

Community Safety Services Food Service Plan

2010/11



***Produced to comply with the requirements of the
“The Framework Agreement on Local Authority
Food Law Enforcement” issued by the Food
Standards Agency***

Forward

“The hygiene of food businesses is a national enforcement priority because of the high impact in terms of numbers of deaths and ill health caused by unhygienic food businesses and the high costs to the economy.”

(National enforcement priorities for local authority regulatory services (Rogers Review 2007))

Annually, food poisoning costs the UK economy over £1.5 billion (including costs to the health care system). With an estimated 850,500 cases of food borne disease (2,328 per day), 12,000 hospitalisations (33 per day) and 329 deaths (almost 1 death per day), it is an area that can ill afford to be overlooked. To put it in perspective, if this is divided on a population basis, it is the equivalent of the London Borough of Harrow suffering 2,833 cases, 40 hospitalisations and 1 death per year at a cost to the Harrow economy of £5 million.

The Environmental Health Food Safety Team, within Community Safety Services, is responsible for the prevention and investigation of matters related to food safety and standards within the Borough. The role and responsibilities of the Food Safety Team are set down in legislation as well as the Food Law Code of Practice (June 2008). It is subject to better regulation, as advocated by Government and regard is also given to the Hampton Agenda, the Rogers Review and the Local Better Regulation Office.

The Food Standards Agency, under powers contained in the Food Standards Act 1999 requires all enforcement authorities in the England and Wales to put in place an Annual Food 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.

This 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.

Contents

	<u>Page No.</u>	
1.0	Service Aims and Objectives	
1.1	Aim and Objectives	5
1.2	Government Priorities	5
1.3	Regional Priorities	5
1.4	Council Priorities	5
1.5	National Indicators	6
2.0	Background	
2.1	Profile of Harrow	8
2.2	Characteristics of Local Food Businesses	8
2.3	Organisational Structure	9
2.4	The Scope of the Food Service	10
2.5	Demands on the Food Service	11
2.6	Service Delivery Points	11
2.7	Out of Hours Contacts (including Emergencies)	12
2.8	Forthcoming Challenges	12
2.9	Enforcement Policy	13
3.0	Service Delivery	
3.1	Food Hygiene Premises Inspections	14
3.2	Food Standards Premises Inspections	14
3.3	Food Premises Revisits	15
3.4	Feeding Stuffs Inspections	15
3.5	Food, Feeding Stuffs and Premises Complaints	15
3.6	Home Authority Principle	15
3.7	Advice to Business	16
3.8	Food and Feeding Stuffs Inspection and Sampling	16
3.9	Control and Investigation of Outbreaks in Food Related Infectious Disease	19
3.10	Food Safety Alerts	19
3.11	Liaison with Other Organisations	19
3.12	The Promotion of Food and Feeding Stuffs Safety and Standards	20
3.13	Annual Performance 2008/9 at glance	21
3.14	Imported Foods	22
4.0	Resources	
4.1	Financial Resources	23
4.2	Staffing Allocation	24
4.3	Estimated Breakdown of Hours per Service Delivered	25
4.4	Staff Development Plan	25
5.0	Quality Assessment	
5.1	Quality Assessment	26
5.2	External Audits	27
6.0	Review	
6.1	Review against the Service Plan	28
6.2	Identification of any Variation from the Food Service Plan	28
6.3	Areas of Improvement	28
6.4	Review of the Database	29

Appendix 1: Food Service Delivery/Development Objectives 2010/2011	30
Appendix 2: Infectious Disease Service Delivery/Development Objectives 2010/2011	33
Appendix 3: Delivery of Service Objectives 2009/10	35
Appendix 4: Comments on Variances 2009/10	39
Appendix 5: Areas of Work covered by the Food Safety Service and Overview of Legislation	42
Appendix 6: Estimated Breakdown of Hours per Service Delivered	44
Appendix 7: 2009-2010 project update and 2010-2011 Major Projects Proposed	46
Appendix 8: Enforcement Breakdown 2009-2010	54
Appendix 9: Scores on the Doors Premise Breakdown	56

1. SERVICE AIMS AND OBJECTIVES

1.1 Aim

- To ensure that food and drink produced, purchased and / or consumed in the Borough is safe and without risks to health.

Objectives

- To meet the 'standard' set out in the Framework Authority Food Law Enforcement issued by the Food Standards Agency
- To contribute to the Community Safety Services service plan by assisting the Council to achieve its priorities, through the principles of performance, partnership and participation

1.2 Government Priorities

“There can be few areas of public policy where the positive benefits to lives, health and wellbeing are potentially as dramatic as they could be in diet and nutrition”

“Food: an analysis of the issues”, Cabinet Office Study

The Local Government White Paper on prosperous and strong communities sets out the Governments priorities, including tackling public health, health protection and disease prevention through the need to change the culture of communities. These form the fundamental workings of the Food Safety Team and are reflected within this Service Plan.

1.3 Regional Priorities

“A strategic challenge for London will be to address long term public health issues”

(Harrow Council Year Ahead Statement 2009/10)

The Food Safety Service is involved in food, food safety, food standards, infectious diseases and health promotion, which are all integral to improving public health. Through these areas, the Food Safety Service impact communities, both business, visitors and residents, throughout Harrow

1.4 Council Priorities

“To be recognised as one of the best London Councils by 2012, in a borough that is cosmopolitan, confident and cohesive”

(Harrow Council Vision and Corporate Priorities 2008-2011)

The three Council priorities are detailed in the Year Ahead Statement 2009/10 issued by Harrow Council. The Food Service Plan links with these, in particular Building Stronger Communities through changing the culture of

food businesses in terms of hygiene, standards and health promotion. There are also links to Better Streets, through the impact food businesses have on the environment in terms of refuse storage and disposal.

The Food Safety Service also are linked to the key themes of Harrows Local Area Agreements including health & wellbeing, educate & achieve and safer and stronger communities.

1.5 National Indicators

“(National Indicators) will be the only measures on which central Government will performance manage outcomes delivered by local government working alone or in partnership”

(Communities and Local Government Department)

As part of the Comprehensive Spending Review (CSR), the Government announced a new single set of 198 national indicators for English local authorities and local authority partnerships. A lot of these are based around improving health and the community.

The links the Food Safety Team has with these indicators clearly demonstrates the diverse role the team has, and the importance in meeting these targets. Based on LACORs guidance alone, the Food Safety Team links into the following National Indicators:

NI 6: Participation in Regular Volunteering

NI 17: Environment for a Thriving Third Sector

- Delivering training courses for volunteers in food hygiene

NI 53: Prevalence of Breast-Feeding at 6-8 Weeks from Birth

- Contribute to enforcement of Infant Formula Regulations to ensure promotion of breast feeding
- Working with the Planning Section to recommend the provision of suitable facilities in new buildings

NI 55: Obesity in Primary School Age Children in Reception

NI 56: Obesity in Primary School Age Children in Year 6

- Inspections of schools to ensure food hygiene and labelling (including nutritional information) is met
- Provision of healthy eating information to schools and suppliers
- Promotion of healthy eating to residents and businesses

NI 120: All-Age All Cause Mortality Rate

NI 121: Mortality Rate from All Circulatory Diseases at Ages under 75

NI 124: People with a Long-Term Condition Supported to be Independent and in Control of their condition

- Ensuring food is safe and compliant with UK Law
- Promoting greater understanding of food labelling so that consumers are able to choose healthier options
- Helping to prevent food incidents and so increase consumer confidence in food
- Targeting food sampling activities to highlight the saturated fat, sugar and salt content of foods

