



ENVIRONMENTAL HEALTH & LICENSING SERVICES

FOOD SAFETY SERVICE PLAN

2011-12



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1.0 SERVICE AIMS AND OBJECTIVES

1.1 Service Aim

- 1.1.1 The aim of the food safety service is to protect health by assuring the safe production, preparation, storage, distribution and supply of food within Guildford Borough and promoting the health of the population. We aim to provide a comprehensive food safety service to consumers and the business community, by achieving a good balance between providing advice, information, training and where necessary, enforcement.
- 1.1.2 Our service objectives and specific targets for 2011/12 are outlined in the following table:

TABLE SUMMARISING THE FOOD SAFETY TARGETS FOR 2011/12

	SERVICE TARGET FOR 2011/12	COMMENTS
1.	To achieve 100% of higher risk food hygiene inspections/interventions in accordance with frequencies set out in Food Law Code of Practice (revised June 2008) and extend and implement effective alternative interventions for lower risk premises.	The current Food Law Code of Practice (revised June 2008) allows us the flexibility to introduce an alternative intervention strategy for 'broadly compliant' category C and D premises. Once 'broad compliance' has been achieved, planned interventions may alternate between inspections and other interventions, such as monitoring, verification, or audit visits.
2.	To protect consumers through improved food safety standards by securing compliance with food hygiene legislation and promoting good hygiene practice in food businesses. (As measured by achieving a 10% improvement in food premises risk ratings).	Changes in premises risk scores and risk categories are a good objective way for us to monitor whether our actions and interventions are actually improving standards in our food businesses. The scores take into account a number of factors including the potential hazard, number of consumers at risk, level of current hygiene and structural compliance and confidence in management.
3.	To achieve a 5% improvement in the number of broadly compliant premises.	For the purpose of this target, 'broadly compliant' is defined as a food business which has a risk rating score of not more than 10 points under each of the of the following 3 parts of Annex 5 to the Food Law Code of Practice: level of current hygiene and structural compliance and confidence in management.
4.	To conduct a customer survey and achieve a minimum of 90% of food business operators expressing satisfaction with the provision of our food safety regulatory service.	This local customer survey replaces the previous statutory National Performance Indicator (NI) 182 'business satisfaction with regulatory services' target.
5.	To submit an application to the Food Standards Agency (FSA) for grant funding to enable us to migrate from our current local Scores on the Doors food hygiene rating scheme to the newly launched National Food Hygiene Rating Scheme (FHRS).	The grant bid document must be submitted to the FSA before 04/05/11 for a project to deliver migration to the FHRS before 30/04/12.

6.	To participate in a Surrey-wide Inter-authority Audit of our food safety enforcement service.	The focussed audit will be conducted by an external third party auditor in quarter 1 (Q1). The audit will assess and benchmark the quality of the service we deliver and will provide a mechanism for sharing best practice between Surrey LA's. Any action plan highlighting areas for further improvement will be fully implemented.
7.	To plan, co-ordinate and implement an initiative to raise awareness and compliance with measures to prevent the risk of <i>E coli</i> 0157 food poisoning in potentially high risk premises such as butcher's shops handling both raw and ready to eat foods and caterers using vac packers.	This initiative will focus on promoting awareness and compliance with the FSA guidance (published Feb 2011) and fact sheet for business.
8.	To review and revise our food safety enforcement policy in light of recent legislative changes and to improve service delivery.	This target is carried over from 2010/11.
9.	To achieve a minimum of 95% of customer response times for service requests.	We aim to respond to all complaints about food or food hygiene standards in food premises within 1 working day, and within 4 hours for the most serious food cases.
10.	To enhance our website to make our service more open and accessible to our customers, embracing the principles of electronic government.	We are working to extend the range of services delivered on our website.

1.2 The Service in the Corporate Context

1.2.1 This service plan should be seen in the context of the Council's Vision, Mission, Core Values, Key Strategic Priorities and the Environmental Health and Licensing Service Unit's Service Plan.

1.2.2 The service plays an important role in meeting the social, economic and environmental strategic objectives of the Council, which are set out in the Council's strategic Framework:-

Vision – for the Borough

A Borough that seeks opportunity and choice for future generations, while retaining a pride in its local heritage.

Mission – for the Council

A forward looking, efficiently run Council, working in partnership with others and providing first class services that give the community value for money.

Core Values of the Council

- The Council will provide timely, reliable and targeted public services that are judged by their quality, their cost effectiveness and relevance to the community's needs.
- The Council will focus on providing what the community needs and this will be established through dialogue and consultation, delivered in close partnership with other organisations.
- The Council will be an excellent employer encouraging a 'can do' culture that finds solutions, takes decisions and learns from the best practice of others.
- The Council's work will be publicly accountable and presented with openness and transparency.
- The Council's decisions will be guided throughout by compassion for those people in need.

Key Strategic Priorities

Excellence and Value for Money - Providing efficient, cost-effective and relevant quality public services.

Sustainable Local Environment - Preserving and enhancing a sustainable environment, both rural and urban, within Guildford Borough.

Safe and Vibrant Community - Ensuring our diverse community can live in safety and with dignity.

Dynamic Economy - Encouraging a vibrant business and knowledge based local economy.

1.3 Seamless Services - Links to other strategies

1.3.1 We recognise that the work carried out by the food safety service intrinsically interlinks with other strategic approaches and services. Some key areas where this is the case are:-

One Stop Shop

- 1.3.2 We have a *One Stop Shop* for business dealing with planning, building control and environmental health and licensing matters.

Enforcement Concordat

- 1.3.3 The Council has adopted the provision of the Enforcement Concordat and has approved an enforcement policy developed in consultation with local food businesses. The policy is available in printed format and on the Council's website.

Local Development Framework

- 1.3.4 We recognise the importance of food businesses to the local economy and work closely with Planning Officers to encourage food businesses and to 'design out' potential problems in proposed food premises.

Licensing

- 1.3.5 The Commercial Team are also responsible for licences issued under the Licensing Act 2003 including late night food establishments, premises/persons selling alcohol, night-clubs, entertainment venues, outdoor events, the Gambling Act 2005, and taxi and private hire driver and vehicle licensing.

Community Safety

- 1.3.6 Our aim is to protect the population by preventing food related illnesses from food prepared, distributed or sold within the Borough.

Health Improvement Plan

- 1.3.7 We are actively working with colleagues in the Health Protection Agency and Primary Care Trust to shape and deliver the Health Improvement Plan.

