

CABINET
24 APRIL 2007

DIRECTORATE OF
COMMUNITY AND ENVIRONMENT
ENVIRONMENTAL HEALTH
REPORT NO. ENH07023

FOOD SAFETY SERVICE PLAN 2007/08

INTRODUCTION

- The Council is required to produce an annual Food Safety Service Plan in accordance with guidance from the Food Standards Agency (FSA). The draft plan has been considered by the Licensing and General Purposes Committee on 16th April and comments will be reported at the meeting. Following Cabinet endorsement, local businesses, business organisations and the FSA will be consulted and, if significant comments are received, these will be reported back to Cabinet. The final plan will be submitted to the FSA. *A copy of the draft plan is available in the Member Resource Room or from Colin Alborough (see below).*

BACKGROUND

- This draft is set against an emerging background of a national review of regulatory services stemming from the Hampton Review. This aims to reduce red tape and ensures risk based and appropriate interventions. In addition the Chancellor recently announced the results of the Rogers Review, which established the “hygiene of food businesses” as one of five “national enforcement priorities for local authority regulatory services” from 64 areas of local authority regulation. This draft acknowledges these findings and proposes new ways of working.

THE DRAFT PLAN

- The food safety service makes a significant contribution to the Council’s corporate objectives:
 - **Safe** – the service works to ensure high standards of food safety in local food businesses and also recognises its role in promoting public health. The service is also leading the Council’s work associated with the Smoke Free legislation.
 - **Prosperous** – appropriate and timely, business friendly interventions and assistance to the benefit of employers, employees and residents alike
 - **Clean** – ensuring the maintenance of hygiene standards at commercial premises and dealing with complaints about accumulations, pest control, etc.
 - **Quality** – delivering a service meeting FSA and Health and Safety Commission expectations to Charter Mark standard
 - **Your Voice** - taking a lead in partnerships to listen and learn from our stakeholders and to promote business compliance by effective communication
- As required by FSA guidance, the plan contains:
 - the aims and objectives of the service and the contribution it makes to the Council’s corporate objectives
 - the scope of the service, the demands placed upon it and our enforcement policy
 - the plan for delivering the service including food premises inspection, support and advice for businesses, control of infectious disease and requests for service
 - the resources allocated, quality assessment and review

- **Reviewing performance in 2006/07, the plan notes:**

- the anticipated delivery of 100% of the food premises inspections due in the period 2006/07
- doubling of requests to the Food/Health and Safety Team, largely as a result of new legislation regarding smoking, licensing and food safety management systems as well as in response to our work on the "Fit 3" programme. Environmental Health received over 41,000 calls compared with 25,000 last year
- customer satisfaction surveys show 100% satisfaction with the food/health and safety inspection service
- work at the Farnborough Air Show 2006 which, largely due to the extreme weather, presented food safety issues managed by the team in partnership with the Air Show organisers
- successful application for funding from the Food Standards Agency to support catering businesses to introduce new written food safety management systems.
- the impact of the licensing act
- the impact of staffing vacancies

- **Key issues arising from the service plan for 2007/08 include:**

- continued support for businesses, to help them put in place written food safety management systems
- preparing for the transfer from our Five Star Award Scheme to a Hampshire-wide "Scores on the Doors" scheme
- targeting "unsatisfactory" businesses with more inspections and enforcement whilst reducing the regulatory burden on compliant and lower risk businesses, in line with Government expectation
- reduce the primary inspections of Army food premises as a result of consistently high standards of hygiene and variety of hygiene monitoring systems already in place. This effectively allows Army premises an element of "earned autonomy". Systems will be in place to monitor this arrangement but this allows us to ensure standards are maintained by means other than routine formal inspection
- continuation of food safety service role of Home Authority to the British Army, including development of the Tri-Service arrangements and review of the Joint Services food safety policy
- preparation for the introduction of the Smoke Free legislation

RECOMMENDATION

- Cabinet is recommended to endorse the draft Food Safety Service Plan 2007/08 for consultation.

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**RUSHMOOR BOROUGH COUNCIL
DRAFT FOOD SAFETY SERVICE PLAN 2007/2008**

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1 INTRODUCTION

The Council has a statutory duty to enforce relevant food safety legislation. The Council is required to provide a food safety service plan and, as such, this document sets out the following:

- our food safety objectives, detailing the Council's responsibilities as set out in legislation and the associated code of practice;
- our current work programmes within the service;
- the Council's policy on food safety enforcement, sampling, business support, response to food safety incidents and infectious disease control.

2 BACKGROUND

Profile of Rushmoor Borough Council

Rushmoor Borough Council covers an area of 40 square kilometres with an estimated population of 90,600 (mid-2002 estimate). The Borough includes Aldershot (home of the British Army); Farnborough (noted for aeronautical research and development in Britain). There are approximately 700 food premises mainly composed of restaurants, takeaways and retailers. There are currently no major food manufacturers and no specific unusual demands on the food safety service in the Borough, other than the biennial Farnborough Air Show.

The Principal Food Safety Officer is responsible for the delivery of the Food Service Plan. The Service comprises a Principal Food Safety Officer, two Environmental Health Officers and 20% FTE Technical Officer. The Service is part of the wider Food and Health and Safety Team managed by an Environmental Health Manager (Food/Health and Safety). Administrative support is provided by an internal team.

