



FOOD SAFETY DELIVERY PLAN 2010 – 2011

FOOD SERVICE AIMS AND OBJECTIVES

1.1 Aims and objectives

Aim

The key food safety function of Cheltenham Borough Council is to ensure that the food sold, offered and stored for sale and entering the Borough is wholesome and fit for human consumption.

Our objectives include:

The regular control of food premises within the Borough.

The investigation of the safety and fitness of food including all complaints about the operation of businesses within the Borough.

To sample foods within the Borough whilst participating in local and national food sampling programmes.

To ensure we license, approve and register all food premises within the Borough as required by legislation.

To undertake appropriate and proportionate food safety enforcement action within the Borough.

To undertake Home and Originating Authority duties within the Borough.

To promote food safety by way of advice and assistance to all food businesses, citizens and visitors of the Borough

1.2 Links to Council Strategy

The Councils overarching message is to

“Work together to create a great future for Cheltenham”

Food safety will link to the community objectives of the Council Strategy and in particular in the strengthening of our communities by providing a value for money service that effectively meets the needs of our customers.

In so doing the food team will :

- Undertake activities designed to monitor, support and increase food law compliance within our food establishments
- Undertake food sampling developed on local needs, businesses and premises where high risk food is produced
- Investigate all cases of notified or suspected food poisoning to prevent spread and to identify and where possible eliminate the cause.
- Work in partnership with others to facilitate training identified by businesses in food safety
- Provide information to the business community and work in partnership with business groups in both an advisory capacity and to encourage networking.
- Provide advice and information to our food businesses in particular in relation to food safety management systems
- Participate in consultation processes with our communities to achieve improved service delivery.
- Involve our communities in service review.
- Aim to translate documents into other languages for food businesses whose first language is not English.
- Work in partnership with local businesses and neighbouring authorities in the delivery of food safety messages to our communities
- Ensure that our service is customer focused and committed to customer consultation and the promotion of partnerships with local businesses.

2. BACKGROUND

2.1 Profile

Cheltenham is an attractive and vibrant town serving an extensive catchment area in central and eastern Gloucestershire and the South Midlands. It is ranked in the top thirty regional shopping centres in the UK, third in the Southwest and has the eighteenth highest consumer expenditure in Great Britain.

The borough is based on the town of Cheltenham and is mainly urban with some areas of surrounding countryside. It covers an area of approximately 4,680 hectares and has a population of over 110,000.

Cheltenham has an ever increasing wealth of restaurants and eating places. Twice a month it hosts a farmers market offering a valuable opportunity to sample local produce. The town offers a wide range of educational and employment opportunities, a year-round programme of festivals and events, plus a strong cultural and sporting profile.

2.2 Organisational Structure

Food safety is within the Food & Occupational Safety team of the Public Protection Section of Operations Division. This structure is detailed in Appendix A.

2.3 Scope of the Food Service

The Council is not a Unitary Authority and therefore shares its duties under the Food Safety Act with the Trading Standards Department of Gloucestershire County Council. Cheltenham Borough Council aims to provide a full range of services within its remit offering a balanced approach between education and enforcement.

The Borough Council food service is provided by appointed and authorized officers in accordance with the requirements of the FSA code of practice.

These officers are also responsible for infectious disease control along with other EH functions within all food premises within the Borough. These activities usually include health and safety inspections, accident investigation, complaint investigation and drainage issues.

Specialist services such as public analyst and food examiner are provided externally by Worcester Scientific Services, Worcester and The Health Protection Agency Laboratory, Bristol, respectively.

Demands on the Food Service

The Service Delivery Point

Address	Hours	Contact details
Cheltenham Borough Council Municipal Offices Promenade Cheltenham GL50 9SA	Mon, Tue, Thurs and Fri (09.00-17.00) Wed (09.30- 17.00)	01242 775020 env.health@cheltenham.gov.uk

There is an out of hours emergency service available which addresses the emergency closure of premises, food product withdrawal and outbreaks of food associated disease.

On 31st March 2010 there were 897 food businesses on our database - the profile is given in the table below:

	NO. OF PREMISES
PRIMARY PRODUCERS	0
MANUFACTURERS + PACKERS	3
IMPORTERS/EXPORTERS	0
DISTRIBUTORS/TRANSPORTERS	5
RETAILERS	124
RESTAURANTS AND CATERERS	765

As is expected for a town like Cheltenham the hospitality and catering sector predominates, the majority being small or medium sized enterprises.

With such a small team the programmed food hygiene intervention plan for any given year can be severely disrupted by food poisoning investigations, national food alerts, food sampling and non food related matters such as health and safety accident investigation.

2.4 Enforcement Policy and Regulatory Reform

Cheltenham Borough Council has adopted and published a corporate enforcement policy which will form the basis of all enforcement action undertaken by the Food Service.

In recent years there have been a number of reviews conducted that have resulted in a change to the nature of regulation. The emphasis being that the regulatory system as a whole should use comprehensive risk assessment to concentrate resources in the areas that need them most.