NI 136: People Supported to Live Independently Through Social Services (All Adults)

NI 139: The Extent to which Older People receive the Support they need to live independently

NI 141: Percentage of Vulnerable People Achieving Independent Living

NI 142: Percentage of Vulnerable People who are Supported to maintain Independent Living

- Promoting how to avoid food poisoning through the provision of practical advice
- Promotion of the understanding of food labels, especially durability dates
- Training of residents in food hygiene

NI 171: New Business Registration Rate

- The registration of all food businesses within the Borough

NI 172: Percentage of Small Businesses in an area showing Employment Growth

- supporting food businesses with start up support and advice, legal compliance advice and guidance, training programmes and information on ways to seek business help

NI 191: Residual Household Waster per Household

- Promotion of the understanding of food labels, especially durability dates
- Promotion of recycling / Reducing Packaging in the food business sector
(Contributing to Harrows Target of 227kg per person in 2010/2011)

2. BACKGROUND

2.1 Profile of the Harrow

Harrow is an outer London Borough in northwest London and approximately 10 miles from central London. Covering 50 square kilometres (20 square miles) Harrow is the 12th largest borough in Greater London in terms of area, but 22nd in terms of size of population with 214,600 people. It is one of the most diverse boroughs in the UK, with 41% of the population classified as ethnic minority. 20% of the borough is composed of parkland and open spaces.

There are approximately 5,000 commercial premises, of which approximately 1,300 are covered by inspection by the Food Safety Team.

2.2 Characteristics of Local Food Businesses

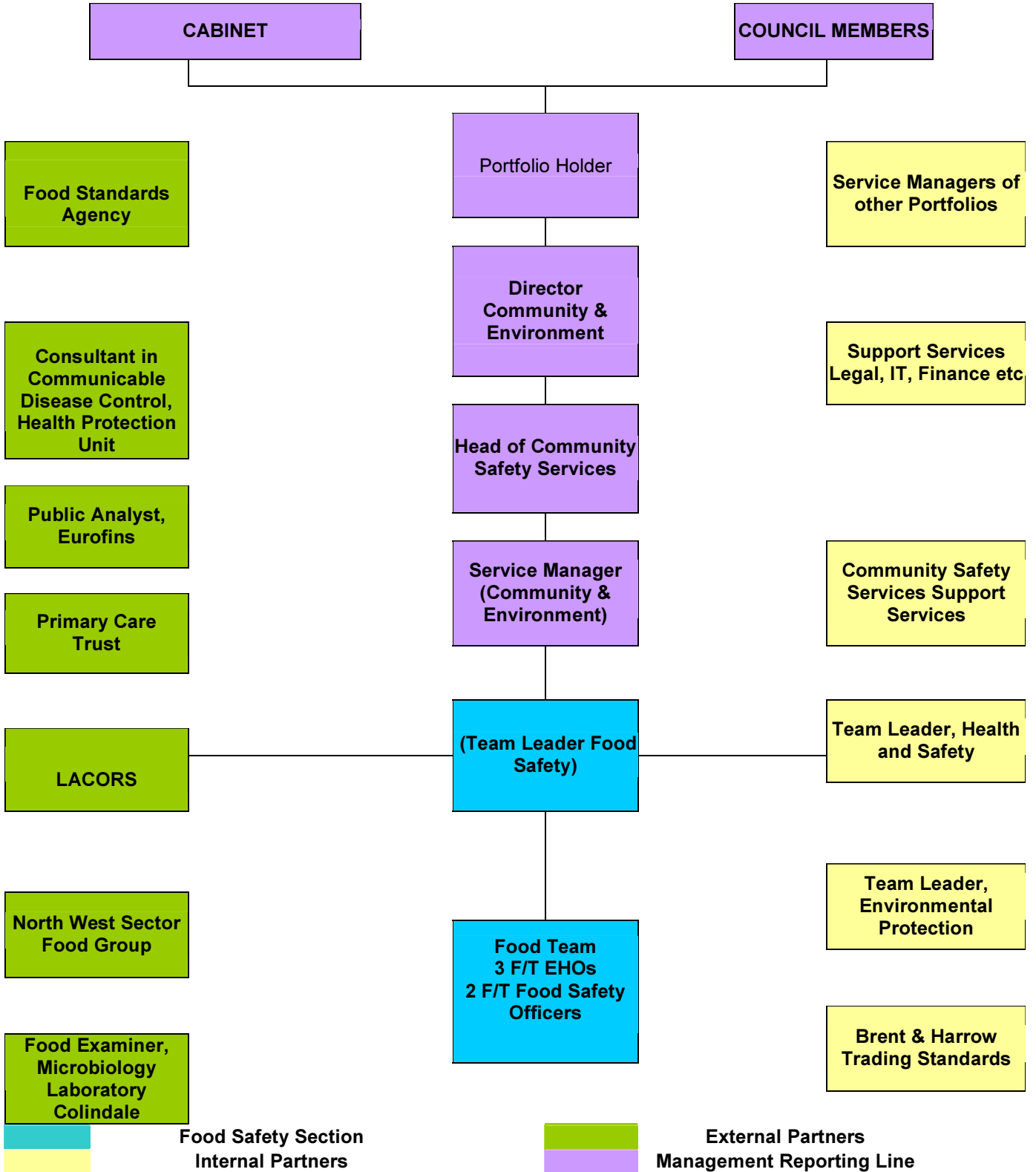
The Harrow food sector is made up of mainly small and medium enterprises, with a high proportion of food and businesses being owner operated by members of the ethnic minority populations within Harrow, reflecting the vibrant and diverse communities within the area. There are also a range of national food premises including Tesco, Sainsburys, Waitrose and Lidl.

Bakkavor, a large manufacturer of pizza bases and finished pizzas have a production facility near Wealdstone, which supplies pizzas for a number of the main supermarkets.

The Borough is host to the Head Office of **Spar UK Ltd**, the chain of independent food retailers, and Harrow Food Safety Service is the national (Home Authority) contact for Spar in terms of food safety and standards issues. Harrow 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 16 businesses.

2.3 Organisational Structure



2.4 The Scope of the Food Service

“Dodgy business people are going to around forever and a day. And the only thing protecting the public against them is environmental health practitioners”

Professor Pennington, Report into the Wales E.Coli Outbreak 2009

The Food Safety Service is delivered by a team of professional, technical and administrative staff and comprises:-

- Programmed food safety/hygiene and food standards inspections
- Food complaint and hygiene complaint investigations & response to Food Alerts
- Response to requests for advice and information / new business visits
- Communicable Disease investigations
- Delivering sampling of food and drink in line with Local, Regional and National Sampling plans

The Food Safety Service is delivered alongside the health and safety function, and Officers in the team also undertake licensing consultations as deemed a Responsible Authority under the Licensing Act 2003. Where the premise has higher risk health and safety activities, but have an element of food (e.g. staff canteen), food safety inspections will be undertaken by Environmental Health Officers from the Health and Safety Team.

Harrow is part of a consortium with the London Borough of Brent for the provision of Trading Standards Services. With the exception of the sampling of alcoholic drinks the Trading Standards Service is not responsible for food standards matters in the borough's food premises; the Food Safety Service principally undertakes these.

The Food Safety Service provides training opportunities for local food businesses in line with the Council priority of building stronger communities. The team offers an extensive range of training courses to food businesses including courses leading to accredited food hygiene qualification.

