

Food Safety Service Plan

Forward

The Food Standards Agency, under powers contained in the Food Standards Act 1999 requires all enforcement authorities to put in place a Service Plan. This Service Plan is drawn up in accordance with guidance issued by the Agency and contained in the Framework Agreement on Local Authority Food Law Enforcement.

The Plan is an important part of the process to ensure that national priorities and standards are addressed and delivered in a way that also meets local needs.

The Plan includes:

- Information about the services provided.
- The means by which those services are delivered.
- Relevant performance standards and information on how they will be met.
- A review of performance in order to identify and address any variance from meeting the requirements of the plan.

The Urban Living Directorate

The Food Safety Service is provided within Community Safety Services, which is part of the Area Services Division of the Urban Living Directorate. The new Community Safety Service was formed in 2003 as part of the reorganisation of the Council under the New Harrow Project, which brought together a number of complementary service areas to create a comprehensive Urban Living Directorate. Structure Plans are provided below for information.

Key focuses for the Directorate are the public infrastructure in Harrow together with the wider environmental and economic well being of the Borough. The Strategic Improvement Plan for the development of the Directorate establishes the priorities for the service and how they are to be delivered for the benefit of the community. The Food Safety Service Plan addresses the detailed planning and implementation of service specific issues and provides the detailed improvement plan for the food safety service provision in direct support of the Strategic Improvement Plan.

The Directorate is responsible to four Portfolio Holders for its services: -

- Environment & Transport
- Planning, Development, Housing and Regeneration
- Lifelong Learning
- Property & Resources

The Corporate Plan and Community Strategy

The Council has very recently revised its Corporate Plan and in partnership with local agencies, residents and stakeholders developed and launched a Community Strategy in 2004. This Service Plan has important links to both and these statements of the strategic direction of the authority. This Plan will continue to be reviewed and developed to reflect the embedding of strategic priorities across the authority.

The Council's Vision and Strategic Corporate Priorities

In Harrow we will strive for:

A borough that is safe, clean, healthy and prosperous with equal life opportunities for all – a friendly and vibrant place to be.

(Community Strategy for Harrow, 2004)

To deliver the council's part in Harrow's vision and the council's commitment to significant improvement in its services to achieve a 'Good' rating under CPA by 2006, we have developed five Corporate Priorities. In the context of the Food Service within Community Safety Services these are:

Strengthening Harrow's Communities – Delivery of local services that are tailored to the needs of the diverse community by area based working across council departments, effective partnering with other agencies, and engaging community groups.

Putting Harrow on the map – Achieve recognition of Harrow as a distinctive environment, as a place to shop, to work and to visit. Through inspection and awards position Harrow as a high-performing council and local government employer of choice.

Valuing Harrow's customers – Make a profound positive impact on the local environment in Harrow to the benefit of service customers.

Impact through Harrow's partnerships – Working with key partners to respond to community needs and to maximise the impact of joint working to resolve problems.

Harrow, a true learning community – Maintain a culture of life long learning for the community, partner organisations and for staff within the organisation.

To enable us to achieve these corporate priorities, we are becoming a more business like organisation. Community Safety Services is being firmly established as an effective and efficient customer-focussed department, led by a strong management team with staff who are competent and motivated to deliver excellent services.

1. SERVICE AIMS AND OBJECTIVES

1.1 Strategic Aims and Objectives

To ensure that food in the borough, its composition, labelling and the conditions under which it is handled, meet the highest possible standards and pose no threat to public health.

Safe food is one of the fundamental issues underpinning Public Health. The Council aims to address this by the provision of a balanced, customer-orientated service involving an appropriate mix of demand, inspection, education and intelligence driven activities.

We will consult with our users to ensure that the Food Safety Service is developed to reflect local needs. We will endeavour to ensure that the Service is accessible to all members of the community and our practices demonstrate a commitment to equality.

Education of our customers and a proactive, pragmatic approach to solving environmental health issues is of paramount importance. An educative approach will be taken where this is considered the most expedient means of achieving the desired outcome and is consistent with the level of risk involved and current enforcement policy.

1.1.1 Operational Service Aims and Objectives

- To maintain and implement a planned programme of food premises inspections based on a prioritised risk assessed basis in accordance with the Code of Practice and related guidance issued under Section 40 of the Food Safety Act 1990. To advise on and where necessary enforce compliance with legal standards.
- To promote food safety by education.
- To approve, licence or register food premises or activities as provided for by statute and to carry out such inspections as may be necessary to determine applications.
- To initiate the investigation of all complaints regarding food and food premises within 5 working days of receipt.
- To investigate food poisoning notifications in accordance with quality procedures. Such investigations to be initiated within 3 working days of receipt. Urgent cases determined by consultation with the Council's Consultant in Communicable Disease Control will be investigated within 1 day of receipt.
- To sample foodstuffs in accordance with the Borough's existing sampling programme and to participate in sampling initiatives in liaison with other enforcement authorities and government agencies.
- To respond to food alerts in accordance with advice issued by the Food Standards Agency, quality procedures and statutory requirements.
- To plan for and implement new legislation affecting the food service and the premises for which it is responsible.

- To provide and facilitate food hygiene training where appropriate through in-house seminars and liaison with local businesses and other training providers.

