

Crawley Borough Council

	ES/215	G
--	--------	---

Report to Licensing Committee

10 June 2009

Approval of the Food Safety and Port Health Service Plan

2009 - 2010

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 A major revision to the Code of Practice for Food Hygiene inspections was undertaken by the Food Standards Agency in 2008 to ensure it meets the requirements of the Compliance Code for Statutory Regulators. This plan sets out how the Food Safety Service will use these changes to promote food hygiene compliance in Crawley and how this will compliment the Crawley Scores on the Doors Scheme.

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 will be 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. Due to the size of this document it is not attached to this report. A copy has been placed in the Members' Room. It is also available on the Document Management System (DMS) and is available on request from Legal and Democratic Services.
- 4.3 The Plan looks back over the previous year (i.e. 1st April 2008 – 31st March 2009) then forward to the coming year (i.e. 1st April 2009 – 31st March 2010)
- 4.4 It is not possible to seek approval of the Plan in April prior to the collation of statistical data for the Food Standards Agency as figures for resources are not available until the end of May.

5. Staffing, Financial and Legal Implications/Powers

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

6. Other Implications

- 6.1 This plan sets out the way Crawley Borough Council will achieve the requirements of National Indicator 184 Food Establishments in the Area that are Broadly Compliant with Food Law. Commentary is also provided on NI 182 business satisfaction with regulatory services.

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	

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.

Contact Officer:- Tony Baldock
Direct Line:- 01293 438220

Crawley Borough Council

Environmental Health

**Food Safety and Port Health Service
Plan**

2009-2010



Contents

Introduction

- 1 Service Aims and Objectives
- 2 Organisational Structure
 - Council Structure
 - Organisation Arrangements for the Food Safety Service
 - Training and Qualifications
- 3 Scope of the Food Service
- 4.0 Service Delivery
 - Food Complaints
 - Home Authority Principle
 - Advice to Businesses
 - Food Sampling
 - Control and Investigation of Outbreaks and Food Related Infectious Disease
 - Food Safety and Port Health Incidents
 - Liaison with Other Organisations
 - Food Safety Promotional Work
- 5.0. Resources
 - Financial Allocation
 - Staffing Allocation
 - Staff Development Plan 2008/2009
- 6.0. Quality Assessment
 - Assessing the Quality of the Service
- 7.0. Review Against the Service Plan 2008-2009
 - Scope of the Food Service
 - The Inspection Programme.
 - Response To Reactive Work
 - Project Work
 - Management

Appendices

Appendix A

Integration of Strategies and Plans

Appendix B

Organisation of Teams

Appendix C

Details of Food Analysts

•

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 regards 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 Service¹ 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 set out the risk based food inspection plan to be completed by officers from the Food and Occupational Health Team for the period 2008-2009 and includes other activities 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 has been completed.

This Food Service Plan plays a key role through its links to Public Health Strategy and Corporate Strategy. Food safety forms a key element in West Sussex Local Area Agreement by ensuring:

- Better health for all

¹ 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.

- Better skills for a better future

This will be achieved through enhancing the following outcomes through planned interventions, and the continuation of existing statutory functions in 2009 -2010. Our work areas compliment the new National Indicators set (NI) as detailed below. (Full definitions of the respective NI's are provided at end of this report):

- Improving workforce skills (NI 163, NI 171)
- Promoting health (NI 55, NI 56, NI 119, NI 121,)
- Retaining businesses and enabling them to grow (NI 172)

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 Environmental Health Enforcement Policy and its commitment to adhere to the Home Office Enforcement Concordat and the Regulators Compliance Code. Crawley has a diverse cultural mix of people as detailed in Table 1 below. Equality Impact Statements have been completed to ensure the Food Service meets the needs of the groups identified in the Census data 2001.

This service plan has also been written to embrace and comply with the Regulatory Compliance Code.

The 2009 – 20010 plan will also assists in meeting the revised themes of the 2008 – 2011 West Sussex Local Area Agreement.

Cultural Group	England	South East Region	Crawley
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)

1.0 Service Aims and Objectives

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:

- All food and drink produced, imported, prepared or sold within the Borough Crawley is in all respects safe and wholesome to eat;
- Food is handled, prepared and produced hygienically;
- The risk of contracting food poisoning or a food borne infection/injury are reduced and where possible eliminated;
- Owners/proprietors of food businesses and their staff understand and comply with their legal obligations to protect consumers;
- Food premises meet (at a minimum) the legal required standards in terms of structure, management and practices;
- 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;
- Complaints and concerns are dealt with fairly and promptly and that information is made available to the trade and other customers;
- 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:

- Achieve 100% of high risk food inspections in premises rated A, B and undertake planned targeted interventions in premises rated C (as defined by the FSA Code of Practice).
- To use alternative interventions in 90% of Food Businesses through the use of self auditing questionnaires in premises rated D and E.
- 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 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.

To investigate cases of food poisoning/food borne infection and to take all necessary measures 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.

To publish the results of Food Safety Inspections and encourage food businesses to perform to a high standard through the Crawley Scores on the Doors food hygiene rating scheme.

Links to Corporate Objectives and Plans

The Food Safety Plan is a key document within the Public Health Strategy and therefore compliments the aims of Corporate Plan. It is integrated into the key themes the Council has chosen to focus on, including:-

Our Communities: Safe healthy, cohesive and enjoyable

- Working for better health and health care. (**Priority 2**).

Our Economy: Thriving, vibrant and prosperous.

- Developing a sustainable local economy where a diverse range of local, regional and national interests flourish (**Priority 7**).

Our Council: Of which we can be proud.

- Delivering value for money services (**Priority 10**).
- Peak performing people (**Priority 11**)
- Creating a culture of efficiency and the habit of success (**Priority 12**).

The Food Safety and Port Health Service will strive to achieve these Council priorities by:-

- Working efficiently to continue to make the best possible use of resources.
- Working in partnership with other organisations.
- Implementing Crawley values to best service systems of the Borough.
- Working to achieve the Council's principles for sustainability.
- Being aware of cross-cutting issues and actively seeking to improve communication within the Council.
- Ensuring our activities are effective and well targeted to provide fairness to commerce and protection to the public and those at work by taking proportionate action at all times.

The Service has also been tested and audited against the Best Value scheme and has an improvement plan, which was approved by the Council in August of 2004.

2.0 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 stakeholders Decisions about how services are delivered are considered by an Overview and Scrutiny Committee and before being considered the Executive Members for approval.

The Council employs approximately 800 people in four Directorates comprising of fourteen Divisions. The Chief Executive of Crawley Borough Council is Lee Harris.

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 (Lee Harris)

- Policy and Performance
- Legal and Democratic Services
- Communications

Directorate of Environment & Housing (Peter Browning)

- Planning Services
- Environmental Services, which includes the food service.
- Housing

Directorate of Community Services (Phil Rogers)

- Amenity Services
- Arts
- Community Services

Directorate of Resources (David Covill)

- Finance
- Information Communications Technology
- Property Services & Procurement
- Customer Services
- Human Resources

The details concerning the approved structure are contained in the Council's Constitution².

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.