2.5 Demands on the Food Service

The biggest demand on the Service is the statutory inspection of approximately 1250 food businesses in the Borough, for both Food Hygiene and Food Standards:

Food Hygiene Inspections: (813 Due 2009-2010)			
Risk Rating	Number of Premises	Inspection Interval (at least every.....)	Number of Inspections Due 2010-2011
A	7	6 months	8
B	115	12 months	123
C	571	18 months	351
D	152	24 months	108*
E	286	Alternative Enforcement	128*
OTHER	106	-	95
Food Standards Inspections: (397 Due 2009-2010)			
Risk Rating	Number of Premises	Inspection Interval	No. of Inspections Due 2010-2011
A	2	12 months	1
B	154	24 months	74
C	1028	Alternative Enforcement	233*
OTHER	64	-	89

* These premises will not all require a physical inspection, though at least a 10% sample will be spot checked on return of the alternative enforcement questionnaire to ensure they are complying.

A list of areas covered by the Food Safety Team is listed in Appendix 4 for reference.

2.6 Service Delivery Points

The Council's food service is based at the council's Forward Drive Depot site, located near Wealdstone. All visitors to the service are generally accommodated at Harrow Civic Centre. The Council operates flexible working for its core staff, 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 can be contacted by direct-dial numbers, by email or through Access Harrow. 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.

The Civic Centre also operates a One Stop Shop, whereby members of the public can visit and get advice or be put through to relevant Officers.

2.7 Out of Hours Contact (including Emergencies)

The Council can be contacted through the switchboard number (020 8863 5611) out of hours. In terms of emergencies, being food poisoning outbreaks, an Infectious Disease rota was in place but has since been discontinued. It is assumed that any such incident would be reported via the switchboard, and on to the emergency contact numbers. Attempts to reinstate the rota are ongoing.

Emergency details are also held by the Food Standards Agency.

General enquiries can be made out of hours using the Council's website (www.harrow.gov.uk)

2.8 Forthcoming Challenges

This year will again provide a number of challenges, on top of the statutory requirements. The food service's objectives for the year to April 2011 include:

- To expand the Health Promotion agenda, through partnership working and incorporation into the Food Premise Inspection programme. To include active participation in the Council's Well Being Agenda.
- To continue to work with Harrow Youth Worker service to provide an accredited outcome to the training of young persons with learning disabilities that is to take place on Saturdays throughout the year
- To improve working with the Council's Planning Section to reduce the business premise turnover within the Borough and provide stability within communities.
- To produce a food safety management guide to enable businesses to comply to at least a basic level of compliance with the requirements. This is to be aimed at small independent food premises that do not have easy access to, or finances for employing, professional advice.
- 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 our Harrow's allocation from the Health Protection Agency

- To carry out a proactive surveillance, to check on the legality of products of animal origin sold within the Borough, especially in terms of those imported from outside of the EU
- To further develop alternative enforcement strategies for lowest risk premises in accordance with the Food Law Code of Practice issued in June 2008
- To deliver a minimum of 12 (paid for) food safety training sessions to the business community
- To continue with the London wide Scores on the Doors scheme, and work towards participation in a National Scheme as approved by the Food Standards Agency
- To contribute to an array of National Indicators linked to food, health and safety and health promotion.
- To increase partnership working with other enforcement agencies to achieve targets and to work towards national, regional and local goals.

2.9 Enforcement Policy

The Food Safety Service, in line with all Enforcement Teams, must comply with the requirements of the Regulator's Compliance Code being the need for an open, targeted, proportionate and consistent approach to enforcement.

The Food Law Code of Practice, issued by the Food Standard Agency, requires the Food Safety Service to have an Enforcement Policy in place that covers the areas of Enforcement as stated within the Code. This Enforcement Policy is to be approved by Council, and incorporates statutory requirements as set down by the Compliance Code and the Food Law Code of Practice.

Recent Case Law (Wandsworth-v-Rashid 2009 EWHC) established that Local Authorities should have regard to its enforcement policy to guide decision makers, promote consistency and equity of treatment, but need not be solely driven by it in its enforcement decisions. Deviations away from the Food Enforcement Policy therefore may occur, but the reasons for this will be documented and approved by an appropriate manager should it be necessary.

3. SERVICE DELIVERY

3.1 Food Hygiene Premises Inspections

The Commercial Section undertakes primary food hygiene and food standards inspections as described in paragraph 4.1.2 the Food Law Code of Practice. In 2010/2011, **813** primary food hygiene inspections are due in categories A to E. This represents a **9.5%** decrease over last year's numbers. This is mainly due to the enforcement action of the team increasing compliance amongst premises.

Due to resource implications, category D and E premises (lowest risk category) won't be subject to a regular inspection regime, as permitted by the Food Law Code of Practice. Alternative strategies will be used to address standards in this 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 inspection or survey of a further **95** vacant, new or otherwise unclassified premises are programmed. Using past data, there is also likely to be a **10%** turnover of premises that will require some form of intervention (c125 premises).

2009/2010 continued to see a steady stream of Childminders registering with the Local Authority in terms of food, due to the publication of FSA detailed guidance. Childminders were previously exempt. A policy has been introduced regarding interventions to prevent unnecessary burden on these premises, including a newsletter sent to all 178 childminders on 1st April 2010.

3.2 Food Standards Premises Inspections

Food Standards inspections cover quality, labelling and composition of food and are rated differently to food hygiene inspections, but where possible, these will be carried out at the same time as food hygiene inspections. In 2010/2011, **397** primary food standards inspections are due. This represents a **2%** decrease over last year's numbers

Due to resource implications, category C premises (lowest risk category) will not be subject to a regular inspection regime as permitted by the Food Standards Agency's Code of Practice. Alternative strategies will be used to address standards in this 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 inspection or survey of a further **89** vacant or otherwise unclassified premises are programmed.

3.3 Food Premises Revisits

Secondary inspections of food premises as described in paragraph 4.1.3 of the Code of Practice are undertaken where, for example, conditions are found to be unsatisfactory at the primary inspection and a further visit is warranted, or for the purposes of sampling or training of food handlers, or in circumstances where notices have been served to ensure that the statutory requirements have been complied with.

In order to engage and maintain a change in culture within premises, revisits are carried out on all but the highest compliant premises after inspections, resulting in a further **200+** visits a year.

As an aid to consistent action by officers, guidance on secondary inspections is provided in Food Quality Manual Document. Last year secondary inspections were made to approximately **33%** of food premises.

3.4 Feeding Stuffs Inspections

The Food Safety Service is responsible for animal feedingstuff, and subsequent inspections. At present, Harrow has no feedingstuff producing premises.

3.5 Food, Feeding Stuffs and Premises Complaints

The food service investigates various complaints concerning food and feeding stuffs that are suspected of being unfit, adulterated, out of condition, contain foreign objects or are incorrectly labelled. It also investigates complaints about hygiene conditions 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 manufacturers, importers and/or retailers of the foodstuffs 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 the outcome.

3.6 Home Authority Principle (See appendix 3)

Harrow is an active contributor to the Home Authority Principle and is currently Home Authority for 16 businesses. Three national companies, Spar plc, Bhakkavor 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.

3.7 Advice to Business

The Service is committed to an educational and advisory role with local business and is a Chartered Institute of Environmental Health (CIEH) registered centre for teaching the Level 2, Level 3 and Level 4 Certificate in Food Hygiene. As a further service to local businesses it is also registered to teach the Food Hygiene Update Course. In 2009/2010, Harrow became an accredited training centre with Highfield to enable the running of accredited Harrow branded courses. Other related and important areas are:

- The provision/production of advisory leaflets on relevant Food Safety and Standards matters.
 - On site advice and coaching on the Food Standards Agency Safer Food Better Business (SFBB) pack which is aimed to aid food businesses in complying with the requirement to have a food safety management system.
 - Working with other Council Sections to deliver food hygiene courses as part of other training given to members of the community. This financial year will see the continuation of partnership working with the Youth Worker Section to accredit training given to young people with learning disabilities;
 - 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 Home Caterers
-
- The Food Team will be aiming to expand advice given in 2010/2011 through the production of an information newsletter for businesses. The Team will also be exploring the better provision of advice to residents covering home catering as well as general food hygiene.