Customer Care

- 1.3.8 In addition to informal systems for resolving complaints and dissatisfaction, the Council has an open, clear, formal system for dealing with complaints. Clear corporate targets have been established for the speed and quality of response to letters and telephone calls and our performance is publicised in the local press, the *About Guildford* newspaper, and is available on the Council's website.
- 1.3.9 Customer consultation and feedback carried out to support Customer Service Excellence has been used to set specific customer care standards and response times for work areas across the organisation, including Environmental Health and Licensing Services.

Economic Development

- 1.3.10 The policies set out in the local development framework seek to achieve a balance between community health and development.
- 1.3.11 We aim to take a balanced approach to food safety enforcement, which safeguards health, but does not act as a disincentive to business.

Equalities

- 1.3.12 The Council aims to provide services fairly for all sectors of the community. We comply with the Equalities Commission Code of Practice in respect of employment and have adopted the standard for Local Government.

Local Agenda 21

- 1.3.13 Through the Council's Strategy we have worked to facilitate and promote farmers markets in the town to support local food producers.

Investors In People

- 1.3.14 The Council is committed to retaining its Investors in People (IIP) accreditation, which will be re-assessed in 2011/12.

Anti Poverty Strategy

- 1.3.15 The operation of the Food Safety Service supports the Council's Anti Poverty Strategy by affording protection, information and advice to all sections of the community free of charge to individual consumers.

2.0 BACKGROUND

2.1 Profile of Guildford

The Borough

- 2.1.1 The Borough of Guildford which includes the county town of Surrey covers some 105 square miles of mixed urban and rural areas.
- 2.1.2 The main centres of population are Guildford town and surrounding urban developments (66%) and Ash and Tongham (18%) on the Western side of the Borough.

The People

- 2.1.3 Guildford's resident population is 129,701 according to 2001 Census data (as released on 13/02/03). However, the latest figures from NOMIS, official labour market statistics estimate the current population has risen to over 133,100.
- 2.1.4 The population is predominantly white with other ethnic groups making up 2% of the population compared with the national average (6%).

The Local Economy

- 2.1.5 The local economy includes manufacturing and service industries, research, agriculture, the professions, administration and important educational and ecclesiastical institutions. A number of large commercial organisations have their main UK offices in the Borough.

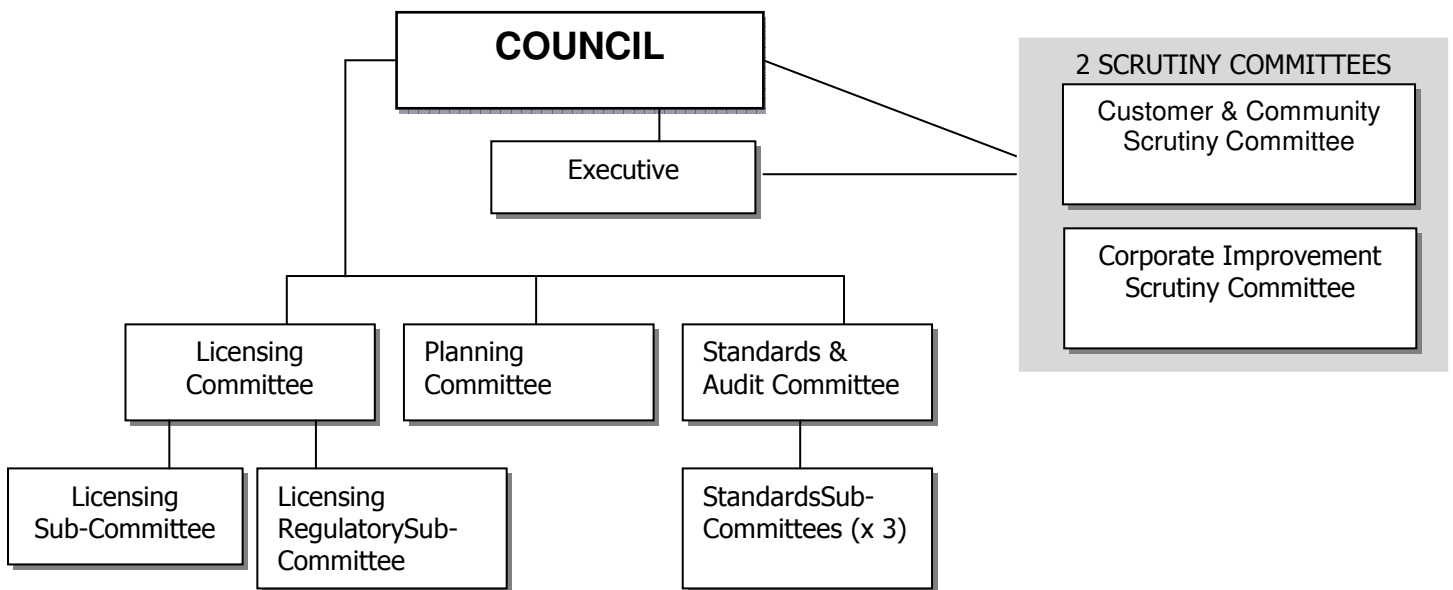
Educational Influences

2.1.6 Guildford is a university town with several other important colleges, such as the College of Law, Guildford College, Guildford School of Acting, and the Academy of Contemporary Music, amongst others, which take in students from all over the country and from abroad.

2.2 Organisational Structure

The Political Structure

2.2.1 The current Council Committee structure is detailed as follows:



2.2.2 The Customer and Community Scrutiny Committee is responsible for matters relating to food and water safety.

The Council's Management Team

2.2.3 The services provided to achieve the Council's strategic objectives are delivered under the direction of the Council's Management Team led by David Hill the Chief Executive. Jim Miles, Strategic Director, is the member of the Management Team with specific responsibility for Environmental Health and Licensing.

Environmental Health and Licensing Service Unit

2.2.4 Cliff Bell, Head of Environmental Health and Licensing Services reports to Jim Miles. Cliff Bell line manages Chris Woodhatch, Principal Environmental Health Officer, who is Guildford Borough Council's lead officer for food hygiene and safety.

2.3 Scope of the Food Service

2.3.1 The Council provides a comprehensive service to food consumers and food businesses in Guildford. We have the main responsibility for enforcing the provisions of the Food Safety Act 1990, and food safety regulations made under the Act in all food premises located within the Borough. The main elements of the service are:-

Food Safety Inspections/Interventions – Prioritised risk rated inspections/interventions of approximately 1200 food premises to check food safety standards and to promote good hygiene practices.