1.2 Links To Corporate Objectives & Plans

The food safety service plan contributes to the wider corporate planning process and in particular its operational aims feature in the Best Value Review Action Plan for Area Services of which Community Safety Services and its Food Team form a part.

The plan relates directly to all corporate priorities through implementation of its operational aims and objectives, achievement of performance targets and implementation of its action plans. It has direct relevance to the Council's Strategic Corporate Priorities through its training provision to address skills requirements, to support regeneration through active community and business involvement and the promotion of higher environmental standards.

2. BACKGROUND

2.1 Profile of the Local Authority

Harrow Council is an Outer London Borough with a population of 215,000 persons, 82,000 domestic dwellings and 5,000 commercial premises. The best description of the character of the borough is that of 'Metroland' and with the exception of the green belt to the north of the borough, the remainder is predominantly domestic housing. This housing was constructed during the inter-war period with commercial premises located in a number of local centres. In comparison to neighbouring Boroughs, Harrow has comparatively few industrial scale food processors. Setting aside the national food retailers, most of whom are represented in the Borough, many local food businesses are small family owned enterprises often with the involvement of one or more partners. Ethnic food businesses, particularly caterers are well represented in and around the borough.

2.2 Organisational Structure

The Council adopted a Cabinet style of government in November 1999. This streamlines the corporate reporting structures. Food safety issues that require Member involvement are reported to the Environment Portfolio Holder who is a member of the Cabinet. This is presently Councillor Phillip O'Dell.

Food Safety is a function of Community Safety Services and is located within the Area Services Division under the Area Director, Andrew Trehern. An Executive Director oversees the Urban Living department and this post is currently vacant.

The Food Team is part of Commercial Services within Community Safety Services under the Chief Environmental Health Officer, Gareth Llywelyn-Roberts. The Team Leader of the Food Team is the designated specialist officer for food matters and reports to the Commercial Environmental Health Manager (Andy Appleby). At the start of the year the Team Leader post is held by John Dunne, however John will leave the authority to further his longstanding interests outside Environmental Health. His knowledge and expertise will be much missed.

The structure described exists under interim arrangements prior to finalisation of the Directorate structure in 2005 as part of the implementation of the New Harrow Project. An outline structure plan is attached as Appendix 4 for information.

2.3 The Scope of the Food Service

The Food Team has as its primary responsibility the inspection of food premises. It deals with all matters in such premises including food hygiene, food standards and health and safety and is also responsible for the registration of food premises and licensing of butchers shops.

Harrow is part of a consortium with the London Borough of Brent for the provision of Trading Standards Services. However with the exception of the sampling of alcoholic drinks in public houses and similar establishments and subsequent enforcement, the Trading Standards Service is not responsible for food standards matters in the borough's food premises, these are principally undertaken by the Food Team.

There are some food premises where although food is provided, there are other high safety risk activities. Examples of such premises are residential care homes. The Health and Safety Team undertake the food safety inspections of such premises.

The Food Team organises and participates in various promotional activities, including an annual food safety seminar for all stakeholders and provides training opportunities for local food businesses. It uses such activities to benefit the service planning process by consulting with participants.

Commercial Service stakeholder forums are to be held during 2005/06 to enable a more systematic review of the needs of the service users and to inform service planning.

The Borough provides an extensive range of training courses to food businesses including courses leading to the foundation, intermediate and advanced certificates in food hygiene. Courses covering topics such as hazard analysis and due diligence are available on request and can be tailored to the needs of individual businesses.

2.4 Demands on the Food Service

The following table gives a broad breakdown of the different types of the food premises within the Borough, as reported to the Food Standards Agency:

<i>Type of activity</i>	<i>Number</i>
Manufacturers and Processors	10
Importers/Exporters	20
Distributors and Packers	19
Retailers:	
▪ Bakers	18
▪ Butchers/fishmongers	34

▪ Greengrocers	17
▪ Grocers (inc supermarkets)	136
▪ Other	243
Total:	497

<i>Type of activity</i>	<i>Number</i>
Caterers:	
▪ Hospital/Education Establishments	159
▪ Hotels and Guest Houses	20
▪ Pubs/Licensed Clubs	111
▪ Take Away/Fast Food	107
▪ Restaurant/Café/Snack	251
▪ Other	70
Total:	718

2.4.1 Characteristics of Local Food Businesses

In keeping with the residential nature of the Borough, there are few specialist food processes operating from premises within the Borough. Many of the local businesses are small family owned concerns. A high proportion of food businesses are owned and operated by members of the ethnic minority populations within Harrow, reflecting the vibrant and diverse communities within the area. Geest plc, a large manufacturer of pizza bases and finished pizzas has a production facility, which is now the only approved premises under 'Vertical' legislation in the Borough.

The Borough plays host to the Head Office of Spar UK Ltd, the chain of independent food retailers. It is also the location of Pharmadass plc, an independent packer and national distributor of food supplements. These businesses and a number of smaller importers result in a higher food standards (labelling, composition, etc.) workload than is typical for the range of retail premises in the area. The Borough is Home Authority for 13 businesses.