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:

- Sussex Food Study Group: Paul Baskerville.
- Sussex Food Liaison Group: Tony Baldock, Angela Tanner (Sussex Chief Officer's Representative)
- West Sussex Control of Infection Committee: Tony Baldock/Paul Baskerville (organised by Crawley's Consultant in Public Health Medicine).
- Water Quality Liaison Meeting: Paul Baskerville (organised by Sutton and East Surrey Water).
- Association of Port Health Authorities (APHA): Iain Pocknell (Secretary of Aircraft as Food Premises Group)
- Chartered Institute of Environmental Health (CIEH): Beverley Edmondson (Centre Councillor Port Health Special Interest Group)
- 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).
- 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.
- 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 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.

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: Mrs C Reynolds, Health Protection Agency, Royal Sussex County Hospital Eastern Road Brighton BN2 5BE

- Public Analysts:
- (1) Hampshire Scientific Services, Hyde Park Road, Southsea, PO5 4LL
 - (2) Eurofins Scientific Ltd. Jeremy Wotton, 445 New Cross Road. London, SE14 6TA
 - (3) Kent Scientific Services Ltd. 8 Abbey Wood Road Kings Hill West Malling ME19 4YT

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, where they have been funded by external agencies, using grants..

Contracts are awarded in accord 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 the 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 due to the cost involved.

3.0 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 1990, 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, Official Feed and Food Control Regulations 2006.

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 takes 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 9109102009-2010.

Responding to complaints of unacceptable premises and practices and complaints about fitness/wholesomeness of food. Where a complaint is received concerning a food business, a visit is made as soon as possible regardless of the last programmed visit date and an 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.

Liaison with Gatwick Health Control. Gatwick Health Control assists in the enforcement of the International Health Regulations 2005 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.

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 deals 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.

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 provide cover at weekends.

The Imported Food Office staff undertake 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 to decide whether consignments of food can be allowed to enter the EU for free circulation.

A new Border Inspection Post has now been constructed at London Gatwick Airport to replace the ageing non complaint facilities. This has provided the airport operators with one of the most modern and fully EU compliant Border Inspection Post in the UK.

Enforcement Policies

Crawley Borough Council adopted the enforcement concordat in December 2001. The Food Safety Plan has also been audited against the Department for Business Enterprise and Regulatory Reform 'Regulators' Compliance Code in January 2008 and found to be satisfactory and compliant. Further work is planned in 2009-2010 concerning the potential for using fixed fee notices arising from the McCrory Review.

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. This is consistent with the Regulators Compliance Code.

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 the Head of Service. This is within the parameters of her delegated powers as set out in the Constitution.

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.

4.0 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 its planned interventions 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
A	≥92	At least every 6 months
B	≥72	At least every year
C	≥42	At least every 18 months
D	≥31	At least every 2 years
E	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 2009, we are able to estimate that 303 premises will need to be inspected 09/10.

Table 2 illustrates the number of premises in Crawley and Gatwick, according to their risk rating, broken into the categories provided by the FSA on current registration details due for inspection in the next 12 months..

Risk Rating	Points Range	Due for Inspection
A	≥92	4
B	≥72	43
C	≥42	214
D	≥31	25
E	Below 31.	23

Table 2 Ratings of Premises Due Food Safety Interventions 2009 - 2010

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.

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 and Port Health Team is part of the Environmental Health Service located at the Town Hal and Timberham Housel.

The office at Timberham House (London Gatwick Airport), which provide staff for the Imported Food Service is open from 8.00am to 5.00pm 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 to 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. A Duty Officer, 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.

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 food business 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 EU 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 six areas, four being made up of geographic blocks containing approximately equal numbers of businesses with North and South Terminals of Gatwick Airport forming the fifth and sixth respectively.

Periodic checks are made up 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 the planned interventions. The change to the Code of Practice issued by the Food Standards Agency 2008 now allows the Council to base the interventions programme on outcomes as opposed to planned inspections as has historically been the case. As a result of this change it is proposed that additional interventions will be made concerning food premises with 1 star or less as per the rating given by the Council's Scores on the Doors food hygiene award scheme.

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.

Food Complaints

All food complaints, including complaints about imported food are recorded in the UNiform 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:

- Possible Chemical Contamination
- Foreign Bodies in food.
- Food Hygiene (Premises)
- Food Labelling (including pass sell by date etc)
- Microbiological – mould etc
- 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.

A possibility exists that Crawley Borough Council may be designated a Primary Authority as a result of the Regulatory Enforcement and Sanctions Act 2008.

It is therefore possible that Crawley Borough Council will be a Primary Authority for the following local businesses.

Astraeus Airlines
Virgin Atlantic
Pasta Reale

Crawley Borough Council is also a lead member on the Aircraft as Food Premises working group and 2 senior Environmental Health Officers represent the service on FSA and APHA working parties.

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.

Food Sampling

We intend to complete the food samples shown below during 2009 to 2010, subject to availability of suitable products in the Crawley area.

Sample Type	Sample Size & Number	Laboratory and Test	Type of Premises	Sampling Coordinating Body
Meats Swabbing Cleaning Cloths	5	Microbiological (EColi)	Butcher Shops	LACoRS
Water	24	Microbiological	Aircraft and browsers LGW	CBC Monitoring
Imported Foods	50	Pesticides	Cargo Sheds	FSA
Sandwiches	5	Microbiological (Listeria)	Retail	LACoRS
Ice from Ice Machines	10	Microbiological	Licensed Premises	Sussex Food Liaison Group

Table 2 Sampling Activity Planned for 2009 - 2010

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.

A number of ad hoc food and environmental samples will also be collected during the year depending conditions found when undertaking interventions.

See Appendix. C for details.

Control and Investigation of Outbreaks of Food Related or Other Infectious Disease

Information regarding infectious disease is received by 3 routes:

- Complaints from people suffering for the symptoms of an infectious disease, normally alleging food poisoning
- 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.
- Notification from Gatwick Health Control regarding sick passengers arriving at the airport.

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 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.

Port Health Legal Responsibilities

The Public Health (Aircraft) Regulations 1979 – These are the responsibility of appropriate local or port health authorities, and elements are normally delegated through the appointment of authorised officers and medical officers. Medical Officers are appointed by the local authority and are usually known as Port Medical Officers (PMOs).

Health and Social Care Act 2008 – was introduced into Parliament in November 2007. The public health protection sections provide a comprehensive set of public health measures to help prevent and control the spread of serious diseases caused by infection and contamination. The Bill received royal ascent in July 2008 and implementation will follow.

The International Health Regulations (2005) – these are legal instruments binding on the UK but do not confer powers or responsibilities until incorporated into domestic law. They are designed to provide maximum security against the international spread of threats to public health with minimal interference with world traffic and trade. Although the WHO is responsible for the regulations, they are agreed collectively by its member states.

The current modus operandi as regards food poisoning and port health is as follows:-

Food Poisoning

- Contact the CPHM/CCDC immediately on receipt of information pointing to a possible food poisoning issue and take instruction.