Food Complaint Investigations - Investigation of all complaints relating to food safety, including poor hygiene, foreign objects in food (e.g. metal, glass, insects), unfit food, and food alleged to have caused food poisoning.

Infectious Disease Control - Investigation of all notifications and outbreaks of food poisoning and gastrointestinal infection to (a) identify source (b) control and prevent further cases from source (c) prevent spread from primary case.

Food Sampling Programme - Sampling of foodstuffs for microbiological examination, on (a) a programmed basis (including participation with Local Government Regulation (LGR) sampling programme and the Surrey Food Liaison Group) (b) in response to cases of outbreaks of food poisoning or specific investigations, (c) in accordance with relevant Commercial Team work procedures and statutory guidance.

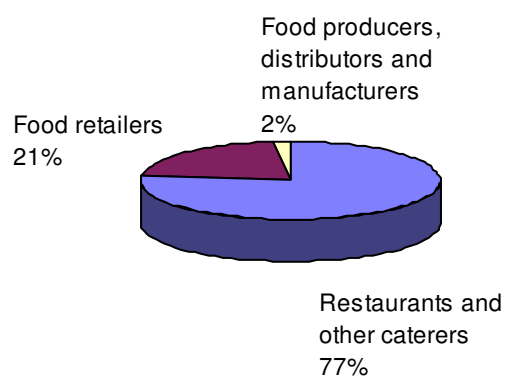
Health Promotion Programme - Provision of accredited food hygiene training courses for food handlers, and food safety advice to managers and proprietors of food businesses. Implementation of the Commercial Team's Health Promotions programme.

2.3.2 The food safety service is provided by the Commercial Team who also provide licensing enforcement and a health and safety enforcement service. The team make a significant contribution to the monitoring and enforcement of licensing conditions in a variety of premises including nightclubs, outdoor events and other entertainment venues. The team are also responsible for corporate safety, including auditing compliance with the Borough's corporate prevention of legionellosis plan.

2.4 Demands on the Food Service

2.4.1 There are approximately 1200 food premises within the borough of Guildford, the majority of which (77%), can be classed as restaurants and other caterers. Food retailers make up the second most significant group (21%), with food producers, distributors and manufacturers accounting for the remaining 2% of premises.

Breakdown of Guildford Borough Food Premises by Type



- 2.4.2 In common with trends in the national economy, the catering and service sector of the food industry sector in Guildford is continuing to expand at the expense of food manufacturers and producers.
- 2.4.3 Food premises of particular current significance include four bakeries, nine butchers, four hospitals, the University of Surrey, three ice cream distributors and one large international sweet manufacturer.
- 2.4.4 In addition to the food businesses with fixed premises within the Borough, Guildford hosts a significant number of outdoor events such as the Surrey County Show, Cricket Festival, Guilfest Music Festival, etc., and the monthly Farmers Markets, which attract a large number of temporary caterers and food producers, all of which need vetting and inspecting where necessary.

2.5 **Accessing the Service**

The service can be accessed by:-

- calling in person to Guildford Borough Council Offices, Millmead House, Millmead, Guildford, GU2 4BB. The Offices are open from 8.30am to 5pm Mondays to Thursdays and 8.30am to 4.30pm on Fridays. The office is closed in the evenings and at weekends
- telephoning our 24 hour out of hours emergency service, which can deal with food safety emergencies.
- officers have direct line telephone numbers.
- officers have individual e-mail addresses.
- information and advice can be accessed via the Council's website (www.guildford.gov.uk)
- telephoning or calling at our 'one stop shop'.

2.6 **Enforcement Policy**

- 2.6.1 Enforcement will be carried out in a way that is effective, consistent, transparent, proportionate, accountable and targeted in accordance with the Regulators' Compliance Code and the Council's food safety enforcement policy. The policy is published and made available to businesses and consumers in printed format and on the Council's website.
- 2.6.2 We recognise that most businesses want to comply with the law and we do not seek to create any unnecessary burdens on business. We will therefore take care to help food businesses and others meet their legal obligations without unnecessary expense, while taking firm action, including prosecution where appropriate, against those who flout the law or act irresponsibly. Enforcement action will always be proportionate to the risk to public health.
- 2.6.3 When considering enforcement action we will give full regard to statutory Codes of Practice, the Code for Crown Prosecutors, the Regulators' Compliance Code, guidance issued by the Local Better Regulation Office (LBRO), guidance from the Food Standards Agency, UK or EU Industry Guides to Good Hygiene Practice, and LGR guidance and advice offered in relation to the Home Authority Principle and the LBRO in relation to liaison with Primary Authorities.

- 2.6.4 All authorised officers will follow the policy when making enforcement decisions. Any departure from the policy must be exceptional, capable of justification and approved by the Head of Environmental Health and Licensing Services.
- 2.6.5 The Council's current food safety, and occupational health and safety enforcement policies were reviewed and approved by Housing, Health and Safety Scrutiny Committee on 7 March 2006. The policy was subsequently updated and amended to take into account the implementation of the Food Hygiene (England) Regulations 2006, which came into force at the beginning of January 2006 and the Smoke Free legislation which came into force in July 2007.
- 2.6.6 We will review and revise our existing enforcement policy again in 2011/12.

3.0 SERVICE DELIVERY

3.1 Food Premises Inspections

3.1.1 Whilst the primary responsibility for identifying food hazards and controlling risks rests with food businesses, food hygiene inspections undertaken by Guildford Borough Council's team of environmental health professionals serve the following purposes:

- to establish whether food is being handled and produced hygienically;
- to establish whether food is, or will be having regard to further processing, safe to eat;
- to identify foreseeable incidences of food poisoning or injury as a consequence of consumption of food.

3.1.2 With this in mind the main objectives of a food hygiene inspection are the:

- determination of the scope of the business activities and of the relevant food safety legislation that applies to the operations taking place at the premises
- thorough and systematic gathering and recording of information, from observations and discussions with food handlers, managers and proprietors
- identification of potential hazards and associated risks to public health
- assessment of the effectiveness of process controls to achieve safe food
- assessment of the food safety management system operated by the business
- identification of specific contraventions of food safety legislation
- consideration of appropriate enforcement action, (proportionate to risk), to secure compliance with food safety legal requirements
- provision of advice and information to food business proprietors and food handlers
- recommendation of practical, good food hygiene practices, in accordance with Industry Guides and relevant sector specific codes of practice where appropriate
- the promotion of continued improvements in food hygiene standards through the adoption of good practice.

