

# Crawley Borough Council

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## Report to Licensing Committee

6<sup>th</sup> June 2007

### Approval of the Food Service Plan 2007 – 2008

#### 1. Summary

- 1.1 The Food Standards Agency is an independent food safety watchdog set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food.
- 1.2 One of their functions is to monitor the performance of Local Authorities' enforcement of Food Safety. To do this, they use a "framework agreement".
- 1.3 One requirement of the framework agreement is to produce a Food Service Plan, which must be "drawn to the attention of Members".
- 1.4 The main objective of this report is to meet this requirement.
- 1.5 In 2006 Crawley Borough Council successfully bid for a grant to assist in introducing local food business operators to the Safer Food Better Business food safety model. The food safety plan set out in summary how this project will be undertaken.

#### 2. Recommendations

- 2.1 To approve the contents of the Food Service Plan.

**ANGELA TANNER**  
Head of Environmental Services

### **3. Background**

- 3.1 The Food Standards Agency is an independent food safety watchdog. It was set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food.
- 3.2 One of the Agency's functions is to monitor the performance of Local Authorities' enforcement of Food Safety. To do this, they use a "framework agreement".
- 3.3 One requirement of the framework agreement is to produce a Food Service Plan, which must be "drawn to the attention of Members". The framework agreement does not prescribe how this will be done.
- 3.4 It has been agreed that the process used for Crawley Borough Council will mean that the Food Service Plan will first be considered by the Portfolio Holder and then the final draft presented to the Licensing Committee. This should enable us to meet this requirement effectively.

### **4. The Food Service Plan**

- 4.1 The required layout and contents of a Food Service Plan are described by the Food Standards Agency.
- 4.2 Crawley Borough Council's Plan has been produced to meet the Food Standards Agency's requirements. The Food Safety Plan is attached to this report as appendix A and is also available on the Document Management System.
- 4.3 The Plan looks back over the previous year (i.e. 1st April 2006 – 31st March 2007) then forward to the coming year (i.e. 1st April 2007 – 31st March 2008)
- 4.4 Having reviewed the process, it has become evident that it is not practicable to achieve approval of the Plan in April, when the collation of statistical data for the Food Standards Agency commences: other information, such as last years' figures for resources, is not available until mid May each year. We therefore look to submit the plan to coincide with a Licensing Committee meeting following collation of the data.

### **5. Staffing, Financial and Legal Implications/Powers**

- 5.1 None in respect of the Plan, which solely collates existing information and plans.

### **6. Other Implications**

- 6.1 None

## 7. Links to the Community Strategy and Corporate Plan

7.1 The proposals contained in this report relate to the following key areas of the Community Strategy

Local Economy	y	Health and Social Care	y
Affordable Housing		Community Safety	
Lifelong Learning		Local Environment	

(please state how the FSP relates to the Community strategy)

The following key principles are applicable:-

(i) Working together	y
(ii) Dignity, respect and opportunities for all	y
(iii) Leaving no-one behind	
(iv) Making it last	y

This report achieves the following aims as set out in the Corporate Plan

Providing high quality services	y	Giving exemplary customer service and satisfaction	y
Being financially efficient and well managed	y	Developing motivated, positive and empowered staff	

## 8. Reasons for the Recommendation

8.1 By noting the contents of the report, the requirements of the Food Standards Agency can be met.

## 9. Background Papers

None to compile this report: other references are within the Plan itself.

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**Crawley Borough Council**

**Environmental Health**

**Food Service Plan**

**2007-2008**

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## Introduction

This Service Plan meets the requirements of the Food Standards Agency (FSA) document "Framework Agreement on Local Authority Law Enforcement". The Food Standards Agency is an independent food safety watchdog set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food. Their functions include setting standards for local government and auditing authorities against those standards.

In June 2004, the Framework Agreement was amended to ensure that all local authorities carry out the tasks required by the various requirements of imported food legislation.

Food legislation is enforced by both District/Borough Councils (Environmental Health) and County Councils (Trading Standards). However, the work undertaken by the Crawley Borough Council with regard to the Imported Food Office covers both Environmental Health and Trading Standards legislation as Gatwick Airport is a point of entry into the EU.

Each local authority is required to develop a plan which specifies the arrangements to be put in place and operated for the enforcement of food hygiene, food standards and/or feeding stuffs legislation which includes imported food controls. The Food Standards Agency regard this as important to ensure national priorities and standards are addressed and delivered locally. The main format of this report is defined by the FSA. However, the FSA also encourages local authorities to include in their plans locally defined objectives. Crawley Borough Council's Food Safety Service<sup>1</sup> has looked to balance enforcement action with education and encourage low risk local food businesses to become "self-auditing" as far as possible.

This plan sets out the risk based food inspection plan to be completed by Officers from the Food and Occupational Health Team for the period 2007-2008 and includes other activity concerning food enforcement issues. Reference is made to the work carried out by the team outside planned work namely food complaints, request for advice and infectious disease control. Such complaints include unfit food and poorly run food businesses.

In addition to any audits carried out by the FSA, Crawley Borough Council will continue to participate with other local authorities in West Sussex as regards inter-authority audits. A Best Value Review was also carried out on the Environmental Health Service in 2005. The subsequent improvement plan produced will take 5 years to complete. Many of our projects for the food service will contribute in the coming year to meet the requirements of the action plan.

This Food Service Plan has key links to the Community Strategy and Corporate Strategy. Food safety is a significant element in connection with numerous cross-cutting issues of importance regarding Crawley and Gatwick including health and social care, lifelong learning, and economic development.

A risk based approach to enforcement is taken concerning food safety having regard to the needs of local businesses and public interest. This is reflected in the

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<sup>1</sup> The term Food Safety Service encompasses all of the food safety functions carried out by the officers within the Food, Licensing and Occupational Health team. This includes Infectious Disease control.

Environmental Health Enforcement Policy and its commitment to adhere to the Home Office Enforcement Concordat.

## **1. Service Aims and Objectives**

### **1.1 Statement of Aims and Objectives**

#### **Aims**

- A.** To prevent food poisoning and safeguard the public from infectious disease and food borne illnesses.
- B.** To work positively with local food businesses to educate and enable them to comply with food safety law.
- C.** To work with partner agencies to improve public health concerning diet as far as is practicable through promotional activities.

We will pursue these aims by striving to ensure that:

- i) All food and drink produced, imported, prepared or sold within the Borough Crawley is in all respects safe and wholesome to eat;
- ii) Food is handled, prepared and produced hygienically;
- iii) The risk of contracting food poisoning or a food borne infection/injury are reduced and where possible eliminated;
- iv) Owners/proprietors of food businesses and their staff understand and comply with their legal obligations to protect consumers;
- v) Food premises meet (at a minimum) the legal required standards in terms of structure, management and practices;
- vi) Food businesses have access to support, advice and information in order to encourage them to be self-regulating, self-auditing and aspiring to best practice;
- vii) Complaints and concerns are dealt with fairly and promptly and that information is made available to the trade and other customers;
- viii) Imported food is safe and complies with EU and UK food safety requirements.

#### **Objectives**

To carry out food hygiene inspections in accordance with the Food Standards Agency Code of Practice as follows:

- i) Achieve 100% of high risk food inspections in premises rated A, B and C (as defined by the FSA Code of Practice).
- ii) To use alternative interventions in 90% of Food Businesses through the use of self auditing questionnaires in premises rated D and E.
- iii) To undertake food safety visits to 10% of premises rated D and E chosen if questionnaires are not returned or selected based on additional perceived risk due to previous poor history.



To provide advice and information to food businesses.

To facilitate and/or provide food hygiene training/courses and encourage food businesses to participate.

To promote food hygiene more widely through contribution to the Primary Care Trusts and the West Sussex Health Improvement Plan, such as dealing with Health Inequalities. This includes promotional campaigns such as Food Safety Week and Junior Citizen.

To participate in LACORS annual food sampling programme.

To respond to food complaints concerning microbiological contamination and foreign bodies, unsatisfactory conditions and unsafe practices in food businesses and to work with colleagues in West Sussex County Council Trading Standards enabling authorities so as to achieve a seamless service to customers concerning labelling, quality and chemical contamination .

To respond to all complaints within a target of 3 working days and to reconcile complaints within no more than 120 working days from receipt depending on the type of complaint. (See Section 5 for details of our standards of service.)

To investigate cases of food poisoning/food borne infection and to take all necessary measures so as to control their spread and to prevent a recurrence. We will consult with the appropriate agencies, including the Consultant in Communicable Disease Control (CCDC). We will aim to respond immediately to serious cases and continue to develop an emergency response procedure in the form of a Go Bag.

To respond to food alerts received from the Food Standards Agency (100% response to be in accordance with Code of Practice and our own procedures).

To inspect food to ensure that it is fit for human consumption and to control and ensure the proper disposal of unfit and unsound food.