- 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.
- Liaise, where necessary, with other local authorities within three working days notification.
- Visit and carry out investigations where premises are identified in this area, ideally on the day of notification or on the next day.
- Take the samples of food and other evidence as required and arrange for their delivery to the appropriate laboratory for examination.
- 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.
- Assist with the formulation of and send out questionnaires, when instructed by the CPHM as a follow-up to the investigation.
- Contact those who have been involved with the case, at the conclusion of the investigation and inform them of the outcome.
- 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.
- Be part of any outbreak control team/or review team.

The food team are unable to:-

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

Port Health

Public Health (Aircraft) Regulations 1979 (PMOs) and Responsibilities of the Port Medical Officers

The responsibilities in this section refer to the current ones contained in the Public Health (Aircraft) Regulations 1979 as amended 2007. In order to perform these medical officers and authorised officers must be appointed by the local authority. There is currently a review of these UK regulations to incorporate the International Health Regulations 2005 (IHR) through the Health and Social Care Bill which received Royal Assent in July 2008.

The first step in the response to a public health aviation incident is the international requirement that the captain of the aircraft arriving at an international port of entry notify the public health authority when there is a suspected communicable disease on board. IATA has supplied guidelines for cabin crew and ICAO has revised the procedure which facilitates this process. The responsibility for management of such an event rests primarily with both the Health Protection Agency and the port operator

(or 'competent authority'). Local plans should incorporate this and ensure a means of receiving and acting on such events.

Once notified, there is a legislated requirement that an appropriate response by the medical officer is within three hours of an aircraft being detained. For maritime incidents this is twelve hours. This may cause difficulty and local plans should reflect this.

A summary of current powers which must be provided is given below and DH has given an endeavour to retain all with some revisions incorporated, reference to the actual act is necessary. I have indicated where a medical officer (as opposed to an authorised officer) is required:

- Regulation 7 – Inspection of aircraft (medical officer or authorised officer) must do
- Regulation 8 – Examination, etc, of persons on aircraft (medical officer) must do if requested
- Regulation 9 – Persons leaving aircraft with infectious disease (medical officer) may do
- Regulation 10 – Notice to customs officer by authorised officer
- Regulation 11 – Supply of information, etc, by commanders (including death on board from infectious disease) to authorised officer
- Regulation 12 – Notification of infectious disease, etc, on board to authorised officer
- Regulation 13 – Deratting and disinfection of aircraft (authorised officer)
- Regulations 14-19 – Detention and release of aircraft (medical officer for some)
- Regulation 20 – Surveillance of persons from infected areas (medical officer)
- Regulation 21 – Removal of infected persons from aircraft where required by commander (medical officer must do)
- Regulation 22 – Removal of aircraft to another customs airport (authorised officer)
- Regulation 25 – Aircraft alighting elsewhere than a customs airport (authorised officer)
- Regulations 27-28 – Outgoing aircraft, examination of persons proposing to embark (medical officer)
- Regulations 32-34 – Charges and expenses of health authorities
- Regulation 36 – Aircraft unwilling to comply with regulations (authorised officer).

The provider of the service must notify the local Health Protection Unit in a timely manner, incidents when a commander of an aircraft, ship or train has notified port health of a suspected public health event. Under the International Health Regulations there are procedures whereby WHO (through the UK National Focal Point) must be notified of Public Health Emergencies of International Concern and this is done through the local Health Protection Unit who report it to the HPA Centre for Infections.

The provider will agree specific information systems with the Health Protection Agency to pass on information with the details of entrants through an electronic method and this will inform protocols.

- All cases relating to passengers that are taken ill on board an aircraft are dealt with directly by the Port Medical Officer in accordance with a Service Level Agreement signed between CBC and GHC..

Infectious disease notifications to Crawley Borough Council 2006-2007, 2007 – 2008 and 2008 -2009 are illustrated in Table 3.

Notifiable Diseases for April 2006 – April 2008

Notifiable Disease (F indicates food borne)	06/07	07/08	08/09
Campylobacter (F)	100	103	119
Salmonellosis (F)	21	15	19
Tuberculosis	27	11	N/A
Gastroenteritis (F)	2	2	1
Giardiasis (F)	13	7	12
Dysentery (F)	6	2	1
Cryptosporidiosis (F)	3	5	7
Meningitis	1	0	0
Measles	8	3	2
Typhoid (F)	2	2	1
Miscellaneous (F)	4	1	2
Mumps	5	4	2
Rubella	1	3	2
Scarlet Fever	3	5	2
Cholera (F)	0	1	1
Clostridium (F)	0	0	0
E. Coli (F)	2	1	1
Hepatitis A			1
Hepatitis B	1	2	0
Malaria	1	1	1
Paratyphoid (F)	0	1	0
Whooping Cough	1	5	0
Total	211	188	174

Table 3 Notifications of Infectious Disease

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.

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.

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 and the Head of Environmental Services attend the Sussex Food Liaison Group as the Chief Officers' Group representative and operational manager accordingly.

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.

Regular meetings are also held with Gatwick Health Control to ensure that the Council obligations under the Public Health (Aircraft Regulations) 1979 are met. Substantial legislative changes have arisen further to the revision of the International Health Regulations 2005 and changes to the manner in staffing is provided to GHC.

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:-

- Passed on to neighbouring authorities who regularly run food hygiene courses.
- Training in food safety is co-ordinated by Crawley Officers and includes CIEH courses. In 2008 – 2009 it is hoped that a number of food safety training initiatives will also be undertaken to assist businesses with 0-1 stars as according the Scores on the Doors scheme. At the time of writing this report 91 premises fall within the category. Staff time will be diverted from number driven targets concerning inspection numbers to achieve outcome driven measures in accordance with the findings of the Hampton Report. Whilst it may be problematic to charge for Safer Food Better Business seminars and training it is anticipated that a number of CIEH Foundation Food Hygiene Courses will be delivered to local businesses at low cost or a small surplus which will be used to provide a free course to a local schools for pupils entering the work place.

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.

Scores on the Doors

Crawley Borough Council successfully launched its own Scores on the Doors Food Hygiene Award Scheme in April 2008. This is the first such scheme in Sussex to be launched by a District as opposed to a Unitary Council.

This scheme provides the public with information concerning the standards of food hygiene within the local area and will also be very useful in identifying future interventions in failing local businesses.

A National Scheme has now been proposed by the Food Standards Agency using six tiers in keeping with our own local scheme.

This initiative has proved a great success resulting in positive publicity for both the Council and local food business operators alike. It has also enabled the Council to exceed the FSA target of 75% of premises being broadly compliant with food law (NI184) in our first year of operation having achieved an 84% compliance rate overall. The star ratings for all premises as at the 1st April 2009 are shown below in figure 1.