2.4.2 Service Delivery Points

The Council's Food Team is based at Harrow Civic Centre from where it serves the entire Borough. The Council operates flexible working hours ranging from 8 am to 7 pm and advice on food safety issues is available either by telephone or to personal callers between 9 am and 5.00 pm. Officers direct dial telephone number are freely available and may be used for telephone enquiries. If there is a need for advice of a specialist nature or concerning a specific issue, it is advisable to make an appointment with the relevant officer.

2.4.3 Forthcoming Challenges

This year will again provide a number of challenges. The Food Team's objectives for the year to April 2006 include:

- To develop and implement a programme of information and promotional activities linked to the introduction of new EU food legislation by the operative date at the start of January 2006.
- To host a food safety seminar for local food businesses.
- To host stakeholder forums for the service.
- To review our chemical sampling plan in conjunction with the Council's Public Analyst and maintain the level of sampling for analysis that was achieved during 2004/05.
- To continue to expand the surveillance of the bacteriological quality of food by building on the previous year's sampling activity. The aim being to increase the number of bacteriological samples taken in a structured and focussed manner and thus make the best use of Harrow's allocation from the Health Protection Agency.
- To further increase the profile of food standards issues by the development, in conjunction with other Agencies, of readily understood public information on nutrition and health. It is anticipated that such information would be provided in leaflet and poster formats. Posters could be displayed at libraries, clinics, surgeries and other appropriate premises. The feasibility of providing leaflets and posters in foreign languages to be reviewed.
- To carry out a proactive surveillance, to check on the legality of products of animal origin sold within the Borough.
- To further develop alternative enforcement strategies for lowest risk premises in accordance with the consolidated Food Code of Practice issued November 2004.

2.5 Enforcement Policy

The Council recognises the need for an open, targeted, proportionate and consistent approach to enforcement and has in place relevant Enforcement Policies. The Council is a signatory of the Enforcement Concordat.

3. SERVICE DELIVERY

3.1 Food and Feeding Stuffs Premises Inspections

The Commercial Section carry out food hygiene and food standards inspections in accordance with the relevant Codes of Practice. In 2005/2006, 629 primary food hygiene inspections are due in categories A to E below. The following table gives a

breakdown of the numbers of risk rated premises inspections.

<i>Risk Rating of Premises</i>	<i>Number of Inspections</i>
A category	6
B category	65
C category	392
D category	112
E category	54
F category	9

Category F premises are the lowest risk category and in accordance with the Food Standards Agency's code of practice issued in 2004 will not be subject to a regular inspection regime. Alternative strategies will be used to address standards in this lowest risk category. This will include the periodic provision of information, information cards and self-assessment questionnaires, together with advised strategies from the FSA or LACORS.

In addition the programmed inspection or survey of a further 75 vacant or otherwise unclassified premises.

In 2005/2006, 293 primary food standards inspections are due. The following table gives a breakdown of the risk rated inspections due.

<i>Risk Rating of Premises</i>	<i>Number of Inspections</i>
High	1
Medium	239
Low	53

In addition the inspection or survey of a further 55 vacant or otherwise unclassified premises is programmed.

Secondary inspections or revisits, depending on the purpose, are undertaken where conditions at premises are unsatisfactory and further action is warranted. In circumstances where notices have been served to ensure that improvements have been made, the officer will revisit to ensure that the notice has been completed to a satisfactory standard. As an aid to consistent action by officers a policy document has been issued that incorporates guidance to staff. Last year revisits were made to 24% of food premises following a primary inspection. Legislation requiring the annual licensing of butchers also required the targeted inspection of 27 butchers' shops.

The resources required for primary inspection activities (including administration by officers) amount to approximately 60% of the Team's time per annum.

3.2 Food, Feeding Stuffs and Premises Complaints

The Food Section investigates complaints concerning food and feeding stuffs that are out of condition, contain foreign objects, have labelling problems, etc. It also investigates complaints about hygiene conditions and related issues at individual food premises. The service performance standard is to respond to all such

complaints within 5 working days of receipt. The Council will raise relevant issues with the suppliers or retailers of the food product in order to confirm any possible offences and relevant defences. Officers will respond to complainants, keeping them informed of action taken, details of the investigation and its outcome.

In the last year (2004/05) there were 305 such complaints. The resources required for the investigation of these complaints amount to approximately 10% of the Team's time per annum.

3.3 Home Authority Principle (see also Appendix 3)

Harrow is an active contributor to the Home Authority Principle and is currently Home Authority for 13 businesses in the borough. Three national companies, Spar plc, Geest Convenience Foods Limited and Pharmadass plc, have head offices or significant production facilities in the borough that entail regular home authority work. Additionally there are a number of small importers in the borough that have a range of labelling and other matters that require periodic resolution. Spar plc is a national retailer and the large number of Spar branded foods makes it appropriate to hold regular meetings with the Company. During 2004/05 the time spent on home authority work amounted to an aggregate of 10 days.

3.4 Advice to Business

The Council is committed to an educational and advisory role with local business. Harrow Environmental Health Services is a CIEH registered Centre for teaching the Foundation, Intermediate and Advanced Certificates in Food Hygiene. As a further service to the local businesses it is also registered to teach the Food Hygiene Update Course. Other related and important areas are:

- An annual Food Safety Seminar for local businesses.
- The provision/production of advisory leaflets on relevant Safety and Standards matters.
- The Food Team hold a large number of food and health and safety information leaflets, many of which are available in ethnic minority languages. These are provided to local businesses and the public. Some of this guidance is written and produced in-house, examples of which are:
 - Design of high-risk food premises
 - Provision of sanitary accommodation in Catering Establishments
 - Safer Food for small businesses.
 - Guidance for catering at events.
 - Guidance for parents and teachers on packed lunches.