The Council routinely uses the services of the Health Protection Agency Microbiology Laboratory (Reading/Southampton) and the Consultant in Communicable Disease Control (CCDC) together with Hampshire Scientific Services.

Democratic Arrangements

In accordance with the Local Government Act 2000, the policy functions of the food safety service are the responsibility of the Cabinet. The enforcement functions are the responsibility of the Licensing and General Purposes Committee. In practice many of these functions have been delegated to the Head of Service.

Scope of the Service

The Food Safety Service consists of the following:

- the provision of advice to businesses and the public on food safety matters
- the investigation of requests for service relating to food safety or food premises
- food premises inspection
- food sampling, investigation of food complaints and response to food safety incidents
- infectious disease control

In order to maximise the use of limited staff resources and to ensure a more coherent service to business, the same officer will deal with all food safety and health and safety relating to any single premises.

3 SERVICE AIMS AND OBJECTIVES

It is the Council's aim to ensure that food and drink on sale for human consumption, which is produced, stored, distributed, handled or consumed within the Borough, is without risk to the health and safety of the consumer.

The key objective of the Food Safety Service is to promote good standards of food hygiene and safety by:

- taking appropriate enforcement action proportionate to the risks involved in accordance with the Council's Enforcement Policy
- providing appropriate help, support and guidance wherever possible
- responding to all requests for service regarding food safety at least within three working days and, in the case of risks to health, on the day of receipt
- ensuring all premises due for inspection are inspected in accordance with FSA requirements
- responding to all Food Alerts categorised as "For Action" on the day of receipt
- responding to all cases of food borne infectious diseases within three working days and, in the case of risks to health, on the day of receipt
- maintaining a compliant food sampling programme
- ensuring all staff involved in food safety are qualified and competent with equipment and resources to enable them to undertake the work
- to meet statutory responsibilities in a cost effective and responsible manner in accordance with Food Standards Agency (FSA) and Local Authority Co-ordinators of Regulatory Services (LACORS) guidance

4 LINKS TO THE COUNCIL'S STRATEGIC OBJECTIVES 2007/08

The Strategic Objectives and Key Priorities for the Council for 2007/08 are set out in three main themes: **SAFE, PROSPEROUS and CLEAN**. There are two supporting theme areas of **Quality Services** and **Your Voice**. The priorities are drawn from public consultation and reflect our Comprehensive Performance Assessment improvement plan.

SAFE - 'Protecting and improving people's lives'

The main strands in this objective include protecting and improving the health of the community. A Key Priority is "Health" recognising our work with partners to improve the health of the local population and minimise health inequalities.

The Food Safety Service contributes to this priority, both directly and in its partnership working to secure food and drink that is safe and without risks to the health and safety of the consumer.

The Service also recognises its role in health education. The Service has much to offer in meeting the wider public health remit.

In addition, the team will be the primary lead for the Council in respect of the new smoke free legislation which has implications for the Council as enforcers of the ban, as an owner of premises to which the ban applies and as an organisation committed to improving the public health generally.

A further strand reflects the implementation of licensing legislation particularly the objectives to implement licensing regimes for alcohol and public entertainment (Licensing Act 2003), gambling and gaming, and charitable collections. These areas fall to Environmental Health Services for implementation and will impact upon the Food Safety Service.

PROSPEROUS - 'Encouraging a healthy economy'

This objective has five strands: regenerating our town centres and developing communities; developing sustainable and diverse employment opportunities; providing affordable housing; promoting learning opportunities; developing sustainable transport.

Key tasks in this area include regeneration to improve facilities, economic prosperity and an improved quality of life in town and district centres and deprived neighbourhoods. Further objectives relate to ensuring the Aldershot Urban Extension benefits the local community and raises the quality of the built environment.

The Food Safety Service supports this objective by providing appropriate and timely advice and support to businesses and by providing an even-handed and fair enforcement role that follows the Governments Enforcement Concordat. This is achieved through the routine work of the Food Safety Service and by proactive Health Education opportunities.

CLEAN - 'Looking after your environment'

This objective includes improving the appearance and cleanliness of the Borough and encouraging sustainable development and promoting environmentally responsible practices. Key priorities include promoting a clean Borough.

The Food Safety Service is committed to ensuring clean environments in relation to its food hygiene and safety role but also currently carries responsibilities for wider health issues in relation to, for example, commercial drainage and refuse complaints.

Quality - 'Providing high quality services'

This theme includes reviewing our services in consultation with our local community and by making comparisons with others; improving accessibility to our services and our customer care; maintaining a healthy organisation; meeting our statutory duties; and developing and monitoring an integrated corporate and financial planning process.

The Food Safety Service contributes to this supporting theme by ensuring that the services delivered are provided in a manner that meets the obligations placed on us by monitoring authorities such as the FSA.

The Service is part of the Charter Mark award winning Directorate, a demonstration of the commitment to customer service. Customer satisfaction surveys, overt business plan targets, inter-authority auditing and benchmarking mechanisms are all part of the work of the Food Safety Team to provide a quality service to customers.

Your Voice - 'Engaging with you'

This includes: developing and implementing a community strategy; encouraging greater public interest and involvement in the well being of the local community; improving systems that provide information and enable effective response to the community; communicating well with the local community; and improving the ways we obtain, use and provide information.

The Council will ensure increased customer focus and continuous improvement through promoting the Council and its services by actively seeking two-way communications with the community. The Food Safety Team contributes to this overall supporting theme by facilitating two-way communication ensuring appropriate service delivery.