3.8 Food and Feeding Stuff 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 food service works to a predetermined 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 gastro-intestinal 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 2009/10, **71** chemical samples and **40** microbiological samples were sent for analysis and examination respectively.

The Council's appointed Public Analyst is Eurofins Scientific Limited based at Acton, London. The bacteriological examination of food and clinical samples is carried out by the Health Protection Agency.

In relation to feeding stuffs, 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 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 beef cattle and sheep 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 Stuff (Establishments & Intermediaries) Regulations 1999.

For 2010/11 it is intended, as a minimum to maintain the level of chemical sampling at a level comparable to the previous year. Further, and subject to resources, it is intended to increase the level of bacteriological sampling.

3.9 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 the Service Quality Manual. The Consultant in Communicable Disease Control Guidance provides

guidance relating to the investigation of food poisoning and food borne illness, including 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.

<i>Types of Specified Infectious Disease Food Poisoning and Suspected Food Poisoning Cases Reported During 2009/2010</i>	
	241 (28%↑)
Food Poisoning	
Meningococcal Septicaemia	8 (800↑)
Typhoid Fever	8 (-)
Tuberculosis	84 (59%↑)
Acute Meningitis	1 (50%↓)
Paratyphoid Fever	1 (50%↓)
Malaria	6 (50%↑)
Leptospirosis	0 (-)
Viral Hepatitis	9 (450%↑)
Dysentery	3 (40%↓)
Scarlet Fever	18 (50%↑)
Measles	11 (22%↑)
Mumps	66 (275%↑)
Rubella	1 (-)
Cholera	1 (-)

3.9 **Food Safety Alerts**

The Section responds to food alerts in accordance with the Food Quality Manual 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 late 2004 to correspond with publication of the revised Food Law Code of Practice. 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 Team Leader Food Safety or the Commercial Services Manager and an appropriate response made. A procedure for the assessment of these alerts is contained in Service Quality Manual. The food service co-ordinates 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.

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 2009, a total of **45** food alerts were received. This is a **52%** decrease in warnings against the previous year.

3.10 **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 include:

- North West London Sector Food Liaison Group. The Group, which meets six times per year, comprises representatives of the nine northwest London Boroughs. The remit of the Group is to provide advice on such matters as enforcement, professional standards and sampling initiatives with the objectives of maximising resources and promoting consistency. Harrow host the meetings.
- 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
- Primary Care Trust (especially in terms of Health Promotion)
- Ofsted in terms of nurseries and schools regarding food and safety
- HM Customs and Revenue and the Border Agency

Internally, liaison arrangements include:

- Planning: in respect of planning applications involving food premises
- Licensing: the Food Team are a designated Responsible Authority under the Licensing Act 2003
- Legal: the production of policies./ procedures as well as taking of court cases
- Building Control: regarding food premises
- Public Realm: collection of waste from commercial premises

3.11 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.

For the forthcoming year a key hygiene theme will be the recent and forthcoming changes to food safety legislation due to Better Regulation requirements.

In terms of health and nutrition, the service will be aiming to improve partnership links and provide targeted information to businesses and residents. This has already included the provision of a guide to compliance to all child minders throughout the premise.

3.12 Annual Performance 2009/2010 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 X%
	Low Risk categories 78%
The total number of primary inspections carried out. This figure includes new businesses opened during the year.	707 food hygiene 341 food standards
Number of other secondary inspections and other visits to food premises, including sampling visits.	229
Percentage of complaints responded to within 5 working days of receipt.	90%
Number of food samples submitted for chemical analysis.	71
Number of samples submitted for microbiological analysis.	40
Number of food hygiene training courses held.	16
The number of individuals successful in completing food hygiene training courses.	261
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)	45

NB: Approximately 15% of the total primary inspections were inspections outstanding from 2009/10

3.13 Imported Foods

The authority does not have major facilities within the Borough that deal with imported food of animal origin. However programmed food standards inspections are carried out at 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 Food Standards Agency, Public Analyst and Health Protection Agency.

Work on imported food also arises through home authority referrals and direct from the importers. Advice is provided in support of smaller local food importers; as such businesses are usually unable to call on detailed technical advice from the specialist consultancies.

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. All Officers within the Team have undergone FSA Imported Food Training to enable to identify issues and take appropriate action.

4. RESOURCES

“Providing Environmental Health and Trading Standards Services (is) equivalent to just under 1% of Local Authority Expenditure”

Local Better Regulation Office Report, 2008

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 2009/2010</i>	<i>Estimated Expenditure 2010/2011</i>
Staffing cost	334,000	327,000
Car Allowances and mileage	10,300	10,466
All Other Revenue Costs **	7,000	8,150
Sampling & analysis	10,000	9,760
All Other SSC Costs **	94,000	96,000
Income	21,000	21,000
Total	424,300	430,376

** 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 successful in attracting qualified officers to permanent posts, but one EHO was off on maternity for the majority of the financial year leading to a 25% loss in fully qualified officers within the team. A Food Safety Officer left at the end of February 2010, leading to a current 20% loss in full time officers. This post is to be recruited to.

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>
0.3	Commercial Services Manager	Full and includes authorisation of proceedings
1	Team Leader	Full
2	Environmental Health Officers	Full
1	Environmental Health Officers	Part – unable to currently do formal closures until 2 years food experience reached
1	Technical Officer	Qualified to do low risk food hygiene inspections, but not food standards. Enforcement and formal action limited due to level of qualification
1	Technical Officer	Vacant

All current Environmental Health Officers within the food service are assessed as competent in accordance with the Food Safety Code of Practice, with one requiring an additional 18 months experience to meet the Code of Practice requirement in terms of formal closures. One Technical Officer post is currently vacant and being covered on a 40% basis by a contractor. The contractor costs are met from within existing budgets.

Administrative support is provided by a centralised support 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 Estimated Breakdown of Hours per Service Delivered

The full complement of the Food Safety Team is **6 FTE Officers** (including the Team Leader). The current vacant food safety officer post is currently being covered on a 40% basis (2 days a week), and one EHO is moving to flexible working (3 day/week). Therefore the complement of the team will be **4.8 FTE Officers** until recruitment to the vacant post.

A breakdown of time and task for 2010/2011 (Appendix 5) shows that **4.2 FTE Officers** are required to carry out the statutory inspection programme, being:

Total FTE Officers required to deliver Food Hygiene Inspections:	3.2
Total FTE Officers required to deliver Food Standard Inspections:	0.9
Total FTE Officers required to deliver Health & Safety Inspections:	0.1
	4.2 FTE

This leaves an estimate of **0.6 FTE Officers** to do the other work outside the inspection programme. This includes the investigation of food poisonings / infectious diseases, investigation of food complaints/food hygiene complaints, delivery of the sampling plan or other reactive aspects of the service or contributions to the Councils activities such as Weeks of Action. Resources will be concentrated on the highest risk inspections.

4.4 Staff Development Plan

The scheme or Individual Personal Development Plan (IPAD) seeks to identify personal development issues for staff and business needs by agreement, formulate an action plan to build upon strengths and address areas for improvement. All food service staff are included in this scheme.