To facilitate the trade/export of food through London Gatwick Airport.

To deliver all of our services to a high standard.

To follow LACORS guidance

To inform and advise our customers both trade and members of the public.

To enforce imported food conditions at the Cargo Transit Sheds at Gatwick Airport and the Enhanced Remote Transit Sheds (ERTS) located within Crawley's boundaries.

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## **1.2 Links to Corporate Objectives and Plans**

The Food Safety Plan compliments both the Community Strategy and Corporate Policy<sup>2</sup>. It is integrated into key Council aims complimenting the following areas by working with local stakeholders. Within the four principles of:-

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<sup>2</sup> See Appendix A to show the integration of the various strategies.

- i) Working together
- ii) Dignity, respect and opportunities for all
- iii) Leaving no one behind
- iv) Making it last

#### Local economy

*“To encourage a thriving local economy where a diverse range of local, regional and national business interests are encouraged to flourish”.*

Achieved through working with local food businesses to educate and inform.

#### Health and Social Care

*“Health and well-being go hand in hand. We must do all we can to make sure the quality of life is not sacrificed because of ill health, physical or otherwise”.*

Achieved by undertaking food safety inspections, food complaint investigations, investigations concerning infectious disease, food sampling and enforcement action if required.

#### Education and lifelong learning

*“Everyone from pre-school children and school leavers to adults with basic learning needs, to people keen to develop their workplace skills or expand their all round knowledge or have access to the opportunities and facilities they need to realise their personal, academic and professional goals”.*

Achieved by facilitating and delivering food safety training. This also includes provision for language support within the ethnic communities.

The Food Safety Service will strive to realise these objects through:-

- i) Working efficiently to continue to make the best possible use of resources.
- ii) Working in partnership with other organisations.
- iii) Working to achieve the Council's principles for sustainability.
- iv) Being aware of cross-cutting issues and actively seeking to improve communication within the organisation.

## 2 Background

### 2.1 Profile of Crawley Borough Council

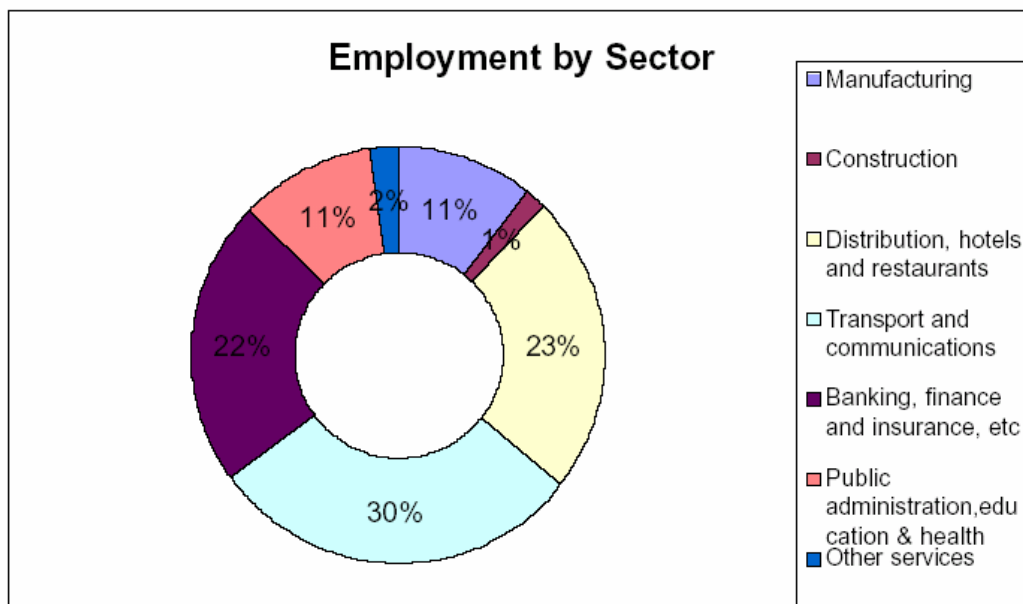
Crawley is situated in West Sussex, halfway between London and Brighton. The town has approximately below 100,000 residents. Whilst only covering a small part of West Sussex, Crawley has a high number of large and small to medium enterprises, which are located within close proximity to Gatwick Airport.

Generally, there is a youthful disposition to the population, thus vulnerable groups tend to be children, rather than the elderly.

Food premises broadly comprise the following:

- i) Larger restaurants and food retailers in the town centre,
- ii) A town centre market, held on Fridays and Saturdays,
- iii) Smaller restaurants and food retailers in the neighbourhood parades,
- iv) Food manufacturers in the outlying industrial estates,
- v) Food venues at the Airport,
- vi) Large hotels serving the Airport: despite being home to Gatwick airport, there are relatively few small hotels and B&B in the area, as Crawley is not generally considered a holiday destination in itself,
- vii) A monthly farmers market situated in the High Street.

The graph below illustrates the breakdown of employment within the Town by sector. The food industry plays an important part in Crawley's economy and 23% of the population are employed within these sectors.



Source: Annual Business Inquiry

We are aware that many local people are employed as food handlers and it is noted that Crawley has the highest number of adults with very low literacy skills in Sussex. In addition, Crawley has a diverse range of cultures and spoken languages, as can

be seen in Table 1. Crawley has a larger ethnic minority population than average as regards England and the South East Region. The largest ethnic groups are Asian/Asian British Indian and Asian/Asian British Pakistani groups.

This requires consideration when carrying out inspections, education and enforcement, in accordance with the Council's commitment to equal opportunities for all. A series of Educational seminars will be delivered in 2007 to introduce the Safer Food Better Business model into Crawley based businesses. Seminars will be delivered in Chinese, Turkish and Indian to assist in tackling potential local language difficulties. This will be accomplished using outside support and input from the existing food safety staff who will be delivering coaching to ensure the safer food better businesses support remains sustainable at the conclusion of the initial project.

<b>Cultural Group</b>	<b>England</b>	<b>South East Region</b>	<b>Crawley</b>
All people (number)	49,138, 831	8,000,645	99, 744
<i>Percentage of people in ethnic groups:</i>			
White: British	86.99	91.30	84.50
White: Irish	1.27	1.03	1.31
White: Other White	2.66	2.77	2.72
Mixed: White and Black Caribbean	0.47	0.30	0.34
Mixed: White and Black African	0.16	0.12	0.23
Mixed: White and Asian	0.37	0.37	0.46
Mixed: Other Mixed	0.31	0.28	0.34
Asian or Asian British: Indian	2.09	1.12	4.40
Asian or Asian British: Pakistani	1.44	0.73	3.00
Asian or Asian British: Bangladeshi	0.56	0.19	0.15
Asian or Asian British: Other Asian	0.48	0.29	0.77
Black or Black British: Caribbean	1.14	0.34	0.30
Black or Black British: African	0.97	0.31	0.73
Black or Black British: Other Black	0.19	0.06	0.08
Chinese or other ethnic group: Chinese	0.45	0.41	0.31
Chinese or other ethnic group: Other ethnic group	0.44	0.37	0.34

Table 1 Ethnic Breakdown in Crawley (Census 2001, Crown copyright)

## **2.2 Organisational Structure**

### **Council Structure**

Crawley Borough Council operates a cabinet system: the incumbent Portfolio holder for the Food Service is Councillor Keith Blake. Policies are created using Policy Development forums involving stake holders. Decisions about how services are delivered are considered by an Overview and Scrutiny Committee before being considered by the Executive Members for approval.

Also, the Licensing Committee considers and makes decisions on a number of areas beyond purely "Licensing" issues. These are described in the Council's Constitution.

The Council employs approximately 800 people in four Directorates comprising of sixteen Divisions. The Chief Executive of Crawley Borough Council is Michael Coughlin.

The Council's Vision is for *"a town in which people take pride: prosperous and safe where value for money services contribute to a high quality of life and environment, with opportunities for all."*

The Council's Directorates are divided as follows:

#### **Chief Executive's Directorate.**

- i) Policy and Performance
- ii) Democratic Services
- iii) Communications
- iv) Human Resources

#### **Directorate of Environment & Housing (Jim Redwood)**

- i) Planning Services
- ii) Environmental Services, which includes the food service.
- iii) Housing

#### **Directorate of Community Services (John Thraves)**

- i) Amenity Services
- ii) Arts
- iii) Community Services

#### **Directorate of Resources (David Covill)**

- i) Finance
- ii) Information Communications Technology
- iii) Property Services & Procurement
- iv) Legal Services
- v) Customer Services

The details concerning the approved structure are contained in the Council's Constitution<sup>3</sup>.

#### **Organisation Arrangements for the Food Safety Service**

The food service is provided by officers within the Food, Licensing and Occupational Health Team. This team covers food related issues, including infectious disease control and Imported Food control at London Gatwick Airport. The Food Team cover all commercial type environmental health issues including health and safety and licensing enforcement.