These corporate strategic objectives are addressed and measured through the Council's performance management system including the service based annual business plans.

Community Planning

The Council recognises its role as a community leader and provider of a range of public services for the local population. The Food Safety Service Plan connects with several of the wider strategic plans which underpin the Council's mission to improve the quality of life of residents and businesses in Rushmoor, including:

- Environmental Health Services Business Plan
- Local Health Improvement and Modernisation Plan (HIMP)
- Economic Development Strategy
- Communication and Information Strategy
- Local Strategic Plan

Best Value

The Food Safety Service was reviewed as part of the Council's Comprehensive Performance Assessment in September 2003. In addition, the Service has met the Charter Mark standard along with the whole Directorate, demonstrating commitment to customer service and continuous improvement.

5 ENFORCEMENT POLICY

The Council has signed up to the Central and Local Government Enforcement Concordat and an existing corporate enforcement policy is in place. A review of the Corporate Enforcement Policy has recently been undertaken and a further review of the Food Safety Service Enforcement Policy will shortly occur to ensure the policy reflects the new Corporate policy and accords with statutory codes of practice and LACORS' (Local Authority Co-ordinators of Regulatory Services) guidance.

A copy of the enforcement policy and a summary leaflet explaining the key elements is available on request and is on the Council's website. The summary leaflet is given to businesses following every inspection.

All food law enforcement is carried out in accordance with the newly updated Code of Practice and other official guidance produced by the Food Standards Agency, LACORS and other relevant bodies.

6 DEMANDS ON THE SERVICE DURING 2006/2007

This section reviews the principle demands placed on the Food Safety Service during 2006/07. These have included, in particular:

- the primary demand placed on the Service during the past year has been the delivery of the planned inspection programme. The Service is anticipating delivery of 100% of inspections against the programme for 2006/07.
- it is estimated that by year end, the Service will have dealt with 250 complaints relating to hygiene at premises, unsatisfactory foods or other issues relating to food safety. Food complaints represent a small proportion of such occurrences since many sales go unreported or are reported straight to the retailer or manufacturer.
- In addition, by year end over 800 service requests will have been investigated across the food/health and safety team as service also has the responsibility for investigating a broad range of activities regarding the public health in commercial premises. This represents an approximate doubling of the number of service requests received across the team. A large part of this can be accounted for by an increase in the number of enquiries generated by new legislation concerning licensing, smoking, food safety

management systems and as a result of our positive outreach to businesses to assist the health and safety "Fit 3" programme. We have also sought to maintain our support to businesses to assist compliance through Partnership Matters and Arena and the increased demand could be interpreted as positive as business confidence to contact the authorities experts in these areas may have increased.

- Considerable resource was targeted to maintaining standards of food and health and safety at Farnborough International Air Show 2006. Our work at the Air Show primarily involved a review of the 120 plans sent in prior to the event by prospective chalet caterers and, at the Air Show, a considerable number of visits to the 135 exhibitor chalets and 43 concession sites (which fall outside the planned inspection cycle). The Air Show was hampered by extreme weather conditions, with hot weather and power failures across the site leading to major food safety issues that were managed by the team in partnership with the Air Show organisers. A total of 250,000 visitors attended the Air Show with some £12 billion of business done in the trade days.
- With a consortium of six authorities across North Hampshire, a bid was made to the Food Standards Agency (FSA) for support in delivering the new "Safer Food, Better Business" (SFBB) model to around 120 catering businesses in the Borough. Food safety legislation in force as of 1st January 2006 required every food businesses to implement documented food safety management systems, with SFBB being the preferred model for catering establishments. The subsequent consortium grant of around £250,000 allowed Rushmoor to support these selected businesses by hosting training seminars and providing one-to-one implementation sessions in the food businesses premises using competent coaches. This project is currently drawing to a close and is being subject to evaluation although initial findings have established substantial improvements in catering businesses.
- The implementation of the new licensing regime has proven a considerable demand across the Food/Health and Safety Team. The input of the role of Responsible Authority, and the support in terms of resourcing moved to support the Licensing Team has reduced resource for the Food Safety Service.
- The Food/Health and Safety has suffered considerable resource shortfall over the year due to a number of factors:
 - following a vacancy of two months in 06/07, Julie Burke rejoined the team in June 2006 to the post of EHO Food
 - following a vacancy of 6 months, Lynn McLaughlin was recruited in October 2006 to work 0.6 FTE in a full time EHO Food post
 - Natalie Osborn, 0.5FTE PHSO opted to take one full year maternity leave throughout 2006/07
 - Brian Thomas, HSTO retired in December 2006 and the post will remain vacant until at least April 2007
- The resulting salary savings allowed the team to employ contractors to deliver part of the initial inspection programme and we are grateful to Jane Hancock and David Baker of Environmental Management Solutions Ltd. for their work to support our Service. We also employed David Graham and Toby Leviers on a casual basis at various stages throughout the year to work on specific projects within the Food/Health and Safety Team and their contribution is appreciated.