3.1.3 We aim to undertake 100% of food hygiene inspections/interventions of higher risk premises within the Borough at a frequency which is in accordance with the inspection rating system set out within the Statutory Code of Practice (Revised June 2008) made under the Food Safety Act.

- 3.1.4 All food premises in the Borough are categorized according to potential risk and the frequency that they are inspected depends on this category. The rating system takes account of management practices and past compliance with legislation in determining likely future risk. Premises are inspected within the following minimum frequencies:

Category	Minimum frequency of Inspection/Intervention
A	At least every 6 months
B	At least every year
C	At least every 18 months
D	At least every 2 years
E	Subject to a programme of alternative enforcement strategies or interventions every three years.

- 3.1.5 The Council recognises that some food businesses present a higher risk to consumers than others. The priority task shall be to ensure that planned visits to Category A, B and C inspections/interventions are completed within their due date.
- 3.1.6 Prior notice of an inspection will not normally be given in accordance with the Statutory Code of Practice (Revised June 2008). Exceptions will be made for certain large organisations in order that key personnel and documents may be available, home caterers operating from their own domestic premises, bed and breakfast businesses, charitable groups, church and community centres.
- 3.1.7 Food premises will be inspected during normal trading hours. We recognise that certain food businesses operate in the early hours of the morning, late at night and at weekends, so the inspections programme will include food hygiene inspections outside of normal working hours. In addition, food businesses that are open at night, at weekends or in the early hours of the morning, will on occasions, be inspected at these times, even if they are also open for business during the day.
- 3.1.8 We aim to undertake food hygiene inspections of all new premises within 28 days of registration. When we become aware of unregistered premises we will seek to inspect as soon as possible, subject to other priorities.
- 3.1.9 Wherever it is practicable and appropriate to do so, we will combine a food hygiene inspection with another visit for food hygiene purposes (e.g. food complaint or a request for advice) to help make effective use of resources and to minimise disruption to business.
- 3.1.10 We will reschedule our proactive food hygiene inspection programme in exceptional circumstances if requested to do so by the Food Standards Agency (FSA) in order to take specific urgent action to protect public health. We will co-operate with the FSA and will provide them with any information and assistance as may be necessary.
- 3.1.11 All food hygiene inspections will be conducted by appropriately qualified officers who satisfy the requirements of the relevant Food Safety Act Codes of Practice and are fully aware of advice contained in current Codes of Practice, Industry Guides and LGR guidance.
- 3.1.12 If we identify serious contraventions of food hygiene legislation and/or poor practices during a programmed inspection we will undertake a revisit to the premises after an appropriate time period to check that matters have been attended to. We revisit between 5 and 10% of premises inspected per annum.

- 3.1.13 In accordance with the revised Code of Practice we have implemented alternative interventions for certain sectors of our 'broadly compliant' category C premises, and an alternative enforcement strategy for the lowest risk premises, by providing businesses with self-assessment questionnaires and information. For example, a poor or incomplete self-assessment will trigger follow up interventions.
- 3.1.14 The Food Standards Agency issued a new Statutory Food Safety Act Code of Practice in June 2008. The code introduced some welcome flexibility to redirect resources away from premises, which are either 'broadly compliant' or 'fully compliant' with the law to those poorly performing premises where improvements are required. This is in line with the principles of the Regulators' compliance code and the Regulatory Enforcement and Sanctions Act 2008, which requires regulators to reduce unnecessary burdens on compliant businesses.
- 3.1.15 There are no changes to the frequency of inspection of category A or B Premises. However, the new Code of Practice allows the flexibility of alternating inspections with alternative interventions of 'broadly compliant' food premises for category C premises every 18 months and an appropriate intervention for category D premises every 2 years.

Breakdown of Programmed Food Safety Inspections/Interventions for 2011/12

Risk Rating	No. of Premises	Insp/Int. Rate per Annum	No. Insp/Int. per Annum
A	2	2	4
B	45	1	45
C	467	0.67	312
D	212	0.5	106
E	446	Alternative intervention strategy	Alternative intervention strategy
Unrated (newly registered premises)	43	Not known until inspected	43 (minimum)
Outside programme (e.g. head office only)	4	0	0
TOTAL	1219		510

- 3.1.16 The human resources required to deliver the planned programme of food premises inspections/interventions in 2011/12 equates to **1.98 FTE**.

3.2 Food Complaints

- 3.2.1 Our policy is to investigate all food complaints concerning extraneous matter, chemical or microbiological contamination, unfitness and food alleged to have caused food poisoning, provided that the food was purchased within Guildford

Borough. We will also investigate all allegations concerning poor hygiene in food premises located within the Borough.

3.2.2 Our main aims in undertaking independent investigations of food complaints on behalf of members of the public are:

- to identify what caused the problem and assess the likely risk to public health;
- to prevent a recurrence of the complaint by securing improvements in food hygiene standards and/or food handling practices and procedures;
- to take enforcement action where appropriate.

3.2.3 We aim to respond to all food complaints within 24 hours of receipt in accordance with our documented procedures and relevant statutory Code of Practice, LGR and LBRO guidance.

3.2.4 We will refer any food complaints relating to premises outside the Borough and any complaints regarding food labelling, composition, or any other matter which is the responsibility of Surrey County Council Trading Standards Team to the relevant food authority.

3.2.5 The depth and scope of investigation required will depend on the nature of the complaint and whether the food was produced within a food premises for which the Council has food safety enforcement responsibility. If the foodstuff concerned is produced outside of Guildford Borough, we liaise with our counterparts in the local authority responsible for the premises where the food was manufactured to obtain detailed information about the effectiveness of existing food safety management systems.

3.2.6 In certain circumstances, where there is a possibility that formal proceedings may be taken or it is considered in the interests of consumer protection for samples to be formally analysed, we send food complaint samples to the Public Analyst for examination. This service is currently provided by Eurofins Scientific Ltd, 28-32 Brunel Way, Westway Estate, Acton, London W3 7XR.

3.2.7 On average we submit about 10 food complaint samples per annum to the Public Analyst for analysis. This equates to a total cost of approximately £1000 per annum for the analysis of food complaint samples.