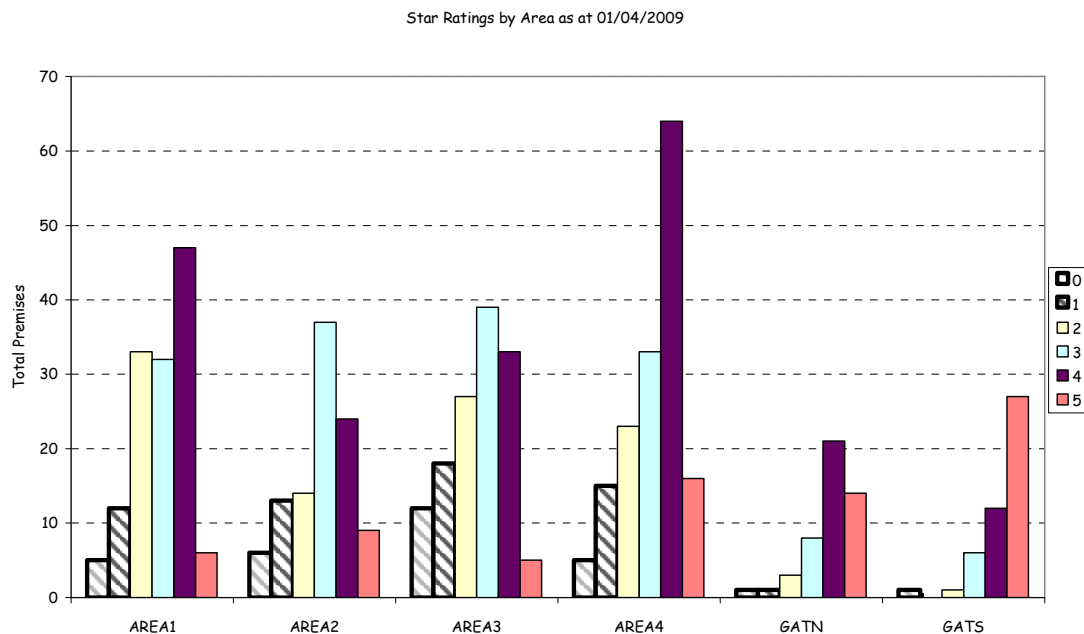


Figure 1 Scores on the Doors Ratings 1st April 2009

Significant changes to the official returns required by the FSA in 2009 have also shown the decision to launch such a scheme as very timely due to similarities in the data being collected.

Whilst an appeal scheme has been created for food business operators who may be unhappy with their rating only 3 appeals have been received in the first 12 months of operation all of which were successfully defended.

The creation of a Workplace Wellbeing Officer (funded entirely by the Primary Care Trust) in 2009 – 2010 will it is hoped provide an opportunity to develop further food related initiatives dealing with healthy eating in the workplace.

5.0 Resources

Financial Allocation

The budget available to the Food Service is as follows:

Food Safety Team			
C1023	10010	Permanent Staff Pay	126180
C1023	10030	Overtime	5880
C1023	10100	Nat. Insurance - Empers Cont.	10470
C1023	10101	Nat. Insurance - Car Lease	800
C1023	10110	Employers Pension	16780
C1023	10210	Car Leasing - Council Cont.	7160
C1023	10240	Professional Subscriptions	410
C1023	10400	Qualification Training	560
C1023	10410	Course/Seminar Fees	1000
C1023	10420	Training - Travel	100
C1023	10600	Personal Accident Insurance	20
C1023	10601	Employees General Insurance	940
C1023	10610	Eye Tests	100
Sum: Employees			170400

Table 4 Town Hall Based Staff Total Cost (includes on costs)

Port Health			
C1021	10010	Permanent Staff Pay	102380
C1021	10030	Overtime	5990
C1021	10100	Nat. Insurance - Empers Cont.	8500
C1021	10101	Nat. Insurance - Car Lease	730
C1021	10110	Employers Pension	13620
C1021	10210	Car Leasing - Council Cont.	6520
C1021	10240	Professional Subscriptions	280
C1021	10600	Personal Accident Insurance	10
C1021	10601	Employees General Insurance	470
C1021	10610	Eye Tests	50
Sum: Employees			138550

Table 5 Timberham House Based Staff Total Cost (includes on costs)

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. It should also be noted that with exception to 3 of the Officers employed within the Food Safety and Port Health Teams all are dual tasked and undertake Health and Safety enforcement duties as part of the role.

Type of Officer	FTE's Food Safety Service based at the Town Hall	FTE's Imported Food Service London Gatwick Airport
Other Management	0.05	0.05
Group Manager	0.25	0.15
Senior EHO	2.5	1
EHO	0.6	0.6
Technical Support	1	1
Administrative Support	.75	1
Official Veterinary Surgeon	0	.5

Table 6 Staff Resources

6.0 Quality Assessment

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: We also actively collect data to provide information for the calculation of NI 182 Satisfaction of Businesses with Regulatory Service. In 2009 – 2009 we achieved a score of 84% of local business rating our service as good.

The Group manager operates a monitoring system, which reviews

- Consistency and quality of inspections, by monitoring inspection forms
- Consistency and quality of record keeping, by review of files
- The quality of the service, as rated by our customers, by review of regular customer surveys.
- Shadow visits in which the Group manager accompanies the officer concerned, to give feedback and check consistency of approach.
- Consistency and quality of the application of policies and procedures, by including an update session in the regular team meetings.
- 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 (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 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 performance: check by Group Manager as and when required.)

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

Completion of LACORS food sampling programme. (Measure 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 performance: shadowed inspections on first appointment, then each inspection paperwork vetted by Group Manager.)

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.

It is hoped that a number of Chartered Institute of Environmental Health basic food hygiene courses will provided as no cost to the Council in 2009 – 2010 using the Civic Hall. A course regarding the identification and fitness of wet fish has also been organised in association with the Worshipful Company of Fishmongers to be held at Central Sussex College.

The creation of a Wellbeing Officer post funded by the PCT but based with this team has also opened up a possibility to explore a nutrition based scheme to operate in Crawley. This post has not yet been filled but plans are being drawn up to revisit scheme such as Heartbeat for introduction into local businesses and workplaces to include schools.

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:

Developing the Staff. (e.g. Training, Monitoring)

Monitoring the Processes (including meeting targets, keeping procedures in line with the FSA framework requirements, financial control)

Evaluating and Planning (such as creation of this service plan to meet framework requirements.)

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 Manager and Duty Manager at the airport is now held on a quarterly basis to review targets set in the SLA. The SLA is also being reviewed this year and improvements to the data quality capture methods have been proposed.
- Kent Scientific Services. We have appointed an additional public analyst in 2009 to minimise the costs of transporting samples to the laboratory and allow samples to be delivered directly by the Port Health staff.

Staff Development Plan 2009 - 2010.

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. A competency matrix has also 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 although they are 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 deals 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.

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 that 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.

Significant changes have been made to the data that Local Authorities are now required to collect as a result of the Hampton Review and it is no longer necessary to supply a list of planned inspections to the Food Standards Agency in April each year. We are now required to supply all the data concerning the food premises in our area and with a view to monitoring the level of compliance with food hygiene law respectively. The Food Standards Agency's own target is to ensure that 75% of Food

Businesses in England are fully compliant by 2010 (this equates to achieving a score of 0 or 5 for confidence in management as defined by the code of practice). It has not yet been possible to provide the required electronic return to the Food Standards Agency as the UNiform system has not been maintained as regards required upgrades.

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.

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 that contribute to the objectives of the Local Strategic partnership and corporate plan.

Increase partnership working with other enforcement bodies, to include Trading Standards, DEFRA and State Veterinary Service.

Procedural Review.