3.5 Food and Feeding Stuffs Inspection and Sampling

The council's policy is to sample food and animal feeding stuffs to determine

compliance with compositional and labelling requirements. Sampling is both proactive and reactive. Proactive active work involves surveillance sampling in accordance with annually reviewed sampling plans. Reactive work includes sampling by Officers during inspections, as a result of possible involvement with cases of apparent disease and in response to complaints to the service. The sampling policy is at described within section S80-1 in the Division's Quality Manual.

The Food Team works to a predetermined annual chemical sampling plan for the purchase and analysis of a wide range of foods and feeding stuffs. The approach to bacteriological sampling more distinctly falls into two categories, that of reactive and proactive sampling. Reactive sampling takes place during the investigation of gastrointestinal illness and as an adjunct to hygiene inspections. Proactive sampling usually takes place as part of local, regional or national surveillance initiatives. Officers adhere to the sampling plans and protocols which detail procedures for sampling indicating how, when and what to sample. Regular meetings are held to discuss, monitor and review sampling initiatives. In 2004/05, 103 chemical samples and 131 microbiological samples were sent for analysis and examination respectively, a total of 234 samples.

The Council's appointed Public Analyst is Mr Duncan Arthur of Eurofins Scientific Limited based at New Cross. The bacteriological examination of food and clinical samples is carried out by the Health Protection Agency.

In relation to feedingstuffs, there are two farms within the Borough, Harrow School Farm and Pinner Park Farm. Harrow Public School owns the former and it is home to a small herd of longhorn cattle used solely for conservation grazing. The School in conjunction with the Herts and Middx Wildlife Trust are in the process of producing a management plan to develop the farm as a resource for the study of conservation and the environment. The cattle graze on pasture throughout the year. This is supplemented by silage, produced from grass harvested on the farm during the spring.

A herd of approximately 50 beef cattle are kept at Pinner Park Farm. The cattle are fed wholly from the farm either through grazing the grass pasture or on hay and silage produced at the farm. This intake is supplemented by the provision of commercial mineral blocks. Neither farm is involved in the on-site mixing of animal feed. There are no manufacturers or on-farm mixers of animal feedstuffs within the Borough. As a consequence there are at present no enforcement issues for the council under The Feeding Stuffs (Establishments & Intermediaries) Regulations 1999.

The resources required to undertake all sampling work amounted to approximately 15% of the Team's time per annum.

3.6 Control and Investigation of Outbreaks in Food Related Infectious Disease

All appropriate notified cases and suspected cases of food borne and non-food borne infectious disease are investigated. The objectives are to determine the source of infection and prevent its spread. All notifications of cases are acted upon in accordance with Section's quality assurance procedures (Quality Manual R7-1) and guidance is provided by the Consultant in Communicable Disease Control, relating to

investigation and exclusion from work. Officers liaise with the Consultant in Communicable Disease Control, General Practitioners and the Health Protection Agency regarding notifications and subsequent investigations, as appropriate. There were 549 reported cases of infectious disease, food poisoning and suspected food poisoning for 2004/05.

Officers are to respond to reported cases of specified infectious disease, food poisoning and suspected food poisoning within 1 working day for urgent cases and 3 working days for all other cases from the day of receipt. Of the cases notified, 72 fell within these categories and were investigated.

<i>Types of Specified Infectious Disease Food Poisoning and Suspected Food Poisoning Cases Reported During 2004/2005</i>	
Food Poisoning	273
Meningococcal Septicaemia	2
Typhoid Fever	6
Tuberculosis	177
Acute Meningitis	6
Paratyphoid Fever	1
Malaria	7
Leptospirosis	0
Viral Hepatitis	12
Dysentery	11
Scarlet Fever	9
Measles	7
Mumps	36
Rubella	2

In August 2004 reports were received from the local unit of the Health Protection Agency of a number of cases of gastrointestinal illness that appeared to be associated with the consumption of food from a local restaurant in the borough. Reports later indicated that in excess of 100 persons might have become ill. An investigation by the Consultant in Communicable Disease Control followed and the results of the investigation are being considered by the council as part of an evaluation of the premises, and the practices and procedures in use. The premises, trading as Kebabish, Queensbury Circle, was formally closed under powers in the Food Safety Act and following an extensive refit reopened in the autumn of 2004.

The resources required to investigate all notified cases of food related infectious disease amount to approximately 8% of the Team's time per annum. However this figure does not include the control and investigation of the August 2004 food poisoning outbreak.

3.7 Food Safety Alerts

The Section responds to food alerts in accordance with quality procedures (Quality Manual S21-1) and statutory requirements. Food alerts were previously termed food hazard warnings; the new name and new procedure were introduced by the Food Standards Agency in October 2004. All officers of the Food Team receive food alerts by email direct from the Food Standards Agency.