3.2.8 We received a total of 178 food complaints/enquiries in 2010/11. Demand for the service has been fairly consistent over recent years with an average of 190 enquiries per annum dealt with by the Council over the past ten years. Requests for advice from new food businesses and members of the public account for the highest number of service requests (38.2%), with suspected food poisoning next (31.5%) and complaints about poor hygiene (20.2%) third highest of the total for 2010/11.

3.2.9 All complaints are investigated and complainants are advised of the outcome, if they express a preference to be kept informed.

3.2.10 If the number of food complaints and enquiries for 2010/11 is consistent with recent years the human resources required to deliver the service equates to **0.42 FTE** per annum.

3.3 Home Authority/Primary Authority Schemes

- 3.3.1 The existing voluntary Home Authority Scheme recognises the importance of the relationship between a food business and the local authority where the relevant decision making base (i.e. head office) of the company is located. It is a scheme that has been supported by the FSA, LGR, local authorities and a significant number of food businesses, particularly large enterprises.
- 3.3.3 The concept of the Home Authority Scheme is that a home authority offers food safety advice to the business and provides assistance to local authorities by providing them with information concerning company policies, procedures and standards. Such information is of particular help to local authorities who may be investigating a food complaint concerning a product produced by the company.
- 3.3.4 The Council is committed to the LGR Home Authority Principle and will adhere to relevant LGR guidance. If enforcement action is being considered in relation to a food business which has a number of branches or units in other food authority areas and a decision making base in another area, the relevant Home Authority will be consulted before taking any action.
- 3.3.5 We will provide detailed advice to food businesses with a decision making base in the Borough of Guildford on matters relating to food hygiene, food safety policy and legislation.
- 3.3.6 We also support the statutory 'Primary Authority Scheme' which was introduced by the Government in April 2009. This scheme permits any business which trades across council boundaries, to register with one local authority as a source of advice on environmental health and trading standards in much the same way as the existing Home Authority Scheme operates. The key difference is that the scheme is a statutory scheme and as such, the Council will be required to contact the Primary Authority before taking any enforcement action against that company.
- 3.3.7 The Primary Authority can then block the proposed enforcement action if it believes that it is inconsistent with advice or guidance that it has previously given to the organisation concerned.
- 3.3.8 Where a local authority and Primary Authority are unable to agree a regulatory approach, a proposed enforcement action can be referred to the Local Better Regulation Office for determination within 28 days.

3.4 Advice to Business

- 3.4.1 We recognise that the majority of food businesses seek to comply with the law and will provide such advice and assistance as may be necessary. This will include:
- advisory visits to new businesses prior to opening
 - running food hygiene training courses/seminars
 - provision of business information sheets, including leaflets detailing other local providers of food hygiene courses, practical advice on hazard analysis and controlling food safety hazards, temperature control and guides to compliance with specific food safety legislation.
 - on the spot advice during routine visits and inspections
 - provision of free telephone advice
 - publication of a guide for new food businesses

- publication of a free food safety handbook
- dialogue with business through the establishment of a local business partnership
- website: we regularly update the information on our food safety web pages

3.5 Food Inspection and Sampling

3.5.1 Food sampling provides useful information about the microbiological safety of food produced, prepared and sold within the borough, and constitutes an important element of the intelligence driven side of the food safety enforcement mix.

3.5.2 We will ensure that food is inspected and sampled in accordance with relevant legislation, statutory Food Safety Act Code of Practice and centrally issued guidance to ensure that food meets the food safety requirements.

3.5.3 We propose to undertake a minimum of 100 samples per annum for 2011/12.

3.5.4 We will carry out sampling in accordance with our published food sampling policy, procedures and programme, which was prepared in consultation with the Food Examiner. Our approach to food sampling is:

- We will undertake routine sampling in respect of all manufacturing premises located within the Borough including, the bakeries, and the sweet manufacturer.
- We will undertake a special survey of ready to eat foods sold by hospital premises within the Borough.
- We will continue to support and fully participate in the LGR/HPA national & EU co-ordinated sampling programmes for 2011/12, which will include lightly cooked foods such as sous vide foods, uncooked egg dishes, chicken parfait and pate made with flash fried liver, ready to eat foods and environmental samples from premises where there is a potential risk of cross contamination (Pennington response study), and a reactive national study yet to be announced.
- In line with the FSA 'step change' in imported foods, we will continue to target imported foods in 2011/12.
- We will support and fully participate in the Surrey Food Liaison Group co-ordinated local sampling programme for 2011/12.
- We will submit approximately 20 food samples collected during routine food hygiene inspections of Category A, B and C premises.
- Food complaint samples will be submitted on an 'ad hoc' basis where appropriate, as they arise.
- We will adopt a policy of re-sampling should any sample result be unsatisfactory, unacceptable or potentially hazardous.

3.5.5 Food, water and environmental samples will be submitted for analysis to the HPA Laboratory in Ashford, Kent, which currently holds UKAS accreditation for the microbiological examination of food, water and environmental samples.

3.5.6 If food sampling can be combined, whenever possible with another reason for visiting premises such as a food hygiene inspection, food complaint visit etc., the human resource implication for delivering the proposed food sampling programme for 2011/12 is **0.1 FTE per annum**.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Diseases

3.6.1 Doctors are required by statute to notify cases of particular infectious diseases, including food poisoning, to the Proper Officer of their Local Authority.

3.6.2 The Council will investigate all notifications of food poisoning, suspected food poisoning and laboratory notifications of gastrointestinal infections such as campylobacter, cryptosporidium and giardia, in accordance with relevant central guidance.

3.6.3 Our objective is to identify the source, to control and prevent further cases from the source if the suspected source is within the Borough, and to prevent spread from the primary case (e.g. if the case is a food handler, health worker or young child).

3.6.4 We received 181 notifications of food poisoning (including suspected food poisoning) in 2010/11, a small decrease of almost 4% on the previous year. The table below shows the numbers of cases reported over the past nine years:

3.6.5 In addition to the investigation of sporadic cases of infectious disease, the Council also investigate outbreaks of infectious disease, such as food poisoning, in accordance with the joint Surrey Health Protection Unit and Local Authority Outbreak Control Plan. The plan identifies action to be taken in order to manage infectious disease control in an outbreak situation and describes the roles and responsibilities of the various agencies concerned, including the Council.

3.6.6 In such outbreak situations there is a need for co-ordinated action between the Council, under the direction of the Consultant in Communicable Disease Control (CCDC), at Surrey and Sussex Health Protection Unit, County Hall North, Chart Way, Horsham, RH12 1XA and Epsom and Ashford HPA laboratories.