The Environmental Health Service is currently undertaking a Regulatory Services Peer Challenge Review. An action plan will be produced as a result of this exercise and any matters identified as Areas for Improvement will be prioritised for action during the next 3 years.

7.0 Review of Work Programme 2008 - 2009

Identification of any Variation from the Service Plan

The major deviation from the service plan in 2008-2009 was due to launch of the Crawley Scores on the Doors food hygiene rating scheme. This has proved to be a great success and will play a crucial part of the interventions used by the Council in driving up food hygiene law compliance in Crawley

A diagram showing the relationship between the division's plans is attached as Appendix A. Close links exist between the Food Safety Team and Port Health

functions which this service has responsibility for and a joint plan has been introduced for 2009-2010.

The Risk Based Interventions 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 shows 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	8	79	184	35	27	10
In Year Changes*	1	79	10	15	1	30
Number of inspections achieved	9	79	194	20	28	40

Table 7 Interventions Achieved 2008 - 2009

The Council's policy is to complete 100% of planned interventions in accordance with the FSA risk rating system.

In 2008 – 2009 we completed 370 inspections exceeding the years target by 38 visits. The team therefore achieved an overall performance level in this area of 111.44 %.

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:

- Food complaint investigations (such as foreign objects in food.)
- Food poisoning investigations.
- Investigations into complaints of poor food safety at premises
- Food incidents (e.g. national product recalls, such as with Sudan 1.)
- Advice to businesses (e.g. new businesses)
- Clearance of consignments of imported food through Gatwick Airport.
- 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. In the latter 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.

The rate of *Campylobacter* food poisoning rose from 103 cases to 117. This organism is the most common form of food poisoning causing gastro intestinal illness in England. It is acquired from eating contaminated food. Most raw poultry is infected with the disease. A large number of food poisoning cases occur within the home and this is one of the potential reasons that reduction has not occurred in recent years. This service assists the Food Standards Agency with this initiative through educational events such as Food Safety Week and visiting local schools and assisting with elements of the national Curriculum regarding Food. *Campylobacter* investigations are undertaken by way of survey on behalf of the CCDC.

The rate of *Salmonella* poisoning increased during this period from 15 to 19 cases. Whilst it is possible that many cases of this type of food poisoning also occur within the home it is hoped interventions locally such as Safer Food Better Business have helped reduced the number of cases reported.

No significant change has been seen with regard to other food borne infections acquired directly form food or within the UK. A slight increase in *Cryptosporidium* and *Giardiasis* infection is noted which may be due to weather conditions affecting water supply and storage.

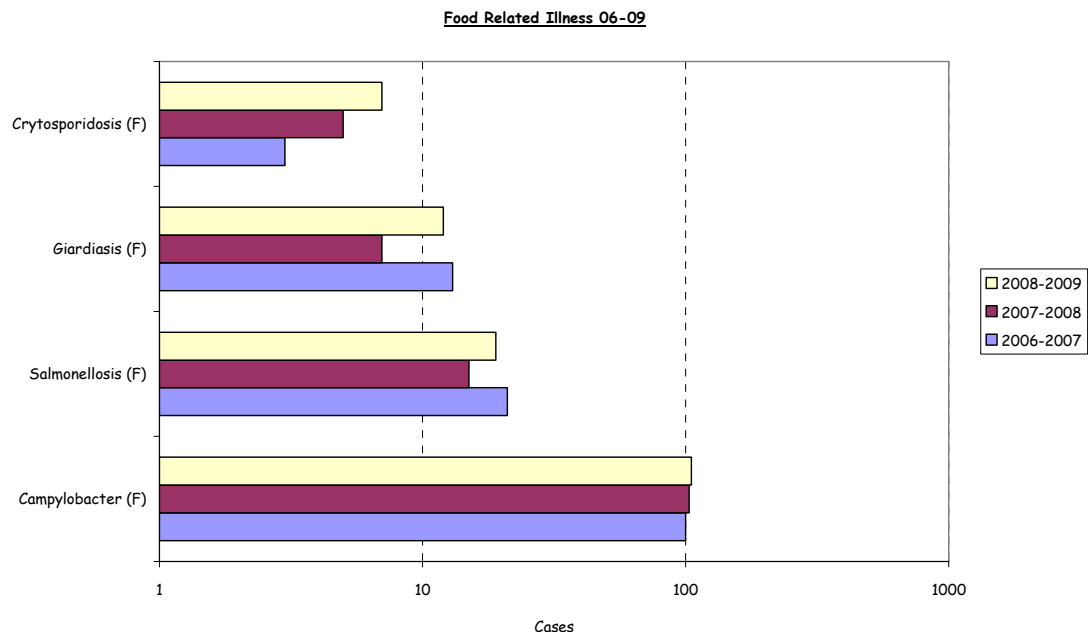


Figure 2 Reports of Food Related Illness

The underlying trends in this data show that *Campylobacter* infections continue to be the most common form of food poisoning encountered in Crawley with a small year

on year increase. A small increase in salmonella cases and cryptosporidiosis was also seen last year as noted above.

Infectious Disease 08 - 09 by Wards

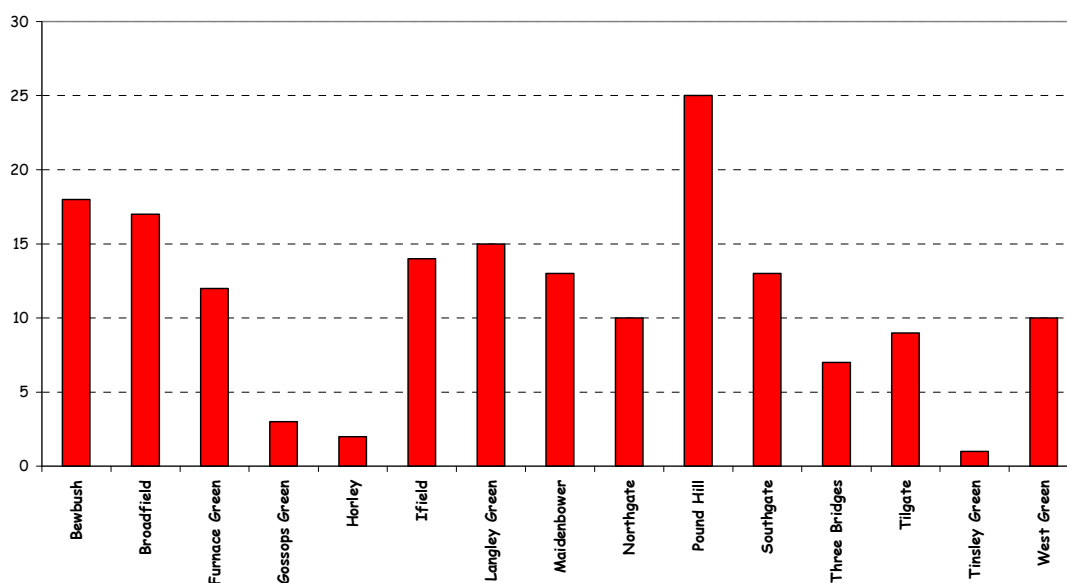


Figure 3 Reports of Notifiable Infectious Disease by Ward Area

It is interesting to note that the more affluent Wards within Crawley do not appear to follow the normal response between income and poor health in that a higher incidence of illness is apparent. This is due to food poisoning organisms but why such a difference should exist is not clear. It is possible that either the General Practitioners serving these areas are better at report such illness or residents are more likely to visit their Doctor when suffering from such conditions.