The food service has a competency framework established for the appointment of staff and monitoring of existing staff. All food officers must undertake at least 10 hours continuing professional development (CPD) in line with the Food Law Code of Practice. Additionally, all qualified EHOs must undertake at least 20 hours CPD as required under their Chartered Institute membership (qualification requirement under the Food Law Code of Practice)

Officers carrying out food hygiene and standards will also be subject to a monitoring procedure to ensure competence and consistency, where further training may be identified and actioned.

5. QUALITY ASSESSMENT

5.1 Quality Assessment

In June 2008, The Food Standards Agency issued a consolidated Code of Practice and associated guidance under the Food Safety Act 1990 and new Food Hygiene (England) Regulations 2006 relating to such matters as inspection programming, conduct of inspections 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 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 related guidance and the information is readily available to all enforcement staff.

In line with the Food Law Code of Practice, all food officers undertake monitoring to ensure consistency of approach as well as assessment to ensure compliance to policies and procedures. The Food Team Leader co-ordinates and participates to ensure consistency and fairness. These visits are recorded on the internal quality monitoring forms.

In line with the National Indicator 182, the Community Safety Service participates in sending satisfaction surveys to customers to evaluate satisfaction with the service. The Food Safety Team is an active part of this.

The FSA has also introduced a National Indicator (NI 184) measuring the percentage of premises within the Borough which are 'Broadly Compliant'. "Broadly Compliant" equates to a food premises scoring no more than 10 points when risk rated in respect of hygiene, structure and confidence in management, as detailed in the FSA Code of Practice. A national target of 75% of food premises being broadly compliant has been set, and Officers within the Borough actively work towards this. Current figures for the Borough are as follows:

1 st April 2009	1 st April 2010
78.06%	78.15%

This shows good consistency taking into account the turnover of premises, and the maintenance of standards in the majority of premises.

5.2 **External Audits**

The last Food Standards Audit of Harrows Food Safety Service took place in 2004. The audit process is currently being reviewed, with a move towards peer auditing and leading to an increased frequency of audits.

Community Safety Service is also investigating the possibility of participating in a peer review scheme currently being devised between IdeA, Westminster Council, Coventry Council and the Department for Business, Enterprise and Regulatory Reform (BERR)

6. REVIEW

6.1 Review against the Service Plan

The Service Plan is reviewed annually. The Departments 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, the achievement of targets and areas for development for the service as a whole. It further 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 an "Executive" function. Further as it affects all food businesses in the Borough it is a Key Decision and must therefore be approved by Cabinet.

A review of 2009/10 performance delivery objectives is set out in **Appendix 2**.

6.2 Identification of any variation from the Food Service Plan

The review process considers variations from the service plan and performance delivery objective and, where appropriate, the reasons for the variance. A Quarterly review of how the Service Plan targets are being met is to be conducted by the Team Leader and reported to the Service Manager. This is to identify early on an major deviance or potential failure to meet targets, and put appropriate actions in place.

6.3 Areas of Improvement

As part of the planning process the Service will identify targets and areas for improvements in the forthcoming year. The action plan for work to be undertaken in 2010/11 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.

6.4 Review of the Database

The actions of the Food Safety Team are recorded on a computer database, M3 provided by Northgate. Inspections are allocated, assessed and risk rated on this system. It is therefore imperative that the data is as accurate as feasibly possible.

Therefore the database will be reviewed quarterly to ensure that all food premises are correctly recorded and have food hygiene, food standards and any other relevant components recorded against them.

Through the use of online publications, Officers visits and other sources of information, the database will be checked to ensure its accuracy in recording all food premises in the Borough.

APPENDIX 1:
FOOD SERVICE DELIVERY / DEVELOPMENT
OBJECTIVES 2010 - 2011

APPENDIX 1

FOOD SERVICE DELIVERY/DEVELOPMENT OBJECTIVES 2010/2011

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS	LINK TO CORPORATE / NATIONAL TARGETS	WELL BEING OUTCOMES*
FS 1	To inspect all food premises, vehicles, stalls and other related premises under the provisions of Food Safety Law, 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	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. Completion of practical professional training to enable the Food Safety Officer to be qualified to participate in this objective	StrongerCommunities: improved, sustainable premises. Improved economy and job sector Better Streets: improved street environment through duty of care enforcement	Economic Wellbeing / Improved Health / Improved Quality of Life
FS 2	To meet in full the food sampling programme.	Team Leader Food Team	Sampling programme implemented in compliance with the Code of Practice.	In post qualification training and guidance to officers, as necessary.	Stronger Communities: improved confidence in food safety, as well as greater information for consumers	Improved Health / Improved Quality of Life
FS 3	To respond to all complaints regarding food and food premises within 5 working days of receipt.	Team Leader Food Team	Response within time scale.	In post qualification training and guidance to officers, as necessary.	Stronger Communities: improved confidence in the food sector, working closely to meet communities needs Better Streets: improved street environment through rubbish investigations	Economic Wellbeing / Improved Health / Improved Quality of Life
FS 4	To instigate a series of projects aimed at topical areas within the food sector to improve compliance	Team Leader Food Team	Completion of projects	As required	Stronger Communities: improved confidence in food safety, as well as greater information for consumers	Economic Wellbeing / Improved Health / Improved Quality of Life

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS	LINK TO CORPORATE / NATIONAL TARGETS	WELL BEING OUTCOMES*
FS 5	To lead or contribute to a Waste Disposal enforcement for commercial premises during the Councils Weeks of Action, incorporating duty of care and related issues.	Service Manager Team Leader	Attendance during the Weeks of Action, including visits to all related commercial premises to ensure correct refuse collection and storage (to be carried out in conjunction with enviro-crime team)	To be assessed and addressed as necessary	Better Streets: Improving the street scene / environment by better compliance by food premises with the storage and collection of waste	Making a Positive Contribution / Economic Well-being / Improved Quality of Life
FS 6	To continue to work with The Association of London Environmental health Managers, the Chartered Institute of Environmental Health and the FSA to provide an internet-based public assess point to view "Rating Scores" for food premises.	Service Manager Team Leader	Continued publication of inspection ratings on the "yourlondon.com" website, or future website that may replace this as part of any national scheme.	Continuous staff updates to ensure risk ratings carried out to enable the scores on the doors.	Stronger Communities: Improving confidence in Harrows food sector, as well as providing communities with better information	Exercise of choice and control / Economic Well-Being
FS 7	To deliver a minimum 12 accredited Level 2 food training sessions	Team Leader All training staff	Completion of target within the financial year	Ensure all staff involved delivering training are appropriately trained.	Stronger Communities: Improving training opportunities for businesses and residents, to lead to better standards and resulting benefits.	Improved Health / Improved Quality of Life / Making a Positive Contribution / Economic Well-Being / Personal Dignity

* **Well Being Outcomes:** These are the key outcomes as detailed in the White Paper 'Our Health, Our Care, Our Say'.