On receipt, food alerts are assessed by the Environmental Health Manager (Commercial) or Team Leader (Food Control) and an appropriate response made. A procedure for the assessment of these alerts is contained in the Quality Procedures (reference Quality Manual S21-1). The Food Team orchestrates the response to food alerts with additional resources being obtained from the wider service, if necessary. The level of work depends upon the nature of the alert and the extent of the investigation subsequently required. All food alerts are reported to Chief Environmental Health Officer or Environmental Health Manager (Commercial) in order to confirm the action.

The Division operates a duty officer system for cases of communicable disease and a senior officer is available on a 24-hour basis through liaison arrangements with Northwick Park Hospital. The Director of Public Health and the Consultant in Communicable Disease Control also have details of the contact arrangements for the duty officers.

A file of all food alerts and the responses made is maintained. In the calendar year 2004, a total of 75 food alerts were received. This is a 32% increase in warnings against the previous year. It is estimated that the resources required for responding to food safety incidents in 2004 was 9% of the Team's time.

3.8 Liaison with other Organisations

The Council's food safety activities involve liaison with the Food Standards Agency, DEFRA, DOH, LACORS, HSE and other appropriate bodies to achieve food safety objectives and consistency in enforcement. This liaison will normally be through the Team Leader (Food Safety).

Other liaison arrangements are:

- North West London Sector Food Liaison Group. The Group, which meets six times per year, comprises representatives of the eight northwest London Boroughs. The remit of the Group is to provide advice, considering and reviewing matters such as enforcement, professional standards and sampling initiatives with the objectives of maximising resources and promoting consistency.
- Public Analyst
- Brent and Harrow Trading Standards Service
- Three Valleys Water Company. Harrow is represented at the bi-annual Liaison Meeting with the water authority and the health authority.
- Police
- Working Groups on the Pinner Show and other events with an element of food control.
- Health Protection Agency

It is estimated that liaison arrangements in 2004/2005 accounted for approximately 8 days of the Team's time.

3.9 The Promotion of Food and Feeding Stuffs Safety and Standards

The Division is committed to promotional activities as a vital part of the enforcement mix needed to develop high standards within premises. Recent efforts have been made to improve the balance of promotional activity so that it targets business and the consumer in equal measure. Thus 2004/05 Food Safety Seminar took nutrition and diet as its main theme, reflecting in part the issues raised in the recent White Paper on Public Health.

For the forthcoming year a key theme will be the recent and the future changes to food safety legislation. These changes arise through a long awaited move by the EU to introduce community wide regulations and to move away from standards based on directives. The changes, particularly the expectation of a new form of hazard analysis duty on food businesses, will require substantial resources to inform local businesses of the new requirements and to encourage compliance. The formal requirement on Butchers Shops to obtain a licence is also expected to cease with the new EU regulations.

Staff time spent on this function in 2004/2005 was approximately 15 days.

3.9.1 Annual Performance 2004/5 at a glance

The percentage of all food premises due to be inspected that were inspected in accordance with Food Safety Act Codes of Practice.	A category 100% B category 87% Low Risk categories 72%
The total number of primary inspections carried out. This figure includes new businesses opened during the year.	628
Number of other secondary inspections and other visits to food premises, including sampling visits.	202
Percentage of complaints responded to within 5 working days of receipt.	71%
Number of food samples submitted for chemical analysis.	103
Number of samples submitted for microbiological analysis.	131
Number of food hygiene training courses held.	8
The number of individuals successful in completing food hygiene training courses.	122
The percentage of notifications of confirmed or suspected cases of food poisoning or other infectious disease investigated in accordance with quality procedures.	100%
Number of Food Alerts issued by the Food Standards Agency (Food Hazard Warnings)	75
Activity in response to Food Alerts (inspections, visits, letters, contacts)	Over 4000

3.10 Imported Foods

The authority does not have major facilities within the Borough that deal with imported food. However programmed food standards inspections are carried out of all food premises on a risk assessed basis and individual officers carry out random checks on foods during other visits to food businesses. Additionally, sampling in accordance with the sampling plan and as part of coordinated initiatives, address concerns over the chemical and bacteriological safety of imported food. These priorities are determined in the light of advice from the Public Analyst, any current issues over imported food safety and

Work on imported food also arises through home authority referrals from other authorities and direct from the importers. A number of the smaller local importers are not able to call on detailed technical advice from the specialist consultancies and advice is provided in support of local small businesses. This year it is proposed to carry out proactive surveillance, to check on the legality of products of animal origin sold within the Borough, especially where such products originate outside the EU.

As part of the investigation of illegal dyestuffs in food products, the authority took samples of imported Palm Oils on sale in the borough. Some oils were positive for Sudan dye, the information was passed to the Food Standards Agency and was used as part of the national withdrawal of the product. Palm oil is particularly used in African cookery.