Investigations into complaints of poor food safety at premises

Overall number of complaints received.

Type of Complaint	Number of Complaints 2006 - 07	Number of Complaints 2007 - 08	Number of Complaints 2008 - 09
Possible-Chemical Contamination	3	2	1
Foreign Bodies in food.	29	14	9
Food Hygiene (Premises)	54	51	56
Food Labelling (inc. out of date etc)	6	6	5
Microbiological – mould etc	11	9	14
Suspected food poisoning	42	22	17
Food advice*		27	26
Total	145	131	128

Table 8 Food Type Complaints 2008 - 2009

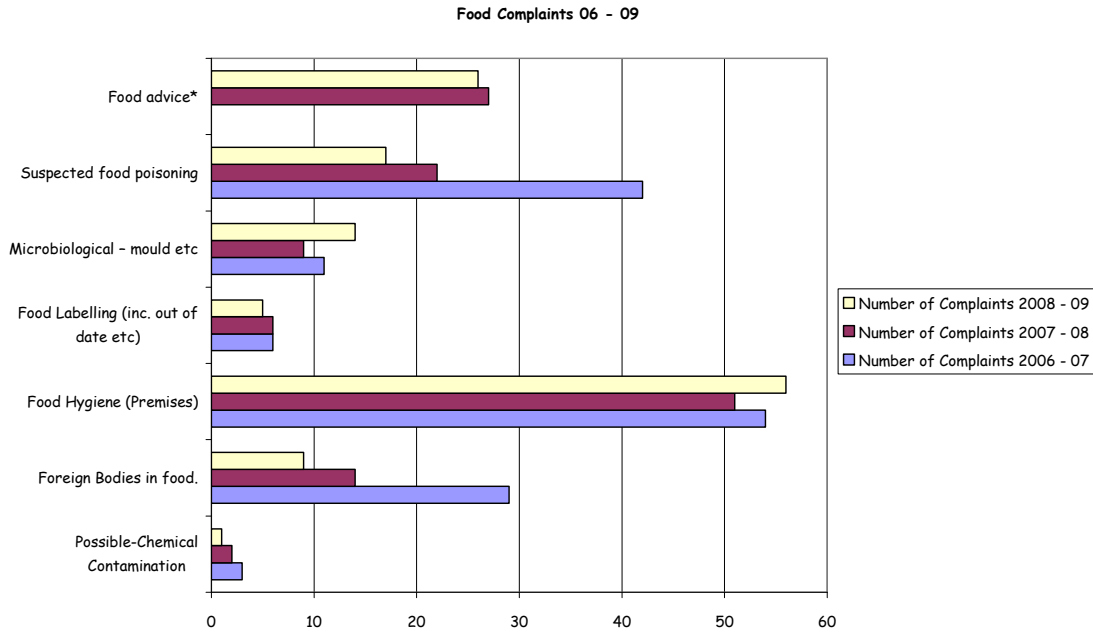


Figure 4 Trends of Food Type Complaints

Overall the trends above indicate- a continued reduction in the number of cases of suspected food poisoning and foreign bodies found within food and a slight increase in complaints about conditions in food businesses. This demonstrates the effectiveness of the Food Safety Team in improving food hygiene standards.

Food Sampling

The team participated in the LACoRS National Sampling plan and local Sussex Food Liaison Group sampling initiatives in 2008 – 2009. A number of ad hoc local samples were also taken to investigate food hygiene practices related to cleaning. In total 94 samples were taken. The results of the samples have been divided into satisfactory and unsatisfactory below. The high failure rate for cleaning cloths and surface swabs indicates significant problems associated with cleaning practices. In all cases where sample failures were recorded follow up action and secondary sampling was undertaken.

Food Samples 08/09

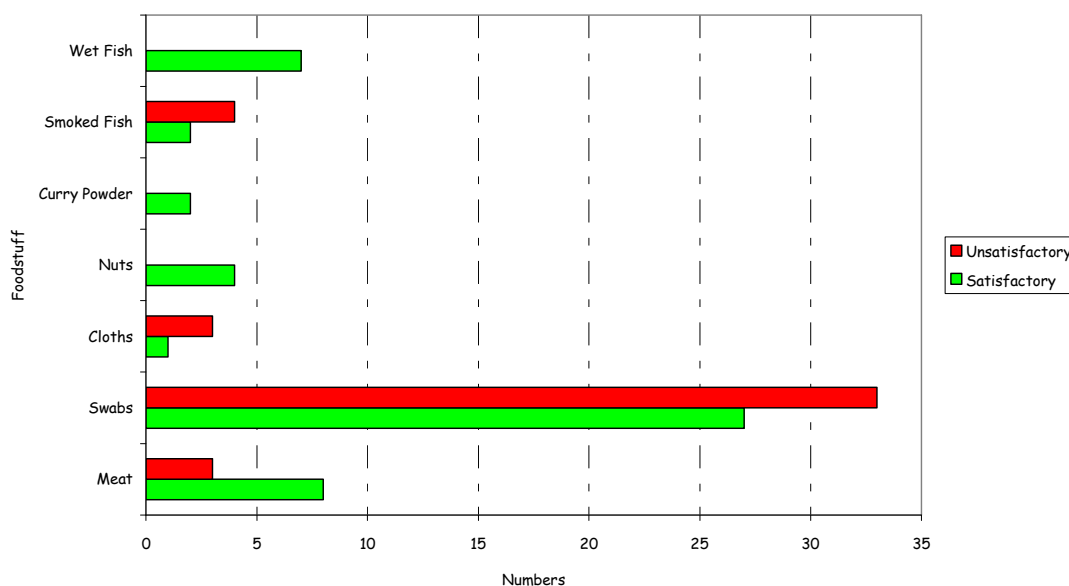


Figure 5 Food Sampling Activity

Imported Food Samples

Due to the dramatic downturn in trade at Gatwick Airport it was decided to opt out of the Food Standards Agency imported food sampling programme at points of entry to enable investigation of potential in land problems. In 2008 – 2009 53 samples were taken and analysed using the services of Hampshire Scientific Services. The results of this sampling are shown below. All sample failures were investigated and a request for follow up action was made to the originating local authorities in each case. Labelling offences were also brought to the attention of West Sussex County Council as this area of enforcement falls within their remit.