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<sup>3</sup> See Intranet documents.

A diagram showing the integration between the Food Team, Licensing and Occupational Health Team can be found in Appendix B.

Officers attend and participate in a number of key groups as outlined below:

- i) Sussex Food Study Group: Tony Baldock
- ii) Sussex Food Liaison Group: Tony Baldock, Angela Tanner (Sussex Chief Officer's Representative)
- iii) West Sussex Control of Infection Committee: Paul Baskerville (organised by Crawley's Consultant in Public Health Medicine)
- iv) Water Quality Liaison Meeting: Paul Baskerville (organised by Sutton and East Surrey Water)
- v) Association of Port Health Authorities (APHA): Iain Pocknell (Secretary of Aircraft as Food Premises Group)
- vi) Chartered Institute of Environmental Health (CIEH): Beverley Edmondson (Centre Councillor Port Health Special Interest Group)
- vii) Port Health Centre; FSA; DEFRA; British Airports Authority (BAA) Cargo Working Group; SE Local Authorities Imported Food Liaison Group. Angela Tanner, Tony Baldock, Iain Pocknell, Bev Edmondson and Paul Haden: (organised by Slough BC).
- viii) Team meetings for the Food, Licensing and Occupational Health Team and separate meetings for the Imported Food Office Team. These are held monthly on Tuesdays and Wednesdays respectively. These include training sessions on procedures and legislation.
- ix) Airport Duty Officers meetings. These are held every other month. These meetings are also supplemented by Duty Officer case study based training to ensure all staff engaged in Imported Food Control remain suitably competent.

Attendance and participation in these groups is monitored and reviewed, using feedback in the regular team meetings.

### **Training and Qualifications**

Proof of suitable qualification is required prior to the appointment staff to any post concerning Food Hygiene Safety enforcement. Ongoing training for all officers is collated and monitored, in line with the FSA Code of Practice. This information is reviewed by the Group Manager (FLOH), during the corporate appraisal process. A training needs analysis exercise is carried out and a training plan produced for each officer respectively<sup>4</sup>.

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<sup>4</sup> Training plans are attached to each officer's annual appraisal.

## **Use of Specialist Services.**

The Council uses 3 approved laboratories for food or infectious disease related matters as detailed below (in accordance with the procedure, as attached as Appendix C).

Food Examiner: Ms C Bacon, Health Protection Agency, Royal Sussex County Hospital Eastern Road Brighton BN2 5BE

Public Analyst: (1) Hampshire Scientific Services, Hyde Park Road, Southsea, PO5 4LL

(2) Eurofins Scientific Ltd. Jeremy Wotton, 445 New Cross Road. London, SE14 6TA

The Officers based at Timberham House dealing with Imported Food Office use the same services for the examination or analysis of imported food samples and water from aircraft and water bowsers.

## **Vacant Posts and Use of Contractors**

Where possible vacant posts are filled using temporary contracts. Contractors have historically been used to allow time for specialist officers to work on specific projects such as Imported Food Surveillance and Sampling initiatives. This will be repeated in 2007-2008 to enable the team to implement the Smokefree Agenda as required under the Health Act 2006.

Contracts are awarded in accordance with the Council's procurement policies and procedures. Once appointed, the contractor's work is monitored by the Group Manager through auditing completed visit reports. Revisits are also arranged to 5% of the premises inspected to check the quality accuracy of the work undertaken. This is undertaken by a Senior Environmental Health Officer. Any major variations in premises scores (before and after the contractor's inspection) are investigated with contractor or the appointed contract manager.

The Imported Food Office was previously accredited to ISO 9001. Although we will be aiming for the same standard of procedure, re-accreditation is not being sought to due to the cost involved.

### **2.2 Scope of the Food Service**

The following activities form the core of Crawley Borough Council's Food Safety Service:

Inspection of food premises under the Food Safety Act, Food Hygiene England Regulations 2006, EU Directives 178/2002, 852/2004 853,2004, 854/2004 The Products of Animal Origin (Third Country Imports) (England) (No. 4) Amendment Regs. 2006..

Biannual inspection of approved premises under the EC Directive 853/2004 (milk, fish, meat, and meat products). There are currently 2 approved premises in Crawley<sup>5</sup>.

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<sup>5</sup> Pasta Reale and Real Pie Co.

First time inspections of food businesses subsequent to registration with Crawley Borough Council

Consultation with Development Control concerning planning applications for new food premises.

Inspection, investigation (including sampling), detention and seizure of suspect food stuffs. Officers are also required to consider imported foods when carrying out food hygiene inspections in catering and retail premises.

Inspection, investigation (including sampling), detention and seizure of suspect imported food stuffs in Cargo Transit Sheds at Gatwick Airport and Enhanced Remote Transit Sheds within the Crawley boundaries.

Food sampling (including water used in food preparation). The Food Safety Team also take part in national food sampling programmes (LACoRS) and to fulfil legal requirement for certain producers, such a premises approved under product specific regulations. Details of this work are given in the food sampling plan. Samples are taken in accordance with protocols set out in the Food Safety Act 1990 Code of Practice and EU sampling protocols for specific imported foods.

The Imported Food Office is required by EU Law to sample 1% of Products of Animal Origin arriving through the Border Inspection Post. Non-Animal Origin Foods are also sampled to check for compliance with EU and UK food safety standards e.g. for contaminants such as Sudan colouring and aflatoxins.

The staff located Imported Food Office also sample the quality of aircraft drinking water. Samples have been taken from the rising mains located on the airfield and the water bowsers (vehicles used to transport and deliver the water to the aircraft.) The quality of the supply (rising mains and bowsers) is monitored to ensure it is satisfactory. The sampling water of on board aircraft is also planned to be undertaken in 2007-2008.

Responding to complaints of unacceptable premises and practices and complaints about fitness/wholesomeness of food. Where a complaint is received concerning a food businesses a visit is made as soon as possible regardless of the last programmed visit date and investigation is undertaken. Cases concerning food quality or chemical contamination are passed immediately to West Sussex County Council for the attention of a Trading Standards Officer. This is in line with the Code of Practice which places responsibility for chemical contamination with Trading Standards Departments together with food labelling law although either service may in fact take appropriate action. Liaison arrangements exist so that no matter which service receives such a complaint in the first instance, it is expediently transferred to the service that has the best possibility of a thorough investigation. This has been facilitated through the Sussex Food Liaison/Coordination Group.

Responding to complaints about imported food.

Responding to "Food Alerts", (which are classified as either "For action" or "For Information"). Depending on the action required, this may involve assisting with trade withdrawals or visiting and advising, and in emergency situations making immediate visits with a view to surrender or seizure of the food in question.



Sending and responding to Rapid Alerts (a warning network controlled by the European Commission). This will mainly relate to imported food.

Inspection and issuing of export licences.

Advice and support to food businesses either during inspection on request, and where proprietors are considering starting a new food businesses.

Advice to customers on hygiene regulations, best practice, current media concerns and similar issues (this would include reactive advice and proactive work such as news releases, promotional activities, etc.)

Enforcing food safety legislation in accordance with the environmental health enforcement policy (in line with the Home Office Enforcement Concordat). This ranges from informal written warnings through to the service of improvement notices, voluntary and emergency prohibition (closure and sundry premises), etc., to prosecution in court (or a formal caution, depending on the circumstances of the offence.)

Investigating alleged food poisoning complaints or referrals of actual food poisoning from the Consultant in Public Medicine, GP or isolating laboratory, or members of the public.

Provision or arrangement of training, as dictated by demand as part of a themed promotion/introduction in legislation.

Provision of Port Health Student Training Courses. Four courses have been planned for 2007, allowing 10 students per course. This training is delivered at actual cost to provide low price training to student Environmental Health Officers. A course has also been planned for qualified officers in 2007 to improve knowledge in the profession concerning imported food matters. These training courses involve speakers from related organisations such as West Sussex County Council Trading Standards, Animal Reception Centre at Gatwick Airport and Gatwick Health Control (NHS Primary Care Trust).

Liaison with Gatwick Health Control. Gatwick Health Control assists in the enforcement of the International Health Regulations 1967 and Public Health Aircraft Regulations 1968 on behalf of the Council. This arrangement is underpinned by a Service Level Agreement. This area of work concerns disinsection of aircraft (mosquito control to prevent malaria infected vectors entering the UK) and investigation of infectious diseases regarding notification sick passengers from aircraft landing at Gatwick Airport. Officers at the Imported Food Office are also involved in public health enforcement of legislation covering infectious disease and sick passenger controls. Work has also commenced to define the specific roles and responsibilities of officers at the Imported Food Office within this public health framework.