4. RESOURCES

4.1 Financial Allocation

Each of the enforcement Sections within Environmental Health Services is separately accounted as an individual business unit. However, some budgets shown are a proportion of the larger management and administration budgets. The principal budgets for the Food Safety Section are:

<i>Budgetary Cost Centre</i>	<i>Actual Expenditure 2003/2004</i>	<i>Actual Expenditure 2004/2005</i>	<i>Estimated Expenditure 2005/2006</i>
Staffing cost	£302,310	£280,053 ***	£346,500 ****
Car Allowances and mileage	£9,930	£7,882	£10,230
IT Support Costs **	£4,944	£5,092	£6,063
Sampling & analysis	£10,000	£12,178	£10,000
Legal Services (SSC) **	£9,426	£9,708	£12,088
General Revenue Expenses *	£6,604	£4,980	£4,092
Training	£3,896	£4,200	£3,896
Income	£(9,980)	£(7,140)	£(10,190)
Total	£337,130	£316,953	£382,679

* There is a main management and administration budget; this includes the training of staff, as business and individual needs are identified. The figure shown is a proportional representation of this budget. General revenue expenses are shown as a proportional representation of the revenue expenditure of the Service budget as a whole.

** Travel, subsistence, equipment, legal advice and IT costs are separately accounted for.

*** Particular difficulties were experienced through the year in maintaining levels of qualified staff. External recruitment was unsuccessful in attracting qualified officers to permanent posts. Agency staff could only be recruited to fill part of the shortfall in permanent staff due to the national shortage of qualified officers. This resulted in an under spend in 2004/5 against a staffing budget of £305,850.

**** Budget figure includes growth of one staff member for new duties on the authority, see section 4.2 below.

There have been no costs or time attributed to the service in terms of senior management structures and support functions such as administrative support, which is provided by the centralised support team.

4.2 Staffing Allocation

The full time equivalent staffing in the Section is as follows:

<i>Number of full time equivalent officers</i>	<i>Job Title</i>	<i>Food Safety Codes of Practice Authorisations/Competencies</i>
0.5	Commercial Services Manager	Full and includes authorisation of proceedings
1	Team Leader	Full
4	Environmental Health Officers	Full
1	Food Safety Officer	Depending on level of qualification
1	Food Safety Assistant	Depending on level of qualification

There is approved budgetary growth 2005/6 for an additional EHO or equivalent to address the new EU food legislation, the developing public health agenda and support healthy eating initiatives.

All current Environmental Health Officers are assessed as competent in accordance with the Food Safety Act Code of Practice. Administrative support is provided by a centralised administration team and has not been included in the above. In addition there have been no costs or time attributed to the service in terms of senior management structures and support functions.

4.3 Staff Development Plan

The Division has operated a staff development and training scheme for many years. This seeks to identify personal development issues and business needs and by agreement, formulate an action plan to build upon strengths and address areas for improvement. This is being replaced by the phased introduction of a corporate Individual Personal Development Plan (IPAD), which achieves the same aims through broadly similar processes.

The Food Safety Team has a competency framework established for the appointment of staff and monitoring of existing staff.

Environmental Health Services retained its accreditation as an Investor in People in June 2003. (Quality Manual Induction D20-1, Interviews D21-1, Staff Training D22-1, IIP Scheme D25-1).

5. QUALITY ASSESSMENT

5.1 Quality Assessment

In November 2004, The Food Standards Agency issued a consolidated Code of Practice and associated guidance under the Food Safety Act 1990 relating to such matters as inspection programming, conduct of inspection and the qualifications of inspecting officers. Supplementary guidance is issued by LACORS (Local Authority Co-ordinating Body on Regulatory Standards). The object of the Code of Practice and guidance is to provide advice on the interpretation, implementation and operational aspects of food law enforcement and to help ensure consistency of food law enforcement on a national basis. In addition, there are industry guides to good hygiene practice that provide advice on compliance with hygiene regulations. Officers are fully aware that all inspections must be carried out in accordance with the Code of Practice and guidance and the information is readily available to all enforcement staff.

5.2 Food Standards Agency Audit

As part of a systematic national inspection programme the Food Standards Agency undertook a full audit of the food safety service in Harrow in May 2004. Following the inspection an action plan of 9 items was agreed with the authority. The action plan included additions to be made to the planning of feeding stuffs work, certain monitoring procedures and reporting in the Service Plan. The action plan was implemented during the year. The Agency recommended Harrow's procedure for Food Alerts as good practice for authorities nationally.

6. REVIEW

6.1 Review against the Service Plan

The Service Plan review goes through an annual process. The Division's main service plan is reported to Members of the Council, under non-executive arrangements as soon as practicable at the start of the financial year. This draws together the work carried out in the previous year and the achievement of targets and areas for development for the service as a whole and establishes the service wide areas of work for the coming year.

The Food Service Plan is reported as part of this process but as a statutory plan is considered as an 'Executive' function and as it affects all food businesses in the Borough is a Key Decision and must therefore be approved by Cabinet.

A review of 2004/05 performance delivery objectives is set out in Appendix 2.

6.2 Identification of any variation from the Service Plan

The review process considers variations from the service plan and performance delivery objective and, where appropriate, the reasons for the variance.

6.3 Areas of Improvement

As part of the survey review planning process the Division identify targets and areas for improvements in the forthcoming year. The action plan for work to be undertaken in 2005/6 is given in Appendix 1. These relate to the specific improvement targets for the food service.

The Division's main service plan draws together the achievement of targets and areas for development for the service as a whole and establishes an improvement programme for the division for the coming year.