- To further partnership working and in response to a public demand for “freedom of information” we have been working to deliver a “Scores on the Doors” system, which effectively provides relevant information arising from our inspections of businesses to residents. We have established partnership working on this issue with neighbouring authorities in Hampshire through the Hampshire Food Advisory Group and will seek to initiate this service as of 1st April 2007.
- We have initiated work on the new Smoke Free legislation with partner organisations. A new website has been created by Rushmoor’s officers and we have publicised the intentions of the legislation through Partnership Matters, our business newsletter, through leaflets sponsored by the PCT and through a series of County and local seminars to interested groups. We have identified that Rushmoor has a larger proportion of smokers than the regional and national norm and a very high incidence of lung cancer (4th out of 364 authorities) and our work in this area will also seek to close this “health gap”. The team will coordinate the Council’s response as an employer, owner of buildings, as an enforcing authority for the new regulations and as an organisation committed to improving the public health.
- With FSA demands for increased and more appropriately targeted food sampling, the Food Safety Service has again utilised its full budgetary allocation from the Health Protection Agency during this year. The Service has coordinated its activities with the local sampling group which it fully supports.
- The Food Safety Service has continued to issue “Partnership Matters”, a newsletter sent quarterly to all businesses. It delivers up-to-date information for businesses primarily on food, health and safety and health promotion issues. It continues to be seen as a valuable tool for the Service as well as an excellent and reliable source of information by the business community.
- Rushmoor Borough Council remains proud to serve as Home Authority for the British Army within the Tri-Service arrangements. The Food Safety Service regularly meets with representatives from the Army, Navy and Air Force together with their respective home authorities and other partners, including the FSA, to maintain and review existing joint arrangements for application across the services worldwide. In addition there are 57 Army premises in the Borough which require food premises inspection.
- The number of “Food Alerts” (national food hazard warnings issued by the Agency) has again increased requiring more resource to particularly deal with those alerts deemed “For Action” including those on the scale of the Cadbury chocolate withdrawal.
- The team has pursued formal action against a number of local businesses including formal cautions for breaches of five food hygiene regulations against the Bombay Balti Tandoori, Aldershot. Two further businesses are currently under investigation for possible further formal action. A total of 26 hygiene improvement notices have been served by the team in the current year.
- The service continues to be delivered during normal working hours, 0900 to 1700 hours, by officers based at the Council Offices in Farnborough. Officers are flexible and are frequently called upon to operate outside these hours. In addition, the Environmental Health out-of-hours emergency service is available and can be contacted through the authority’s out-of-hours telephone number.

7 AUDIT BY THE FOOD STANDARDS AGENCY

In September 2005, the Food Safety Service was selected for audit by the Food Standards Agency. FSA audits assess a local authority's conformance against the Food Law Enforcement Standard, part of the FSA "Framework Agreement on Local Authority Food Law Enforcement".

The Agency carried out 30 similar audits of local authorities with the stated aim of ensuring that local authorities provide an effective food law enforcement service, as well as taking the opportunity to identify and disseminate good practice and inform future agency policy.

Taking into account the close scoping of this one day audit to only include matters relating to Rushmoor's application of the home authority principle, advice to businesses and food safety promotion, the audit report found:

"It was clear that the authority supported the home authority principle and had a well established formal agreement with the British Army. These home authority arrangements formed part of a successful tri-service agreement with other armed services and relevant home authorities.

It was evident from file checks carried out during the audit that officers were consistently considering the home authority principle when carrying out food safety law enforcement and responded appropriately to any referrals in their role as originating authority.

The authority had been pro-active in providing advice to businesses in the area and was actively promoting food safety. Officers were consistently providing clear and comprehensive advice to businesses following routine inspections and following unsatisfactory food sample results."

In summary, the audit identified that the Food Safety Service was fully compliant with the Agency Standard with no "recommendations or requirements" proposed by the auditors.

The auditors made note of a number of business advice initiatives and promotional work undertaken by the Council and recorded these as areas of good practice for inclusion in their final summary report which will be based on their audits of the 30 authorities. These included our:

- quarterly magazine "Partnership Matters" used to update businesses on developments in legislation and to disseminate best practice
- "Five Star Award Scheme" and our participation in Food Safety Week
- programme of training support and other initiatives to assist businesses to compliance with new food legislation being implemented from 1 January 2006
- Simply Safe Catering Pack designed to assist businesses with documented food safety management systems (now replaced by "Safer Food, Better Businesses")
- wide use of information sources including the provision of leaflets, our well developed web pages and specific guidance developed to assist good food hygiene standards at our unique Air Show
- Alternative Enforcement Strategy self assessment booklet which allows assessment of a low risk businesses food safety standards in lieu of formal inspection
- training partnership for hygiene courses with Farnborough College of Technology

Rushmoor's final audit document will be published on the FSA's website, together with a directory of good practice which may be shared by other local authorities. In conclusion, the FSA's report indicates that Rushmoor's Food Safety Service is acting in compliance with the FSA standard within the scope of the audit.

8 SERVICE PLANNING FOR 2007/08

Governmental Regulatory Review - Prioritising Food Hygiene Inspections

The Hampton Review

In 2006, the Government published a report “Implementing Hampton: From Enforcement to Compliance” detailing progress made on the Hampton Report. The Hampton Report considered the scope for reducing administrative burdens by promoting more efficient approaches to inspection and enforcement, without compromising standards, and made recommendations to raise the quality and effectiveness of the regulatory system.

The Government has announced that it will issue a statutory Code of Practice - the Regulators' Compliance Code. The Code will enable the “Hampton principles” that address regulatory inspection and enforcement, as listed in Philip Hampton's report, “Reducing administrative burdens: effective inspection and enforcement”, to be established in UK law. The Code will work alongside the Enforcement Concordat and will ensure that regulatory best practice is adopted and carried out by regulators.