3.6.7 The commonest type of food poisoning reported in 2010/11 was campylobacter, which accounts for 69% of reported cases; cryptosporidium was next with 9% of cases reported and salmonella accounted for 8% of cases. The majority of the cryptosporidium cases were associated with an outbreak at one local nursery school in September 2010.

3.6.8 The number of outbreaks reported to the Council is thankfully small, and averages less than one per year over the past 5 years. However, each outbreak does require a significant amount of officer time to investigate, control and to prepare a case for prosecution (where appropriate), depending upon the individual circumstances of the outbreak.

3.6.9 If the number of cases of food poisoning reported to the Council in 2011/12 is consistent with recent years, the service can be delivered by **0.175 FTE** per annum.

3.7 Food Alerts

- 3.7.1 We have a documented procedure for responding to all food alerts received from the Food Standards Agency, in accordance with Food Safety Act Code of Practice (Revised June 2008). A “food alert” is a communication from the Food Standards Agency to a Food Authority concerning a food hazard or other food incident relating to food which does not meet food safety standards or food which does not meet compositional standards.
- 3.7.2 Food alerts are the FSA’s way of letting local authorities and consumers know about problems associated with food and, in some cases, provide details of specific action to be taken. Food alerts are also copied to Consultants in Communicable Disease Control, Trading Standards Officers, and food trade organisations. They are often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor.
- 3.7.3 The content of all food alerts received will be assessed by the Principal Environmental Health Officer, and appropriate action will be taken as specified in the notification. Food alerts issued by the Food Standards Agency fall into two main categories:
- A - for action by local authorities;
 - B - for information (e.g. Product Withdrawal Information Notice or a Product Recall Information Notice).
- 3.7.4 We have provided the Food Standards Agency with our out of hours emergency contact details to enable us to respond to alerts received outside of normal office hours.
- 3.7.5 The Council is generally required to take action by making direct contact with relevant food businesses by telephone, letter, fax or e-mail, by undertaking visits, or by making indirect contact via the local media, usually following consultation with our partners at Surrey County Council Trading Standards. Food will usually be withdrawn from sale or supply through the voluntary co-operation of food businesses. However, the Council may seize or detain the food if food business proprietors refuse to co-operate with voluntary withdrawal of the product.
- 3.7.6 In addition, we will promptly notify the Food Standards Agency and all other relevant agencies if any potentially serious incidents are identified locally via food complaints, food sampling, notifications from GP’s or manufacturers etc. in accordance with the Code of Practice (Revised June 2008).
- 3.7.7 In 2010/11 we received 21 food alerts, a significant decrease of 16 on the previous year. The majority of these alerts were for information only and required no specific action by the Council, other than to make the information available on our website.
- 3.7.8 It is impossible to predict with any degree of accuracy, the number of food alerts that the Council will have to respond to in the next financial year, but recent experience would suggest that the figures for 2010/11 are likely to be representative of the demand on the service. It is estimated that this relatively small demand can be met with **0.01 FTE**.

3.8 Liaison with Other Organisations

- 3.81 We actively participate in liaison arrangements with a number of other local authorities, agencies and professional organisations in order to facilitate consistent enforcement, to share good practice and to reduce duplicity of effort.

Business Link

Food Standards Agency (S.E Regional Office based at Bridge House, Guildford)

Internal GBC liaison arrangements with Building Control, Planning & Legal Services
LGR

Local Better Regulation Office

Surrey PCT

Surrey Food Liaison Group

Surrey Food Examination Focus Group

Surrey Infection and Environmental Health Group

Surrey Environmental Health Managers Group

Surrey CIEH Branch

South East Centre CIEH Group

Surrey Eat Out Eat Well Steering Group

- 3.8.2 This is expected to take **0.025 FTE**.

3.9 Food Safety and Promotion

- 3.9.1 In addition to enforcing food safety legislation in food businesses, health promotion is an important part of our work. By promoting awareness of good food safety practices through our programme of food hygiene training and health promotion initiatives, we can achieve high standards of food safety in food businesses in the Borough as well as have an impact on food safety in the home.

- 3.9.2 We will continue to organise food hygiene training via the CIEH training courses for all food businesses in the Guildford Borough. We propose to run 4 CIEH Level 2 food hygiene training courses for caterers per annum in 2011/12.

- 3.9.3 We will be continuing to support our partners at Surrey County Council Trading Standards and the PCT regarding the Eat Out Eat Well scheme, which now has over 100 award winners across Surrey.

- 3.9.4 The aim of Eat Out Eat Well is to increase awareness of healthy eating (particularly in relation to decreased salt, total fat, saturated fat & sugar, and increased intake of fruit and vegetables) amongst consumers and food businesses operators (FBO). It is targeted at the catering sector and offers an award to those businesses that can demonstrate: compliance with food hygiene and food standards legislation; provision of customer labelling information regarding salt, total fat, saturated fat, and sugar; and offer healthier menu choices (reduced salt/reduced total fat/reduced saturated fat/reduced sugar options and increase in fruit and vegetables).

- 3.9.5 We will also work to contribute to the local Health Improvement Programme in areas related to food quality and safety and strive to communicate messages related to healthy eating (e.g. low fat, low salt etc.).

- 3.9.6 We will be participating again in National Food Safety Week in June 2011, which provides a focal point for highlighting the importance of food safety and the basic principles of food hygiene to the general public. Our contribution will be the hand

washing set for Junior Citizen to be held between 6 to 17 June 2011 for approximately 1000 year 6 students.

- 3.9.7 To assist food businesses, particularly small and medium sized businesses, to comply with legislation and improve hygiene standards, we will continue to provide a wide range of advisory information in the form of free leaflets, handbooks and posters.
- 3.9.8 The resources required to deliver this programme of training and health education initiatives in 2011/12 will be a budgetary provision of £1000pa and **0.3 FTE** per annum.

3.10 Imported Foods

- 3.10.1 The FSA estimate that approximately 50% of all food offered for sale in the UK is imported. The foot and mouth crisis several years ago highlighted the importance of ensuring that food that has been imported into the UK has been legally introduced and is safe for the consumer. As a result local authorities have been required to achieve a 'step change ' in imported food enforcement.
- 3.10.2 As an inland authority with no ports or airports Guildford is not right in the front line of this work, but we do have an important part to play in premises under our jurisdiction in assessing whether foodstuffs imported from a third country have been legally introduced and are fit for consumption.
- 3.10.3 We will ensure that our food safety inspection procedures and sampling programme are amended to place greater emphasis on imported foodstuffs in 2011/12. In addition, we reviewed the scope of officer authorisations in 2009/10 to include imported food legislation and ensured that food officers received training in imported foodstuff enforcement in 2009/10, so that they are adequately equipped to carry out this role effectively.