## **2.4 Demands on the Food Service**

In addition to core work, the Food Safety Team is responsible for the investigation of non-food related infectious disease such as Legionella type infections. This team also deal with low level pollution investigations regarding noise and odours from food premises, and breaches of Licensing Conditions in respect of the Licensing Act 2003. Advice is also provided to other sections of the Council on food issues relating to matters such as external events attracting large numbers of visitors where food will

be involved. Food Officers also assist in health and safety initiatives and in addition give advice on planning applications concerning food premises. A contractor was used in 2006-2007 to complete a number of visits outstanding due to staff shortage due to a disciplinary matter and subsequent suspension and re-training requirements.

The staff situated in the Imported Food Office, have fluctuating demands on their time. Specific flights are targeted which are likely to contain food which fails to comply with the food safety requirements. Suspect food is detained, sampled and then, if unsatisfactory, the product is destroyed either by a destruction notice where legislation permits, or by applying for a Condemnation Order at the Magistrates' Court. There are limitations in the legislation e.g. lack of prior notification which makes monitoring, intelligence gathering and liaising with other agencies and local authorities essential.

Clearance of consignments of products of animal origin. No pre notification to the Border Inspection Post of the arrival of such goods is required. Clearing such products is a time consuming operation requiring the checking of documents, identification of product and physical examination of 1 in 4 consignments. As a consequence it is not possible to plan work in advance. Environmental Health Officers based at Timberham House therefore also inspect and deal with complaints concerning food safety and health and safety within the airport terminals. The work of this team is also supported by a number of Environmental Health Officers who provided cover at weekends and weekday evenings.

The Imported Food Office staff undertakes their own administration which involves updating the legislation compendiums. European Union (EU) Law in the form of Directives, Regulations and Decisions is subjected to large number of changes based on perceived risk on a regular basis. Constant updating is therefore required to keep the compendiums up to date in order decide whether consignments of food can be allowed to enter the EU for free circulation.

## **2.5 Enforcement Policies**

Crawley Borough Council adopted the enforcement concordat in December 2001.

The Environmental Health Services has a generic enforcement policy. A specific policy for Imported Food enforcement has also been produced. This was adopted by the Executive in March 2005.

To promote best practice and ensure consistent decisions are taken with regard to public interest and likely outcome of any legal proceedings an "enforcement review" is held involving the Case Officer, Line Manager, Head of Service and Solicitor to the Council where the merits of any proposed formal action is being considered. All legal proceedings within the Environmental Services Division are subjected to this process in line with the local procedure.

This process requires the Case Officers to produce a case file for the Head of Service in accordance with the Criminal Investigations and Procedures Act 1996. The said officer is also required to present the facts of the case in person. The matter then receives an objective review. Details of the decision are recorded by Head of Service. This is within the parameters of her delegated powers as set out in the Constitution.

In cases involving formal cautions, the case is discussed with the Chair of the Licensing Committee, prior to the decision being confirmed.

The Council has a formal complaints procedure, whereby any customer aggrieved by our processes or decisions can have their grievance investigated. This is independent of the service being investigated.

There are also opportunities for “informal” complaints to be raised via our customer survey forms.

### 3 Service Delivery

The FSA prescribe a minimum inspection frequency for food premises. The Council’s policy is in line with the guidance e.g. to complete 100% of the inspections within the 28 days of the due date

#### Premises Profile in Crawley

The table below shows the FSA categories for inspection frequencies. There have been recent changes in the method of using risk ratings, which is reflected below.

Risk Rating	Points Range	Minimum Frequency of Inspection
<b>A</b>	≥92	At least every 6 months
<b>B</b>	≥72	At least every year
<b>C</b>	≥42	At least every 18 months
<b>D</b>	≥31	At least every 2 years
<b>E</b>	Below 31.	“Alternative Strategies” can be considered*

\*The strategies used will depend on the competent officers’ assessment of the needs of the individual

It is only possible to estimate the number of programmed, risk based inspections, as new businesses may open and others close during the period of the year. However, at April 2007, we are able to estimate that 433 premises will need to be inspected 2007-2008 (fiscal year).

Table 2 illustrates the number of premises in Crawley and Gatwick, according to their risk rating, broken into the categories provided by the FSA, that will be inspected from 1<sup>st</sup> April 2007 and 31<sup>st</sup> March 2008, based on current registration details.

Food Business Type	A	B	C	D	E	F	Unrated
Primary producers	0	0	0	0	0	0	0
Slaughterhouses	0	0	0	0	0	0	0
Manufacture/processors	2	0	0	0	0	0	0
Packers	0	0	0	0	0	0	0
Importers/exporters	0	0	0	0	0	0	0
Distributors/Transporters	0	0	0	1	0	0	0
Retailers	2	7	20	10	17	0	10
Restaurants and other caterers	6	70	225	19	20	4	20
Materials and articles	0	0	0	0	0	0	0

Manufacture mainly selling retail	0	0	0	0	0	0	0
Total (Estimated number programmed inspections at April 2007)	10	77	245	30	37	4	

Risk based inspections (Primary Visits) comprise only part of the interventions used to ensure food safety as a range of follow up actions are also used (Secondary Visits). An instant carbonised report is left at the time of all inspection visits. If any works are required to comply with the law or improve food hygiene, a letter confirming the actions to be completed is also sent as soon as possible.

In addition to programmed inspections, the Food Safety Team investigates complaints made by members of the public or other businesses. Performance concerning complaints is reported in the Corporate with other Environmental Health type complaints.

The Imported Food Office aims to clear products of animal origin within 2 hours of presentation of documents and the consignment at the Border Inspection Post.

### **Operation Times**

The Food Safety Team is part of the Environmental Health Service located at the Town Hall.

There is also an office at Timberham House (London Gatwick Airport), which provides staff for Imported Food Service. Current opening hours are: 8.00am to 7.00pm Monday to Friday and 10.00am to 4.00pm on Saturdays, Sundays and Bank Holidays. The office is open 365 days a year.

The Town Hall is open Monday to Thursday 8:45am 5.20pm, Friday 8:45am 4.20pm. However, a flexitime system is worked and officers are able work from 7:00am to 7.00pm. An informal arrangement exists amongst the Food Safety staff to ensure cover is provided at all times during office hours. Cover is provided at Timberham House through a Duty Officer rota.

The emergency response for out of hour's problems, such as serious cases of food poisoning operates by way of a cascade system initialised by an out of hours call service. An Environmental Health contractor, who is employed to respond outside normal hours, is able to contact the Head of Environmental Services and Group Manager responsible for Food Safety who are both qualified Environmental Health Officers.

### **3.1 Food Premises Inspections**

The Environmental Health computer system (UNI-form) is one used by many local authorities. It contains details of the food premises registered in Crawley and Gatwick. It is also used to generate the risk based inspection programme and record key details regarding inspections and actions. This information is used to complete FSA returns. The UNI-form computer software although being highly useful requires a high level of technical input from a system administrator. Severe problems have arisen historically due to extremely limited access to such support and it has not been possible to run statutory returns from the programme and significant corruption of the database records and code fields has occurred. This is an area where additional resource is urgently required which would deliver exceptional benefits from realising the true potential of the software package.

The inspection programme is driven by the risk rating assigned to a premises as defined the FSA Code of Practice. This highlights the premises which are due to be inspected according to the perceived risk due type of food produced and level of compliance with the law. New premises also require initial visits subsequent to registration. It is also a requirement that premises approved under the European Directive 853/2004 receive 2 annual visits irrespective of their risk rating.

The allocation of the premises to individual team members is determined by its location in the borough. The borough is split into five areas, four being made up of geographic blocks containing approximately equal numbers of businesses with Gatwick Airport forming the fifth in its entirety. This arrangement was created in 2006 to increase effectiveness and ensure equity of work amongst officers

Periodic checks are made of progress against the planned inspection programme during monthly meetings. Crawley Borough Council is also required to submit an annual return to the FSA. Environmental Services also has a local performance indicator which mirrors the FSA indicator.

The council's own policy is to complete 100% of inspections of premises due an inspection, in accordance with the FSA risk rating system. In 2007–2008 433 premises inspections will be required.

The budget for concerning food safety enforcement is now separate from imported food and other functions. The budgets for these areas are shown in section 4.1 below. Staffing arrangements are detailed in table 4.2.

### **3.2 Food Complaints**

All food complaints, including complaints about imported food are recorded in the UNI-form computer system. They are then allocated on a location basis as described above, in accordance with the current procedure.

The estimate of resources required for complaints is based on the previous years' trends. Such complaints are recorded in accordance with the FSA requirements and include the following:

- i) Possible Chemical Contamination
- ii) Foreign Bodies in food.
- iii) Food Hygiene (Premises)
- iv) Food Labelling (including pass sell by date etc)
- v) Microbiological – mould etc
- vi) Suspected food poisoning

### **3.3 Home Authority Principle**

The Environmental Health Service supports and endorses the Home Authority scheme, but has not currently formally adopted home authority status with any food businesses in the area. This is currently under review as a result of changes to the Code of Practice.