APPENDIX 2:
INFECTIOUS DISEASES SERVICE DELIVERY /
DEVELOPMENT OBJECTIVES 2010 – 2011

Appendix 2

INFECTIOUS DISEASES SERVICE DELIVERY/DEVELOPMENT OBJECTIVES FOR 2010/2011





REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	RESPONSIBILITY	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS (TN)	OUTCOME	WELL BEING OUTCOMES*
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 (ID Clerk) Service Manager Team Leader Food Team	Urgent notifications to responded to within 1 working day. Respond to non-urgent notification within 3 days.	Ongoing as business needs are identified.	Stronger Communities: Improving the health of the community and ensuring minimal impact on the local economy through sickness	Economic Wellbeing / Improved Health / Improved Quality of Life
ID2	Implementation of new Public Health Regulations, that updates the investigation of Infectious Diseases and clarifies the role of Local Authorities and Health Protection Unit	Maria Carolan (ID Clerk) Service Manager Team Leader Food Team	Implementation of new Public Health Notices and updating of memorandum of understanding	Training session between HPU and Food Safety Team	Stronger Communities: Improving the health of the community and ensuring minimal impact on the local economy through sickness	Improved Health / Improved Quality of Life




* **Well Being Outcomes:** These are the key outcomes as detailed in the White Paper 'Our Health, Our Care, Our Say'.

APPENDIX 3:
DELIVERY OF FOOD SERVICE OBJECTIVES
2009 - 2010


APPENDIX 3

DELIVERY OF FOOD SERVICE OBJECTIVES 2009/2010

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS	LINK TO CORPORATE / NATIONAL TARGETS	WELL BEING OUTCOMES*	2009/10 OUTCOME
FS 1	To inspect all food premises, vehicles, stalls and other related premises under the provisions of Food Safety Law, related Regulations, new EU legislation and any other relevant legislation, to ensure satisfactory standards of hygiene and food safety are being maintained.	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. Completion of practical professional training to enable the Food Safety Officer to be qualified to participate in this objective	Stronger Communities: improved, sustainable premises. Improved economy and job sector Better Streets: improved street environment through duty of care enforcement	Economic Wellbeing / Improved Health / Improved Quality of Life	 100% A & B premises inspected  78% Low Risk Premises Inspected
FS 2	To meet in full the food sampling programme.	Sampling programme implemented in compliance with the Code of Practice.	In post qualification training and guidance to officers, as necessary.	Stronger Communities: improved confidence in food safety, as well as greater information for consumers	Improved Health / Improved Quality of Life	 Sampling done within budget
FS 3	To respond to all complaints regarding food and food premises within 5 working days of receipt.	Response within time scale.	In post qualification training and guidance to officers, as necessary.	Stronger Communities: improved confidence in the food sector, working closely to meet communities needs Better Streets: improved street environment through rubbish investigations	Economic Wellbeing / Improved Health / Improved Quality of Life	
FS 4	To further develop alternative enforcement strategies in accordance with the FSA Code of Practice issued in June 2008. To promote food safety and food standards issues for distribution to the lowest category of local food business.	Production of a Quality Manual note for alternative enforcement strategies by June 2009 Alternative strategies, policies and procedures in place and operating.	None identified at present.	Stronger Communities: improved confidence in the food sector, by targeting high risk areas of concern and minimising risk.	Economic Wellbeing	 Alternative Enforcement policy and procedure in place and working Quality Manual updated to

						reflect above
REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS	LINK TO CORPORATE / NATIONAL TARGETS	WELL BEING OUTCOMES*	2009/10 OUTCOME
FS 8	To lead or contribute to a Waste Disposal enforcement for commercial premises during the Councils Weeks of Action, incorporating duty of care and related issues.	Attendance during the Weeks of Action, including visits to all related commercial premises to ensure correct refuse collection and storage (to be carried out in conjunction with enviro-crime team)	To be assessed and addressed as necessary	Better Streets: Improving the street scene / environment by better compliance by food premises with the storage and collection of waste	Making a Positive Contribution / Economic Well-being / Improved Quality of Life	 Contributed to all weeks of action
FS 9	To continue to work with The Association of London Environmental health Managers, the Chartered Institute of Environmental Health and the FSA to provide an internet-based public assess point to view "Rating Scores" for food premises.	Continued publication of inspection ratings on the "yourlondon.com" website, or future website that may replace this as part of any national scheme.	Continuous staff updates to ensure risk ratings carried out to enable the scores on the doors.	Stronger Communities: Improving confidence in Harrows food sector, as well as providing communities with better information	Exercise of choice and control / Economic Well-Being	 National scheme still in draft. Harrow has contributed to the process, and continues to operate the London Wide Scheme
FS 10	To deliver 12 CIEH Level 2 food training sessions	Completion of target within the financial year	Ensure all staff involved delivering training are appropriately trained.	Stronger Communities: Improving training opportunities for businesses and residents, to lead to better standards and resulting benefits.	Improved Health / Improved Quality of Life / Making a Positive Contribution / Economic Well-Being / Personal Dignity	 Delivered X accredited courses, teaching X candidates

INFECTIOUS DISEASES SERVICE DELIVERY/DEVELOPMENT OBJECTIVES FOR 2010/2011

REF. NO.	SERVICE DELIVERY/ DEVELOPMENT OBJECTIVES	PERFORMANCE INDICATOR	STAFF DEVELOPMENT AND TRAINING NEEDS (TN)	OUTCOME	WELL BEING OUTCOMES*	2009/10 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.	Urgent notifications to responded to within 1 working day. Respond to non-urgent notification within 3 days.	Ongoing as business needs are identified.	Stronger Communities: Improving training opportunities for businesses and residents, to lead to better standards and resulting benefits.	Economic Wellbeing / Improved Health / Improved Quality of Life	 100% Response time

* **Well Being Outcomes:** These are the key outcomes as detailed in the White Paper 'Our Health, Our Care, Our Say'.

APPENDIX 4:
COMMENTS ON VARIANCES 2009 - 2010

APPENDIX 4: Comments on Variances 2009/10

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 Food Safety Team had one EHO on full time maternity since February 2009 until February 2010. Due to financial constraints, cover for this full time post was only in place for 2 days a week (40% cover).
- One Food Safety Officer left at the end of February 2010
- The use of long term leave by Officers leading to an additional loss of Officers for a total of approximately 60 additional days in 2009/10
- The prosecution of a Public House for food hygiene offences, resulting in the in-depth collation of evidence and leading to a successful prosecution resulting in a £20,000 fine
- The Food Standards Agency drive towards outcomes rather than outputs during inspections and follow ups has led to a concerted effort by the Food Safety Team to drive an improved cultural and safety change. Enforcement increased, with Improvement Notices Served in 2009/10 seeing an increase of approximately **20%** compared to 2008/9
- The marked increase from **77** to **92** (up by over **21%**) 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.
- Increased resistance to compliance by Food Businesses mainly due to financial implications of carrying out necessary legal works. This is likely to increase due to an increasingly harsh economic climate. This was and will be further seen as premises change hands more regularly due to running costs, a lack of registrations being submitted and therefore more new premises being found by the Food Safety Service while out on district. Such premises are then subject to reactive changes, at greater cost than if they had been put in place prior to opening.
- Increased build up of food premises in specific areas, leading to increased competition and a markedly increase in “corner cutting” especially in statutory required areas (e.g. toilet facilities, food hygiene training, food safety management systems etc). This requires a greater emphasis on enforcement, which is time consuming for the team. Steps are being taken to work with Planning to prevent non-sustainable food premises from being allowed.

- In response to the corporate priority “ Build Stronger Communities” the Food Safety Service participated in Weeks of Actions as well as Community Safety Services specific initiatives to deal with a range of environmental problems throughout Harrow. The project was undertaken in partnership with other internal and external service providers and focused on food safety, storage and safe disposal of waste, duty of care, drainage and rodent problems.
- Of the two Technical Officers, only one met the Code of Practice competency requirements for food hygiene and for only low risk (C-E) premises. This Officer is not Food Standards qualified so unable to take any food standards enforcement or inspection. The other Technical Officer was qualified in food standards, and was undergoing professional practical training to enable them to carry out food hygiene tasks. This Officer has since left.
- 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. Additionally, some statutory functions have suffered as a result of having to divert resources to meet Council initiatives.