Feed / Food stuffs	Type of Analysis	No of Analyses	No of Adverse Results
Pumpkin and Melon Seeds	Aflatoxin	0	0
Spices	Aflatoxin	13	1
Instant Coffee	Ochratoxin	4	0
Various food	Arsenic	5	0
Imported food	Salt	4	0
Peanuts and peanut products	Aflatoxin	11	7
Bread/flours	Ochratoxin	5	0
Other fish products	Fish Content	3	0

Table 9 Imported Food Sample Results (a)

Feed / Food stuffs	Type of Analysis	No of Analyses	No of Adverse Results
Pumpkin and Melon Seeds		0	0
Spices	Ochratoxin	13	4
Instant Coffee			
Various food			
Imported food			
Peanuts and peanut products			
Bread/flours	Aflatoxin	1	1
Other fish products	Salt	2	2

Table 10 Imported Food Sample Results (b)

Feed / Food stuffs	Type of Analysis	No of Analyses	No of Adverse Results
Pumpkin and Melon Seeds		0	0
Spices	Quantitative colours/sudan	22	0
Instant Coffee			
Various food			
Imported food			
Peanuts and peanut products	presence of foreign matter	1	1
Bread/flours		0	0
Other fish products	Microbiological Spoilage	4	1

Table 11 Imported Food Results (c)

Feed / Food stuffs	Analyses	No of Analyses	No of Adverse Results
Pumpkin and Melon Seeds	Labelling	0	0
Spices	Labelling	18	8
Instant Coffee	Labelling	4	1
Various food	Labelling	5	4
Imported food	Labelling	4	3
Peanuts and peanut products	Labelling	10	5
Bread/flours	Labelling	6	4
Other fish products	Labelling	5	4
Other	Labelling	0	0

Table 12 Imported Food Sample Results (d)

Advice to businesses (e.g. new businesses)

We always offer advice and recommendations during risk based premises inspections. We also gave advice and coaching to over 30 businesses through the Safer Food Better Businesses initiative to continue work following on from the Food Standards Agency Grant.

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. The consignments received at the Border Inspection Post are shown below in table 4 below.

Weight of Consignment	APHA Banding for Charging Purposes	Totals 07/08	Totals 08/09
1-100kg	Band 1	229	68
101-1000kg	Band 2	352	89
1001-5000kg	Band 3	307	131
>5001kg	Band 4	85	75
Totals		973	363

Table 10 Imported Food Consignments Gatwick Airport

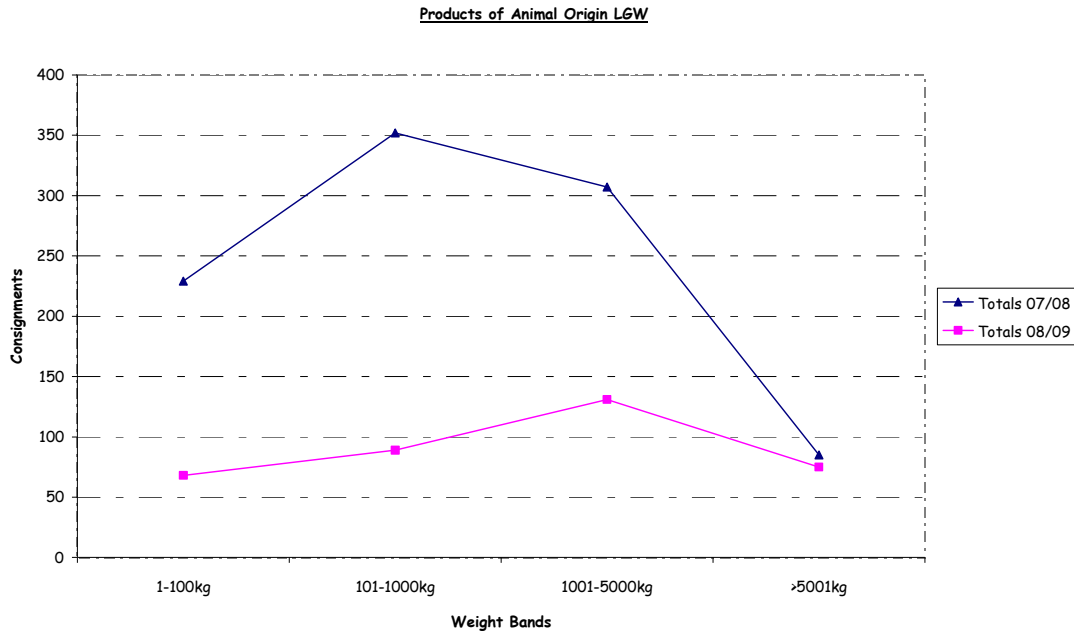


Figure 6 Imported Food Consignments Arriving at Gatwick Airport

As a result of the opening of T5 at Heathrow and the general economic downturn in trade globally the numbers of consignments of products of animal origin arriving at Gatwick dropped significantly as shown above. It was therefore necessary to reduce the opening hours of the Imported Food Office and dispense with a Duty Officer after 17.00 hours to ensure costs were controlled accordingly. The Port Official Veterinary Officers hours were also reduced removing cover arrangements for weekends and the need for their attendance on a Monday again to save costs. The remainder of the team at this location undertake a dual role in respect of Port Health and the enforcement of other public health legislation at the airport thus further reductions would not be possible. This has realised £25,000 in savings in 08/09.

Formal Action arising from investigations or inspections.

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. Formal Cautions must be discussed with the Chair of the Licensing Committee. These formal cases were dealt with:

- 17 Hygiene Improvement notices (an increase of 15 from 2007 – 2008)
- A Formal summons has been served for numerous offences reacting to food hygiene in local food premises due to proceed to Court in 2009.
- 4 Police and Criminal Evidence complaint taped interviews with representatives from McDonalds resulting in review and improvement to the Environmental Services enforcement policy.

Training and Promotions.

We have reviewed the opportunities for increasing communication through training sessions and provision of other information. In 2008 -2009 we:

Assisted Thomas Bennett Community College to deliver the food safety elements of their teaching syllabus providing direct teaching support.

Continued to produce a newsletter about the work of the teams in Environmental Services for Elected Members. This is to be extended to the other teams in Environmental Services.

We have shown 500 children from 3 local schools how to wash their hands correctly using a "light box" and ultra violet gel. This demonstrates where hand washing has been ineffective.

2 seminars for local businesses and provided coaching on a one to one basis for 30 local food businesses operators.

Attending Pubwatch to discuss the Scores on the Doors Food Hygiene scheme to local licensees.

Guest speaker at the local Chamber of Commerce business breakfast.