It does, however, act as an originating authority for many food businesses. Of particular interest are the flight caterers, who supply meals to flights from Gatwick. As an originating authority, Crawley has taken responsibility of ensuring that food, goods and services produced within the borough conform to legal requirements. It is difficult to accurately quantify the time spent on conferring with other local authorities and food businesses, as this information is often bound up with food complaint investigation processes.

### **3.4 Advice to Businesses**

Advice to businesses and customers is viewed as an essential part of the food service plan and includes advice for new businesses. Those wishing to discuss their plans to set up or alter the nature of their food businesses are given free advice on layout, standards and best practice.

We also support “business breakfasts” provided by the local Chamber of Commerce, to increase awareness of our advisory role.

### 3.5 Food Sampling

In summary, however, we intend to complete the food samples shown below during 2007 to 2008, subject to availability of suitable products in the Crawley area.

<i>Dates</i>	<i>Sample Type</i>	<i>Sample Size &amp; Number</i>	<i>Laboratory and Test</i>	<i>Type of Premises</i>	<i>Sampling Coordinating Body</i>
April-March	Sandwiches	9	Micro (listeria)	Nursing and Residential Homes	LACoRS
May-June	Shopping basket	10	Micro	Retail shop*	LACoRS
Sept-October	Sauces	9	Micro	Kebab shops	LACoRS
Imported foods		14	Chemical	Border Inspection Post	FSA
Products of Animal Origin	Red meat Fish	12	Chemical	Border Inspection Post	FSA

In agreement with the Sussex Food Liaison group, each Local Authority will sample, if possible, from a specific Major supermarket

- I. Worthing - Co-op
- II. Horsham – Waitrose
- III. Chichester – Budgens
- IV. Arun – Somerfield
- V. Adur – Tesco
- VI. Crawley – Sainsburys\***
- VII. Mid Sussex – Safeway

This ensures that all the major stores are included.

See Appendix. C for details.

### 3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

Information regarding infectious disease is received by 2 routes:

- i) Complaints from people suffering for the symptoms of an infectious disease, normally alleging food poisoning
- ii) Notifications from laboratories initiated by a GP or hospital, for example. These will confirm that a person in the Crawley area is suffering from a “notifiable disease”. These are provided to the Council because there is a legal duty to notify certain diseases to the Local Authority, who may then investigate the cause.

One-off cases may warrant investigation (if a food handler is involved) or not (an individual case returning from foreign travel, for example.)

In the case of a food poisoning outbreak (defined by Consultant in Public Health Medicine), this will be investigated ideally immediately, but in any case within 48 hours (including weekends and holidays).

Investigations will be conducted in liaison with, and under the guidance of, the Consultant in Public Health Medicine (CPHM) and in accordance with our procedure guide.

At the conclusion of any outbreak investigation, a full debriefing is undertaken to examine any key lessons learned.

The current modus operandi is as follows:-

- i) Contact the CPHM or Consultant in Communicable Disease Control (CCDC) immediately on receipt of information pointing to a possible food poisoning issue and take instruction.
- ii) Attempt within three working days to discuss the situation with suspected cases and contacts and give them advice regarding the need to visit their own General Practitioner.
- iii) Liaise, where necessary, with other local authorities within three working days notification.
- iv) Visit and carry out investigations where premises are identified in this area, ideally on the day of notification or on the next day.
- v) Take the samples of food and other evidence as required and arrange for their delivery to the appropriate laboratory for examination.
- vi) Advise the proprietors on the legal position and in particular give specific instructions as to hygiene requirements of food handlers and the arrangements which are needed for exclusion from work.
- vii) Assist with the formulation of and send out questionnaires, when instructed by the CPHM as a follow-up to the investigation.
- viii) Contact those who have been involved with the case, at the conclusion of the investigation and inform them of the outcome.
- ix) Take action in accordance with the Council's enforcement policy and where required produce the appropriate files and documents for legal opinion and/or decision by the Head of Service.
- x) Be part of any outbreak control team/or review team.

The food team are unable to:-

- i) Become involved in claims for compensation.
- ii) Investigate outbreaks or originating from the home unless advised to do so by the Consultant in Public Health Medicine.

Infectious disease notifications to Crawley Borough Council in 2006 2007 are illustrated in Table 3.



### **Notifiable Diseases for April 2006 – April 2007**

Notifiable Disease (F indicates food borne)	Number of cases reported	
	05-06	06-07
Campylobacter (F)	68	100
Salmonellosis (F)	28	21
Tuberculosis	6	7
Gastroenteritis (F)	0	2
Giardiasis (F)	10	13
Dysentery (F)	6	6
Cryptosporidiosis (F)	11	3
Meningitis	1	1
Measles	2	8
Typhoid (F)	0	2
Miscellaneous (F)	0	4
Mumps	21	5
Rubella	4	1
Scarlet Fever	2	3
Cholera (F)	0	0
Clostridium (F)	0	0
E. Coli (F)	1	2
Hepatitis C (F)	1	1
Malaria	1	1
Paratyphoid (F)	0	0
Whooping Cough	0	1
Total	162	181

### **3.7 Food Alerts**

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 dealt with in accordance with the documented procedure which was based on guidance given in the current FSA Code of Practice.

These alerts can put considerable pressure on the FLOH team as a whole. Fortunately, we were successful in bidding for funds from the FSA in respect of work undertaken at London Gatwick Airport 2006 - 2007, but there is no guarantee that the products imported through Gatwick will match the food samples attracting FSA funding in 2007 – 2008.

As noted above, some food alerts are specifically concerned with imported food. A system has been developed at the Imported Food Office where a list of target products is noted. The same also applies to rapid alerts sent to Port Health Authorities. The day to day inspection of imported food takes into consideration current issues related to imported foods.

### **3.8 Liaison with Other Organisations**

Formal links exist and are being improved with the public health laboratory service and Hampshire Scientific Services.

The Group Manager FLOH acted Chairman CIEH Sussex Food Group in 2006 – 2007 in accordance with an informal arrangement for all Sussex Authorities to fulfil this role on a rolling basis. The Group Manager FLOH and the Head of Environmental Services attend the Sussex Food Liaison Group as the Chief Officers' Group representative and operational manager respectively.

A Senior Environmental Health Officer attends the local borough Control of Infection Committee which is chaired by the CCDC/CPHM.

A Senior Environmental Health Officer is the co-ordinator of training matters for the external providers of food safety training courses.

### **3.9 Food Safety Promotional Work**

The Food Safety Team co-ordinate their promotional activities within the team. Where training requests are received from customers, they are dealt with in a variety of ways:-

- i) Passed on to neighbouring authorities who regularly run food hygiene courses.
- ii) Training in food safety is co-ordinated by Crawley Officers and includes CIEH courses.

The team also participates in campaigns, including:-

Food Safety Week

Promotion of hand washing through training sessions in local schools and community "healthy cooking" schemes.

Crawley's Junior Citizen event in which hand washing is to be promoted to local school children.

The Imported Food Office has also given presentations to external groups including the Department of Transport Committee concerning aircraft disinfection and the Department of Health regarding The World Health Organisation Revised Public Health Regulations 2005. Port Health Student Training courses have also been re started in 2007 and have been approved by the Chartered Institution of Environmental Health. These popular courses assist students in the completion of their practical training requirements of their environmental health university courses.

## 4. Resources

### 4.1 Financial Allocation

As described above, the current budgetary arrangements have been reviewed. The budget available to the Food Service is as follows:

	£
<b>Totals allocated proportionally to the Food Team (C1023) for 07-08</b>	
Total permanent staff	<b>152,902</b>
Total for recharges and central costs	<b>75,730</b>
Total for operational	<b>17,520</b>

	£
<b>Totals allocated proportionally to the Imported Food Team (C1021) 07 - 08</b>	
Total for personnel	<b>131,441</b>
Total for recharges and central costs	<b>206,322</b>
Total for Operational	<b>78,112</b>

There are a number of issues concerning the Imported Food Office budget. The Office provides the services to meet an increasing range of duties imposed by Central Government to control Port activities. It is only possible to charge for some of these. Products of Animal Origin checks, for example, are allowed to be self-financing. However, the decline in the number of imports of Products of Animal Origin has continued and income has not matched the costs. A review of the costs to the service together with ways of improving the efficiency of the system has been carried out. As a result the hours of opening for the office at Gatwick have been reduced.

Plans are currently underway to redevelop the Border Inspection Post at Gatwick Airport further to recent problems being identified by DEFRA and subsequent threat of de-listing (i.e. closing the Post down). Such a closure would have a significant impact for operations at London Gatwick Airport and revenue generated from the clearance of products of animal origin would be lost. These fees currently finance the staff based at the Imported Food Office in respect of an Environmental Health Officer and Technical Assistant. If the Border Inspection Post was closed there will remain a number of duties which need to be carried out at the Port in order for Crawley Borough Council to comply with its legal obligations. This issue is currently under review and decisions will have to be made concerning staffing, office accommodation, veterinary contracts, and the out of hour's system currently operated.