In terms of food safety this means concentrating efforts on those businesses that do not meet the minimum legislative standards with alternative interventions in those that generally comply.

This was further developed in the Regulatory Reform Act 2006 Compliance Code which encompasses the criteria of the Enforcement Concordat of being transparent, accountable, proportionate and consistent with the additional element of being targeted only at cases in which action is needed.

There is a suite of interventions that focus on outputs and continued improvements in food safety. This allows us to choose the most appropriate action to be taken to drive up levels of compliance of food establishments with food law.

3. SERVICE DELIVERY

3.1 Food Premises Regulation

The regulation of food premises is undertaken in accordance with the Food Safety Act Code of Practice. All food premises are subject to a detailed assessment based on particular criteria including types of food and method of handling, consumers at risk, level of current compliance in terms of practices, procedures including cleanliness and confidence in management. This numerical calculation is transferred into the categorisation of premises from A to E. Category A premises are inspected a minimum of every 6 months, category E premises every 3 years.

The national performance indicator (NI 184) has been introduced which looks at the level of broad compliance within food businesses. The intention is to target resources where they are needed i.e. at those premises that are not broadly compliant. The driving up of standards year on year must be demonstrated in the delivery of improvements for the community. 2008/2009 was a baseline year with less than 70% of our food premises being broadly compliant. The target for 2009/2010 was 75% which was exceeded with close to 83% of our food business achieving broad compliance.

The food safety team aim to inspect all non compliant food businesses within our area within 28 days of the due date. This includes all newly registered premises as they are deemed non compliant until the first visit and a risk assessment has been undertaken. All non compliant category A & B premises i.e. those that fall significantly short of broad compliance will be visited by the due date. Other categories of premises that are broadly compliant will be addressed by a combination of official controls and other interventions.

Further official control visits are made to premises where there are food safety concerns in particular where the level of current compliance in food safety practices and procedures fall below satisfactory or there is little or no confidence in management. Other visits to food premises may follow a request for advice, complaint or an alleged food poisoning incident.

Visits are primarily unannounced with evening/weekend inspections undertaken when required to accommodate the needs of some food businesses e.g. those that do not open during office hours and markets and festivals held at weekends.

3.2 Food Complaints

Food complaints are investigated in accordance with the FSA Code of Practice

The number of food complaints fully investigated by the food safety team is in the region of 20 per year; any major deviation from this number is not anticipated.

3.3 Home Authority Principle

The council will consult at an appropriate level with the Home and /or Originating Authority for any food business, in accordance with the Principles laid down in The Food Safety Act 1990 Code of Practice and Local Authority Co-ordinators of Regulatory Services (LACORS) guidance.

The Council will act as *de facto* Home Authority for Kraft Foods UK Ltd, to the extent that:

- It will furnish enforcing authorities with such information as it has which may assist the said authorities to carry out such duties or investigations as are required of them by the Food Safety Act 1990 with respect to the food products of Kraft Foods (UK) Ltd.
- It will provide written confirmation to enforcing authorities of such information, if requested.
- If requested to do so, it will supervise the examination, under controlled conditions, of food samples and complaints, which may be required to be retained as items of evidence or for further examination or analysis by enforcing authorities, by representatives of Kraft Foods (UK) Ltd.
- It will liaise with Kraft Foods (UK) Ltd. and the Food Standards Agency over emergency issues such as product recalls affecting the company's products.

At present the Home Authority function of the council in respect to this company amounts to liaison with relevant authorities over an average of 8 food complaints per year, and 1 product recall per year. This level of activity accounts for approximately 3 working days for the council per year.

The introduction of the principle of primary authorities will put the Home Authority scheme on a statutorily required platform. If we are designated the primary authority for Kraft Foods the impact on the team will be significant as a primary authority is required to be involved in enforcement decisions taken by other food authorities.

3.4 Advice to Business

It is the policy of the team to provide assistance to local food businesses when requested to help them comply with the legislation and to encourage the use of best practice. This is achieved through a range of activities including:

- Advice given during inspections and other visits to premises.
- Provision of advisory leaflets
- Responding to service requests and enquiries

Whilst the resources of the Food Service will always be used in proportion to the risk to public health, every effort will be made to accommodate requests for advisory visits to food premises.

We produce a quarterly newsletter for our businesses in Cheltenham which includes advisory guidance on topical food issues.

3.5 Food Sampling

The food service participates in the LACORS/HPA coordinated food sampling programmes. In 2010/11 this included the submission of samples of cleaning cloths, ready to eat foods and water from outdoor catering events. Another study focused on samples from butchers shops in response to the *E.coli* O157 outbreak in Wales which claimed the life of a young child.

Foods are also sampled in response to complaints and food poisoning investigations when necessary.

3.6 Control & Investigation of Outbreaks & 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 places a duty on local authorities to control the spread of food poisoning and food and water borne diseases.