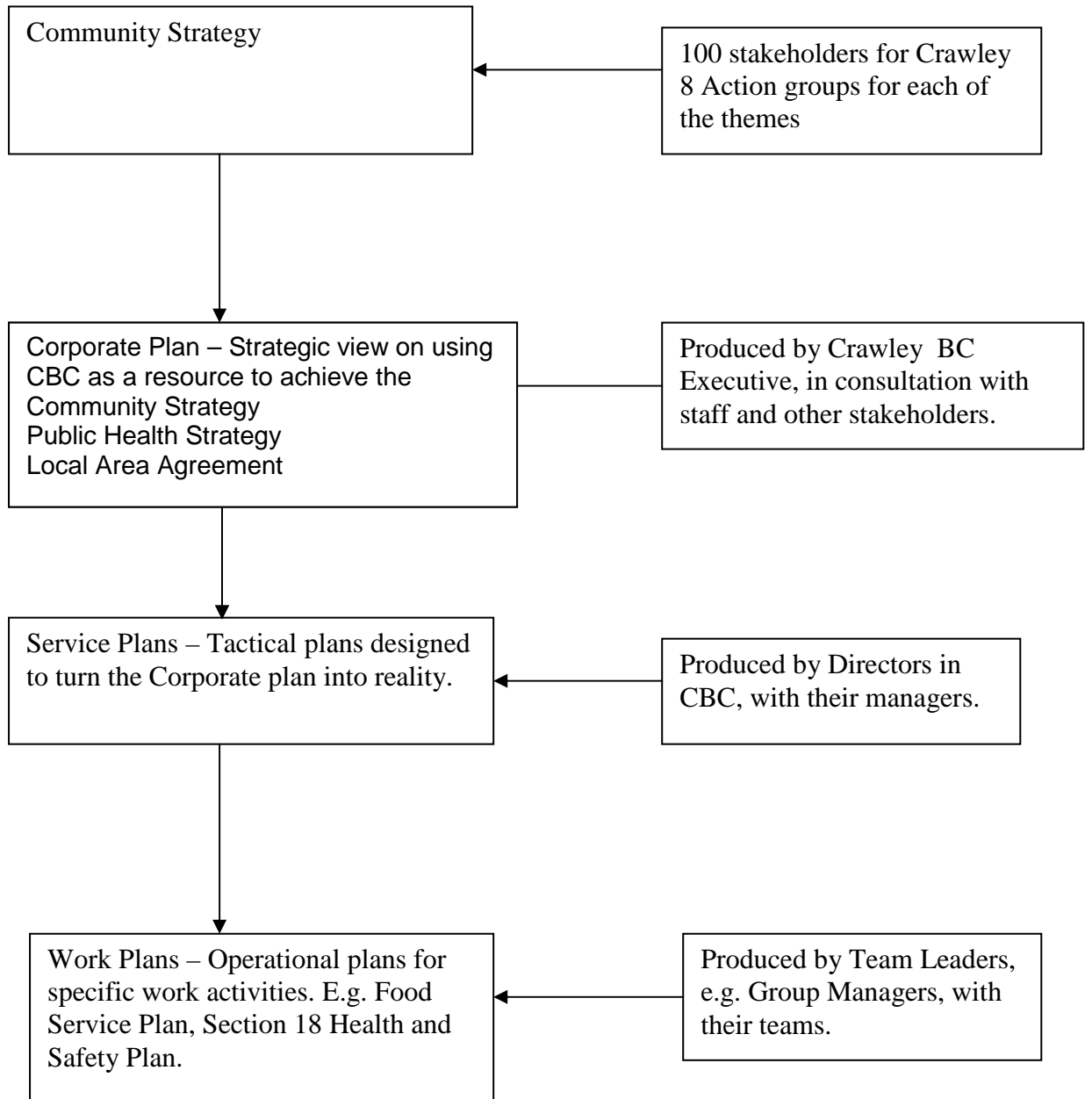
Guest speaker at the regional Food Standards Agency food incidents seminar.

Definitions of National Indicators influenced by the work set out in this plan:

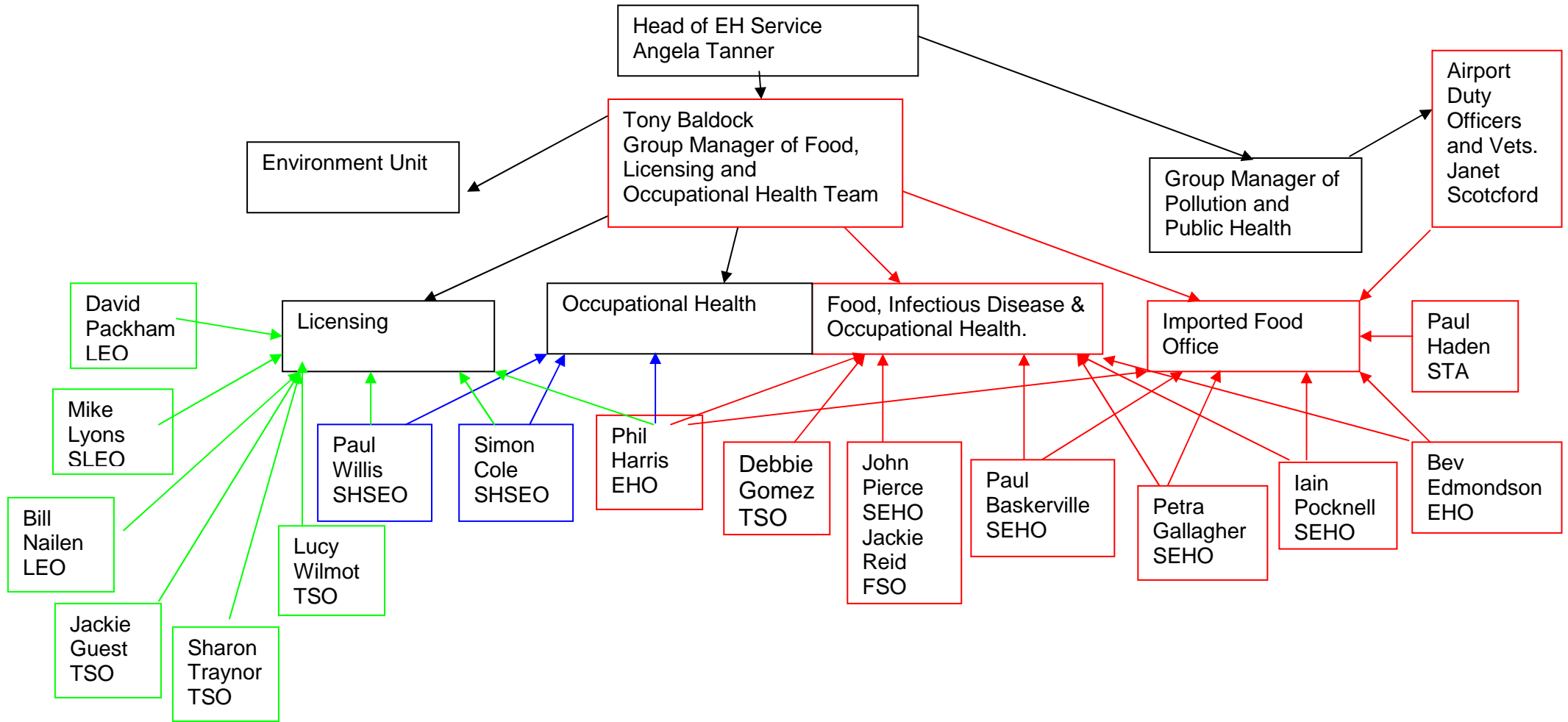
- 55 Obesity in primary school age children in Reception
- 56 Obesity in primary school age children in Year 6
- 119 Self-reported measure of people's overall health and wellbeing
- 121 Mortality rate from all circulatory diseases at ages under 75
- 163 Proportion of population aged 19-64 for males and 19-59 for females qualified to at least Level 2 or higher
- 171 New business registration rate
- 182 Satisfaction of business with local authority regulatory services
- 184 Food establishments in the area which are broadly compliant with food hygiene law

Appendix A

Integration of Strategies and Plans



- 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