APPENDIX 5:
FOOD SERVICE OVERVIEW AND LEGISLATION

APPENDIX 5: Food Service Overview and Legislation

Food Service Overview

The Food Safety Service conducts the following statutory functions:

- Inspection of food premises for food hygiene, food standards and health and safety
- Investigation of Infectious Diseases
- Investigation of Food Poisonings and Food Poisoning Outbreaks
- Microbiological and Chemical Sampling of Food
- Provision of food hygiene and safety advice to residents and businesses
- Home (National) Authority for number of premises including Spar UK Ltd
- Inspection and Enforcement of Feeding Stuffs within the Borough
- Movement of Animals (Pigs, Cattle and Sheep)
- Approval of Product Specific Food Premises
- Disposal of animal by products

The Food Safety Service conducts the following non-statutory functions:

- Implementation and Running of the “Scores on the Doors” scheme
- Promotion of health promotion, specifically linked to food and infectious disease
- Running Food Hygiene Training Courses for Residents and Businesses
- Provide training and advice on the FSA “Safer Food Better Business” pack

The above are areas specifically linked to food hygiene and safety. The Service is also involved in Duty of Care (Waste), pest control and pollution (noise and odour) issues arising from food premises.

Legislation

The Food Safety Service enforces National and European Legislation.

The main legislation relevant to the service is The Food Safety Act 1990 as amended, The Food Hygiene (England) Regulations 2006, and the Food Labelling Regulations 1996 as amended.

Overall, the Service enforce, inspect under and advice on over **600 food related pieces of legislation**. An example is the Food Labelling Regulations 1996 and 11 subsequent major amendments to these since.

APPENDIX 6:
Estimated Breakdown of Hours
Per Service Demand

Appendix 6: Estimated Breakdown of Hours per Service Demand

The estimate is based upon an approximate time for completing an inspection, including paperwork and data entry for a given category of premise and travel time. Attempts are made by Officers to group inspections together to reduce travel time.

FOOD HYGIENE INSPECTIONS			
Risk Category	Average Time per Inspection (hrs)	No. of Inspections	Total (hours) (time x No.)
A-C	5	482	2410
D-E	2	236	472
Revisits (estimated: working on 50%)	2.5	359	718
Misc Inspections (new premises etc)	4	95	380
TOTAL			3980
FOOD STANDARDS INSPECTIONS			
A-B	2	75	150
C	2	233	466
Revisits (estimated: working on 25%)	2	77	154
Misc Inspections (new premises etc)	4	89	356
TOTAL			1126
Overall Total			5106
FOOD PREMISE HEALTH & SAFETY INSPECTIONS			
A-B	2	114	30
Revisits (estimated: working on 20%)	1	23	3
Misc Inspections (new premises etc)	1	20	20
TOTAL			53
Overall Total			5159

Estimate of the total number of hours a full time equivalent post would have in a 12 month period:-

Total hours (37hours week/52weeks) 1924.00

Less annual leave/flexi	(32 days)	240.00
Less Bank Holidays	(8 days)	59.35
Less Sickness	(1 week)	37.00
Total Hours		1587.64

Food Hazard Warning	(2 days)	15
Food Enforcement	(10 days)	74
Research / CPD Update	(8 days)	60
Meetings	(5 days)	37
Misc Admin	(10 days)	74
Performance Review	(2 days)	16
Training	(10 days)	74
Total Hours		350

Total Hours 1 FTE 1237.64

APPENDIX 7:
2009-2010 PROJECT UPDATE
2010-2011 PLANNED MAJOR PROJECTS

2009-2010 PROJECT UPDATE

Counterfeiting and Substitution of Alcoholic Drinks

Project Aim:

To ensure that food produced, purchased and / or consumed in the Borough is safe and without risks to health.

Project Objectives:

- To contribute to Harrow Councils flagship priority of "Building Stronger Communities" by discouraging crime and raising community awareness.
- To safeguard public health through increased education and enforcement

Scope:

- Unannounced visits to Licensed Premises throughout the Borough by the Food Safety, Licensing and Trading Standards
- Concentration on identifying counterfeiting and substitution, as well as traceability

Outcomes:

- Visits were carried out in December 2009 and February 2010, between the Food Safety Service, Trading Standards and Licensing Team.
- Four bottles of Jack Daniels were taken from one premise due to no duty stamp being present. The matter was passed to HM Customs and Revenue, who followed the matter up and resulted in a van containing 82 cases of beer being seized (van was seized as well)
- No counterfeit or substituted alcohol was found, though minor issues with licensing and traceability were followed up.
- The visits gained publicity through the local papers.

Future Work:

- Further visits planned, in conjunction with Trading Standards, Licensing and HM Customs and Revenue
- Checks being carried out as part of a standard inspection / intervention at food premises

IMPROVING THE HEALTH OF THE BOROUGH

Project Aim:

To ensure that food produced, purchased and / or consumed in the Borough is safe and without risks to health.

Project Objectives:

- To contribute to Harrow Councils flagship priority of "Building Stronger Communities" by improving information for residents to improve their health
- To improve the local economy, by reducing food poisoning incidents amongst residents that result in a burden to health services as well as work time lost
- To contribute to health promotion targets, especially those related to nutrition and diet, and thus combating the increase in obesity, heart disease and other related health matters

Scope

- Provision of targeted information for residents at identified locations accessible by the community
- Working with the local PCT and HPA to meet agreed health promotion targets that feed into national targets

Outcomes

- Contributed to the national food safety week campaign, targeting listeria in the elderly. Information leaflets and free fridge thermometers were sent to all relevant premises
- Investigation of all reported food poisonings, offering advice to residents about food hygiene and food poisoning prevention
- Inspections of food premises to improve standards, and lead to a reduction of food poisoning incidents

Future Work:

- Project planned in 2010/11 targeting the reduction of food poisoning within the home
- Continued investigation of food poisoning and giving appropriate advice / information
- Contribute to the 2010 Food Safety Week (National Theme to be announced)
- Liaison with the PCT to find better links and work streams to contribute

SUSTAINABILITY OF FOOD PREMISES

Project Aim:

To ensure that food premises in Harrow are sustainable.

Project Objectives:

- To contribute to Harrow Councils flagship priority of “Building Stronger Communities” by providing stability in the food sector throughout the Borough
- To improve the local economy, by ensuring sustainable commercial premises and thus reducing the burden on support services resulting from business closures
- To improve compliance to food safety through the promotion of financial benefits

Scope

- Provision of targeted information for businesses showing financial benefit of compliance
- Change food safety policies to reflect need for cost benefit analysis
- Advising Planning regarding our requirements and business reasons why certain proposed premises are not suitable

Outcomes

- Provision of a Government Advice sheet “Real Help For Business Now” with every “Scores on the Doors” certificate sent out. This sheet provides a summary of free advice available to businesses in terms of finance, management and the future operation of the business
- Better working with the Planning Department to ensure proposed food businesses are structurally suitable to prevent the need for future expense to ensure compliance
- Review of policies to emphasise the need to take risk based decisions especially when asking premises to spend money.