APPENDIX 1

FOOD SAFETY SERVICE DELIVERY/DEVELOPMENT OBJECTIVES 2005/2006

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS	OUTCOME
FS 1	To inspect all food premises, vehicles, stalls and other related premises under the provisions of Food Safety Act 1990, related Regulations, new EU legislation and any other relevant legislation, to ensure satisfactory standards of hygiene and food safety are being maintained.	Team Leader Food Team and additional staff cover through agency workers. (Food Team)	Achieve 100% inspection rate for Category A & B premises. Achieve a minimum of 70% inspection rate for Category C, D and E premises.	Update training provided to staff joining the Food Team as necessary.	
FS 2	To meet in full the food sampling programme.	Team Leader Sue Haynes Jo Duncombe	Sampling programme implemented in compliance with the Code of Practice.	In post qualification training and guidance to officers, as necessary.	
FS 3	To respond to all complaints regarding food and food premises within 5 working days of receipt.	Team Leader Food Team and additional staff cover through agency workers. (Food Team)	Response within time scale.	In post qualification training and guidance to officers, as necessary.	
FS 4	To further develop alternative enforcement strategies in accordance with the Code of Practice issued in November 2004. To promote food safety and food standards issues for distribution to the lowest category of local food business.	Service Manager Team Leader	Production of a Quality Manual note for alternative enforcement strategies by January 2006. Alternative strategies, policies and procedures in place and operating.	None identified at present.	

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS	OUTCOME
FS 5	To develop and implement a programme of information and promotional activities linked to the new EU legislation.	Team Leader Food Team and additional staff cover through agency workers. (Food Team)	To raise business awareness of the proposals in advance of the proposed implementation date of 1 January 2006. Timescales and indicators to be developed when the legislation is available.	Initial training for staff arranged for 13 May 2005 on the EU Food Law changes. Consideration is being given to an Online Training scheme through ABC Food Safety Training. Additional training to be arranged for all inspection staff in advance of the implementation date.	
FS 6	To host a Seminar for local food businesses on topical issues.	Team Leader	Host by March 2006	Briefing session for staff involved by February 2006.	
FS 7	To host a stakeholder forum for users of the Food Team Service either independently or in conjunction with other Teams within Environmental Health Services.	Service Manager Team Leader	Completion of forum and collation of findings by March 2006	None identified at present.	
FS 8	To lead or contribute to a Waste Disposal enforcement project for commercial premises, incorporating duty of care, awards scheme and related issues.	Service Manager Team Leader	Production of inspection, advice and warning documentation; training and briefing of staff and implementation of a project pilot by December 2005.	To be assessed and addressed as part of the project.	

INFECTIOUS DISEASES SERVICE DELIVERY/DEVELOPMENT OBJECTIVES FOR 2005/2006

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS (TN)	OUTCOME
ID 1	All notifications of confirmed or suspected cases to be acted upon in accordance with quality manual procedures and guidance relating to investigation and exclusion from work etc.	Maria Carolan Joanna Duncombe Service Manager Team Leader	Urgent notifications to responded to within 1 working day, subject to consultation with the Council's CCDC. Respond to non-urgent notification within 3 days. Response times and action taken to be recorded on the database.	Ongoing as business needs are identified.	

APPENDIX 2

FOOD SAFETY SERVICE DELIVERY/DEVELOPMENT OBJECTIVES 2004/2005

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS	OUTCOME
FS 1	To inspect all food premises, vehicles, stalls and other related premises under the provisions of Food Safety Act 1990, Regulations made there under and any other relevant legislation, to ensure satisfactory standards of hygiene and food safety are being maintained.	John Dunne Chris Nwokoro Ken McDonald Sue Haynes Richard Le Brun Lois Flatt (Food Team)	Achieve 100% inspection rate for Category A & B premises. Achieve a minimum of 80% inspection rate of other premises.	Update training provided to staff joining the Food Team as necessary.	100% of A premises inspected. 87% of B premises inspected. 72% of low risk premises were inspected. Shortage of qualified enforcement officers lead to targeting inspection at priority premises.
FS 2	To meet in full the food sampling programme.	John Dunne Jo Duncombe	Sampling programme implemented in compliance with Code of Practice 7.	In post training and guidance to be provided to Joanna Duncombe, as necessary.	Achieved within available budget. Together with additional initiatives linked to FSA concerns over food colours (Sudan), MPCD and illegal irradiation of food supplements.
FS 3	To respond to all complaints regarding food and food premises within 5 working days of receipt.	John Dunne Chris Nwokoro Ken McDonald Sue Haynes Richard Le Brun Lois Flatt Jo Duncombe	Response within time scale.	In post training & guidance to be provided to Joanna Duncombe on an on going basis.	71% achieved within time scale. Lack of qualified staff hindered a better outcome.

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS	OUTCOME
FS 4	To introduce a new report of visit form for food standards inspection and associated guidance	John Dunne	Implementation of documentation and production of guidance by July 2004.	None identified at present.	Achieved and fully implemented.
FS 5	To continue with introduction of information leaflets on food safety and food standards issues for distribution to local business and the public	John Dunne Lois Flatt Chris Nwokoro	Three further information leaflets to be introduced by December 2004	None identified at present.	Not achieved, see comment on variances below.
FS 6	To develop and host a local competition for Chinese food businesses, similar to the National Curry Chef Competition	John Dunne Susan Haynes Joanna Duncombe Ken McDonald Chris Nwokoro Richard Le Brun Lois Flatt	Host by November 2004.	Briefing session for staff involved by October 2004	Not achieved, see comment on variances below.
FS 7	To host a Seminar for local food businesses on topical issues.	John Dunne	Host by October 2004	Briefing session for staff involved by September 2004.	Achieved, see section 3.9 in main body of document.
FS 8	To host a stakeholder forum for users of the Food Team Service either independently or in conjunction with other Teams within Environmental Health Services.	Andy Appleby John Dunne	Completion of forum and collation of findings by January 2005	None identified at present.	Not achieved, see comment on variances below.