### 4.2 Staffing Allocation

Officers carrying out the food safety function also carry out other duties. Only a percentage of their time is, therefore, spent on food safety. The table below shows a full time equivalent post e.g. 37 hours a week, and typical work breakdown. Figures have been rounded up and time has been divided into "Food" and "Imported Food" as required by the FSA.

Type of Officer	Percentage of a full time equivalent post spent in respect of the Food Service	Percentage of a full time equivalent post spent in respect of the Imported Food Service + Gatwick Airport
Other Management	0.1	0.1
Group Manager	0.4	0.2
Senior EHO	2.25	1
EHO	1	1
Technical Support	1.5	1
Administrative Support	1	1
Official Veterinary Surgeon	0	.5

### 4.3 Staff Development Plan 2007/2008

Each year, a training programme is drawn up for individual members of staff, following the staff appraisal process. Training needs are identified at this point.

A competency matrix has been developed.

There are 9 duty officers on the out of hour's rota covering the Imported Food Office. Some of these officers work within the Pollution Team and Public Health Team. The latter officers have qualified as "Official Fish Inspectors" but do not deal with food safety legislation on a day to day basis. The duty officer meetings held every two months deal with issues of consistency. Training requirements are also met through casework scenarios designed by staff at the Imported Food Office. Training in the form of setting scenarios has proved to be a popular and effective means of getting officers to read and interpret the legislation. A training needs analysis is completed at the first Duty Officers' meeting of the financial year.

## 5 Quality Assessment

### 5.1 Assessing the Quality of the Service

The quality of the service is rated by our customers. We carry out regular surveys, the results of which are collated. These include customer survey forms sent out systematically, following completion of investigations and forms handed at the time of commercial premises inspections. In addition, the following quality checks are carried out:

The Group manager operates a monitoring system, which reviews

- i) Consistency and quality of inspections, by monitoring inspection forms
- ii) Consistency and quality of record keeping, by review of files
- iii) The quality of the service, as rated by our customers, by review of regular customer surveys.
- iv) Shadow visits in which the Group manager accompanies the officer concerned, to give feedback and check consistency of approach.
- v) Consistency and quality of the application of policies and procedures, by including an update session in the regular team meetings.
- vi) The teams performance against the Council's standards of service, namely:

Inspection of 100% of food premises requiring inspection in the current FSA Code of Practice (Measure of performance measure: annual return to the FSA, quarterly review by Group Manager, discussion on trends and exceptions to the plan).

Complaints to be responded to ideally within three working days, but not more than 10 working days. (Measure of performance: quarterly review by Group Manager.)

Serious complaints of food poisoning, infectious disease and dirty food premises to be responded to ideally immediately but at least within 24 hours of notification. (Measure of performance: check by Group Manager as and when required.)

Food alerts and trade withdrawals to be responded to as per FSA guidance. (Measure of performance: auditing by Group Manager, via vetting and confirmation of procedure.)

Completion of LACORS food sampling programme. (Measure of performance: annual returns to the FSA, quarterly review by Group Manager, discussion on trends and exceptions to the plan.)

Vetting of contractor quality, if used. (Measure of performance: shadowed inspections on first appointment, then each inspection paperwork vetted by Group Manager.)

## 6 Review

### 6.1 Review of the Service Against the Service Plan 2006-2007

In 2003 to 2004, the Community Strategy was developed through the Local Strategic Partnership<sup>6</sup>. Now, Crawley has the Corporate Plan, based on the strategy. The Team Service Plans provide the operational elements required to put the plan into action. The Food, Licensing and Occupational Health Team Service Plan provide some of the information that is needed for this, more specific, Food Service Plan. A diagram showing the relationship between the various plans is attached as Appendix A.

#### Scope of the Food Service.

Our work for the 2006 – 2007 period involved four elements:

#### The Risk Based Inspection Programme.

Targets and deadlines are set by Central Government and efficiencies are gained by streamlining processes. This work was given highest priority this year. We used the FSA risk scored inspection programme as the basis for our premises inspections. However, additional inspections arose through new businesses starting up and complaints about premises. The former are obliged by law to register as food businesses and are inspected at that time. The latter are subject to an inspection targeted at investigating the complaint. The table below show the number of inspections completed last year.

Inspection frequency	Min 6 months	Min 12 months	Min 18 months	Min 24 months	Min 36 months	Unrated
Premises rating	A	B	C	D	E	
No of planned primary food hygiene visits at start of year	26	102	228	19	28	50
In Year Changes*	0	20	10	0	0	0
<b>Number of inspections achieved</b>	26	74	228	19	28	50

The council's policy is to complete 100% of inspections of premises due an inspection, in accordance with the FSA risk rating system.

\*Changes are due to improvements in food hygiene resulting in movements to a lower risk score and due to the closure of premises.

#### Response to Reactive work.

This produces unpredictable demands, but targets and deadlines for performance (such as type and speed of response) can be set. This work includes:

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<sup>6</sup> A Copy of Community Strategy is available on request.

- i) Food complaint investigations (such as foreign objects in food.)
- ii) Food poisoning investigations.
- iii) Investigations into complaints of poor food safety at premises
- iv) Food incidents (e.g. national product recalls, such as with Sudan 1.)
- v) Advice to businesses (e.g. new businesses)
- vi) Clearance of consignments of imported food through Gatwick Airport.
- vii) Formal Action arising from investigations.

This work has the next priority, but is usually has a greater degree of urgency than the risk programme and has a higher public profile. This year we met our targets in respect of reactive work

#### **Food complaint investigations (such as foreign objects in food.)**

We have two key performance indicators for this type of reactive work: speed of response and quality of service experienced by the customer. In the former, we have achieved well against target<sup>7</sup>. In the latter, we have identified that where an officer from the Environmental Health Department is the first point of contact, the majority of responses range from good to excellent.

#### **Food poisoning investigations.**

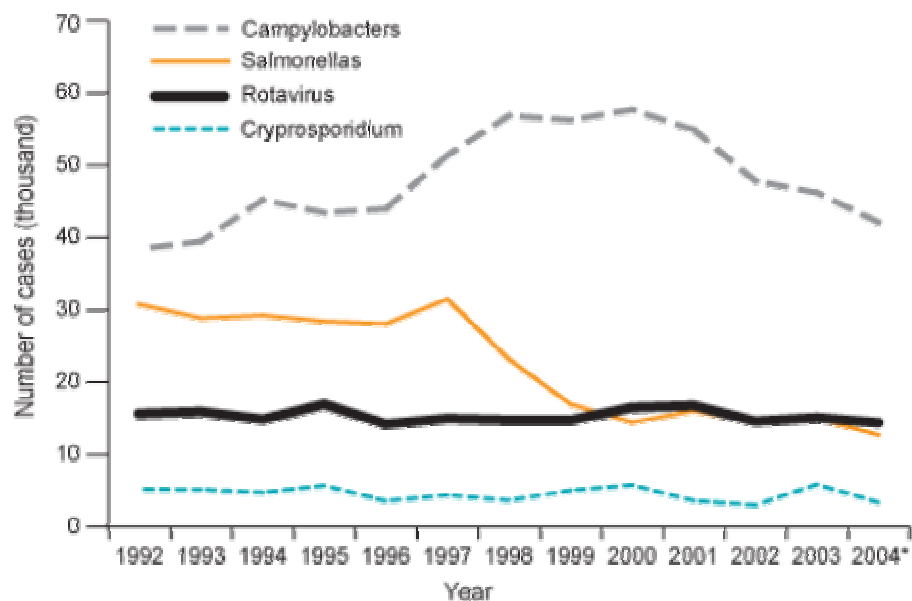
Campylobacter continues to be the most common laboratory-confirmed bacterial cause of gastrointestinal infection in England and Wales (figure 1). In 2004, 42,146 cases were reported to the Health Protection Agency's Centre for Infections, 9% less than the 46,178 cases reported in 2003 and a 27% less than the 57,674 cases in 2000 when the number of cases reported was at its highest. However, Salmonella incidence has, over the last few years remained fairly static. Figure 1 below shows the incidence of common gastrointestinal pathogens in England and Wales<sup>8</sup>:

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<sup>7</sup> Full details are available through the corporate reports on performance.

<sup>8</sup> Source: <http://www.hpa.org.uk/cdr/pages/enteric.htm#trends>

**Figure 1**  
**Annual incidence of selected gastrointestinal pathogens, England and Wales:1992 to 2004**



\*Provisional data.

It would appear, therefore, that the incidence of Campylobacter in Crawley is reflecting the national trend. The incidence of Salmonella, however, is unusual and we will be working with our CCDC to closely monitor reporting patterns over the coming year to determine whether this finding is significant.