4.0 RESOURCES

4.1 Financial

- 4.1.1 The level of expenditure in providing the food safety service is set out below:

Cost Element	2010/11	2011/12*
Employee Related Expenditure	149,542	123,252
Travel/Transport Related	6,934	5,986
Supplies and Services (including analysis of samples and equipment)	36,517	10,845
Support Services including Legal Costs	25,231	33,443
Income	(2,206)	(3,938)
Service Cost	216,018	169,588

*Estimated Figures

- 4.1.2 The figures in row 1 of the previous table relate to the costs of employing those staff directly engaged in delivering food safety services from within Environmental Health and Licensing Services.

4.2 Staffing Allocation

Staffing Allocation for Food Safety Enforcement

The total staffing resource required to deliver the service from section 3 above equals 3.01 F.T.E in 2011/12. The reduction of 0.49 FTE on 2010/11 has been achieved by continuing to extend the scope of our alternative interventions with 'broadly compliant' and lower risk food businesses, and through improvements in food hygiene standards achieved which has resulted in a reduction in the number of proactive inspections required.

The total resource available to deliver the service in 2011/12 is **3.01 F.T.E** as detailed below:

NAME/ JOB TITLE	F.T.E 2011/12	QUALIFICATIONS
Chris Woodhatch Principal EHO	0.60	BSc (Hons), Diploma in Environmental Health, DMS Chartered Environmental Health Practitioner
Susan Holland Senior EHO	0.76	Diploma in Environmental Health Chartered Environmental Health Practitioner
Hannah Hodges EHO	0.66	BSc (Hons) in Environmental Health, Achievement of Assessment of Professional Competence, Chartered Environmental Health Practitioner
Nick Tempest FSO	0.79	HNC in Environmental Health, Higher Certificate in Food Premises Inspection, Red Meat Hygiene Certificate, Poultry Meat Hygiene Certificate
Food Safety Contractor	0.2	Contractor employed will have either BSc (Hons) in Environmental Health or Diploma in Environmental Health
TOTAL	3.01	

4.3 Staff Training and Development

- 4.3.1 We recognise the need for all officers engaged in food safety work to be trained, not only to the level required by law, but also to a level commensurate with the work they carry out. We also recognise the need to develop the personal skills needed in order to work effectively in the field and for EHPs to meet the requirements of Continuing Professional Development (CPD). This is a commitment of 30 hours core training for Chartered members of the CIEH and 20 hours for others.
- 4.3.2 We will ensure that the Council's training plan is used effectively to identify general and personal training and development needs for all members of staff and ensure that these are addressed through the Service Unit Training Plan.

- 4.3.3 The Council currently holds the Investors in People (IIP) accreditation, which will be reassessed in 2011/12. All staff have personal development folders setting out details of the appraisal and development scheme as well as other documents and records.
- 4.3.5 Each member of staff receives two appraisal and development meetings per year as well as regular 1:1 meetings at which development needs are identified and a plan agreed to address these.
- 4.3.6 Training and development is provided by a range of methods including:-
- i) External Qualifications Training
Nominations for formal training courses/qualifications are considered annually and in appropriate cases members of staff are sponsored on formal academic and practical courses.
 - ii) Short Course Training
Where appropriate, short courses, seminars and workshops can provide valuable updates for staff. We support attendance at such events through the Service Unit's training budget. These include the FSA programme of low cost training.
 - iii) In-house Training
We encourage in-house training as this helps to develop individual's presentation skills as well as cascade information to other members of staff.
 - iv) Mentoring
We will help staff to develop a variety of skills by the designation of a suitable mentor where available in-house.
 - v) Cascade Training
Staff are encouraged/required to cascade information skills and knowledge they possess or have gained through attendance at Seminars and short courses to other members of staff at in-house training sessions.
 - vi) Peer Review
Through the use of peer review in monitoring work performance and we encourage exchange of expertise and skills between staff.
 - vii) Secondments
We support appropriate secondments where the secondment appears to be consistent with the development objectives of the team and the individual. For example, a member of the Commercial Team participated in a 2 year secondment to the Health and Safety Executive until April 2007.
 - viii) Assignments
We encourage staff to develop through the submission of assignments to the University of Ulster. These were set on a regular basis through the EH Journal.
 - ix) Team Meetings
These provide useful forum for exchange of information and experience amongst team members, and assist in achieving a uniformity of approach to food safety issues.

5.0 QUALITY ASSESSMENT

5.1 Internal Monitoring

5.1.1 We have set up a number of documented internal monitoring procedures to monitor compliance with statutory Codes of Practice, LGR guidance and our own internal procedures and policies.

5.1.2 In 2011/12 we will review and develop internal monitoring procedures to fully comply with requirements in respect of:-

- the integrity and accuracy of our food premises database;
- quality and consistency of the full range of food safety enforcement services, including food complaints, inspections, infectious disease investigations and sampling.

5.1.3 Our food safety service was subjected to an audit from Guildford Borough Council's Internal Audit team in 2003/04.

5.2 External Monitoring

Peer Review

5.2.1 Our food safety enforcement service is externally audited on a periodic basis by peer review as part of the local Surrey Districts inter-authority audit scheme. The food safety service was last audited in 2000 using the Hampshire and Isle of Wight Benchmarking Model. We will be participating in a Surrey-wide Inter-authority Audit of our food safety enforcement service in 2011/12.

District Auditor

5.2.2 The performance indicator figures submitted by the Environmental Health and Licensing Service in respect of achievement of the food hygiene inspection programme and response to complaints are occasionally audited by the District Auditor.

Food Standards Agency

5.2.3 Guildford's food safety service was subject to an independent audit from the Food Standards Agency in September 2005. This was the first such audit that Guildford has been subject to since the FSA audit scheme was launched in April 2001. The audit was carried out as part of a programme of 30 audits focusing on home authority principle arrangements, advice to business and food safety promotional activities.