The “Hampton enforcement principles” are that:

- regulators, and the regulatory system as a whole, should use comprehensive risk assessment to concentrate resources on the areas that need them most;
- regulators should be accountable for the efficiency and effectiveness of their activities, while remaining independent in the decisions they take;
- no inspection should take place without a reason;
- businesses should not have to give unnecessary information, nor give the same piece of information twice;
- the few businesses that persistently break regulations should be identified quickly;
- regulators should provide authoritative, accessible advice easily and cheaply; and
- regulators should recognise that a key element of their activity will be to allow, or even encourage, economic progress and only to intervene when there is a clear case for protection.

The inspection regime followed by the Food Safety Service is that provided for by the FSA through the “Framework Document” and associated “Codes of Practice”. In order to better follow the Hampton Principles, it is proposed that Category A, B and C1 premises are inspected at intervals as detailed in the guidance.

The Rogers Review

The Rogers Review was established to set the national enforcement priorities for local regulatory services. The results were published as part of the March 2007 budget.

The Rogers Review team identified over 60 policy areas enforced by local authorities; an initial sift identified 24 key policy areas for which more detailed evidence was sought, focusing on risk and effectiveness.

The review has now established “five national priorities for local authority regulatory services to assist local authorities in prioritising their resources.

The five national priorities for local authority enforcement are:

- **Hygiene of food businesses** (Hygiene of businesses, selling, distributing and manufacturing food and the safety and fitness of food in the premises) – e.g., preventing food poisoning.
- **Air quality** (Air quality, including regulation of pollution from factories and homes) – e.g., reducing air pollution.
- **Alcohol licensing** (Alcohol, entertainment and late night refreshment licensing and its enforcement) – e.g., protecting people from the effects of the misuse of alcohol through licensing.
- **Improving health in the workplace**
- **Fair trading** (Trade description/ trade marking/ mis–description/ doorstep selling) – e.g., protecting the vulnerable from scams and rogue traders.
 - **Animal and public health** (Animal and public health, animal movements and identification) – this priority is time limited.

The Roger Review Team recognise that “a clear set of priorities will help local authority regulatory services to deliver high quality services to businesses and citizens, and demonstrate the crucial role they play in their local communities”.

Scores on the Doors Initiative

Recognising the above it is our intention to demonstrate that we are setting our targets appropriately for the coming year and applying our limited resources to priority areas.

In 2006/07, our work with neighbouring Hampshire authorities has created an indicator of food safety compliance which will be used to drive our “Scores on the Doors” initiative.

Effectively, using the existing risk rating system provided for by the FSA, a premises may be categorised as UNSATISFACTORY, SATISFACTORY or EXCELLENT. This status will be displayed for residents and others to see on an approved website, a policy which falls into line with the Government’s Freedom of Information agenda.

The scheme utilises existing food safety risk ratings given to premises following an inspection by an EHO.

To put the scheme into effect, and to best support businesses to compliance, it is our intention during the first quarter of the year to approach all those premises that are currently deemed potentially “Unsatisfactory” to advise them of the status of their rating and to give them the opportunity to improve this prior to a scheduled reassessment. The rating at the time of this reassessment will be published when our dedicated Scores on the Doors website goes live in Food Safety Week in June 2007.

This work will be widely publicised to advise and support businesses.

Targeted follow up work will then be undertaken at these previously “unsatisfactory” businesses to assess their progress or otherwise and appropriate enforcement action will be undertaken to raise standards.

By this means we can target our limited resources to best effect to deliver cleaner and safer businesses.

Maintaining the Inspection Programme

Other than those premises that may be deemed unsatisfactory, it is also our intention to carry out inspections of those premises due in this current year.

It is our intention to inspect all Category A and B businesses in accordance with the current inspection ratings of 6 month and 12 months respectively.

In order to reduce the inspection burden on lower risk premises it is our intention to inspect those premises that have been categorised as D or E less frequently effectively reducing the inspection cycle from 2 years and 3 years respectively to 3 years and 4 years. This will effectively remove these premises such as sweetshops and premises that only sell packaged lower risk foods from our inspection cycle this year. However to monitor standards and to check that this policy does not lead to a deterioration in the standards at these businesses, inspections appropriate to the level of risk posed by each business will be carried out in 10% of those businesses that would otherwise have been due.

We also propose to split the large number of businesses currently falling into Category C (currently inspected at 18 month intervals) into C1 and C2.

C1 premises (the higher risk businesses) will continue to be inspected at 18 month intervals with C2 premises inspected on a 2 year cycle.

C2 premises may typically be wet sales public houses or lower volume, lower risk small catering establishments. These premises will continue to receive inspection on a 2 year cycle.

The opportunity to make these adjustments to our food service is in line with the Government's regulatory review not least the Hampton principles.

Monitoring Food Businesses

Whilst reducing the inspection cycle of lower risk businesses, these will continue to be monitored through customer complaints, potential incidents of food poisoning and through regular mailshots of Partnership Matters and other publicity materials. In addition, new businesses are required to register with us and therefore we can keep track of the food businesses in our Borough.

Army premises

The Service acts as Home Authority to the British Army within the Tri-Service arrangements with some 60 Army food businesses operating within the Borough.

These businesses have recently transferred exclusively to a contractor Sodexho who have demonstrated high standards of food hygiene and safety on an ongoing basis.