Comments on Variances 2004/5

The year saw considerable pressure on the resources of the food enforcement service through the combined effects of the high demand for services and the national shortage of qualified staff that possess the statutory competencies for food inspection work. Particular or unusual demand pressures were:

- The control and investigation of a suspect food poisoning outbreak at a local restaurant involving over 100 persons. The need for further action in relation to this incident is being determined in conjunction with expert advisors.
- The audit by the FSA of the whole of the food enforcement service including the preparation of the pre-visit questionnaire, servicing the three-day inspection, reporting of results and the implementation of the action programme.
- The formal closure of two restaurants where the conditions of food preparation were such as to present an imminent risk to patrons. This included the preparation of evidence and the appearance in court. One of the closures was subsequently appealed to the Crown Court and a date is set in November 2005 for the hearing of this appeal.
- The marked increase from 57 to 75 (up by over 30%) food alerts issued by the FSA plus the additional resources associated with checking for suspect products during inspections, related survey initiatives and sampling. The increase was mainly associated with the identification of illegal dyestuffs in a broad range of foods.
- A number of local initiatives were implemented to respond to public safety concerns over poor quality food including visits to advise retailers, a number of information mailings, use of the media and a programme of inspections in response to a request from the FSA for an audit of the efficiency of the trade withdrawal of suspect products. Contamination of palm oils revealed through sampling of products obtained locally, led to a further national withdrawal of products by the FSA. Approximately 500kg of seized foods were removed before they could be consumed by the public and were sent for proper disposal.
- The reorganisation and restructuring of council services during the year necessitated the commitment of staff resources to the planning and implementation of the project, towards the goals of service improvement, increased customer satisfaction, coordination of services and increased efficiencies.

Measures implemented to address the shortage of staffing in the food service associated with the turn over of staff:

- The external advertising of vacant posts on two occasions during the year was unsuccessful in attracting qualified staff.
- Agency staff were recruited to assist, however the lack of qualified agency staff led to a shortfall in inspection and complaint activity.

- As a medium term strategy two existing technical officers were placed on training courses to provide them with the skills and qualifications to meet competency requirements. The route to full qualification takes in excess of one year and improvements will not be obtained until late in the coming year.
- A successful bid to the ODPM/LGA capacity building programme for government assistance with student training in 2005/6 was submitted. This will build capacity from within the service in the medium term.
- Staff resources were diverted from discretionary or non-statutory activities with lower impacts on overall service delivery, to target high risk premises and higher risk activities.
- A recruitment and re-grading package for staff is being finalised with the aim of advertising vacant posts at the earliest possible stage in the year.

INFECTIOUS DISEASES SERVICE DELIVERY/DEVELOPMENT OBJECTIVES FOR 2004/2005

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS (TN)	OUTCOME
ID 1	All notifications of confirmed or suspected cases to be acted upon in accordance with quality manual procedures and guidance relating to investigation and exclusion from work etc.	Maria Carolan Joanna Duncombe	Respond to non-urgent within 3 days. Urgent notifications to responded to within 1 working day, subject to consultation with the Council's CCDC. Response times and action taken to be recorded on Ocella	None identified at present.	Achieved

APPENDIX 3

COMPANIES FOR WHICH HARROW ACTS AS THE HOME AUTHORITY

Anglo Dal Ltd
Anglo Dal House
5 Spring Villa Road
Edgware
Middlesex
HA8 7EB

Jadesun Trading Company
14 Berriton Road
Harrow
Middlesex
HA2 9LT

Pharmadass Ltd
Healthaid
Healthaid House
Marlborough Hill
Harrow
Middlesex
HA1 1UD

Wenzel's Hot Bread Shops
47 Bridge Street
Pinner
Middlesex

Arkady Feed (UK) Ltd
Congress House
Lyon Road
Harrow
Middlesex
HA1 2HY

Katie's Kitchen
Forward Drive
Christchurch Avenue
Harrow
Middlesex
HA3 8NT

Spar (UK) Ltd
Hygeia Building
66/68 College Road
Harrow
Middlesex
HA1 1BE

Foundation Food Co Ltd
Chantry Place
Headstone Lane
Harrow
Middlesex
HA2 6NY

Mohan & Company
60 Somerville Road
South Harrow
Middlesex
HA2 8ZZ

Top-op (Foods) UK Ltd
7 Garland Road
Stanmore
Middlesex
HA7 1QU

The Fresh Ground Coffee Services
105 Nibthwaite Road
Harrow
Middlesex
HA1 1TF

Neva Ltd
52 High Street
Pinner
Middlesex
HA5 5PW

Waissel's Ltd
58 Gayton Road
Harrow
Middlesex
HA1 2LS