5.2.4 The on-site element of the audit included checks on food premises records, complaint files, interviews with enforcement officers, and direct contact with a number of food businesses seeking their views on the assistance provided by Guildford Borough Council. Audits of local authorities' food law enforcement services are undertaken to improve consumer protection and confidence in relation to food by ensuring that local authorities are providing an effective food law enforcement service.

- 5.2.5 The audit report for Guildford, which was released on 9th January 2006, found that, “There was a clear commitment from the authority to proactively provide local businesses and consumers with detailed, but easy to understand, information on food safety issues.” and that, “officers were consistently providing clear and comprehensive advice to businesses during the course of routine food law enforcement activity, such as inspection, food sampling and complaints investigations.” There were no recommendations from the FSA for service improvements and Guildford were not required to submit an action plan following the audit. A copy of the full audit report can be found on the enforcement portal of the Food Standards Agency website at www.food.gov.uk/enforcement.
- 5.2.6 In addition, we submit an annual statistical return (LAEMS) to the Food Standards Agency in respect of our food safety enforcement, sampling and health promotion activity.

6.0 REVIEW

6.1 Review against the Service Plan

6.1.1 This service plan is used in setting individual and team targets through the annual appraisal process and performance is reviewed through a variety of mechanisms. These include:

- i) Service Unit Meetings
- ii) Team Meetings
- iii) Corporate Development Performance Management Team
- iv) Peer Review

6.1.2 The following table summarises our performance against the specific performance targets that we set out in our Food Safety Service Plan for 2010/11.

6.2 Variations from the Service Plan

6.2.1 The Environmental Health and Licensing Service Unit met the majority of the challenging performance targets set out in our service plan for 2010/11 (as set out in the following table) and there were no significant variations from the plan.

6.3 Areas of Improvement

6.3.1 The main areas for improvement of the food service are set out in the table in section 1 of this service plan which sets out the targets for 2011/12. These will also include implementing any action plan or recommendations arising out of the Inter-Authority audit, migrating to the national Food Hygiene Rating Scheme, reviewing our food safety enforcement policy, and extending our pilot programme of alternative interventions to other suitable groups of ‘broadly compliant’ category C food premises. We will utilize any time saved to focus on securing improvements in our ‘non compliant’ food premises.

ANNEXE 1: TABLE SUMMARISING THE ACTUAL PERFORMANCE OF GUILDFORD BOROUGH COUNCIL'S ENVIRONMENTAL HEALTH & LICENSING TEAM AGAINST SPECIFIC TARGETS SET OUT IN THE FOOD SAFETY SERVICE PLAN 2010/11

	SERVICE TARGET FOR 2010/11	PERFORMANCE	COMMENTS
1.	To achieve 100% of higher risk food hygiene inspections/interventions in accordance with frequencies set out in Food Safety Act Code of Practice.	We achieved 95.6% of our higher risk food premises inspections/interventions.	The shortfall is primarily due to more time being spent by officers undertaking additional administrative duties (e.g. entering food registrations, infectious diseases etc. onto our database) due to maternity leave and several administrative vacancies arising during the course of the year.
2.	To protect consumers through improved food safety standards by securing compliance with food hygiene legislation and promoting good hygiene practice in food businesses (as measured by achieving a 10% improvement in food premises risk ratings).	Target exceeded. There was an overall improvement in the food safety risk rating score of 14% following food safety inspections conducted in 2010/11 (i.e. food safety standards had improved or the nature of the business had changed to make it a lower risk premises).	Our local Scores on the Doors food hygiene rating scheme has undoubtedly had a positive impact on improving food safety standards.
3.	To achieve a minimum of 85% 'broadly compliant' food premises.	Target exceeded. 86% of our food premises are 'broadly compliant'.	For the purpose of this target, 'broadly compliant' is defined as a food business which has a risk rating score of not more than 10 points under each of the of the following 3 parts of Annex 5 to the Food Law Code of Practice: level of current hygiene and structural compliance and confidence in management.

4.	To pilot and implement a new alternative intervention approach to 'broadly compliant category C' food premises to improve the effectiveness and efficiency of the operation.	We designed a procedure and documentation for undertaking alternative interventions in 'broadly compliant' Surrey County Council school premises, which we circulated and piloted with the Surrey Food Liaison Group.	The pilot has proved successful and we will be extending the scheme to other groups of suitable premises.
5.	To review and revise our food safety enforcement policy in light of recent legislative changes and to improve service delivery.	Target put on hold with a view to achieving a comprehensive corporate review of all enforcement policies across the Council.	This target will be carried over into 2011/12.
6.	To participate in a Surrey-wide Inter-authority Audit of our food safety enforcement service.	Not achieved as the appointed third party auditor was not able to conduct the audit until the first quarter of 2011/12.	
7.	To conduct a sampling study of butcher's shops serving raw and ready to eat foods and large scale outdoor events.	Target achieved.	We will implement a further initiative to raise awareness and compliance with measures to prevent the risk of <i>E coli</i> 0157 food poisoning in potentially high risk premises such as butcher's shops handling both raw and ready to eat foods in 2011/12.
8.	To achieve a minimum of 90% of food business operators stating that the food safety inspections/interventions they received were helpful and fair.	Target achieved. We received a 56% response rate to the customer survey we conducted of 279 businesses subject to a visit from us in 2010/11. Of those who responded 157 out of 159 stated that the visits had been helpful and that their business had been treated fairly (98.7%).	
9.	To achieve a minimum of 95% of customer response times.	An overall performance of 93.4% was achieved in relation to food complaints/enquiries in 2010/11.	The shortfall can be attributed to maternity leave and several administrative vacancies that arose during the year which resulted in a failure to enter complaints/enquiries on the system at periods of peak demand.

10.	To enhance our website to make our service more open and accessible to our customers.	In addition to Scores on the Doors, the food safety website now provides a comprehensive source of information on our food safety service both to members of the public and businesses, including downloadable information sheets and record sheets for business and useful links to other websites. We also went live with on-line booking of food hygiene training courses.	We are working to extend the range of services delivered on our website.
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GLOSSARY OF TERMS

CCDC	-	Consultant in Communicable Disease
CIEH	-	Chartered Institute of Environmental Health
EHO	-	Environmental Health Officer
EHP	-	Environmental Health Practitioner
FSA	-	Food Standards Agency
FTE	-	Full-Time Equivalent
HPA	-	Health Protection Agency
LAEMS	-	Local Authority Enforcement Monitoring System
LGR	-	Local Government Regulation
LBRO	-	Local Better Regulation Office