### Investigations into complaints of poor food safety at premises

Overall number of complaints received.

Type of Complaint	Number of Complaints 2005-6	Number of Complaints 2006-7
Possible-Chemical Contamination	2	3
Foreign Bodies in food.	28	29
Food Hygiene (Premises)	27	54
Food Labelling (inc. out of date etc)	10	6
Microbiological – mould etc	15	11
Suspected food poisoning	21	42
<b>Total</b>	<b>103</b>	<b>145</b>

Table 5



### **Advice to businesses (e.g. new businesses)**

We always offer advice and recommendations during risk based premises Inspections. We also gave advice to over 100 businesses, following changes to their food registration data: in some cases, these will have been brand new businesses, in others there will have been changes in their business activities.

### **Clearance of consignments of imported food through Gatwick Airport.**

The Imported Food Office has achieved their aim to clear products of animal origin within 2 hours of presentation of documents and the consignment at the Border Inspection Post.

### **Formal Action arising from investigations.**

Where possible, acceptable standards in food premises are achieved through informal means: the inspecting officer discusses any contraventions with the proprietor, who then gives an undertaking to complete the necessary works. This process happens in hundreds of premises each year. However, it is sometimes necessary to take matters further, particularly where there is a past history where advice has been given, but sufficient improvement has not been made. This results in an Enforcement review. The Head of Service has delegated powers to recommend formal action and considers such cases by hearing the details of the matter from the case officer, with advice from the Council's legal representative. This formal cases were considered:

Prosecution for selling food stuffs after their use by date. Case referred to Horsham Magistrates Court (offender successfully prosecuted but subsequently acquitted due to Legal error).

Release of products of animal origin from London Gatwick Airport without notifying the Official Veterinary Surgeon or Official Fish Inspector (EHO)

### **Project work.**

This aims to maximise the use of time becoming available as the reactive work load fluctuates. Targets are set, often nationally (e.g. implementing new legislation, the food sampling programme, promoting food safety issues) but deadlines have greater long term flexibility. This work provides incremental and essential improvements to the service, but has the lowest priority. Several projects have involved "process" improvements and two food sampling projects were undertaken: We met the targets set in our annual food sampling plan, which included those samples forming part of other national sampling campaign by LACoRS.

The imported food team have developed a programme of targeted inspections on certain high risk imported food being imported through Gatwick. The information collated from this programme enabled them to bid successfully for a grant of £20,000 from the food standards agency. However, one of the high-risk flights stopped in 2007 resulting in much reducing sampling.

## **Management.**

This basically covers the processes required to run the team within the legislative, national and local requirements. In respect of the food service it includes:

- i) Developing the Staff. (e.g. Training, Monitoring)
- ii) Monitoring the Processes (including meeting targets, keeping procedures in line with the FSA framework requirements, Budgetary control)
- iii) Evaluating and Planning (such as creation of this service plan to meet framework requirements.)

### **6.2 Identification of any Variation from the Service Plan**

The only significant variation from last year's service plan was to carry out the FSA sampling project at the airport. However, as the FSA fully funded this project, there was no adverse impact on other areas of the service.

A number of category B food visits were also not completed in the correct time scales due to staff shortages.

### **6.3 Improving the Service, Responding to Challenges.**

#### **Improving Communication.**

The 2004 Best Value Review identified "communication" as an area requiring improvement, particularly in respect of explaining to outside bodies and customers what the service's work involves. We used a series of projects to create more effective frameworks for communication, which are now in use as part of our "day to day" work:

**Gatwick Health Control Unit.** Since passing the control of this service over to the Primary Care Trust, contact with the unit had become fragmented. A joint project was set up to rectify this. We have now produced a set of shared objectives and actions designed to address overlapping public health issues at London Gatwick Airport. This year we will work together to achieve these objectives. A meeting between the Group Manger and Duty Manager at the airport is now held on a quarterly basis to review targets set in the SLA.

**Hampshire Scientific Laboratory.** The increase in sampling activity has identified areas which should improve effectiveness and efficiency in working practices between CBC and the Laboratory. One of the outputs of the project will be a Service Level Agreement: essential when the success of formal action may rest on how and when a sample was analysed.

**Training and Promotions.** We have reviewed the opportunities for increasing communication through training sessions and provision of other information. Last year we:

- i) Provided a tour of the airport for Members. This received very good feedback and a tour will be offered again this year.
- ii) The food team have (with the occupational health team) piloted a newsletter about the work of the teams. This is to be extended to the other teams in Environmental Services.
- iii) Where food incidents (such as Sudan 1) have required action, pictures of products likely to be of concern have, where possible, been included with written text. This is particularly helpful where English is not a first language and we will use this approach again this year.
- iv) We have also purchased a “light box” which, when used with an ultra violet gel, can be used to show where hand washing has been ineffective. This proved such a great hit at the Junior Citizen annual event, we have received requests to roll it out in a number of local schools. This project will be developed in the coming year and will be expanded to include some of the community “healthier cooking” projects.
- v) We have supported national food safety promotions, such as “Foodlink” week but, due to resource constraints, our activity has been limited. This year we are trying a different approach and running a poster competition with the schools that are already within our network.
- vi) Safer Food Better Business we have held a practical workshop with 2 local restaurants to provide hands experience of using SFBB. We are also holding 10 seminars for local businesses and providing coaching on a one to one basis for 150 local food businesses operators (supported by FSA grant in partnership with Hastings Borough Council).

### **The Inspection Programme.**

Considerable changes occurred in January 2006, when the Food Hygiene legislation requirements for food businesses in respect of “Hazard Analysis of Critical Control Points” (HACCP) changed dramatically. The key issue is that food businesses are now required to provide written evidence of a system based on HACCP.

The FSA have provided support materials and a number of Local Authorities have carried out pilots to encourage businesses to provide the required systems. At present the pilots indicate it takes between 6 – 10 hours with each premises to go through the process with a success rate of between 5 – 80% for businesses actually completing of the required systems. Results were particularly poor where English is not a first language. For this reason, we are providing special support for businesses with this need.

Bearing in mind the importance of a completing accurate FSA returns, Crawley's UNI-form system presents considerable frustration. We had requested last year that the problems with the system be dealt with as a matter of urgency, or at least to enable us to start with a “clean sheet” in April 2007 (when the annual data collection commences.) This has not happened. However, we have been maintaining paper

records to address the contingent IT risk and thus will be able to complete the statistical returns within the required timescales. It has been indicated that the updates to the IT system will be completed in due course, which should increase our efficiency in the inputting and collation of data. We have also formed a “self help” group (in addition to the standard user group) with neighbouring authorities, to share good practices in the coming year.

### **Response to Reactive Work**

Having analysed the customer response surveys, we discovered some anomalies: the results had some extreme responses. The majority were scored good to excellent in respect of our service (even in cases where the customer had not received the anticipated result e.g. compensation for the business.) However, a small number were scoring as very poor. It is evident, having reviewed these, that there have been a number of breakdowns in communication with the customer, on occasions where they may have been passed through several contacts/departments before reaching the “right” officer. We have addressed this by liaising with the Trading Standards officers and supplying detailed lists of contact officers to administrative support and colleagues. The surveys will be monitored throughout the year to check whether this action has rectified the situation.

### **Project Work**

#### **Food Sampling**

We aim to meet the targets set in our annual food sampling plan, which included those samples forming part other national sampling campaign by LACORS.

The imported food team will again bid for a grant from the food standards agency. Their success, however, will depend on whether the food imported through London Gatwick Airport match those of interest to the FSA.

#### **Active Networking.**

As the Environmental Health section no longer has an officer dedicated to promoting health issues (which would have included food issues), we reviewed our current networks in order to use them in the most effective way. We have had considerable success in building links with the PCT and look to develop this project further, next year. We are also looking to increase partnership working with other enforcement bodies, including Trading Standards, DEFRA, HM Customs and other local authorities. Last year, a series of contact officers were identified, with a view to carrying out joint projects in the coming year. This year we will

Continue to build the network to provide tangible results which contribute to the objectives of the Local Strategic partnership and corporate plan.

Increase partnership working with other enforcement bodies, to include:

A joint event promoting a smoke free environment in food premises.

A “start up” pack for new businesses, with information and contact details from a range of agencies, including Trading Standards, Fire Safety and ourselves.

Work with Trading Standards, Fire Safety and other West Sussex Local Authorities to reduce the enforcement burden on businesses, in line with guidance from the Better Regulation Executive.

## **Management**

### **Procedural Review.**

Last year we introduced a new document control procedure and produced a programme to review procedures in a systematic manner. The new Food Approved Codes of Practice has resulted in a review of the existing procedures relating to the original codes. This year the procedural review will continue, with associated training for staff.

### **Staffing Allocation.**

Two senior staff left the authority during the period under consideration. One post has since been filled.

