for EHOs involved in food safety enforcement.</p> <p>To take advantage of further training in HACCP plan evaluation for those who have not benefitted from such.</p> <p>As an interim measure, all Officers involved in assessment of HACCP/HACCP based plans such as SFBB to check their proposed course of action with the Lead Officer for Food Safety and for this to be recorded.</p>	<p>By March 2011</p> <p>By March 2011</p> <p>Immediately</p>	<p>✓</p> <p>✓</p> <p>✓</p>
Decisions about confidence in a business's management of food safety should be evidence-based.	<p>To instigate a revised procedure whereby Officers record the decisions as to what led them to give a particular score for the three relevant parts of the annex 5 rating scheme – structure, hygiene and confidence in management. To use the free field text box within the IVA screen to record this.</p> <p>To devise and deliver an in house consistency training exercise.</p> <p>To remind Officers of the availability of the guidance contained within the food law code of practice and generally on the Food Standards Agency Website.</p>	<p>November 2010</p> <p>July 2010</p> <p>July 2010</p>	<p>✓</p> <p>✓</p> <p>✓</p>