Annual notifications vary from year to year with a noticeable increase in Norovirus outbreaks in recent years. These outbreaks are often associated with care homes, day nurseries and other similar settings which have a more vulnerable group of clients. Intervention in these outbreaks takes up a significant amount of officer time.

The objectives in respect of this service are:

- To administer and implement our statutory responsibilities relating to the control of infectious disease.
- Investigate all notifications of food poisoning cases and likely sources of infection whether confirmed or not at the earliest opportunity.
- Where a source is identified take appropriate action to ensure risk of spread is controlled.
- Protect the well-being of individuals at risk by taking action to contain the spread of infection and provide advice and information regarding personal hygiene, food handling and control of infection.
- Exclude food handlers and people working with high-risk groups in consultation with the Consultant for Communicable Disease Control (CCDC).
- A Countywide “Outbreak Control Plan” is operated including standardized food poisoning investigation questionnaires.

3.7 Food Alerts:

The Food Standards Agency operates a system to alert the public and food authorities to serious problems concerning food that does not meet food safety requirements.

Food alerts vary in significance and require an appropriate response. Some are of high priority and require immediate action. This may involve contacting and/or visiting food premises and taking immediate action under powers contained in the Food Safety Act 1990. Others are for information only.

All alerts are received directly from the Food Standards Agency via a secure dedicated computer network system and via the Food & Occupational Safety Managers mobile phone text messaging service. The Manager will instigate the necessary response and provide the necessary out of hours cover for this service.

Where the authority becomes aware of a serious localised incident or a wider food safety problem it will notify the Food Standards Agency in accordance with the Code of Practice.

It is estimated that around 100 food alerts requiring various levels of action will be received on an annual basis. It is difficult to estimate the resource required to meet this responsive element of the service as the work associated with individual alerts can vary significantly.

3.8 Liaison with Other Organisations

The Council is committed to ensuring that the enforcement approach it adopts is consistent with other enforcing authorities. This takes place through regular meetings and attendance by the manager at the Gloucestershire Food Safety Group. This group comprises of peer representatives of each of the 6 district and borough councils in the County, the County Council Trading Standards Service and HPA Laboratory Service.

The forum provides a mechanism for discussion of relevant food matters, the provision of training on a county-wide basis, the formulation of policy, documentation and guidance and co-ordinated responses to Government and Central Agencies.

The Council attends the Consultant in Communicable Disease (CCDC) Committee at the Health Protection Agency. By means of this committee, which meets half yearly, members are kept informed about relevant subjects and are able to benefit from the valuable and very necessary liaison between public health and medicine.

A Divisional Veterinary Officer sits on the CCDC committee and is able to brief the group on local and national issues regarding animal welfare, disease control and food safety.

Within the council, the Food Service is also a consultee for the planning, building control and licensing functions.

4. RESOURCES

4.1 Financial Allocation

The Food Safety budget for the coming year is £217,600 and includes staffing, travel subsistence, I.T. development, legal action, and office overheads necessary as part of the food safety enforcement function. Specific Food Safety related insurances. Recharges for I.T. support, Human Resources, accountancy and audit. Corporate insurances, communications, E government and asset management.

The authority always seeks to recover costs following successful legal proceedings wherever possible.

4.2 Staffing Allocation

All food safety officers are appropriately trained and competent to work within this field. Officers are authorised according to their competency and experience. There are 3.5 FTEs dedicated to the delivery of the food safety function.

The food safety service is led by Yvonne Hope who is EHRB registered, widely experienced and specialised in food safety enforcement.

There are two EHOs and two senior technical officers in the food safety team. The SEHO Chris Fawcett is EHRB registered and widely experienced in food safety. Louise Boyle joined the team in September 2008 as a newly qualified EHO and is achieving appropriate competencies in accordance with the FSA code of practice requirements. The senior technical officers Fiona MacAdam and Stephen Edwardson are EHRB registered and specialised in food safety enforcement.

Additionally, the Public Protection Service Manager, Barbara Exley is EHRB registered and widely experienced in food safety enforcement.

4.3 Staff Development Plan

The Council has an annual review system of staff, this process includes training needs. The food safety team holds regular meetings to review and distribute workloads in addition to monthly 1-2-1 meetings for all the team. Any training needs required for new legislation, guidance etc. are discussed and actioned at these meetings.

Food safety regulators are required to achieve a minimum of 20 hours of continued professional development every year.

5. QUALITY ASSESSMENT

Local and national performance indicators are reviewed annually.

All officers use standard inspection/audit forms.

Customer satisfaction surveys are undertaken including to businesses we deal with in accordance with NI 182.

6. REVIEW

Last years progress in food safety includes:

- inspection of 100% A & B risk rated food premises
- 13% increase in broadly compliant businesses
- inspection of at least 90% of lower category premises
- prioritisation of visits to non compliant food businesses
- visits to all new food businesses
- participation in two national food sampling programmes
- 167 unplanned food visits
- service of 5 hygiene improvement notices
- seizure and destruction of illegally imported food
- accepted voluntary closure of one food business
- written warnings of non compliance to 461 food businesses