Such premises are regularly inspected by Sodexho in-house auditors, by Army EHO's and by an auditing contractor to ensure continuing high standards. Each premises continues to operate to JSP456, the procedure agreed for food safety and hygiene by the Home Authority Group.

It is our intention to acknowledge an element of "earned autonomy" in Army premises. It is proposed that Army premises be removed from our inspection cycle.

By way of ensuring a continuing monitoring of food safety standards it is our intention to inspect 10% of the premises due to ensure a continuity of high standards. Furthermore, negotiations with the Army and Sodexho have resulted in an agreement that certain failures in standards of food hygiene and safety will be reported to Rushmoor's Food Team directly.

This again contributes to our ability to focus attention on non-compliant businesses in the Borough as a whole.

Food Premises Inspections

Taking the above, the anticipated inspection profile programmed premises inspections for 2007/08 is:

Risk Category	Number of Premises	Inspection Period	Number of Inspections due for 2007/08
A	5	6 months	10
B	62	12 months	62
C1	261	18 months	97
C2	109	2 years	40
D	105	3 years	0
E	156	4 years	0
Plus 10% of Category D, E and Army premises		During 07/08	9
Total	698		218

Subject to the service demands outlined below, it remains the aim of the service to deliver 100% of the programme of planned inspections by 31st March 2008 and for those inspections to be undertaken in accordance with the Code of Practice and associated guidance.

Additional Demands on the Service During 2007/08

In addition to the planned programme of routine food hygiene inspections the following principle demands will be made on the Food Safety Service during 2007/08:

- If it can be assumed that approximately one third of inspections require a revisit to check compliance with matters raised at the original inspection, an estimated 75 premises per year will require a revisit.
- New food hygiene legislation came into effect from 1 January 2006 with substantial effects for all food businesses. The new regulations replaced 17 current food hygiene directives. The key changes to the legislation will be a requirement for food businesses to put in place documented food safety management systems based on seven HACCP (Hazard Analysis and Critical Control Point) principles. Whilst FSA grant funding supported the implementation of the FSA's preferred written food safety management system "Safer Food, Better Business" into many of the Borough small caterers, there remains a broad cross-section of businesses who require further support
- The implementation of legislation putting into place the new regimes for alcohol and public entertainment (Licensing Act 2003), gambling and gaming machines (Gambling Bill 2004) and charitable collections/lotteries (Charities Bill 2004) has had a profound effect on the resource available across the Service. The Food Team has been required to lend resource to the Health and Safety Service and to the Licensing Team recently to support this work and it may be the case that this will continue. Certainly the role of Health and Safety Responsible Authority has proved demanding on the service.
- On 1st July 2007 England will be Smoke Free. The team has already initiated work to deliver on this with our various with partner organisations. The wider Food/Health and Safety team will be required to support the various roles of the Council as an employer, owner of buildings, as an enforcing authority for the new regulations and as an organisation committed to improving the public health.
- It is anticipated that the increased level of work responding to service requests will continue this year as further new legislation comes on line.

Home Authority Principle

The Home Authority principle is supported by the Council, which undertakes its role in this respect in accordance with the guidance issued by the Food Standards Agency and LACORS (Local Authority Co-ordinators of Regulatory Services).

In particular the Food Safety Service will:

- provide advice to businesses on legal compliance, or any other food related matter, upon request
- provide advice to businesses on legal compliance where we act as home and/or originating authority
- liaise with the home and/or originating authority of a business whose food premises have been inspected and offences identified which are, or appear to be, associated with the businesses centrally defined policies and procedures
- during a complaint investigation, liaise with the home authority and/or originating authority regarding matters which are, or may be, associated with the businesses centrally defined policies or procedures
- liaise with the home and/or originating authority of a business in relation to any unsatisfactory samples which are or may be associated with the businesses centrally defined policies or procedures

- have regard to any information or advice it has received from any liaison with home and/or originating authorities;
- and, having initiated liaison with any home and/or originating authority, notify that authority of the outcome.

The Council, because of its historic links with the Army, and the concentration of troops in the Aldershot area, has accepted the role of Home Authority for the British Army within the current Tri-Service arrangements.

Providing for the Home Authority principle within the Tri-Service arrangement accounts for approximately 10 officer days a year in total. In addition, there is the need to respond to enquiries from other enforcement authorities resulting from food complaints and other service requests.

In addition, the Council worked closely with the Tri-Services and their respective home authorities to deliver a joint services food policy which has been adopted across the Army, Navy and Air Force. This joint services policy was piloted in the summer of 2001 and has subsequently been reviewed. The development work, consultation and support of this role requires considerable resource input. In addition, the Council advises the NAAFI, a major provider of retail and leisure services to the MoD.

The Lead Officer for our Home Authority relationship with the Army, within the Tri-Service arrangements is Oliver Robinson, Principal Food Safety Officer. The Service routinely meets with the Tri-Services concerning Home Authority matters and regularly responds to requests for advice and support from Army contacts. In addition, the Service is responsible for monitoring the implementation of Joint Services Policies during Primary Inspections and other interventions with Army premises within Rushmoor as part of our routine and ongoing work.