### **Staff Development Plan 2007/2008.**

Staff development will be driven by the current corporate appraisal system, which includes the production of a training plan. This will address generic training issues and identify where additional Continued Professional Development (as required by the FSA) is required. In cases where specific training needs can be identified (such as in developing a training plan for officers dealing with imported food) this is dealt with separately.

### **Quality Assessment.**

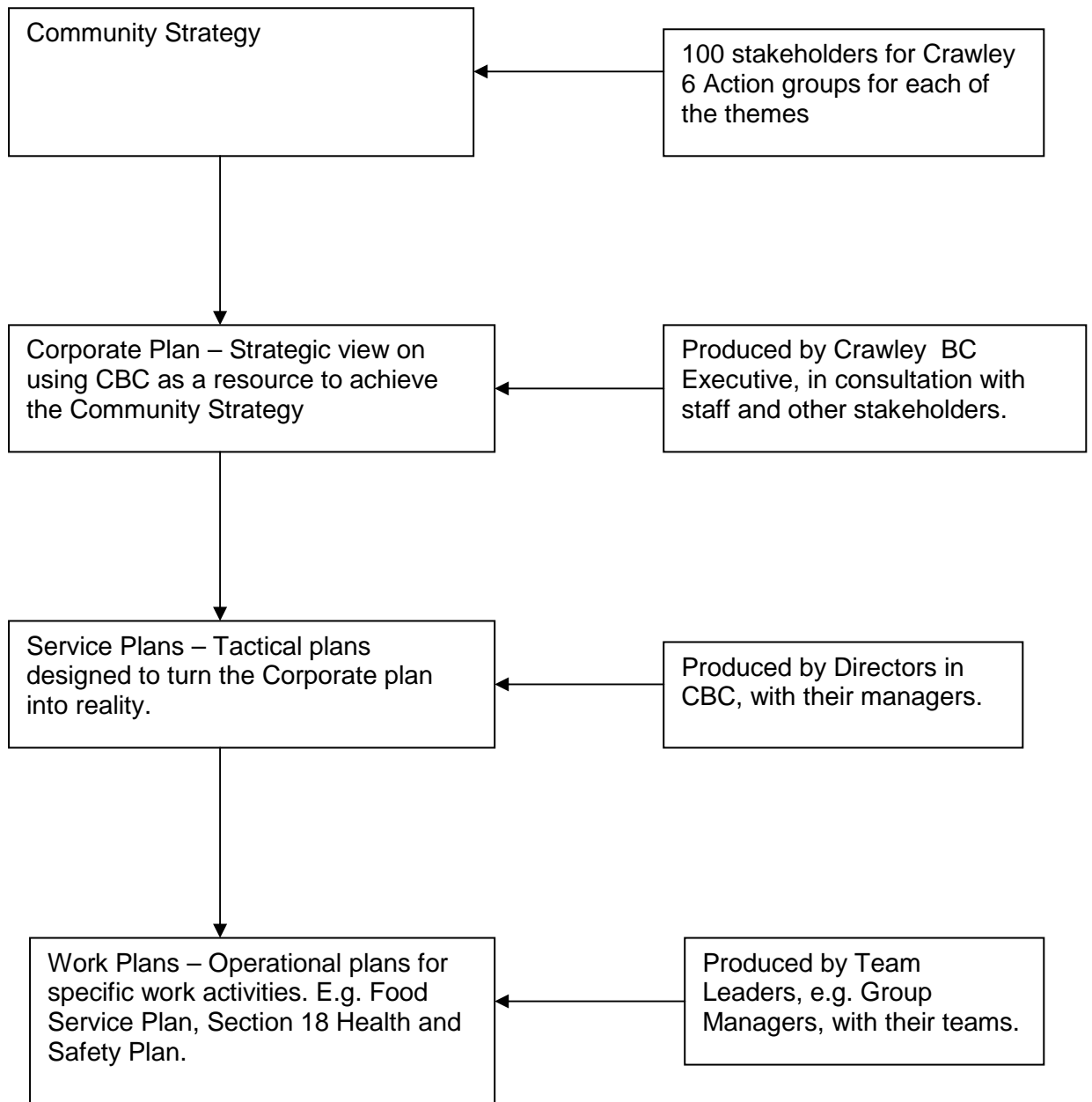
As described above, monitoring and evaluation is carried out using statistical means and by use of customer survey. Individual officers are also monitored, through reviews of inspection records and shadowed (i.e. accompanied visits.<sup>9</sup>)

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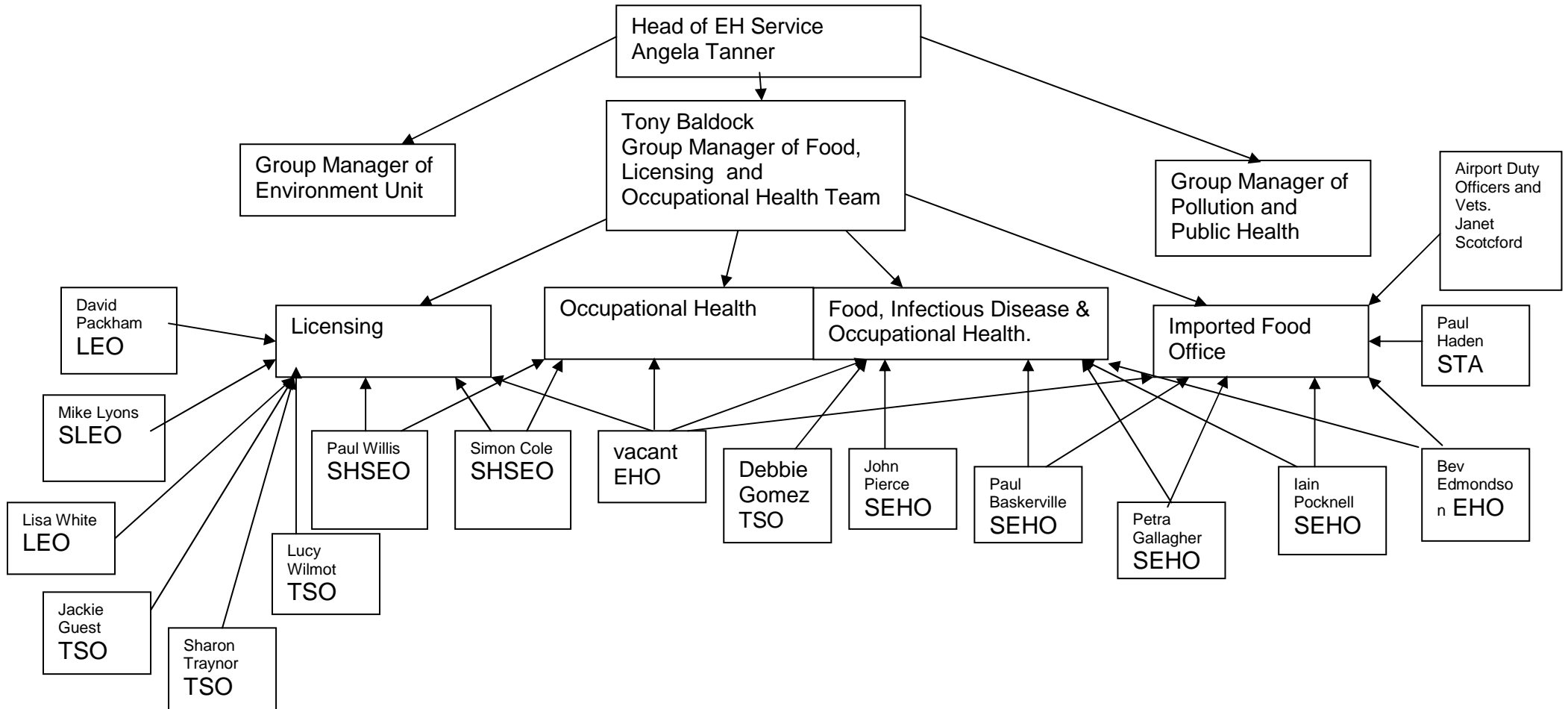
<sup>9</sup> Details of the procedure used to ensure the quality of the service is available on request.

## Appendix A

### Integration of Strategies and Plans



**Appendix B - Organisation of the Teams**



## **Appendix C**

### **Details of Food Analysts**

The three laboratories used are:

Hampshire Scientific Service (Public Analyst)  
Hyde Park Road  
Southsea  
Portsmouth  
Hampshire  
PO5 4LL  
Tel. 0239 2829501

Sussex and Surrey Environmental Microbiology Service (Public Health Laboratory  
Service and Food Examiner.)  
Royal Sussex County Hospital  
Eastern Road  
Brighton  
East Sussex  
BN2 5BE  
Tel. 01273 664 622.

Eurofins Scientific Ltd (Public Analyst )  
445 New Cross Road  
London SE14 6TA  
020 8694 9330