Future Work

- Continue to work with the Planning Department to improve liaison to benefit commercial premises
- Continue to provide information to businesses regarding assistance that is available to them
- Regular review of policies and procedures to ensure unnecessary burden on businesses is restricted / removed

2010-2011 PLANNED MAJOR PROJECTS

Home Catering

Introduction:

With the harsh economic climate, people are continually seeking ways to improve their income and use resources readily available to them. One such activity is the increase in people carrying out Home Catering for the purposes of commercial gain. In decades gone by, Home Catering was limited to the production of food mainly for fetes, stalls and similar events. In the last 5 years in particular, this has expanded to cover all areas of food that would be seen in commercial premises. This includes packing of food, production of food on a large scale and even the production of high-risk food. The vast majority of these are carried out in the normal domestic kitchen that is not set up to meet commercial standards, and lead to an increased risk to the food and ultimately the consumer. Certain activities that have been discovered happening in a domestic dwelling are prohibited by law, but whose discovery is very much hit and miss due to being hidden from the public view.

In the majority of cases, the person(s) involved have no understanding of the legislation or any proper experience in running a food business. They tend to be oblivious to the legal requirements, believing they are not relevant as they are operating from their own home. It is rare that any of them register with the local authority as the law requires, and their discovery tends to be as a result of complaints (eg neighbours complaining about the smell of constant cooking) or the discovery of products in commercial premises.

The Food Standards Agency recognise that it is a national issue and an important one, which will have an effect on food hygiene and safety. Unfortunately, no national action is planned due to the FSA financial restraints. Due to the potential effect on food safety and the likelihood of non-compliance to legislation, the matter of home catering is a key project identified by the Food Safety Team, Environmental Health.

Project Aim:

To ensure that food produced, purchased and / or consumed in the Borough is safe and without risks to health.

Project Objectives:

- To contribute to Harrow Councils flagship priority of “Building Stronger Communities” by discouraging crime and raising community awareness.
- To safeguard public health through increased education and enforcement

Scope

- The better circulation of information regarding the legal requirements that need to be met when doing home catering
- To produce a consistent policy on the identification and approach to these premises

Outcomes

- Raised awareness within the community of Home Catering requirements
- Reduction in complaints from Home Caterers that set up without meeting the legal requirements. This includes the reduced risk of food safety issues, and ultimately food poisoning.

REDUCING FOOD POISONING IN THE HOME

Introduction:

There are an estimated 850,500 cases of food borne disease (2.328 per day), 12,000 hospitalisations (33 per day) and 329 deaths (almost 1 death per day). The cost to the UK economy is approximately £1.5billion per year.

The cost of obesity on the NHS is approximately £1billion per year, with the potential of rising to £6.5billion according to the Department of Health. It is estimated that 1 in 4 children starting primary school are obese, rising to 1 in 3 by the time they leave.

One adult dies every three minutes from heart disease, leading to 70,000 deaths annually.

The common link between these three areas, that are costing the economy billions annually and affect all persons directly or indirectly, is food. The only Team dedicated to this area, and can have an influence is the Food Safety Team, Environmental Health.

Unfortunately, to date, this contribution has not existed due to lack of resources and priority given to other areas of work. While all food premises are subject to inspection in terms of hygiene and standards, there is little work or targeting of residents in an attempt to have an influence in the above areas.

Project Aim:

To ensure that food produced, purchased and / or consumed in the Borough is safe and without risks to health.

Project Objectives:

- To contribute to Harrow Councils flagship priority of "Building Stronger Communities" by improving information for residents to improve their health
- To improve the local economy, by reducing food poisoning incidents amongst residents that result in a burden to health services as well as work time lost
- To contribute to health promotion targets, especially those related to nutrition and diet, and thus combating the increase in obesity, heart disease and other related health matters

Scope

- Provision of targeted information for residents at identified locations accessible by the community
- Working with the local PCT and HPA to meet agreed health promotion targets that feed into national targets

Outcomes

- Aid in meeting national health targets
- Improve resident health as well as improve provision of information to allow them to help themselves

SUSTAINABILITY OF FOOD PREMISES

Introduction:

There are approximately 1500 food premises throughout Harrow, ranging from Home Caterers to national supermarkets, newsagents to restaurants. In the last year, approximately 5% of the premises closed. In the current economic climate, this is likely to increase as the pressures on businesses increase.

The problem is increased as opening a food premise is seen as a viable means to make money quickly, without fully understanding the requirements. This, as well as setting up in a premise that is not suitable for such a business, causes significant compliance issues

Harrow Council Food Safety Team accepts that it has a role to play in assisting business especially during the current economic climate, but without increasing the risk to the public in terms of safety. One key part of this is working with the Planning Section to prevent food premises opening that would not be able to comply with the basic legislation due to the very nature of the premise and its location. For those premises that do open, or currently exist, enforcement should be solely risk based without the need to spend money for minimum return. Where possible, advice should be given to help save money, with emphasis on how legal compliance assists in this task.

Food premises that open that are not sustainable or are closed due to excessive demands placed upon them, are bad for the community as a whole and it places a burden on the Council in terms of lost revenue and increased benefit payments. The Government drive is currently to release the burden of regulation on businesses, especially in the current economic climate. What is to be avoided is the move to complete deregulation that has led to major issues as seen in the finance industry.

Project Aim:

To ensure that food premises in Harrow are sustainable.

Project Objectives:

- To contribute to Harrow Councils flagship priority of “Building Stronger Communities” by providing stability in the food sector throughout the Borough
- To improve the local economy, by ensuring sustainable commercial premises and thus reducing the burden on support services resulting from business closures
- To improve compliance to food safety through the promotion of financial benefits

Scope

- Provision of targeted information for businesses showing financial benefit of compliance
- Change food safety policies to reflect need for cost benefit analysis
- Advising Planning regarding our requirements and business reasons why certain proposed premises are not suitable

Outcomes

- Increased sustainability of the commercial sector within Harrow, resulting in stable employment, council revenue and aiding in building community cohesion
- Better working between departments to assist the business community

APPENDIX 8:
ENFORCEMENT BREAKDOWN 2009-2010

Comparison of Enforcement 2008-2009 and 2009-2010

Enforcement	2008-2009	2009-2010	Increase/Decrease
Warning Letters	245	412	↑41%
Improvement Notices	86	107	↑24%
Simple Cautions	3	3	-
Prosecutions	1	2	↑50%
Closures	8	7	↓12%

APPENDIX 9:
SCORES ON THE DOORS RATINGS

Scores on the Doors

In 2006, a number of pilot schemes were launched nationally regarding the display of hygiene scores at food premises. The London Borough of Harrow was a founding member of the London Wide pilot scheme, centred on a “5 star” scheme. In 2009, the Food Standards Agency started to examine the implication of a national scheme but has yet to agree its format or its support amongst all Local Authorities. While this continues, London continues to implement the 5 star scheme, based on the risk rating given to the premise by the Inspecting Officer as per the Food Law Code of Practice. As a result, food premises are given one of the following ratings:



Excellent: Very high standards of food safety management. Fully compliant with food safety legislation.



Very good: Good food safety management. High standard of compliance with food safety legislation.



Good: Good level of legal compliance. Some more effort might be required.



Broadly compliant: Broadly compliant with food safety legislation. More effort required to meet all legal requirements.



Poor: Poor level of compliance with food safety legislation much more effort required.



Very poor: A general failure to comply with legal requirements. Little or no appreciation of food safety. Major effort required.

There are exceptions, where premises that are rated low risk (E category – minimal food, alternative assessment) are not included in the scheme and nor are those premises subject to prosecution action.

The full list of scores for the Boroughs food premises can be found at www.yourlondon.gov.uk

As of the start of the 2010 financial, 869 Harrow food premises were on the website, broken down as following:

Star Rating	Number of Premises	Percentage
	32	4%
	137	16%
	293	33%
	198	23%
	176	20%
	33	4%