Advice to Businesses

Whilst the Council uses its powers to enforce food legislation, the Food Safety Service recognises that, where food businesses break the law, this may be due to ignorance rather than intent. As part of the Service's commitment to the Charter Mark standard, and as a consequence of the above, it is the Council's policy to actively provide support and advice to businesses, including:

- Promoting the Food Safety Service contact details
- Provision of advice and support on request
- Visits and advice prior to the setting up of a food business
- Informal advice on best practice during inspections and other interventions
- Free advice leaflets and information made widely available
- Advice about planning or building control applications
- Providing appropriate food hygiene training for example to support SFBB implementation

In any one year it is likely that in excess of 50 new food businesses will be registered with the Council, each potentially requiring informal advice and support together with a primary inspection within 28 days. To provide advice and support to new businesses will account for around 50 hours of officer time per year. Additionally, in respect of new businesses, primary inspections and associated actions will account for around a further 100 hours of officer time per year in total.

In any one year the Service will receive a large number of service requests for business advice and support. In the past year the Environmental Health Services handled over 41,000 telephone calls by way of informal requests for service, an increase of over 16,000 over last year!

The opportunity to offer further advice and support to businesses, and beyond, also arises out of other work including our investigation of around 200 cases of infectious disease in 2006/07, and our involvement in Food Alerts received (100) involving literally thousands of business interventions. Similarly, business advice and support is offered during sampling initiatives. In 2006/07 it is estimated that the service will take over 100 food samples.

The Food Safety Service continues to offer a very wide range of leaflets on food safety matters, regarding both regulatory issues and wider public health concerns. Additionally, such matters are promoted during business interventions and also through the Council and Service publications. Information is also widely available on the Council website.

The Service similarly seeks to offer advice at suitable opportunities, notably during Food Safety Week and wider corporate events. The Service also promotes good practice through the Five Star Award Scheme which has been subject to close evaluation with excellent results through our Citizens Panel although this will shortly be replaced with our "Scores on the Doors" scheme.

Partnerships

We actively seek to establish linkages with partners to serve mutual goals. For example we have undertaken some innovative work to support the public health notably on the smoke free agenda with our local PCT and with the Hampshire Fire and Rescue Service. We have developed partnerships across the County with other authorities to deliver Scores on the Doors, low cost training and information sharing schemes.

Food Sampling

The Council believes that a pro-active point-of-sale food sampling programme can provide useful information about the microbiological fitness of food for sale within the Borough. The Council therefore actively participates in the Berkshire sampling group (owing to our use of the Health Protection Agency facility in Reading, although samples are now forwarded on to facilities in Southampton), which has a co-ordinated food-sampling programme based on Food Standards Agency, LACORS and agreed local priorities.

In the year 2006/07, we anticipate taking over 100 food and water samples utilising the full allocation made to the authority by the Health Protection Agency (currently £3000).

Control and Investigation of Outbreaks of Food Related Infectious Disease

The measures to be taken to control the spread of infectious diseases are contained in various Acts of Parliament and their associated regulations. This legislation includes the control of food poisoning and food and water-borne diseases. Although the number of cases reported locally is comparatively low, it is widely acknowledged that the vast majority of cases go unreported. Moreover, a single case may lead to the discovery of an outbreak if the person concerned is a food handler.

Food poisoning cases have been increasing nationally in recent years. Salmonella cases reached record levels but have seen a drop locally during the past three years. Nationally, other organisms such as Campylobacter and a host of viruses have reached significant levels.

There is a need for new initiatives in the prevention of these illnesses. The rigorous enforcement of legislation and the provision of food hygiene training to food handlers should have an impact, but the authority realises that many cases occur in the home. The authority will therefore continue to promote food hygiene messages through the provision of food safety information points in local supermarkets and by contributing to high profile national campaigns.

The investigation of food poisoning cases is therefore given a high priority and in an outbreak can necessitate using qualified staff from across Environmental Health. In such cases, priority will be given to containment and prevention of spread over routine work.

All investigations will follow the procedures laid out in the Health Protection Agency Outbreak Control Plan. In addition, the Food Safety Service supports the North East Hampshire Infectious Disease Liaison Group which exists to promote best practice and consistency of approach in this area of work between the neighbouring local authorities.

In 2007/08, it is estimated that around 200 cases of infectious disease will be investigated.

Food Safety Incidents

In 2006/07, it is estimated that the Food Safety Service will have responded to over 100 Food Alerts from the Food Standards Agency.

The Council has standing arrangements for dealing with hazard warnings that ensure the most senior food safety officer available is informed immediately. These arrangements are in accordance with the Code of Practice.

Where an incident occurs out of normal working hours, the Food Standards Agency is aware of the Environmental Health emergency telephone number and may use this to alert the Council.

Where a response is necessary, this has absolute priority. It may necessitate contacting, or in some cases visiting, premises where the relevant food is likely to be on sale and can therefore have a significant impact on resources.

Where the Council becomes aware of a serious localised incident or a wider food safety problem, it has arrangements to notify the Food Standards Agency in accordance with the Code of Practice. All food hazard warnings are posted on the Council's website for information.

Liaison with Other Organisations

The Food Safety Service actively supports the work of the Chief Environmental Health Officers, Hampshire and Isle of Wight, Food Advisory Committee. This professional body has representatives from all Hampshire and Isle of Wight food authorities, Hampshire Scientific Services and the Wessex Public Health Laboratory Service. Amongst its objectives, it aims to ensure that any enforcement action taken is consistent with other neighbouring local authorities in Hampshire.

The Food Safety Service is a contributor to the Hampshire and Isle of Wight Performance Improvement Group which co-ordinates Inter Authority Auditing and consistency exercises across the County and wider.

The Council undertakes its food safety functions in accordance with LACORS advice, guidance and codes for food safety in order to promote co-ordination, consistency and good regulation amongst all local authorities.

Environmental Health Communications Net acts as a communications network between local authority environmental health departments, highlighting potential nation-wide issues, concerns and matters of consistency.

There are internal arrangements to ensure that appropriate planning and building control applications are reviewed for their compliance with food safety and other legislation.

There are also good liaison arrangements in place with neighbouring authorities, the health services and other agencies.

Food Safety Education and Promotion Activities

The Council's education and promotion activities can have a direct impact on food safety standards. Through the Service, there is the opportunity to provide advice and information both to business and the public through a number of initiatives including:

- **Food Safety information leaflets** located at public information points, including the Council Offices, local supermarkets, libraries and doctors' surgeries, and are used to promote food safety to the public.
- **"Partnership Matters"** - food safety news and information is provided in this quarterly newsletter produced by Environmental Health
- **Council Publications** – information and articles for the public are published in the Council's magazine "Arena" and other publications.
- **The Food Hygiene Star Award Scheme** - introduced by Rushmoor to allow food businesses to demonstrate their commitment to high standards of food hygiene. All food premises receive a rating during routine food inspections and are then sent a certificate which they can display if they wish. This work will come to an end with the new Scores on the Doors Scheme.
- **Food Standards Agency Food Safety Campaign** – ongoing from February 2002, the Food Standards Agency has been promoting a national food safety campaign using a variety of media, including television advertisements, press releases and leaflets available to both businesses and the public. However, the Agency has indicated that enquiries originating within the Borough will be directed to the Food Safety Service and an appropriate response, including information from other stakeholders such as the North and Mid Hampshire Health Promotion Service, has been prepared.
- **The "Safer Food, Better Business" Implementation Scheme** – new legislation requires food businesses to implement food safety management systems with SFBB being the preferred route. Grant funding facilitates our role in implementing SFBB in a selection of catering businesses, the remainder of support being funded by the Council.
- **Business Training and Support Services** – In addition to the above, the Food Safety Service is committed to providing business training and support following the new legislative requirements implemented in January 2006 that will require every food business to comply with HACCP principles.

9 RESOURCES

Financial Allocation

The budget for the Food Safety Service is shown below:

2004/05 Food Safety Budget	2005/06 Food Safety Budget	2006/07 Food Safety Budget	2007/08 Food Safety Budget
£198,580	£233,300	£255,220	£255,680

Staffing Allocation

The Food Safety Service consists of the Environmental Health Manager (Food/Health and Safety), Principal Food Safety Officer and two Environmental Health Officers, one full time and one at 0.6FTE (leaving a vacancy of 0.4FTE).

Staff Development Plan

The Council's policy is to ensure that Environmental Health Officers acquire the statutory minimum of 20 hours Continuing Professional Development (CPD) for the purposes of maintaining EHO status with 10 hours being derived from core activities.

The Code of Practice requires officers working in food safety to maintain 10 hours core CPD activities. The Council will seek to ensure these requirements are maintained.

In addition, training requirements/needs are identified through the appraisal process. This training may be provided through attendance at externally organised courses and seminars or through in-house training activities. All training received will be documented as part of the department's assessment of competency.

The training budget for Environmental Health Services for 2007/08 is £15,800.

10 QUALITY ASSESSMENT

Monitoring Arrangements

The Service is seeking to build on quality assurance procedures including staff development procedures designed to ensure that its food safety service is provided in a way that is consistent with the Food Standards Agency Framework Agreement, the Codes of Practice and nationally issued guidance.

The Hampshire and Isle of Wight Chief Environmental Health Officers Food Advisory Committee has an advanced system of inter-authority auditing that is carried out on a two-year cycle. The Council is committed to this initiative and accepts that there is much that can be learned from the process.

The Service operates a system of peer review whereby officers carry out joint inspections to ensure a consistent interpretation of legislation, Codes of Practice and national guidance. The Council's Environmental Health Service has successfully achieved a further Charter Mark Award in 2003 and was part of a successful Directorate-wide bid in 2005.

To monitor officer activity, at the end of every food or health and safety inspection, the officer leaves a customer satisfaction survey with the business proprietor. The responses returned in the year to date show a 100% satisfaction rate.

During the coming year, in response to the Corporate Black and Ethnic Minorities Survey, the Service will seek to review our enforcement activities in relation to this service in line with the Corporate Group acting on this issue.

Performance Improvement Group

The authority is committed to supporting the Hampshire and Isle of Wight Environmental Health Performance Improvement Group. The Service is committed to the aims of the group which provides innovative means of comparing services provided by different authorities and a means of sharing best practice.

11 REVIEW

Review against the Service Plan

The authority reviews its performance against the Food Service Plan throughout the year through a monthly report presented to the Departmental Management Team. In addition quarterly and annual performance indicators are submitted to Cabinet.

The authority will continue to submit returns to the Food Standards Agency, as detailed in the agency's framework agreement, in order to permit monitoring of both statutory and non-statutory functions (e.g. inspections, revisits, sampling, etc).

Identification of Variances from the Plan

This ongoing review identifies variances from the service plan and, where appropriate, reasons for those variances.

Identification of Improvements

Any areas of improvement identified as a result of the review will be included in the service and performance plans for the following year. The Food Safety Service was reviewed as part of the Council's Comprehensive Performance Assessment carried out in September 2003.